

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

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| POLICE NO. : | |
| PROSECUTOR NO. : | 095438308 |

STATE OF MISSOURI,

PLAINTIFF,

vs.

ROBERT B. WILLIAMS



DOB: 02/13/1971

Race/Sex: W/M;



DEFENDANT.

CASE NO. 1716-CR
DIVISION

COMPLAINT

Count I. Receiving Stolen Property (570.080-002Y20022803.)

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.080, RSMo, committed the **class C felony of receiving stolen property**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about September 10, 2015, in the County of Jackson, State of Missouri, the defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, with the purpose to deprive Gail Yaw of U.S. Currency, retained such property, knowing or believing that it had been stolen, and the property appropriated was money of a value of at least five hundred dollars.

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 two (2) years and not to exceed seven (7) 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

State vs. Robert B. Williams**Count II. Deceptive Business Practice (407.020-001Y19672607.)**

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 407.020, RSMo, committed the **Class D Felony of Unlawful Merchandising Practices**, punishable upon conviction under Sections 558.011 and 560.011 RSMo, in that on or about September 10, 2015, in the County of Jackson, State of Missouri, defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, in connection with the sale of merchandise in trade and commerce, to-wit: home repair and renovation services to Gail Yaw, willfully, knowingly, and with the intent to defraud, made the false promise to Gail Yaw that in exchange for money paid in advance, he would complete agreed upon concrete remodel and 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.

Count III. Receiving Stolen Property (570.080-002Y20022803.)

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.080, RSMo, committed the **Class C Felony of Receiving Stolen Property**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 13, 2015, in the County of Jackson, State of Missouri, the defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, with the purpose to deprive Robert Meints of U.S. Currency, retained such property, knowing or believing that it had been stolen, and the property appropriated was money of a value of at least five hundred dollars.

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 two (2) years and not to exceed seven (7) 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count IV. Deceptive Business Practice (407.020-001Y19672607.)

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 407.020, RSMo, committed the **Class D Felony of Unlawful Merchandising Practices**, punishable upon conviction under Sections 558.011 and 560.011 RSMo, in that on or about June 13, 2015, in the County of Jackson, State of Missouri, defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, in connection with the sale of merchandise in trade and commerce, to-wit: home repair and renovation services to Robert Meints, willfully, knowingly, and with the intent to defraud, made the false promise to Robert Meints that in exchange for money paid in advance, he would complete agreed upon concrete remodel and 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.

Count V. Receiving Stolen Property (570.080-002Y20022803.)

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.080, RSMo, committed the **Class C Felony of Receiving Stolen Property**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 29, 2015, in the County of Jackson, State of Missouri, the defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, with the purpose to deprive Kevin and Michelle Thomas and Thomas Crushing, LLC, of U.S. Currency, retained such property, knowing or believing that it had been stolen, and the property appropriated was money of a value of at least five hundred dollars.

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 two (2) years and not to exceed seven (7) 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

State vs. Robert B. Williams

Count VI. Deceptive Business Practice (407.020-001Y19672607.)

The Attorney General of the State of Missouri and the Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 407.020, RSMo, committed the **Class D Felony of Unlawful Merchandising Practices**, punishable upon conviction under Sections 558.011 and 560.011 RSMo, in that on or about June 29, 2015, in the County of Jackson, State of Missouri, defendant, acting in concert with Xtreme Concrete and Outdoor Living, LLC, in connection with the sale of merchandise in trade and commerce, to-wit: home repair and renovation services to Kevin and Michelle Thomas and Thomas Crushing, LLC, willfully, knowingly, and with the intent to defraud, made the false promise to Kevin and Michelle Thomas and Thomas Crushing, LLC, that in exchange for money paid in advance, he would complete agreed upon concrete remodel and repair services for them, 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 attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

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

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Julia A. Hamilton
Julia A. Hamilton (#45429)
Assistant Prosecuting Attorney
415 East 12th Street
Kansas City, MO - 64106

WITNESSES:

Tony Eierman , Office of the Attorney General