

EMBEZZLEMENT was feloniously committed in CREEK COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$1,000.00, which belonged to David Thornton and had been entrusted to the Defendant to pay for labor and materials to erect a front deck on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Thornton; and/or to any use or purpose not intended or authorized by Mr. Thornton.

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 2:

That approximately between the 1st of September 2021 and the 1st of December 2021, the crime of **EMBEZZLEMENT** was feloniously committed in HUGHES COUNTY State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$1,000.00, which belonged to Sheila Ludwick and had been entrusted to the Defendant to pay for labor and materials to complete various construction and remodeling on two of her properties, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Ludwick; and/or to any use or purpose not intended or authorized by Ms. Ludwick.

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 3:

That approximately between the 1st of February 2022 and the 1st of March 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CREEK COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount of \$2,500.00 or more, which belonged to Ron Leonard and had been entrusted to the Defendant to pay for labor and materials to complete a remodel on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Leonard; and/or to any use or purpose not intended or authorized by Mr. Leonard.

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 4:

That approximately between the 1st of March 2022 and the 1st of July 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which

belonged to Tollie Dodson and had been entrusted to the Defendant to pay for labor and materials to erect a rear-patio deck on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Dodson; and/or to any use or purpose not intended or authorized by Mr. Dodson.

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 5:

That approximately between the 1st of June 2023 and the 1st of July 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Dushyant Dhundara and had been entrusted to the Defendant to pay for labor and materials to erect a fence on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Dhundara; and/or to any use or purpose not intended or authorized by Mr. Dhundara.

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 6:

That approximately between the 1st of November 2021 and the 1st of July 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKFUSKEE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Priscilla Caldwell and had been entrusted to the Defendant to pay for labor and materials to construct a two-car garage as well as a front porch and back steps on her property, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Caldwell; and/or to any use or purpose not intended or authorized by Ms. Caldwell.

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 7:

That approximately between the 1st of March 2022 and the 1st of August 2022, the crime of **EMBEZZLEMENT** was feloniously committed in POTTAWATOMIE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Robert Davis and had been entrusted to the Defendant to pay for labor and materials to complete various construction and remodeling of his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Davis; and/or to any use or purpose not intended or authorized by Mr. Davis.

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 8:

That approximately between the 1st of June 2022 and the 1st of July 2022, the crime of **EMBEZZLEMENT** was feloniously committed in NOBLE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Cassandra Bratcher and had been entrusted to the Defendant to pay for labor and materials to complete various construction and remodeling on her property, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Bratcher; and/or to any use or purpose not intended or authorized by Ms. Bratcher.

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 9:

That approximately between the 1st of January 2022 and the 1st of April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LEFLORE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Steve Pereira and had been entrusted to the Defendant to pay for labor and materials to erect a small house on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Pereira; and/or to any use or purpose not intended or authorized by Mr. Pereira.

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 10:

That approximately between the 1st of September 2021 and the 1st of July 2023, the crime of **PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE COUNTIES** was feloniously committed in the counties of CREEK, TULSA, HUGHES, POTTAWATOMIE, NOBLE, OKFUSKEE, PAYNE, MUSKOGEE, and LEFLORE, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant engaged in a pattern of Embezzlement as alleged in Counts 1 through 15, 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.

COUNT 11:

That approximately between the 1st of December, 2022 and the 1st of April 2023, the crime of **EMBEZZLEMENT** was feloniously committed in CREEK COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Gabriel and Jonna Taylor and had been entrusted to the Defendant to pay for labor and materials to erect a fence on their property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. or Mrs. Taylor; and/or to any use or purpose not intended or authorized by Mr. or Mrs. Taylor.

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 12:

That approximately between the 24th day of March 2022 and the 18th of April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Irene Atim and had been entrusted to the Defendant to pay for labor and materials to complete an attic conversion and handicap shower, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Atim; and/or to any use or purpose not intended or authorized by Ms. Atim.

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 13:

That approximately between the 1st of May 2022 and the 19th of September 2022, the crime of **EMBEZZLEMENT** was feloniously committed in PAYNE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Tyler Lang and had been entrusted to the Defendant to pay for labor and materials to replace a metal shop on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Lang; and/or to any use or purpose not intended or authorized by Mr. Lang.

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 14:

That approximately between the 1st of August 2023 and the 31st of August 2023, the crime of **EMBEZZLEMENT** was feloniously committed in MUSKOGEE COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Patricia Peterson and had been entrusted to the Defendant to pay for labor and materials to replace a privacy fence and flooring, belonging to Patricia Peterson and Karen Market, to the Defendant's own use and benefit, a purpose not intended or authorized by Patricia Peterson and Karen Market; and/or to any use or purpose not intended or authorized by Patricia Peterson and Karen Market.

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 15:

That approximately between the 1st of December 2022 and the 1st of April 2023, the crime of **EMBEZZLEMENT** was committed in TULSA COUNTY, State of Oklahoma, by **BENJAMIN MOORE** d/b/a Moore Construction., to wit:

The Defendant fraudulently appropriated an amount less than \$1,000, which belonged to Shelley Forehand and had been entrusted to the Defendant to pay for labor and materials to replace a fence on her property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mrs. Forehand; and/or to any use or purpose not intended or authorized by Mrs. Forehand.

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.

**GENTNER DRUMMOND
ATTORNEY GENERAL OF OKLAHOMA**

BY:  _____

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