

IN THE ASSOCIATE CIRCUIT COURT IN
THE COUNTY OF GREENE, MISSOURI

STATE OF MISSOURI)

v.)

GLENN M. JESSEN)

Address: 74 Rod N Reel Dr.)
Camdenton, MO 65020)

White/Male)
DOB: 06/18/1969)
SSN: XXX-XX-2784)

Cause No.)
Division No.)
OCN:)

F I L E D
J.A. FEB 28 2023
MAIL
CIRCUIT CLERK
GREENE COUNTY

FELONY COMPLAINT

COUNT I

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2020 through August 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Abbe Ehlers and/or Tom Ehlers, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 June 1, 2020 through May 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or

Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing and siding repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Roy Courtney, that in exchange for payment in advance, defendant would provide roofing and siding repair/replacement 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 III

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 June 1, 2020 through September 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Aughty Bailey, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 August 1, 2020 through June 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: solar panel removal and installation services, willfully, knowingly, and with the intent to defraud, made false promises to Brad Lyons, that in exchange for payment in advance, defendant would provide solar panel removal and installation 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 V

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 August 1, 2020 through October 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to John-Clayton Moore, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 September 1, 2020 through April 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Robert Tyus, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 VII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 September 1, 2020 through September 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly,

and with the intent to defraud, made false promises to Marisol Arancibia, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 September 1, 2020 through October 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Linda Wilson, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 October 1, 2020 through September 1, 2020, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Kelly Arnold and/or Michael Arnold, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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: 407.020-001Y20172699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2020 through September 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Oktawian Tarnowiecky, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 November 1, 2020 through April 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to James Holland, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 December 1, 2020 through October 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Tamara Bryan, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XIII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 October 1, 2020 through August 1, 2020, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Carol Adams, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XIV

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 December 1, 2020 through October 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Barry Rock, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XV

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 January 1, 2021 through September 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly,

and with the intent to defraud, made false promises to Nancy Kresanek, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XVI

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 December 1 2020 through July 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to James Boutwell, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XVII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 January 1, 2021 through March 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Kenneth Meier, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XVIII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 November 1, 2020 through October 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Dennis Austin, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XIX

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 January 1, 2021 through April 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to John Cummins, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XX

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 September 1, 2020 through August 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing, gutters, siding, and garage door repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Christina Dowdle, née Stevens, and/or Ashton Dowdle, that in exchange for payment in advance, defendant would provide roofing, gutters, siding, and garage door repair/replacement 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 XXI

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2021 through April 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Alvin Langston and/or Mary Langston, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XXII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2021 through July 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Larry Scriven, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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 XXIII

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2021 through January 1, 2022, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential,

Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing, gutter, and siding repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Shirley Stark, that in exchange for payment in advance, defendant would provide roofing, gutter, and siding repair/replacement 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 XIV

DECEPTIVE BUSINESS PRACTICES

Charge Code Number: 407.020-001Y20202699.00

The Attorney General of the State of Missouri, upon information and belief, charges that 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 1, 2021 through September 1, 2021, in the County of Greene, State of Missouri, defendant, acting alone or in concert with Midwest Roofing Commercial & Residential, Inc., or Overland Roof Exchange, Inc., in connection with the sale of merchandise, in trade or commerce, to wit: roofing repair and replacement services and materials, willfully, knowingly, and with the intent to defraud, made false promises to Joseph Wasser, that in exchange for payment in advance, defendant would provide roofing repair/replacement 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.

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

Wherefore, The Attorney General of the State of Missouri prays that a summons be issued as provided by law.

ANDREW BAILEY
Attorney General of the State of Missouri

/s/ Steven Reed
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