

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

STATE OF MISSOURI)	
)	Cause No. 2116-CR01577
vs)	Division No.
)	OCN:
JERRY WALTER WAYNE)	
THOMPSON)	
)	
White/Male DOB: 11/12/1984)	
SSN: XXX-XX-3468)	
3104 SW McDaniels St.)	
Blue Springs, MO 64015)	

SECRET INDICTMENT

The Grand Jurors of the County of Jackson, State of Missouri, charge that:

COUNT I

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The defendant, in violation of Section 407.020, RSMo, committed the class E felony of Deceptive Business Practices, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 13, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential construction services, willfully, knowingly, and with the intent to defraud, made false promises to Margaret Huff that in exchange for payment in advance, defendant would provide construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT II

FINANCIAL EXPLOITATION OF AN ELDERLY PERSON

Charge Code Number: 570.145-004Y20172699.0

The defendant, in violation of Section 570.145, RSMo, committed the class D felony of Financial Exploitation of an Elderly Person, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 18, 2020, in the County of Jackson, State of Missouri, Barbara Sandy was sixty years of age or older and defendant made false promises that defendant would provide residential demolition and construction

services, to induce or encourage Barbara Sandy to enter into an agreement by promising performance the defendant did not intend to perform or knew would not be performed and thereby knowingly obtained control of money, property of Barbara Sandy, with a value of at least seven hundred fifty dollars, with the intent to permanently deprive Barbara Sandy of the possession of the property; and thereby benefitted defendant and detrimentally affected Barbara Sandy.

COUNT III

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, committed **the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 18, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential demolition and construction services, willfully, knowingly, and with the intent to defraud, made false promises to Barbara Sandy that in exchange for payment in advance, defendant would provide demolition and construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT IV

FINANCIAL EXPLOITATION OF AN ELDERLY PERSON

Charge Code Number: 570.145-004Y20172699.0

The defendant, in violation of Section 570.145, RSMo, committed **the class D felony of Financial Exploitation of an Elderly Person**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 25, 2020, in the County of Jackson, State of Missouri, Dale Darr was sixty years of age or older and defendant made false promises that defendant would provide residential construction services, to induce or encourage Dale Darr to enter into an agreement by promising performance the defendant did not intend to perform or knew would not be performed and thereby knowingly obtained control of money, property of Dale Darr, with a value of at least seven hundred fifty dollars, with the intent to permanently deprive Dale Darr of the possession of the property; and thereby benefitted defendant and detrimentally affected Dale Darr.

COUNT V

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, committed **the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on about March 25, 2020, in the County of Jackson,

State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential construction services, willfully, knowingly, and with the intent to defraud, made false promises to Dale Darr that in exchange for payment in advance, defendant would provide construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT VI
FINANCIAL EXPLOITATION OF AN ELDERLY PERSON

Charge Code Number: 570.145-004Y20172699.0

The defendant, in violation of Section 570.145, RSMo, committed **the class D felony of Financial Exploitation of an Elderly Person**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 28, 2020, in the County of Jackson, State of Missouri, James Howard was sixty years of age or older and defendant made false promises that defendant would provide residential demolition and construction services; to induce or encourage James Howard to enter into an agreement by promising performance the defendant did not intend to perform or knew would not be performed and thereby knowingly obtained control of money, property of James Howard, with a value of at least seven hundred fifty dollars, with the intent to permanently deprive James Howard of the possession of the property; and thereby benefitted defendant and detrimentally affected James Howard.

COUNT VII
DECEPTIVE BUSINESS PRACTICES
Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, **committed the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on about March 28, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential demolition and construction services, willfully, knowingly, and with the intent to defraud, made false promises to James Howard that in exchange for payment in advance, defendant would provide demolition and construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT VIII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, **committed the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections Sections 558.002 and 558.011, RSMo, in that on or about April 4, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential demolition and construction services, willfully, knowingly, and with the intent to defraud, made false promises to Greg Martinette that in exchange for said payment in advance, defendant would provide demolition and construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT IX

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, **committed the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections Sections 558.002 and 558.011, RSMo, in that on or about April 17, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential demolition and construction services, willfully, knowingly, and with the intent to defraud, made false promises to Scott Barnett that in exchange for said payment in advance, defendant would provide demolition and construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

COUNT X

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, **committed the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 6, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential demolition and construction services, willfully, knowingly, and with the intent to defraud, made false promises to James McCloud that in exchange for payment in advance, defendant would provide demolition and construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

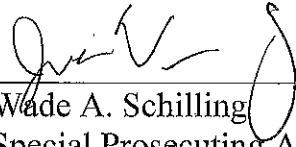
COUNT XI
DECEPTIVE BUSINESS PRACTICES
Charge Code Number: 407.020-001Y20172699.0

The defendant, in violation of Section 407.020, RSMo, **committed the class E felony of Deceptive Business Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 17, 2020, in the County of Jackson, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: residential construction services, willfully, knowingly, and with the intent to defraud, made false promises to Rachel Metoyer that in exchange for payment in advance, defendant would provide construction services, a representation that was false or misleading as to defendant's intention or ability to perform the promise, or likelihood the promise would be performed.

A TRUE BILL

Ronald S. Tharrn
FOREPERSON

**JEAN PETERS BAKER
PROSECUTING ATTORNEY
FOR THE COUNTY OF JACKSON,
STATE OF MISSOURI, by**


Wade A. Schilling FOR Wade Schilling
Special Prosecuting Attorney
And Assistant Attorney General

STATE WITNESSES:

Lindsey Velasquez, Investigator, c/o Missouri Attorney General's Office, 615 13th St.,
Suite 401

Margaret Huff, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Barbara Sandy, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Dale Darr, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

James Howard, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Greg Martinette, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Scott Barnett, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

James McCloud, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Rachel Metoyer, c/o Missouri Attorney General's Office, 615 13th St., Suite 401

Received this 16th day of April, 2021.

SUMMONS TO ISSUE. BOND TO REMAIN AS PREVIOUSLY SET. SPECIAL
CONDITIONS SHALL REMAIN IN EFFECT.

WARRANT TO ISSUE. BOND SET AS FOLLOWS:
\$ 25,000.00 cash. No contact with victims.



CIRCUIT COURT JUDGE