

MISSOURI STATE HIGHWAY PATROL  
PROBABLE CAUSE STATEMENT

STATE OF MISSOURI }

COUNTY OF MONITEAU }  
DATE: 01/29/2020

MISSOURI STATE HIGHWAY PATROL

CASE # 200041548  
OCN:

I, Sergeant Darrin R. Haslag, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that Amanda L. Trimble d.o.b. [REDACTED] SSN [REDACTED], on between April of 2018 and October of 2019, at Moniteau County Treasurer's Office, located in California, Missouri, committed the offense(s) listed below:

Fraudulent use of a credit device (Class A Misdemeanor) RSMo 570.130  
Forgery (Class D Felony) RSMo 570.090  
Stealing (Class D Felony) RSMo 570.030  
Filing a False Document (Class D Felony) RSMo 570.095

2. State the facts that support a finding of probable cause to believe crime(s) was/were committed and that the accused committed the crime(s): On October 12, 2019, Moniteau County Assessor Amanda Trimble used a Moniteau County Missouri credit card to purchase two American Airlines flight tickets for a flight from Columbia Missouri Regional Airport, to Dallas/Ft. Worth Airport, departing on October 18, 2019. The total cost of the two airline tickets was \$446.20. Trimble reported to county officials that the trip to Texas was for mapping software training with ESRI, a mapping software company used by the Assessor's Office. In addition to the airline ticket charge, Trimble submitted receipts to the Moniteau County Treasurer for personal reimbursement, reportedly incurred by her during the training trip, for Uber rides and registration fees paid to ESRI. In addition to the airline tickets charged to the county, the total reimbursement of the personal expenses reported by Trimble totalled \$223.16.

Officials with Moniteau County reported they located several suspicious papers from a trash can at the Moniteau County Courthouse, which were for Trimble's reported trip to Texas in October of 2019. Included in this paperwork was an American Airlines trip confirmation/receipt for Trimble's October 18th, 2019 flight. When examining the trip confirmation paperwork taken from the trash can, pieces of blank white paper were taped to it, covering pertinent information about who the second ticket was issued to. Under the white pieces of paper officials found the name of Trimble's sister, R. L., who was listed along with Trimble, as one of two person's who flew that day. When compared to the trip confirmation/receipt submitted by Trimble, it was apparent the tape was used to hide Trimble's sister's name when a copy was made and submitted by Trimble to the county treasurer. Also, located in the trash can was a generic training form from the ESRI, with the same kind of white paper pieces taped to it. Obscured under the taped white paper was a total quote for training of \$1950.00. Printed on another white piece of paper taped to the training registration was typed text stating "Total paid \$199.00". When compared to receipts turned in by Trimble to the county treasurer, it was apparent the tape and subsequent typed text showing a different total was used to produce a paper made to appear as a receipt with a fictitious charge amount, for which Trimble was seeking reimbursement for.

Officials with ESRI were contacted and questioned about the training Trimble reportedly attended. ESRI officials indicated that Trimble was not registered to attend any of their trainings and also indicated they did not even offer training in the Dallas/Ft. Worth area on October 18, 2019. Furthermore, they indicated they do not offer training in evenings or on weekends. This is noteworthy because Trimble's flight was scheduled to arrive in Dallas/Ft. Worth in the evening of Friday, October 18, 2019, at 5:34 P.M. A review of Trimble's personal

Facebook account revealed posts showing Trimble and her sister R.L., in Fort Worth, Texas over the weekend of October 18th, celebrating the birthday of a mutual friend named H.H.

When questioned about the Texas trip and its subsequent charges, Trimble told investigators several versions of the reason for the trip, naming different sources/companies she obtained the training from and named different contacts with those companies she either spoke with or paid fees to. Trimble also changed the date and locations of the reported training, when confronted with the facts and evidence of the case that contradicted her story. Attempts to verify Trimble's varying accounts were unsuccessful and representatives with the companies denied ever providing training in that area or to Trimble on that date.

Further investigation into the misuse of county funds by Trimble revealed 115 fuel purchases made between April of 2018 and October of 2019, using a Petro-Fuel Card issued to her office, for which no entry into the county fuel log was made. Investigators determined that a number of these purchases occurred on weekends or holidays, when Trimble would not have worked. Additionally, when comparing the Petro-Fuel Card statements to the fuel logs, investigators found several dates when Trimble obtained fuel twice in a day, with one entry being logged in the fuel log and the second purchase not documented. Furthermore, some purchases were for total gallons exceeding the amount capable of being held in the accessor's assigned vehicle, a 2008 Ford Escape. The total cost of fuel purchases made by Trimble, for which no entry was recorded in the fuel log, was \$3,187.05.

In addition to the fuel purchases, investigators found six incidents where Trimble misrepresented county related expenses, in order to receive reimbursement. On six separate dates, beginning in May of 2018 and ending in June of 2019, Trimble either reported that she incurred expenses on a trip to a meeting with Ameren UE or for training, when in fact checks with those responsible for the Ameren UE meetings and trainings confirm that no meetings or trainings were held during the timeframe indicated by Trimble. Furthermore, checks with Trimble's personal Facebook page reveal posts showing her and her family at competitive sporting competitions/tournaments for her children at those times. These public Facebook posts appeared on the dates and at the locations where she was reporting to the county to be working and seeking reimbursement for. The total cost of the six personal weekends fraudulently reported by Trimble as work related expenses, comes to \$960.16.

In total, considering Trimble's Texas trip, fuel purchases, and six out of town sporting events, all of which were misrepresented as Moniteau county related expenses, investigators found the total amount of county funds taken by Trimble to be at least \$4,816.57.

I, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

Sgt. Darrin R. Haslag

Signature

01/29/2020

Date



IN THE 26TH JUDICIAL CIRCUIT, MONITEAU COUNTY, MISSOURI

Judge or Division: AARON JOHN MARTIN	Case Number: 20MT-CR00041	(Date File Stamp)
State of Missouri vs.		Date/Time of Hearing: <b>26-MAR-2020 09:00 AM</b>
Defendant Name/Address:  AMANDA L TRIMBLE 509 Morgan Street California, MO 65018		Location of Hearing: Upstairs Courtroom MONITEAU COUNTY COURTHOUSE 200 E MAIN CALIFORNIA, MO 65018
Alias:		
Other Address(es) for Service:		

Summons – Criminal Case

Because you have been charged in this court with the offense(s) listed below, you are summoned to appear at the above location and time to plead and answer to the charges. If you fail to appear, a warrant for your arrest may be issued.

Charge Code/Description	Charge Level	Offense Date
570.090-001Y20172589.0 Forgery	Felony D	01-APR-2018
570.030-035Y20172399.0 Stealing - \$750 Or More	Felony D	01-APR-2018
570.095-002Y20182607.0 Filing False Documents - First Offense	Felony D	01-SEP-2018
570.130-002Y20172699.0 Fraudulent Use Of A Credit/Debit Device	Misdemeanor A	01-APR-2018

COURT SEAL OF



MONITEAU COUNTY

11/31/2020  
Date

Aaron J. Martin  
Judge

By: \_\_\_\_\_  
Clerk

If you have a disability requiring special assistance for your court appearance, please contact the court at least 48 hours in advance of scheduled hearing.

Further Information:

If you are convicted of a misdemeanor crime involving violence where you are or were a spouse, intimate partner, parent, or guardian of the victim or are or were involved in another, similar relationship with the victim, it may be unlawful for you to possess or purchase a firearm, including a rifle, pistol, or revolver, or ammunition, pursuant to federal law under 18 U.S.C.922(g)(9). If you have any questions whether these laws make it illegal for you to possess or purchase a firearm, you should consult an attorney.

Certificate of Mailing

I certify that this summons was mailed on \_\_\_\_\_ (date) by first class mail to the above named defendant at the address listed above.

COURT SEAL OF



MONITEAU COUNTY

\_\_\_\_\_  
Date

\_\_\_\_\_  
Clerk

Sheriff's or Server's Return

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the defendant.
- leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant with \_\_\_\_\_ a person of the defendant's family over the age of 15 years who permanently resides with the defendant.
- (For service on a corporation) delivering a copy of the summons and a copy of the petition to: \_\_\_\_\_ (name) \_\_\_\_\_ (title) at \_\_\_\_\_ (address).
- other: \_\_\_\_\_

Served in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Sheriff's Fees

Fees \$ N/A

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

\_\_\_\_\_  
Sheriff or Server

By: \_\_\_\_\_  
Deputy

AFFIDAVIT OR COMPLAINT IN FELONY CASE

**FILED**

JAN 30 2020

MONITEAU COUNTY CIRCUIT COURT  
ASSOCIATE CIRCUIT JUDGE DIVISION

STATE OF MISSOURI )  
 ) ss.  
County of Moniteau )

IN THE CIRCUIT COURT OF MONITEAU COUNTY, MISSOURI  
ASSOCIATE CIRCUIT JUDGE DIVISION

STATE OF MISSOURI,  
Plaintiff,

vs.

AMANDA L TRIMBLE  
dob: [REDACTED] SSN: [REDACTED]  
Defendant.

**CHARGE:**  
Forgery, Count - I  
Stealing - \$750 Or More, Count - II  
Filing False Documents - First Offense, Count  
- III  
Fraudulent Use Of Credit/debit Device, Count  
- IV

CASE NO. 20MT-CR00041  
PA FILE NO. 135008510

The Prosecuting Attorney of the County of Moniteau, State of Missouri, charges:

**COUNT: I Charge Code: 570.090-001Y20172589.0.**

That the defendant in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that during the period of April, 2018 through October 2019, in the County of Moniteau, State of Missouri, the defendant, the then Moniteau County Assessor, with the intention to defraud, forged and altered, in writing, receipts, requests, and invoices, claiming that said documents showed expenses incurred by the Moniteau County Assessor and her office for official use, when same were in fact for her personal use and requests for reimbursement to defendant.

**COUNT: II Charge Code: 570.030-035Y20172399.0.**

That the defendant in violation of Section 570.030, RSMo, committed the class D felony of stealing by deceit, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that during the period of April, 2018 through October, 2019, in the County of Moniteau, State of Missouri, the defendant, an office holder, namely the Moniteau County Assessor, appropriated money and payments, of a value of at least seven hundred fifty (\$750) dollars, which property was owned by the County of Moniteau, and defendant appropriated such property from Moniteau County and with the purpose to deprive the county thereof, by deceit in that the defendant represented to the county receipts, requests and invoices, bills and requests for reimbursement, representing that same were for official expenses of the Moniteau County Assessor, which representations were false and known by defendant to be false and the county relied on the representations and was thereby induced to pay said sums, which were false and in fact, defendant's personal expenses.

**COUNT: III Charge Code: 570.095-002Y20182607.0.**

That the defendant, in violation of Section 570.095, RSMo, committed the class D felony of filing false documents, punishable upon conviction under Sections 558.054 and 558.011, RSMo, in that during the period of September, 2018 through October, 2019, the defendant, the then Moniteau County Assessor, with the intent to defraud and deceive, filed altered and false documents with the Moniteau County Clerk's Office, false and altered receipts, bills, requests and invoices, purporting to be requesting payments and reimbursements for expenses and services incurred by the Moniteau County Assessor's Office, when in fact said expenses were not incurred by the Moniteau County Assessor's Office, but were incurred by defendant for her personal use.

**COUNT: IV Charge Code: 570.130-002Y20172699.0.**

That the defendant in violation of Section 570.130, RSMo, committed the class A misdemeanor of fraudulent use of a credit device, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that during the period of April, 2018 through October, 2019, in the County of Moniteau, State of Missouri, the defendant, for her personal use, used a credit device, namely the Moniteau County credit card, and a Petro-Fuel Card issued to the Moniteau County Assessor's Office, for the purpose of obtaining gas, airline tickets, and other property, which property was of a value of at least seven hundred fifty dollars, knowing that defendant's use of the credit devices for her personal expenses was not authorized.

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.

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

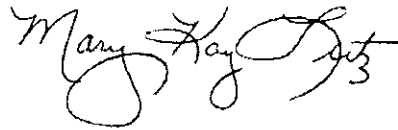
**PENALTIES:**

**COUNT I** - The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years 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 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. If the court imposes a sentence of imprisonment for a term longer than one year upon a person convicted of a class D felony, it shall commit the person to the custody of the department of corrections.

**COUNT II** - The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years 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 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. If the court imposes a sentence of imprisonment for a term longer than one year upon a person convicted of a class D felony, it shall commit the person to the custody of the department of corrections.

**COUNT III** - - The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years 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 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. If the court imposes a sentence of imprisonment for a term longer than one year upon a person convicted of a class D felony, it shall commit the person to the custody of the department of corrections

**COUNT IV** - The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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).



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Mary Kay Sommer Lutz, Prosecutor , # 34675  
01/30/2020