

IN THE DISTRICT COURT OF GRADY COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA,)

Plaintiff,)

v.)

NORMAN THOMAS GOMES)

W/M, DOB: March, 1982)

SSN: XXX-XX-3822)

Defendant.)

COUNTY OF GRADY)

STATE OF OKLAHOMA) ss.

Case No. CF-2022-136

FILED IN DISTRICT COURT
Grady County, Oklahoma

JUN 09 2022

LISA HANNAH, Court Clerk
By Deputy

AFFIDAVIT OF PROBABLE CAUSE

I, Kenneth Rodgers, do attest that the following is true and factual to the best of my knowledge with regard to the following information. This affidavit does not include each and every fact known to the State of Oklahoma, but only those facts necessary to support a finding of probable cause. I am currently employed as an Agent for the State of Oklahoma, Office of the Attorney General, assigned to the Consumer Protection Unit.

In July of 2021, Agent Patrick Lambakis was assigned to investigate a consumer complaint against Norman "Buddy" Gomes, doing business as BNV Construction ("Gomes"). I, Agent Kenneth Rodgers, was later assigned to assist in the investigation. The State of Oklahoma Office of Attorney General, Consumer Protection Unit, had received complaints from consumers who alleged that Gomes had defrauded them of money. During the investigation, myself and Agent Lambakis interviewed the complainants and reviewed various documents pertaining to the allegations made against Gomes. The following information was obtained during the investigation:

1. Complainant Jared Ellis (40 years of age) resides at 319 Christopher Drive, Chickasha OK, 73018 in Grady County. Ellis needed his roof replaced and contacted Gomes to be retained for the work. Ellis gave Gomes a check from his insurance company for \$7,867.48 as a deposit on January 22nd, 2021. This transaction occurred at Ellis' residence in Chickasha, Oklahoma. Gomes then deposited that check into his BancFirst account on that same day. Gomes would give various excuses throughout the months of why work had not been started and then eventually ceased all communications with Ellis. Gomes did not start any work, nor did he ever refund Ellis the money.


2. Complainant Shawn Sandt (50 years of age) resides at 205 Maple St Elk City, OK 73644 in Beckham County. Sandt needed his roof replaced so he contacted Gomes to be retained for the work. On April 6th, 2021, while Sandt was in the hospital in Alva, Oklahoma (Woods County) battling Covid-19, Sandt wired (paid) Gomes **\$9,563.57** to his BancFirst account. Gomes then gave various excuses to Sandt why work had not begun. Gomes stopped communicating with Sandt and would not refund his money. Gomes never completed any work for Sandt. On July 1st, 2021, Sandt filed a consumer complaint with the Oklahoma Attorney General's Office.
3. Complainant Dorothy Mehan (66 years of age) resides at 19178 CS 2750 Minco, OK 73059 in Caddo County. Mehan needed home remodeling done so she contacted Gomes. On September 8th, 2020, Mehan paid Gomes up front with a check from her insurance company (\$6,096.65) and with a personal check (\$4,464.26) totaling **\$10,560.91**. This transaction occurred at Mehan's residence in Caddo County. Gomes deposited those two checks into his BancFirst account in Union City (Canadian County) on September 9th, 2020. Gomes had originally agreed with Mehan to start work on September 22nd, 2020, and be done by November 22nd, 2020 per their signed contract. Over the next few weeks, Gomes gave various excuses to Mehan as to why work had not begun. Gomes stopped communicating with Mehan and would not refund her money. Gomes never completed any work for Mehan or refunded any of her money.
4. Complainant Layne Thrift (62 years of age) resides at 1828 South 15th Street, Chickasha OK, 73018 in Grady County. Thrift needed a roof over his back patio built. Thrift gave Gomes a personal check for **\$5,931.00** as a deposit on March 2nd, 2021. This transaction occurred at Thrift's residence in Chickasha, Oklahoma. Gomes then deposited the check into his BancFirst account on March 3rd, 2021. Gomes would give various excuses throughout the months of why work had not been started and then eventually ceased all communications with Thrift. Gomes did not start any work, nor did he ever refund Thrift the money.
5. Complainant Doug Wilson (44 years of age) resides at 106 E. Three Oaks Drive, Luther OK 73054 in Oklahoma County. Wilson was searching on Facebook for a dump trailer when he came across Gomes selling one that he needed. Wilson contacted Gomes via Facebook messenger and negotiated a deal for **\$4,500.00** for the trailer. Gomes required a deposit of **\$500.00** to hold the trailer for Wilson. Wilson paid Gomes the \$500.00 via Cash App on December 10th, 2021 from his residence. Gomes then ceased all communication with Wilson and failed to return the money.
6. Based on my investigation, the information I received, and the pattern and common scheme of conduct displayed by the Defendant Norman Thomas Gomes, I believe the Defendant to have committed a pattern of criminal activity by employing a similar scheme of Embezzlement.

Your Affiant believes probable cause exists to show that the Defendant committed **five counts (5) of Embezzlement Title 21 Section 1451 and one count (1) of Pattern of Criminal Offenses**

Title 21 Section 425. The undersigned asks that this Court issue a finding of fact that there is probable cause to believe that the above-named Defendant committed this crime and issue a warrant for the arrest of the above-named defendant.

Further affiant sayeth not.

Oklahoma Office of the Attorney General

By: 
Agent Kenneth Rodgers
Consumer Protection Unit

SUBSCRIBED AND SWORN to before me this 18th day of May 2022.


Notary Public

Commission Expires:
Commission Number:

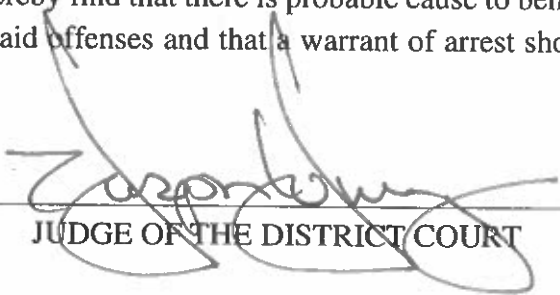


FINDING OF PROBABLE CAUSE

On this 9th day of June 2022, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Caddo County, State of Oklahoma, upon the above affidavit, requesting that a warrant of arrest be issued for the within-named defendant, and that he might be arrested and held to answer for the offenses of the following:

Five (5) felony counts of Embezzlement 21 O.S. 1451 and one (1) felony count of Pattern of Criminal Offenses Title 21 O.S. 425.

Based upon said affidavit, I am satisfied and do hereby find that there is probable cause to believe that the within-named defendant has committed said offenses and that a warrant of arrest should be issued.



JUDGE OF THE DISTRICT COURT