

**IN THE CIRCUIT COURT OF PLATTE COUNTY,
SIXTH JUDICIAL CIRCUIT**

STATE OF MISSOURI,)	
)	Case No.
vs.)	
)	Div. No.
)	
Curtis Lee Domann)	
11773 Ridgeway Drive)	
St. Joseph, Missouri 64505)	
SSN: XXX-XX-5736 DOB: 09/29/1970)	
Defendant.)	

COMPLAINT AND REQUEST FOR A WARRANT

Andrew Bailey, the Attorney General of the State of Missouri, and John W. Grantham, Assistant Attorney General, upon information and belief, charge that the defendant:

COUNT I

Unlawful Merchandising Practices
407.020-001Y20172607.0

In violation of Section 407.020, RSMo, committed the **class E felony of Unlawful Merchandising Practices**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about October 2 2021, in the County of Platte, State of Missouri, defendant, in connection with the sale of merchandise, in trade or commerce, to wit: home repair services, willfully knowingly and with the intent to defraud made the false promise to Nicole Pearson that in exchange for payment in advance, defendant would provide home repair 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.
407.020-001Y20172607.0

The facts that form the basis for this information and belief are contained in the attached statement of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

Wherefore, the Attorney General prays that an arrest warrant be issued as provided by law.

RESPECTFULLY SUBMITTED,

**ANDREW BAILEY
ATTORNEY GENERAL**

/s/ John W. Grantham

John W. Grantham, #60556

Assistant Attorney General

P.O. Box 899

Jefferson City, Missouri 65101

(573) 751-3942

John.grantham@ago.mo.gov