

IN THE CIRCUIT COURT OF THE COUNTY OF FRANKLIN
STATE OF MISSOURI

STATE OF MISSOURI,
Plaintiff,

VS

DANIEL E HARRISON

Defendant.

) Cause No. **24ABCR00797**
) Division No. I
) OCN:
) PA File No. 071212500

) INDICTMENT

FILED

MAR 12 2024

CONNIE WARD, Circuit Clerk
FRANKLIN COUNTY MISSOURI

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

COUNT I CLASS C FELONY FINANCIAL EXPLOITATION OF ELDERLY/DISABLED PERSON

Charge Code Number: 570.145-003Y202026990

The defendant, in violation of Section 570.145 RSMo, committed the class C felony of financial exploitation of the elderly, punishable upon conviction under Sections 558.002 and 558.011 RSMo, in that on or between February 11, 2022 through August 28, 2022, in the County of Franklin, State of Missouri, [REDACTED] was sixty years of age or older and Defendant made a false pretense that defendant would construct a composite wood deck at the residence for \$9,883.37 to induce [REDACTED] 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 monies, property of [REDACTED], with a value of at least five thousand dollars, with the intent to permanently deprive [REDACTED] of the use of the property, and thereby detrimentally affected [REDACTED].

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

COUNT II CLASS E FELONY DECEPTIVE BUSINESS PRACTICE

Charge Code Number: 407.020-001Y202026990

The defendant, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practice, punishable upon conviction under Sections 558.002 and 558.011, RSMo in that on or between February 11, 2022 through August 28, 2022, in the County of Franklin, State of Missouri, Defendant, in connection with the sale of merchandise in trade or commerce, did willingly, knowingly, and with the intent to defraud, make a false promise to [REDACTED] that in exchange for money paid, Defendant would purchase materials and construct a composite wood deck at the residence. This representation was false or misleading as to Defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the

commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

COUNT III CLASS C FELONY FINANCIAL EXPLOITATION OF ELDERLY/DISABLED PERSON

Charge Code Number: 570.145-003Y202026990

The defendant, in violation of Section 570.145 RSMo, committed the class C felony of financial exploitation of the elderly, punishable upon conviction under Sections 558.002 and 558.011 RSMo, in that on or between March 31, 2022 through July 26, 2022, in the County of Franklin, State of Missouri, [REDACTED] was sixty years of age or older and Defendant made a false pretense that defendant would replace the flooring and railings on the front porch at the residence and replace the siding, install new windows, and install a new soffit for the snack bar at [REDACTED] for \$18,397.54 to induce [REDACTED] 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 monies, property of [REDACTED], with a value of at least five thousand dollars, with the intent to permanently deprive [REDACTED] of the use of the property, and thereby detrimentally affected [REDACTED].

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

COUNT IV CLASS E FELONY DECEPTIVE BUSINESS PRACTICE

Charge Code Number: 407.020-001Y202026990

The defendant, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practice, punishable upon conviction under Sections 558.002 and 558.011, RSMo in that on or between March 31, 2022 through July 26, 2022, in the County of Franklin, State of Missouri, Defendant, in connection with the sale of merchandise in trade or commerce, did willingly, knowingly, and with the intent to defraud, make a false promise to [REDACTED] that in exchange for money paid, Defendant would purchase materials, replace the flooring and railings on her front porch at the residence and replace the siding, install new windows, and install a new soffit for the snack bar at [REDACTED]. This representation was false or misleading as to Defendant's intention or ability to perform the promise or the likelihood the promise would be performed.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

COUNT V CLASS C FELONY FINANCIAL EXPLOITATION OF ELDERLY/DISABLED PERSON

Charge Code Number: 570.145-003Y202026990

The defendant, in violation of Section 570.145 RSMo, committed the class C felony of financial exploitation of the elderly, punishable upon conviction under Sections 558.002 and 558.011 RSMo, in that on or between June 21, 2022 through August 2, 2022, in the County of Franklin, State of Missouri, [REDACTED] was sixty

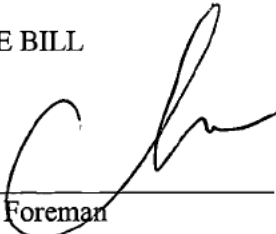
years of age or older and Defendant made a false pretense that defendant would replace the retaining wall at the residence for \$22,974.98 to induce [REDACTED] to enter into an agreement by promising performance the defendant did not intend to perform or knew would not be performed, and thereby knowingly obtained control of monies, property of [REDACTED], with a value of at least five thousand dollars, with the intent to permanently deprive [REDACTED] of the use of the property, and thereby detrimentally affected [REDACTED]

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

COUNT VI CLASS E FELONY DECEPTIVE BUSINESS PRACTICE
Charge Code Number: 407.020-001Y202026990

The defendant, in violation of Sections 407.020.1 and 407.020.3, RSMo, committed the class E felony of deceptive business practice, punishable upon conviction under Sections 558.002 and 558.011, RSMo in that on or between June 21, 2022 through August 2, 2022, in the County of Franklin, State of Missouri, Defendant, in connection with the sale of merchandise in trade or commerce, did willingly, knowingly, and with the intent to defraud, make a false promise to [REDACTED] that in exchange for money paid, Defendant would purchase materials and replace the retaining wall at the residence. This representation was false or misleading as to Defendant's intention or ability to perform the promise or the likelihood the promise would be performed.


The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

A TRUE BILL


Foreman

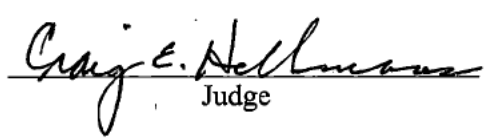
NO TRUE BILL

Foreman

/s/  #67396

Assistant Attorney General

As a condition of release for defendant bond is set in the amount of \$ 100,000.00 Cash



Judge

STATE WITNESSES: SEE ATTACHED DOCUMENT