



IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

APR 06 2022

RICK WARREN  
COURT CLERK

27 \_\_\_\_\_

STATE OF OKLAHOMA,

Plaintiff,

vs.

Case No.

CF - 2022 - 1542

HANSON, MICHAEL S. SR.

H/M DOB: 1-1-1980

SSN: xxx-xx-4467

Defendant.

*Stalling*

INFORMATION

COUNTS I-III:

**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 IV-VIII:

**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 IX:

**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 X:

**PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. §425, FELONY**

This crime is punishable by not more than 2 years imprisonment or up to 1 year in county jail and/or a fine up to \$25,000

---

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, 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, 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 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, 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 V:**

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, 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 VI:**

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, 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 VII:**

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, 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 VIII:**

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, 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 IX:**

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 X:**

That between approximately April 2021 and February 2022, the crime of **PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE COUNTIES** was feloniously committed in the counties of CANADIAN, GRADY, CLEVELAND, AND OKLAHOMA, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant engaged in a pattern of Embezzlement as alleged in Counts I through IX as part of the same plan, scheme, or adventure.

Said actions and practices are contrary to the provisions of Section 425 of Title 21 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  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
Telephone: (405) 522-3061  
Facsimile: (405) 522-0085

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

vs.

Case No. ~~CF-2022~~ \_\_\_\_\_

HANSON, Michael S. Jr.

W/M, DOB: 1-1-1980

SSN: xxx-xx-4467

Defendant.

COUNTY OF OKLAHOMA )

) ss.

STATE OF OKLAHOMA )

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 a 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 victims, involving contractor fraud at the hands of Michael Hanson (AKA; Mike Hanson), doing business as Leaders Construction LLC. All the victims reported communicating with M. Hanson or Jessica Hanson through cell phone calls, text messaging, electronic mail, and social media messenger. The listed address for Leaders Construction is **4400 Rabbit Run Edmond, Logan County, Oklahoma**. A check of an Oklahoma Law Enforcement database revealed that Michael Hanson lists **4400 Rabbit Run Edmond, Logan County, Oklahoma**, as his address on his Oklahoma Driver's license. The following is a summary of transactions between Hanson and nine victims of Hanson's fraudulent criminal activities.
2. 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.

3. 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.

4. On 7/5/2021, Austin Waddle, who resides at 10425 Southeast 39<sup>th</sup> 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.
5. 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.
6. On 8/18/2021, Matthew Jewell, who resides at 10117 NW 139<sup>th</sup> 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 139<sup>th</sup> Terrace Leaders Construction / full payment) made out to Mike Hanson, for the amount of \$2,825.00. M. 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 M. Hanson would return the next day to finish the project. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Jewell's property to complete the project as agreed. Jewell made several attempts to contact M. Hanson with no response. Jewell said he eventually had to hire another contractor to complete the project.

7. On 9/2/2021, Arnulfo Garcia, who resides at 1504 Northeast 9<sup>th</sup> 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](mailto: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 M. Hanson into his account at Arvest Bank. M. Hanson told Garcia that the project would be started by 10/13/2021 or 10/15/2021. However, neither Mike 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 M. Hanson with no response.
8. 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 M. Hanson a personal check from his Oklahoma's Credit Union account (\*\*\*\*\*5400, Check #: 2262) made out to Mike Hanson, for the amount of \$5,800.00. On 10/29/2021, Jones gave M. 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 M. Hanson at the Oklahoma's Credit Union Branch in Oklahoma City. Neither Mike 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 M. Hanson with no response.
9. On 11/23/2021, John Brewer, who resides at 3601 NW 176<sup>th</sup> 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 M. 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. M. Hanson later deposited the check at Arvest Bank, which is the Bank where M. Hanson has an account. After that time, neither Mike 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 M. Hanson with no response.
10. 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 M. Hanson \$10,000.00 cash for material and was promised a discount if he paid the full amount for the project up-front. M. 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 Mike 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.

11. This investigation has shown that since April 2021 to this present date, Mike Hanson has committed nine (9) counts of Embezzlement in violation of Title 21 O.S. §1451.(B)(2-4), and one (1) count of Pattern of Criminal Offenses in violation of Title 21 O.S. §425 by taking \$87,031.64 from nine (9) different victims, while committing Embezzlement.

Your Affiant reviewed Hanson's criminal history and observed the following record listed below:

1. Oklahoma County, State of Oklahoma, District Court Case Number CF-2013-6269, Grand Larceny. Hanson received a 10 year Deferred sentence that expires September 17, 2024 following a guilty plea, and he is under supervision by the Oklahoma County District Attorney's Office.

Your Affiant believes probable cause exists to show the Defendant committed nine (9) counts of Embezzlement, Title 21 O.S. §1451(B)(2-4) and one (1) count of Pattern of Criminal Offenses, Title 21 O.S. §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 these crimes and issue a warrant for the arrest of Michael S. Hanson Jr.

Further Affiant sayeth not.

Oklahoma Office of the Attorney General

By: 

Eric VanGurp, Agent  
Consumer Protection Unit

SUBSCRIBED AND SWORN to before me this 4 day of April 2022.

  
~~Notary Public~~ Judge

Commission Expires: /

Commission Number: /

#### FINDING OF PROBABLE CAUSE

On this 4 day of April, 2022, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Oklahoma 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 nine (9) counts of Embezzlement, Title 21 §1451(B)(2-4) and one (1) count of Pattern of Criminal Offenses, Title 21 §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