

SEP 15 2022

RICK WARREN
COURT CLERK
90 _____

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,)
)
Plaintiff,)
vs.)
)
MICHAEL S. HANSON, JR.,)
W/M DOB: 1-1-1980)
SSN: xxx-xx-4467)
)
Defendant.)

Case No. CF-2022-1542

THIRD AMENDED INFORMATION

COUNTS I-IX (1-9):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(2), FELONY

This crime is punishable by not more than 2 years imprisonment or up to 1 year in county jail and a fine up to \$5,000

COUNTS X-XXII (10-22):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(3), FELONY

This crime is punishable by not more than 5 years imprisonment and a fine up to \$5,000

COUNT XXIII-XXIV (23-24):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(4), FELONY

This crime is punishable by not more than 8 years imprisonment and a fine up to \$10,000

COUNT XXV (25):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(1), MISDEMEANOR

This crime is punishable by not more than 1 year imprisonment in county jail and fine up to \$1,000

COUNT XXVI (26):

OKLAHOMA RACKETEER-INFLUENCED AND CORRUPT ORGANIZATION ACT (RACKETEERING) ~ 22 O.S. § 1403, FELONY

This crime is punishable by a term of imprisonment of not less than 10 years and a fine up to three times the value of the Defendant's pecuniary gain or loss caused

COMES NOW John M. O'Connor, the duly authorized and acting Attorney General of the State of Oklahoma, in the name and by the authority of the State of Oklahoma, and on his official oath gives information as follows:

COUNT I:

That between approximately May, 2021 and September, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in CLEVELAND COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC, to wit:

The Defendant fraudulently appropriated \$2,340.36, belonging to Austin Morrow and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials

to construct a concrete project at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Morrow; and/or to any use or purpose not intended or authorized by Mr. Morrow.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT II:

That between approximately September 2021 and October 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,100.00, belonging to Arnulfo Garcia and which had been entrusted to the Defendant for the specific purpose as a down payment for the labor and materials to build a concrete retaining wall and metal gate on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Garcia; and/or to any use or purpose not intended or authorized by Mr. Garcia.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT III:

That between approximately December 2021 and January 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,275.00, belonging to John Brewer and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Brewer; and/or to any use or purpose not intended or authorized by Mr. Brewer.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT IV:

That between approximately March 2021 and April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,600.00, belonging to George Werner and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Werner; and/or to any use or purpose not intended or authorized by Mr. Werner.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT V:

That between approximately April 2021 and April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,725.00, belonging to Jeremiah Elwell and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Elwell; and/or to any use or purpose not intended or authorized by Mr. Elwell.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VI:

That between approximately June, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,709.00, belonging to Bill Demattio and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Demattio; and/or to any use or purpose not intended or authorized by Mr. Demattio.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VII:

That between approximately July, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,715.74.00, belonging to Rick Wickenkamp and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Wickenkamp; and/or to any use or purpose not intended or authorized by Mr. Wickenkamp.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VIII:

That between approximately October, 2021 and May, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,350.00 belonging to Wayne Petree and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Petree; and/or to any use or purpose not intended or authorized by Mr. Petree.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT IX:

That between approximately January, 2022 and June, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,300.00, belonging to Robert Powers and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Powers; and/or to any use or purpose not intended or authorized by Mr. Powers.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT X:

That between approximately April, 2021 and August, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in GRADY COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$7,800.00, belonging to Kathy Johnson and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Johnson; and/or to any use or purpose not intended or authorized by Ms. Johnson.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XI:

That between approximately July, 2021 and January, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,700.00, belonging to Austin Waddle and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to complete a concrete patio and sidewalk extension on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Waddle; and/or to any use or purpose not intended or authorized by Mr. Waddle.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XII:

That between approximately July, 2021 and October, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,618.00, belonging to Carmen Stepp and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Stepp; and/or to any use or purpose not intended or authorized by Ms. Stepp.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIII:

That between approximately August, 2021 and September, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,825.00, belonging to Matthew Jewell and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to complete a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Jewell; and/or to any use or purpose not intended or authorized by Mr. Jewell.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIV:

That between approximately April, 2021 and December, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$5,319.00, belonging to Mark Jones and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a greenhouse and complete HVAC and concrete work of the same at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Jones; and/or to any use or purpose not intended or authorized by Mr. Jones.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XV:

That between approximately March, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,800.00, belonging to Robert Barnett and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Barnett; and/or to any use or purpose not intended or authorized by Mr. Barnett.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVI:

That between approximately July, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LOGAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$6,700.77, belonging to Richard Lane and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and paint at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Lane; and/or to any use or purpose not intended or authorized by Mr. Lane.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVII:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LOGAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$3,228.47, belonging to James Larimore and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Larimore; and/or to any use or purpose not intended or authorized by Mr. Larimore.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVIII:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$13,900.00, belonging to Drew Hendrix and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Hendrix; and/or to any use or purpose not intended or authorized by Mr. Hendrix.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIX:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$12,927.60, belonging to David Herrig and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Herrig; and/or to any use or purpose not intended or authorized by Mr. Herrig.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XX:

That between approximately December, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LINCOLN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,439.29, belonging to Paula Gladden and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence

at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Gladden; and/or to any use or purpose not intended or authorized by Ms. Gladden.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXI:

That between approximately April, 2021 and July, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,227.00, belonging to Roberta Kendall and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence on her property, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Kendall; and/or to any use or purpose not intended or authorized by Ms. Kendall.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXII:

That between approximately August, 2021 and July, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CLEVELAND COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,900.00, belonging to Robert Fieldin and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Fieldin; and/or to any use or purpose not intended or authorized by Mr. Fieldin.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXIII:

That between approximately December, 2021 and February, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$52,255.68, belonging to John Anderson and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence, concrete pad, sidewalks, and a shop building on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Anderson; and/or to any use or purpose not intended or authorized by Mr. Anderson.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXIV:

That between approximately June, 2021 and July, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$23,000.00, belonging to Lori McGreey and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to complete home renovations on her property, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. McGreey; and/or to any use or purpose not intended or authorized by Ms. McGreey.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXV:

That between approximately November, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$800.00, belonging to Kathleen Amour and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Amour; and/or to any use or purpose not intended or authorized by Ms. Amour.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXVI:

That between approximately March 2021 and April 2022, the crime of **RACKETEERING** was feloniously committed in multiple counties (OKLAHOMA, CLEVELAND, CANADIAN, LOGAN, GRADY) State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

MICHAEL HANSON was associated with the enterprise Leaders Construction, LLC. As described below, **MICHAEL HANSON** conducted or otherwise participated in the affairs of Leaders Construction, LLC through a pattern of racketeering activity in that he was entrusted with money from Oklahoma consumers to complete fence work and other home renovation projects and fraudulently appropriated those monies to purposes for which they were not intended.

These illegal acts constitute racketeering activity as enumerated under Title 22, Section 1402(10)(r) of the Oklahoma Statutes:


- Above counts I-IX as alleged in this Information: Embezzlement 21 O.S. § 1451 (B)(2)
- Above counts X-XXII as alleged in this Information: Embezzlement 21 O.S. § 1451 (B)(3)
- Above counts XXIII-XXIV as alleged in this Information: Embezzlement 21 O.S. § 1451 (B)(4)

These racketeering activities were two or more occasions of conduct that were related to the affairs of Leaders Construction, LLC, were not isolated, and were not so closely related to one another that they constituted a single event.

Venue in Oklahoma County is proper as at least one of the above counts of racketeering activity occurred in Oklahoma County.

Said actions and practices are contrary to the provisions of Section 1403 of Title 22 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

JOHN M. O'CONNOR
ATTORNEY GENERAL OF OKLAHOMA

By: 
Matthew Willoughby, OBA No. 33305
Assistant Attorney General
Consumer Protection Unit
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
Telephone: (405) 522-3061
Facsimile: (405) 522-0085

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

1. **ERIC S. VANGURP**
Oklahoma office of the Attorney General
Consumer Protection Unit
313 N.E. 21st Street
Oklahoma City, OK 73105

2. **KATHY JOHNSON**
972 County Street
Tuttle, OK 73064

3. **AUSTIN MORROW**
11713 Shroyer Drive
Oklahoma City, OK 73170

4. **AUSTIN WADDLE**
Southeast 39th Circle
Oklahoma City, OK 73150

5. **CARMEN STEPP**
14209 Smithhurst Road
Edmond, OK 73013

6. **MATTHEW JEWELL**
10117 NW 139th Terrace
Yukon, OK 73099

7. **ARNULFO GARCIA**
1504 Northeast 9th Street
Oklahoma City, OK 73117

8. **MARK JONES**
12617 Bell Oak Road
Edmond, OK 73013

9. **JOHN BREWER**
3601 NW 176th Street
Edmond, OK 73012

10. **JOHN ANDERSON**
6281 Starry Night
Piedmont, OK 73078

11. **GEORGE WERNER**
1909 Normal Hill
Edmond, OK 73034

12. **ROBERT BARNETT**
5816 N. Terry
Oklahoma City, OK 73111

13. **JEREMIAH ELWELL**
1713 Geeta Road
Edmond, OK 73003
14. **BILL DEMATTIO**
1717 Northcliff Avenue
Norman, OK 73071
15. **RICK WICKENKAMP**
4608 NW 31st Street
Oklahoma City, OK 73122
16. **RICHARD LANE**
2025 Bella Sera Drive
Edmond, OK 73034
17. **JAMES LARIMORE**
2055 Bella Sera Drive
Edmond, OK 73034
18. **DREW HENDRIX**
14113 Timber Ridge Estates Blvd.
Yukon, OK 73099
19. **DAVID HERRIG**
2340 Steeplechase Road
Edmond, OK 73034
20. **KATHLEEN AMOUR**
6628 Woodridge Avenue
Oklahoma City, OK 73132
21. **PAULA GLADDEN**
970726 S. 3430 Road
Chandler, OK 74834
22. **WAYNE PETREE**
10401 East Apple Valley Road
Edmond, Oklahoma 73151
23. **ROBERT POWERS**
1802 Gilford Street
Nichols Hills, OK 73120
24. **ROBERTA KENDALL**
2116 Riverglen Way
Edmond, OK 73013
25. **ROBERT FIELDIN**
1304 Deer Run Drive
Norman, OK 73071

26. **LORI MCGREEY**
3316 Cheyenne Villa Circle
Edmond, OK 73013
27. **MIDFIRST BANK REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
501 NW Grand Boulevard
Oklahoma City, OK 73118
28. **OKLAHOMA CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
15100 N. May
Edmond, OK 73103
29. **ALLEGIANCE CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
4235 North Meridian Avenue
Oklahoma City, OK 73112
30. **ARVEST BANK REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
5000 Rogers Avenue
Ft. Smith, AR 72903
31. **TINKER FEDERAL CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
P.O. Box 4570
Tinker AFB, OK 73145

SEP 15 2022

RICK WARREN
COURT CLERK
90 _____

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,)
)
Plaintiff,)
)
vs.)
)
MICHAEL S. HANSON, JR.,)
W/M, DOB: 1-1-1980)
SSN: xxx-xx-4467)
)
Defendant.)

Case No. CF-2022-1542

COUNTY OF OKLAHOMA)
) ss.
STATE OF OKLAHOMA)

SUPPLEMENTAL AFFIDAVIT OF PROBABLE CAUSE

I, State of Oklahoma, Office of the Attorney General (OAG) Agent Eric S. VanGurp, do attest that the following is true and factual to the best of my knowledge with regard to the following information. I am currently employed as an Agent for the Consumer Protection Unit (CPU) of the OAG, since 11-8-2021. I have been a Council on Law Enforcement Education and Training (CLEET) certified Law Enforcement Officer in the State of Oklahoma Since 1998. During the course of my 24-year Law Enforcement career, I have conducted investigations associated with several different types of criminal activities in Federal, State, and local jurisdictions. I am aware of what it takes to establish probable cause and how to present those facts to the court for the issuance of an arrest warrant or detention order for a defendant. This affidavit does not contain all the information from this investigation; however, it contains factual information necessary to establish probable cause that **Michael S. Hanson Jr. d.b.a. Leaders Construction** committed the below listed crimes, which are in violation of Oklahoma law.

1. In November 2021, the Oklahoma Attorney General's Office (OAG) Consumer Protection Unit (CPU) began investigating a consumer fraud case involving Michael Hanson (AKA: Mike Hanson), OAG Case number CINV-21-0031, after receiving several complaints. Your Affiant was assigned to the case and is currently conducting an investigation. During the investigation, your Affiant has discovered several incidents and 25 victims involving contractor fraud at the hands of Michael Hanson (AKA; Mike Hanson), doing business as Leaders Construction LLC. The total loss to the victims is \$175,854.51.
2. According to the State of Oklahoma Secretary of State website, Leaders Construction LLC, filing number 3512678777, is a Domestic Limited Liability Company that was formed on May 15, 2018. The registered Agent is identified as Michael S. Hanson Jr. (Defendant) and the address is listed as 4400 Rabbit Run Edmond, Oklahoma 73034, which is located in Logan County. A check through law enforcement database resources revealed that Michael S. Hanson Jr. lists **4400 Rabbit Run Edmond, Logan County, Oklahoma**, as his home address on his Oklahoma Driver's license. During the

investigation, your Affiant learned that Hanson had conducted reputable business while doing construction projects for Leaders Construction LLC, through at least March 2021. Several of the victims reported using Hanson/Leaders Construction, LLC for previous construction projects, while several report that trusted associates recommended Hanson for the victims' construction projects. Many of the previous construction projects were completed in full and the customers were satisfied. It is the belief of your Affiant as a result of the investigation that Michael Hanson, while being associated with Leaders Construction, LLC, conducted Racketeering activities in violation of the Oklahoma Racketeering-Influenced and Corrupt Organization Act (RICO), 22 O.S. § 1403. The following paragraphs summarize twenty-four separate transactions where the crime of embezzlement was committed by Michael Hanson in furtherance of Leaders Construction, LLC. Each of these transactions constitute racketeering activity under 22 O.S. § 1402(10)(r). The transactions were related to the affairs of Leaders Construction, LLC, and were not isolated. Each transaction was a separate occurrence over the course of a period of time between March 15, 2021, and July 2022.

3. On 3-15-2021, George Werner, who resides at 1909 Normal Hill, Edmond Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Werner was required to pay \$1600.00 up front for the project. On 3-15-2021 Werner gave M. Hanson a personal check from his Citizens Bank of Edmond Personal account, Check number 3495, on 3-15-2021, in the amount of \$1600.00, paid to the order of Mike Hanson, Memo: Fence Deposit, signed by George H. Werner. The bank confirmed that Werner's check was cashed by Hanson on 3-15-2021 after he received the check, at the Citizen's Bank of Edmond, located at 1 E 1st Street Edmond, Oklahoma County, Oklahoma 73034. The endorsing signature on the back of the check was consistent with Hanson's signature, which was confirmed on other documents in this investigation. Also, hand-written on the back was OK/B080617150 and 8/31/23, which is Hanson's Oklahoma Driver's License number and expiration date and 1/1/80, which is Hanson's date of birth. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Werner's property to either start or complete the project as agreed. Werner made several attempts to contact M. Hanson with no response. Werner said he eventually had to hire another contractor to complete the project.
4. On 3-29-2021, Robert Barnett, who resides at 5816 N. Terry Avenue Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Barnett was required to pay \$2800.00 up front for the project. On 3-29-2021 Barnett gave M. Hanson a Cashier's check from Tinker Federal Credit Union (TFCU), Check number 11254287, dated 3-29-2021 in the amount of \$2800.00, paid to the order of Leaders Construction LLC, memo: Payment in full for backyard fence, endorsed by TFCU Financial Officer, Kathy Kelso. The back of the check showed the Cashier's check was deposited to the "The within named" (Leaders Construction LLC) on 3-30-2021 into a BancFirst branch in Edmond, Oklahoma County, Oklahoma. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Barnett's property to either start or complete the project as agreed. Barnett made several attempts

to contact M. Hanson with no response. Barnett has been unable to hire another contractor to complete the fence project, because of the money he lost, when he paid Hanson to complete the fence project.

5. On 4-6-2021, Kathy Johnson, who resides at 972 County Street 2920 Tuttle, Grady County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on her property. Johnson was required to pay half of the money up front for the project to purchase materials. On 4-6-2021 Johnson gave M. Hanson a personal check from her Fort Sill Federal Credit Union account (**9640, Check #: 5074) made out to Mike Hanson, for the amount of \$7,800.00. M. Hanson later deposited the check at Arvest Bank, which is the Bank at which M. Hanson has an account. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Johnson's property to either start or complete the project as agreed. Johnson made several attempts to contact M. Hanson with no response. Johnson said she eventually had to hire another contractor to complete the project.
6. On 4-8-2021, Jeremiah Elwell, who resides at 1713 Geeta Road Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Elwell was required to pay \$1725.00 up front for the project. On 4-8-2021 Elwell gave M. Hanson a check from his personal Tinker Federal Credit Union (TFCU) account, Check number: 1434, on 4-8-2021, paid to the order of Mike Hanson, in the amount of \$1725.00, Memo: Fence, signed by Jeremiah Elwell. The back of the check showed the check was deposited into an Arvest Bank account on 4-8-2021 at Arvest Branch number 0628, which is the Arvest Bank branch located at 1133 N. Bryant Edmond, Oklahoma County, Oklahoma 73035. The endorsement signature on the back was similar to Michael Hanson's signature, which has been confirmed on other items during this investigation. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Elwell's property to either start or complete the project as agreed. Elwell made several attempts to contact M. Hanson with no response. Elwell said he eventually had to hire another contractor to complete the project.
7. On 4-23-2021, Roberta Kendall, who resides at 2116 Riverglen Way Edmond, Oklahoma County, Oklahoma 73013, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fencing project on her property. Kendall had received a quote from Hanson of \$4852.00, however, he offered her a discount price of \$4227.00, if she paid in full up front. Kendall wrote Hanson a check from her personal Bank of Oklahoma checking account, Check number 1728, dated 4-23-2021, paid to the order of Mike Hanson, in the amount of \$4227.00 Account number XXXXXX1318, signed by Roberta Kendall, Memo: Fence. Kendall reported the check was cashed on 4-26-2021 according to her bank records. According to bank records the check was credited to Hanson's account on 4-23-2021 and stamped Credit to the account of the within named payee Arvest Bank Oklahoma City. The transaction took place at the Arvest Bank branch located at 4301 W. Memorial Road Oklahoma City, Oklahoma County, Oklahoma 73134. Kendall later received an

emailed receipt from Hanson saying she was paid in full for her project. The work was scheduled to begin the following week on 4-30-2021 according to a text message from Hanson. Kendall said neither Hanson nor anyone else from Leaders Construction LLC have returned to her residence to start the fencing project. Kendall attempted to contact Hanson several times, but he has either not answered the calls or has sent a text message with empty promises.

8. On 5-1-2021, Austin Morrow, who resides at 11713 Shroyer Drive Oklahoma City, Cleveland County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a concrete project on his property. Morrow said on 5-1-2021, he paid Leaders Construction LLC through a "Quickbooks" on-line payment transaction in the amount to cover the full agreed upon amount for the project of \$2,340.36. According to the agreement, the project was supposed to start and be completed shortly after the payment on 5-1-2021. Starting on 5-6-2021 Morrow attempted to contact M. Hanson to check the status for the start of the project. On 5-10-2021, Morrow was able to get in touch with M. Hanson, who said his wife, Jessica Hanson, was in the hospital. On 5-11-2021, Morrow said he contacted M. Hanson to check on J. Hanson. M. Hanson said J. Hanson was doing much better and the project was now scheduled to start on 5-18-2021.

Morrow said 5-18-2021 came and no one from Leaders Construction showed up and Morrow called M. Hanson. During that conversation, M. Hanson told Morrow that he was getting a COVID-19 test. Following that conversation, Morrow spoke to J. Hanson a few days later and she told Morrow that M. Hanson was in the hospital with COVID-19. Morrow said following that time, the start and completion dates had been pushed back several times, due to scheduling the concrete deliveries. Morrow said on 7-12-2021, M. Hanson showed up to his residence and installed the framework for the concrete project. Morrow said he was told by M. Hanson that he would be back to finish the project on 7-14-2021 or 7-15-2021. Morrow said when M. Hanson failed to show up on 7-14-2021 he called him. During that conversation, M. Hanson blamed the delay on the concrete company. From that time, during several communications with M. Hanson, Morrow was given several delayed start dates, until the last date of 9-21-2021. As of this time, neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Morrow's property to complete the project as agreed.

9. On 6-22-2021, Bill Demattio, who resides at 1717 Northcliff Avenue Norman, Cleveland County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Demattio was required to pay \$1709.00 up front for the project. On 6-22-2021 Demattio gave M. Hanson a personal check from Demattio's personal Tinker Federal Credit Union (TFCU) account, Check number 1096, on 6-22-2021, paid to the order of Mike Hanson, in the amount of \$1709.00, memo: Deposit, signed by Demattio. The back of the check showed that it was deposited on 6-24-2021 at Arvest Bank Branch 0605, which is the branch located at 1501 W. Edmond Road Edmond, Oklahoma County, Oklahoma. The endorsement signature on the back was similar to Michael Hanson's signature, which has been confirmed on other items during this investigation.

Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Demattio's property to either start or complete the project as agreed. Demattio made several attempts to contact M. Hanson with no response. Demattio said he eventually had to complete the fence project himself.

10. Between the end of June 2021 and beginning of July 2021, Lori McGreey, who resides at 3316 Cheyenne Villa Circle Edmond, Oklahoma County, Oklahoma 73013, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete several projects on her property. The projects included installing a handrail for her patio, which Hanson completed except for a post cap. McGreey said she paid Hanson \$300.00 for that project. Other projects consisted of Tile flooring throughout the residence, which was ripped up and never completed, and screening in the patio and installing a water system, which were never completed. Hanson told McGreey he needed cash up-front to save money and to have things ordered. McGreey said there was no set start date or timeline established, however, Hanson told her the projects would be completed as materials were available. It should be noted that Hanson later contacted McGreey and let her know there were delays due to supply issues. McGreey supplied Hanson a total of \$23,000.00 in cash during this time, which she pulled from her retirement fund and on-hand cash she had available at her residence. McGreey said she met Hanson at her bank on a few occasions to get the money to pay him. McGreey identified her bank as Tinker Federal Credit Union (TFCU), located at 3141 S. Bryant Avenue Edmond, Oklahoma County, Oklahoma. McGreey explained her main bank, BECU, located in Washington State, would transfer the money to her TFCU account. McGreey said the majority of the transactions occurred at her residence in Edmond, Oklahoma County, Oklahoma. McGreey said the only work that was completed at the residence was the handrail and the flooring was removed from her residence. McGreey attempted to contact Hanson several times and those contacts were met with empty promises from Hanson, through text messaging. McGreey has not contacted another contractor to complete the work because she has spent a lot of her money for this project.
11. On 7-5-2021, Austin Waddle, who resides at 10425 Southeast 39th Circle, Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a. Leaders Construction LLC to complete a concrete patio and sidewalk extension on his property. Waddle said he was offered a discount if he paid in- full up-front, for the project. On 7-5-2021, Waddle left M. Hanson a personal check from his First National Bank account (Account number: ***9820, Check #: 543, Memo: Leaders Construction / Concrete) made out to Mike Hanson, for the amount of \$4,700.00. M. Hanson later cashed the check at First National Bank Branch in Midwest City, Oklahoma. The project was originally scheduled between 7-19-2021 and 8-9-2021. However, M. Hanson never showed up to do the job. On 8-9-2021 Waddle contacted M. Hanson about the status of the job and after that conversation a framing crew was sent to Waddle's residence. The framing crew installed a sub-standard frame for the concrete patio and sidewalk extension, then left. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Waddle's property to

complete the project as agreed. Waddle made several attempts to contact M. Hanson with little or no response. Waddle said he eventually completed the project himself.

12. On 7-6-2021, Rick Wickenkamp, who resides at 4608 NW 31st Street Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Wickenkamp was required to pay \$1715.74 up front for the project. On 7-6-2021 Wickenkamp gave M. Hanson a personal check from a personal check from Municipal Employees Credit Union (ME/CU) from the account of Rick or Laurie Wickenkamp, check number 4511, endorsed to Mike Hanson in the amount of \$1715.74, Memo: 60% of fence job week of July 27,2021, signed by Laurie Wickenkamp. The back of the check showed the check was cashed on 7-6-2021 with a routing number at the ME/CU branch located at 101 N. Walker Oklahoma City, Oklahoma County, Oklahoma. The back of the check also had a signature endorsement that was similar to Hanson's signature, which has been confirmed on other documents in this investigation. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Wickenkamp's property to either start or complete the project as agreed. Wickenkamp made several attempts to contact M. Hanson with no response. Wickenkamp said he eventually had to complete the fence project himself.
13. On 7-14-2021, Carmen Stepp, who resides at 14209 Smithhurst Road, Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on her property. Stepp was required to pay their portion of a shared fence with a neighbor, up-front and was told if they paid the full amount up-front, they would get a discount. On 7-14-2021, Stepp said she supplied M. Hanson a personal check from her Tinker Federal Credit Union account (*****6607, Check #: 5176) made out to Mike Hanson, for the amount of \$2,617.50. Stepp said her neighbor also paid M. Hanson \$1137.50 at the same time for their portion of the fence. M. Hanson later cashed the check at a Tinker Federal Credit Union Branch. Stepp said she has made several attempts to contact M. Hanson with no response. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Stepp's property to either start or complete the project as agreed.
14. On 7-16-2021, Richard Lane, who resides at 2025 Bella Sera Drive Edmond, Logan County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence and some painting on his property. Lane was required to pay \$7200.77 up front for the project. Lane supplied Hanson two different checks for the project. The first check was a personal check from the Bank of Oklahoma, from the account of Richard and Bridgette Lane, Check number 1358, dated 7-16-2021, endorsed to Leaders Construction in the amount of \$4783.00, Memo: Fence 129' Paint and signed by Richard Lane. The back of the check showed it was for deposit only into a BancFirst account on 7-16-2021, which could not be made out from the copy, but the routing number was identified as 103003632, which was identified as the BancFirst Branch, located at 3509 S. Purdue St. Oklahoma City, Oklahoma County, Oklahoma 73179. A second check was given to Hanson by Lane,

while at Lane's residence, on or about 9-2-2021. The check was in the amount of \$1917.77 which included a five (5) percent discount. The amount was for a section of fence that Lane shared with his neighbor, James Larimore, who resides at 2055 Bella Sera Drive, Edmond, Logan County, Oklahoma 73034. The amount Lane paid was for half of that section of fence. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Lane's property to either start or complete the fence project as agreed. However, a representative of Leaders Construction LLC started the painting project, but never finished it. Lane made several attempts to contact M. Hanson with no response. Lane said he eventually had to hire another contractor to complete the project.

15. On 8-12-2021, Robert Fielden, who resides at 1304 Deer Run Drive Norman, Cleveland County, Oklahoma 73071, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence project on his property. The contract covered the replacement of 208 feet of fencing and the installation of gates, and the cost of the project was \$5188.00. However, Fielden was offered a discount if he paid up front for the project and that brought the total cost to \$4900.00. During the meeting, Fielden gave Hanson a check from his personal Arvest Bank account, Check number 6240, paid to the order of Mike hanson, in the amount of \$4900.00 dated 8-12-2021, Memo: Leaders Construction / 208 Linear ft of fence, and signed by Robert Fielden. According to Fielden's bank records, the check was cashed on Friday (8-13-2021). Fielden said neither Hanson, nor anyone from Leaders Construction has ever returned to his residence to start the work on his fencing project. Fielden said he has attempted to contact Hanson several times through calls and text messages since 8-12-2021 with the last time being 10-1-2021. Those inquiries resulted in empty promises by Hanson.
16. On 8-18-2021, Matthew Jewell, who resides at 10117 NW 139th Terrace, Yukon, Canadian County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Jewell said he was offered a discount if he paid in full up- front, for the project. On 8-18-2021 Jewell gave M. Hanson a personal check from his F & M Bank account (***3823, Check #: 1409, Memo: 10117 NW 139th Terrace Leaders Construction / full payment) made out to Mike Hanson, for the amount of \$2,825.00. Hanson later cashed the check at a F&M Bank Branch. The project was originally scheduled for 9-2-2021, however M. Hanson did not show up until 9/8/2021, at which time he installed the fence posts. Jewell was told Hanson would return the next day to finish the project. Neither Hanson, nor anyone representing Leaders Construction ever returned to Jewell's property to complete the project as agreed. Jewell made several attempts to contact Hanson with no response. Jewell said he eventually had to hire another contractor to complete the project.
17. On 9-2-2021, Arnulfo Garcia, who resides at 1504 Northeast 9th Street Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a. Leaders Construction LLC to complete a concrete retaining wall and metal gate on his property. Garcia was required to pay half of the money up

front for the project. On 9-2-2021 Garcia gave M. Hanson a personal check from his Bank of Oklahoma account (*****8140, Check #: 4168, Memo: onthepath3@yahoo.com 50% deposit / concrete edging & metal gate) made out to Mike Hanson, for the amount of \$2,100.00. The check was later deposited by Hanson into his account at Arvest Bank. Hanson told Garcia that the project would be started by 10-13-2021 or 10-15-2021. However, neither Hanson, nor anyone representing Leaders Construction ever returned to Garcia's property to either start or complete the project as agreed. Garcia made several attempts to contact Hanson with no response.

18. On 9-2-2021, James Larimore, who resides at 2055 Bella Sera Drive Edmond, Logan County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Larimore was required to pay \$3228.47 up front for the project. On 9-2-2021 Larimore gave Hanson a personal check from the Bank of America from the personal account of James W. Larimore and Jilian Larimore. The check was identified as check number 3068, written on 9-2-2021, endorsed to Mike Hanson in the amount of \$3228.47, For: Fence. The back of the check had a signature endorsement that was similar to Hanson's signature as confirmed on other documents reviewed during this investigation. According to the stamp on the back, the check was cashed on 9-2-2021 at the Bank of America located at 333 N. Bryant Edmond, Oklahoma County, Oklahoma 73034, which is the Larimore's Bank. Neither Hanson, nor anyone representing Leaders Construction ever returned to Larimore's property to either start or complete the project as agreed. Larimore made several attempts to contact Hanson with no response. Larimore said he eventually had to hire another contractor to complete the project.
19. On 9-11-2021, Drew Hendrix, who resides at 14113 Timber Ridge Estates Boulevard Yukon, Canadian County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence and retaining wall on his property. Hendrix was required to pay \$13,900.00 up front for the project. On 9-11-2021, Hendrix met Hanson at the Lowe's, located at 2400 West Memorial Road, Oklahoma City, Oklahoma County, Oklahoma 73134. During that meeting, Hendrix paid Hanson \$13,900.00 in cash, for the contracted project. Hendrix supplied a copy of the bank withdrawal slip and the bank statement showing a \$14,000.00 cash withdrawal from his BancFirst account on 9-11-2021. Neither Hanson, nor anyone representing Leaders Construction ever returned to Hendrix's property to either start or complete the project as agreed. Hendrix made several attempts to contact Hanson with no response. Hendrix said he is in the process of finding another contractor to complete the project.
20. On 9-28-2021 Mark Jones, who resides at 12617 Bell Oak Road, Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to build a greenhouse and complete the HVAC and concrete work associated with the greenhouse on his property. Jones was required to pay a total of \$11,180.10 up-front, to purchase materials for the project. On 9-27-2021 Jones gave Hanson a personal check from his Oklahoma's Credit Union account (*****5400, Check #: 2262) made out to Hanson, for the amount of \$5,800.00.

On 10-29-2021, Jones gave Hanson a personal check from his Oklahoma's Credit Union account (*****5400, Check #: 2272) made out to Mike Hanson, for the amount of \$5,318.10. Both checks were later cashed by Hanson at the Oklahoma's Credit Union Branch in Oklahoma City. Neither Hanson, nor anyone representing Leaders Construction ever returned to Jones' property to either start or complete the project as agreed. Jones made several attempts to contact Hanson with no response.

21. On 9-29-2021, David Herrig, who resides at 2340 Steeplechase Road Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence and retaining wall on his property. Herrig was required to pay \$12,927.60 up front for the project. On 9-29-2021 Herrig gave Hanson a personal check from his USAA Bank from the account of Susanne or David Herrig, endorsed to Hanson on 9-29-2021 in the amount of \$12,927.60, For: Retaining Wall and Fence. The back of the check showed it was deposited on 9-30-2021, at an Arvest Bank Branch number 0670, which was identified as the Arvest Bank branch located at 4500 N. Harrison St. Shawnee, Pottawatomie County, Oklahoma. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Herrig's property to either start or complete the project as agreed. However, Hanson did deliver a portion of the fencing support rails to the property, but never started the project. Hendrix made several attempts to contact Hanson with little or no response. Herrig said he eventually had to hire another contractor to complete the project.
22. On 10-15-2022, Wayne Petree, who resides at 10401 East Apple Valley Road Edmond, Oklahoma County, Oklahoma entered into a verbal and written agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a retaining wall, for his pool house, on his property. Petree was required to pay \$2350.00 up front for the project. On 10-15-2021 Petree gave M. Hanson \$2350.00 in cash, during a meeting at the Mardel's, located at 3300 S. Boulevard Edmond, Oklahoma County, Oklahoma. Toward the end of October 2021, Hanson had removed some rock and replaced a few pieces of wooden siding on the pool house, associated with the project. Following that time, neither Hanson, nor anyone representing Leaders Construction ever returned to Petree's property to complete the project as agreed. Petree made several attempts to contact Hanson with little or no response. Petree said he has not hired another contractor to complete the project.
23. On 11-23-2021, John Brewer, who resides at 3601 NW 176th Street Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on his property. Brewer said he was quoted a price of \$1,275.00 for the cedar fence, metal posts, and gate. On 11-23-2021, Brewer gave Hanson a personal check from his Prosperity Bank account (Account number: **8792, Check #: 6332, dated for 12-1-2021, Memo: Cedar fence, steel posts & gate) made out to Mike Hanson, for the amount of \$1,275.00. Hanson later deposited the check at Arvest Bank, which is the Bank where Hanson has an account. After that time, neither Hanson, nor anyone representing Leaders Construction have

ever returned to Brewer's property to start and complete the project as agreed. Brewer made several attempts to contact Hanson with no response.

24. On 12-10-2021, Paula Gladden, who resides at 970726 S. 3430 Road Chandler, Lincoln County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence on her property. Gladden was required to pay \$4439.29 up front for the project. On 12-10-2021, Gladden met Hanson at her work, located at the Oklahoma University Health and Science Center 975 NE 10th Street Oklahoma City, Oklahoma County, Oklahoma. During this meeting Gladden said she gave Hanson a check for \$4439.29 for the fencing that Hanson was contracted to install. Gladden supplied a copy of the check which was written from her personal Focus Federal Credit Union account, Check number 6584, dated 12-10-2021 in the amount of \$4,439.29, paid to the order of Mike Hanson, memo: Deposit for fence, signed by Paula Gladden. The back of the check showed the check was cashed at the Focus Federal Credit Union, located at 420 NE 10th Street Oklahoma City, Oklahoma County, Oklahoma, on 12-10-2021. The endorsement signature on the back was similar to Hanson's signature, which has been confirmed on other items during this investigation. Neither Hanson, nor anyone representing Leaders Construction completed the project on Gladden's property. However, Hanson started the project by removing approximately three quarters of the fence, but Hanson never returned to finish the project. Gladden made several attempts to contact Hanson with no response. Gladden said she cannot afford to hire another contractor, so she will have to complete the project herself.
25. On 12-30-2021, John Anderson, who resides at 6281 Starry Night Piedmont, Canadian County, Oklahoma, entered into a verbal agreement, for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to complete a fence, concrete pad, concrete sidewalks, and a shop building on the property. Anderson said he paid Hanson \$10,000.00 cash for material and was promised a discount if he paid the full amount for the project up-front. Hanson later provided a Mid First Bank account slip which contained an account number: ***2080933 and Routing number: 303087995, via a text message, instructing Anderson to deposit the money into the account number on the slip. Anderson said he sent two wire transfers from his bank, US Bank, to Mid First Bank account number: ***2080933 and Routing number: 303087995. The first was sent and received on 1-6-2022, for the amount of \$18,255.68 and the second was sent and received on 1-13-2022, for the amount of \$24,000.00. This made the total amount Anderson paid Hanson up-front, \$52,255.68. J. Anderson said the only work done on the project was setting approximately 70 percent of the fence posts, but the quality was very poor. After that time, neither Hanson, nor anyone representing Leaders Construction have ever returned to Anderson's property to start and complete the project as agreed. Anderson said he has contacted Hanson several times in the last month requesting his money back. Each time, Hanson has promised to give Anderson his money back, but has never refunded the \$52,255.68 to Anderson.
26. On 1-25-2022, Robert Powers entered into a verbal agreement for Michael Hanson (AKA: Mike Hanson) d.b.a./ Leaders Construction LLC to subcontract and complete a

fencing project at his property at 1802 Guilford Street Nichols Hills, Oklahoma County, Oklahoma. Powers said Hanson had built a fence for him approximately two (2) years ago and he was pleased with his work. The job on the property was for fencing and Hanson supplied an estimate of \$2400.00 including haul-off of the old materials. Hanson offered a \$100.00 discount and made the total \$2300.00 if Powers paid up front. Powers said during a meeting on 1-25-2022 at 1802 Guilford Nichols Hills, Oklahoma, he gave Hanson a check for \$2300.00. The check was written from Powers' business account from Inter Bank located at 125 E. 1st Street Edmond, Oklahoma County, Oklahoma 73034, Account number 1755278806, Check number 8664, made out to Mike Hanson, date 1-25-2022 in the amount of \$2300.00, Memo: B080617150 – exp 08/31/2023 – DOB: 01/01/1980, and signed by Robert Powers. It should be noted the information in the memo line is from Hanson's Oklahoma State Driver's license, which included his date of birth, License number and expiration. Powers said based on his bank records Hanson cashed the check at Powers' bank, in Oklahoma County, on that same day, 1-25-2022. Powers said there was not a set time for Hanson to complete the job, however, Powers believed Hanson would show up in a reasonable amount of time and complete the job. Powers said to this date, Hanson has never returned to start the fence project. Powers said he has attempted to contact Hanson several times by attempting to call him and leaving a voice message since the second week of February with no response. Powers said his customer eventually got another contractor to replace the fence, so Powers lost that job.

This investigation has shown that since March 2021 to this present date, Hanson has committed twenty-four (24) counts of Embezzlement against twenty-four (24) different victims. Taken together, twenty-four (24) of these counts of embezzlement constitute a pattern of racketeering activity and thus, Hanson has conducted the affairs of an enterprise, Leaders Construction, LLC, through a pattern of racketeering activity in violation of the Oklahoma Racketeering-Influenced and Corrupt Organization Act (RICO) 22 O.S. § 1403. The total amount Embezzled equaling \$175,854.51.

This investigation has also shown Hanson committed one count of misdemeanor Embezzlement 21 O.S. 1451 (b)(1) against one victim, Kathleen Amour. The Court previously held a finding of probable cause for this count in the Supplemental Affidavit of Probable Cause dated June 16, 2022.

Your Affiant believes probable cause exists to show the Defendant committed **Racketeering in violation of the Oklahoma Racketeering-Influenced and Corrupt Organization Act (RICO) 22 O.S. 1403 while committing** twenty-four (24) counts of **Embezzlement in violation of Oklahoma Statute 21 O.S. 1451 (b) (2-4)**. Defendant also committed one count of Embezzlement 21 O.S. § 1451 (b)(1). The undersigned asks that this Court issue a finding of fact that there is probable cause to believe that the above-named Defendant committed these crimes.

Further Affiant sayeth not.

Oklahoma Office of the Attorney General

By: 

Eric VanGurp, Agent
Consumer Protection Unit

SUBSCRIBED AND SWORN to before me this 15th day of September 2022.

Cari Kelso

Notary Public

Commission Expires: 12-29-2025
Commission Number: 5011397

