

AUG 12 2024

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Amanda VanOrsdol COURT CLERK

STATE OF OKLAHOMA,)
)
 PLAINTIFF,)
)
 vs.)
)
 TODD DOUGLAS BRIGGS,)
 W/M, DOB: November 1974)
 SSN: xxx-xx- 1702)
)
 DEFENDANT.)
)
 COUNTY OF CREEK)
) SS:
 STATE OF OKLAHOMA)

CF-2024-180
Case No. CF-2024-

AFFIDAVIT OF PROBABLE CAUSE

Justin Hokett, being of lawful age and after having been affirmed upon his oath to tell the truth, states as follows:

I am a certified Advanced Peace Officer in the State of Oklahoma, employed as an Agent in the Office of Oklahoma Attorney General (OAG) assigned to the Consumer Protection Unit (CPU). I attest that the following is true and factual to the best of my knowledge. This Affidavit does not include every fact known, but only those facts necessary to support a finding of probable cause.

In July of 2023, Brandy Ford (Ford) voluntarily reported to the Tulsa Police Department (TPD) that she was a witness to a crime. Ford told officers she worked as the exclusive real estate agent for T Briggs Construction, LLC, as well as a sales agent for Oasis Pools & Outdoor Living, LLC, for owner Todd Douglas Briggs (Briggs). Ford reported she assisted clients in contracting with Briggs for the construction of new homes and/or pools. Ford stated that Briggs recently informed her he was closing his businesses and was filing for bankruptcy. Ford advised officers that Briggs had multiple customers who paid Briggs in full for projects he did not complete and did not intend to complete because he was "out of money." TPD ultimately turned over the investigation to the OAG.

The CPU received seventeen (17) complaints against Briggs, sole owner and operator of T Briggs Construction, LLC and Oasis Pools & Outdoor Living, LLC. The complaints were all similar in nature, involving Briggs being paid funds for projects which he either never started, never finished, or didn't pay subcontractors and/or material suppliers for. This resulted in investigation CINV-23-0035 being opened and assigned to your Affiant.

Your Affiant served subpoenas to two financial institutions and obtained extensive documentation in response. This included account information for the accounts listed below, as well as loan documentation and W-4 filings, etc.:

Financial Institution	Date Opened	Acct. #	Signatory	Name on Acct.
First Priority Bank	01/01/2020	5663	Todd Briggs	T Briggs Construction
First Priority Bank	03/17/2021	4980	Todd Briggs	T Briggs Construction
First Priority Bank	04/19/2022	1782	Todd Briggs	Oasis Pools & Outdoor
Prosperity Bank	04/07/2022	7787	Todd Briggs	T Briggs Construction

COMPLAINT 1 (Patricia Mann):

On October 31, 2023, your Affiant conducted a voluntary interview of Patricia Mann (Mann). On May 12, 2023, Patricia and Rex Mann entered into a contract with T Briggs Construction, LLC, to build a residence at 2605 Falls Bend Drive, Sapulpa, OK 74066 Lot 11 Block 2 (Creek County), for \$462,884.00. By July 18, 2023, Mann had made six payments totaling \$83,585.84, as shown in Exhibit 1.

In July 2023, only days after Mann made her last payment to Briggs, Mann was contacted by Ford who advised her Briggs was closing his business and filing for bankruptcy. Following Briggs abandonment, Mann contracted with Jaroh Construction to finish the project. Your Affiant compared the Jaroh estimate to Briggs' draw sheet and identified a total of \$14,500.00 in completed work which was credited to Briggs.

In total, Briggs embezzled \$69,085.84. from Mann by taking payments and not using the funds to complete the work they were intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 2 (Melissa Boman):

On September 13, 2023, your Affiant conducted a voluntary interview of Melissa Boman (Boman). On September 13, 2022, Melissa and Shea Boman entered into a contract with T Briggs Construction, LLC to build a residence at 4880 West 77th St, Tulsa, OK (Tulsa County), for \$590,250.00. By July 24, 2023, Boman had paid the full contract price, as shown in Exhibit 1.

Only days after receiving Boman's final payment, Briggs informed her that he was bankrupt and would not finish her project. According to documentation from First Priority Bank (FBP), who held the mortgage loan, the house was approximately 84% complete based on FBP's last inspection. After Briggs abandoned the project, liens totaling \$77,023.45 were placed against Boman's property by unpaid subcontractors.

In total, Briggs embezzled \$171,423.45 from Boman by taking funds and not using the funds to pay for sub-contractors and/or materials associated with that payment's work or as

intended. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 3 (Carrie Garrett):

On September 13, 2023, your Affiant conducted a voluntary interview of Carrie Garrett (Garrett). On May 8, 2023, an agreement was reached between Garrett and T Briggs Construction, LLC, for the building of a detached garage at 10809 N. 172nd E. Avenue, Owasso, OK 74055 (Rogers County), for \$59,400.00. By July 13, 2023, Garrett had made two payments totaling \$29,650.00, as shown in Exhibit 1.

Garrett stated that the slab was poured and rough-in plumbing within the slab was completed. However, only days after receiving Garrett's last payment, Briggs stopped construction and informed Garrett that he was filing for bankruptcy and would not be finishing her project. After Briggs abandoned the project, liens totaling \$13,380.14 were placed against the property by unpaid subcontractors.

In total, Briggs embezzled \$13,380.14 from Garrett by taking payments and not using the funds to pay for sub-contractors and/or materials associated with that payment's work. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-3)**.

COMPLAINT 4 (Shannon Williams):

On October 25, 2023, your Affiant conducted a voluntary interview of Shannon Williams (Williams). On June 15, 2023, Williams entered into a contract with Oasis Pools & Outdoor Living, LLC, to construct a pool at 18706 E. 45th Place South, Tulsa, OK 74134 (Tulsa County), for \$108,000.00. By July 13, 2023, Williams had made two payments totaling \$86,400.00, as shown in Exhibit 1.

In late July 2023, only days after receiving Williams's last payment, Briggs informed her that he was filing for bankruptcy and closing his business. At that time, the only work performed by Briggs was partial excavation and some forming, which had collapsed. Gordan McAnally, owner of G & G Pools, was hired to finish the pool and estimated the work completed by Briggs to be worth no more than \$13,989.12.

In total, Briggs embezzled \$72,410.88 from Williams by taking payments and not using the funds to complete the work they were intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 5 (Christian Lour):

On October 25, 2023, your Affiant conducted a voluntary interview of Christian Lour (Lour). On April 24, 2023, Christian and Jovanna Kenney-Lour entered into a contract with T Briggs Construction, LLC, to construct a residence at 17075 N. 129th Ave, Collinsville, OK (Tulsa County), for \$308,250.00. By July 13, 2023, Lour had made three payments totaling \$53,665.00, as shown in Exhibit 1.

On July 25, 2023, only days after receiving Lour's last payment, Briggs notified Lour that he was bankrupt and would be abandoning the project. At that time the job site had been graded but no other work had begun or was completed by Briggs. Lour then contracted with Jaroh Construction to finish the project. Your Affiant compared the Jaroh estimate to Briggs' draw sheet for the property and identified a total of \$13,700.00 in completed work which was credited to Briggs.

In total, Briggs embezzled \$39,965.00 from Lour by taking payments and not using the funds to complete the work they were intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 6 (Loy Hall):

On October 4, 2023, your Affiant conducted a voluntary interview of Loy Hall (Hall). Hall entered into a contract with T Briggs Construction, LLC, on April 6, 2022, to build a residence at 9802 South Union Avenue, Jenks, OK 74132 (Tulsa County), for \$506,050.00. The property was within a new housing development known as "Jamestown" and it became 3320 West Jamestown Circle. By April 2023, Hall had paid the full contract price, as shown in Exhibit 1 attached.

Despite paying the full contract amount, Briggs completed only the concrete slab, stud framing, some roughed-in items, and a roof with shingles. Hall discovered Briggs was abandoning her project when he contacted her on July 25, 2023, stating he was "out of money." After Briggs abandoned the project, liens totaling \$48,026.84 were placed against Hall's property by unpaid subcontractors.

Hall contracted with True North Homes, LLC to finish the project. Your Affiant compared the True North estimate to Briggs' draw sheet for the property and identified a total of \$152,541.37 in completed work which was credited to Briggs.

In total, Briggs embezzled \$353,508.64 from Hall by taking funds and not using the funds to complete the work they were intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 7 (Heidi Puglia):

On October 31, 2023, your Affiant conducted a voluntary interview of Heidi Puglia (Puglia). On July 6, 2023, Frank and Heidi Puglia entered into a contract with Oasis Pools & Outdoor Living, LLC, to construct a pool at 2022 E. 133rd St South, Bixby, OK 74008 (Tulsa

County), for \$115,000.00. By July 20, 2023, Puglia had made two payments totaling \$57,500.00, as shown in Exhibit 1.

In late July 2023, only days after making her last payment, Puglia learned that Briggs was declaring bankruptcy and would not be returning to finish their pool construction. Puglia stated that Briggs dug a hole for the pool and some rebar was delivered, but no other work was done. Briggs left approximately 40 pieces of 10-foot, #3 rebar, worth approximately \$240.00, at the job site. Justin Carlson of Pool Remodels & Renovations of Tulsa, who finished the pool for Puglia, advised the excavation of the pool Briggs started was worth no more than \$10,000.00.

In total, Briggs embezzled \$47,260.00 from Puglia by taking payments and not using the funds to complete the work they were intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 8 (Ken Morton):

On October 31, 2023, your Affiant conducted a voluntary interview of Kenneth Morton (Morton). On July 21, 2023, Ken and Rachel Morton entered into a contract with Oasis Pools & Outdoor Living, LLC, to construct a pool at 11336 S. Adams Street, Jenks, OK 74037 (Tulsa County), for \$129,500.00. On July 21, 2023, Morton made a payment of \$26,460.00, as shown in Exhibit 1.

On July 27, 2023, six days after signing the contract, Briggs informed Morton he was declaring bankruptcy and would not be constructing the pool. No work was performed by Briggs.

In total, Briggs embezzled \$26,460.00 from Morton by taking payment and not using it towards the work it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 9 (Siera Schwarz):

On November 01, 2023, your Affiant conducted a voluntary interview of Siera Schwarz (Schwarz). On July 12, 2023, Siera and Michael Schwarz entered into a contract with T Briggs Construction, LLC, to renovate a residence at 13600 South Mingo Road, Tulsa, OK 74147 (Tulsa County), for \$371,780.00. On July 17, 2023, Schwarz made a payment of \$37,178.00, as shown in Exhibit 1.

On July 27, 2023, only days after accepting payment, Briggs informed Schwarz he was declaring bankruptcy and would not be starting the project. No work was performed by Briggs.

In total, Briggs embezzled \$37,178.00 from Schwarz by taking payment and not using it towards the work it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 10 (Mackayla Baggett):

On November 2, 2023, your Affiant conducted a voluntary interview of Mackayla Baggett (Baggett). On May 12, 2023, Mackayla and Dylan Baggett entered into a contract with T Briggs Construction, LLC, to construct a new home on unplotted land described in the contract as 0000 E. 9th Street, Beggs, OK 74421 (Okmulgee County), for \$557,740.00. By July 21, 2023, Baggett had made three payments totaling \$55,022.00, as shown in Exhibit 1.

On July 25, 2023, only days after Baggett made her last payment to Briggs, Ford informed the Baggett's that Briggs was declaring bankruptcy and would not be completing their project. Baggett stated the only work Briggs performed was forming a dirt pad and delivering gravel, worth \$3,000.00 per the contract.

In total, Briggs embezzled \$52,022.00 from Baggett by taking payments and not using it towards the work it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 11 (Julie Patrick):

On November 2, 2023, your Affiant conducted a voluntary interview of Julie Patrick (Patrick). On May 11, 2023, Julie and David Patrick entered into a contract with T Briggs Construction, LLC, to build a home at 18025 E. 112th Street North, Owasso, OK 74055 (Rogers County), for \$313,325.00. By July 21, 2023, Patrick had made two payments totaling \$34,556.50, as shown in Exhibit 1.

On July 26, 2023, only days after Patrick made her last payment to Briggs, she was informed Briggs was declaring bankruptcy and would no longer be their contractor. No work was performed by Briggs.

In total, Briggs embezzled \$34,556.50 from the Patricks by taking payments and not using the funds towards the work it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 12 (Travis Krimbill):

On November 02, 2023, your Affiant conducted a voluntary interview of Travis Krimbill (Krimbill). On June 19, 2023, Travis and Kelsey Krimbill entered into a contract with Oasis Pools & Outdoor Living, LLC, to install a pool at 12406 S. Norwood Avenue, Bixby, OK 74008 (Tulsa County), for \$61,750.00. By June 19, 2023, Krimbill had paid the full contract price, as shown in Exhibit 1.

On July 27, 2023, barely a month after Krimbill paid Briggs in full, Briggs informed Krimbill he was declaring bankruptcy and would not begin work on the pool project. No work was performed by Briggs.

In total, Briggs embezzled \$61,750.00 from Krimbill by taking payment and not using it towards the work it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 13 (Jarad Fisher):

On November 20, 2023, your Affiant conducted a voluntary interview of Jarad Fisher (Fisher). On August 7, 2022, Jarad and Rhonda Fisher entered into a contract with T Briggs Construction, LLC, to construct a home and in-ground pool at 2210 E. Glendale Street, Broken Arrow, OK 74011 (Tulsa County), for \$701,530.00. During the course of construction, the Fishers requested four change orders to occur which increased the total cost of the contract to \$735,110.00, including the addition of a dozen mature trees. By May 25, 2023, Fisher had paid the contract price in full, as shown in Exhibit 1.

Following completion of the project, Fisher discovered the mature trees he paid for were never delivered. In addition, liens totaling \$90,883.68 were placed against the Fishers' property by unpaid subcontractors.

In total, Briggs embezzled \$95,683.68 from Fisher. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 14 (Jenna Harkreader):

On November 20, 2023, your Affiant conducted a voluntary interview of Jenna Harkreader (Harkreader). On August 24, 2022, Jenna and Jack Harkreader entered into a contract with Oasis Pools & Outdoor Living, LLC, construct a pool house at 8328 E. 116th Street South, Bixby, OK 74008 (Tulsa County), for \$112,500.00. By July 21, 2023, Harkreader paid five payments totaling \$102,450.00, as shown in Exhibit 1.

In July 2023, only days after her last payment to Briggs, Briggs informed Harkreader he was bankrupt and would not be finishing their pool house. After Briggs abandonment, liens totaling \$9,665.50 were placed against Harkreader's property by unpaid subcontractors.

In total, Briggs embezzled \$9,665.50 from Harkreader by taking payments and not using it towards paying for work which it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-3)**.

COMPLAINT 15 (Joshua Miller):

On November 20, 2023, your Affiant conducted a voluntary interview of Joshua Miller (Miller). On February 15, 2023, Joshua and Nicole Miller entered into a contract with T Briggs Construction, LLC, to build a home and pool at 1903 W 78th Street, Tulsa, OK 74132 (Tulsa County) for \$665,950.00. By June 23, 2023, Miller had paid five payments totaling \$221,367.50, as shown in Exhibit 1.

On July 25, 2023, barely a month after Miller's last payment to Briggs, Briggs informed Miller that he was bankrupt and would not be finishing the home or pool. Miller then contracted with Jaroh Construction to finish the project. Your Affiant compared the Jaroh estimate to Briggs' draw sheet and identified a total of \$30,834.85 in completed work which was credited to Briggs. Additionally, liens totaling \$76,180.85 were placed against the Miller's property by unpaid subcontractors.

In total, Briggs embezzled \$107,014.85 from Miller by taking funds paid to him and not using them towards the project. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 16 (Jamie Mehas):

On November 20, 2023, your Affiant conducted a voluntary interview of Jamie Mehas (Mehas). On June 4, 2023, Jamie and Nicholas Mehas entered into a contract with Oasis Pools & Outdoor Living, LLC, to build a pool at 12720 South 4th Street, Jenks, OK 74037 (Tulsa County) for \$106,850.00. By July 6, 2023, Mehas had paid three payments totaling \$85,480.00, as shown in Exhibit 1.

On July 27, 2023, only three weeks after Mehas's last payment Briggs, Briggs her he was bankrupt and would not be finishing the pool. Mehas provided documentation to your Affiant substantiating she paid \$66,966.26 to complete the project. Additionally, after Briggs abandonment, a lien totaling \$16,710.00 was placed against the property by an unpaid subcontractor.

In total, Briggs embezzled \$62,306.26 from Mehas by taking payments and not using it towards paying for work and/or materials which it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

COMPLAINT 17 (Sushil Hatkar):

On January 23, 2024, your Affiant conducted a voluntary interview of Sushil Hatkar (Hatkar). On December 2, 2022, Hatkar entered into a contract with Oasis Pools & Outdoor Living, LLC, to install a pool at 5704 E. 100 Place, Tulsa, OK 74137 (Tulsa County), for \$135,000. By June 27, 2023, Hatkar had paid the contract price in full, as shown in Exhibit 1.

On July 21, 2023, less than a month after Hatkar's last payment to Briggs, Briggs contacted Hatkar stating he was bankrupt and would not be finishing the pool. The only remaining tasks left unfinished were the installation of the automated pool cover and re-sodding and landscaping the yard around the pool, which totaled \$11,360.00. Additionally, after Briggs abandonment, a lien totaling \$5,518.00 was placed against the property by an unpaid subcontractor.

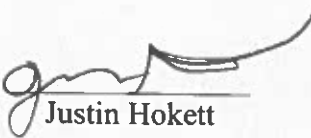
In total, Briggs embezzled \$16,878.00 from Hatkar by taking funds and not using them towards paying for work and/or materials which it was intended for. As such, your Affiant believes there is substantial evidence to charge Briggs with **Embezzlement, Title 21 § 1451(A-1)(B-4)**

Conclusion:

In total, Briggs utilized his companies to embezzle approximately \$1,270,548.74 from the 17 victims identified above.

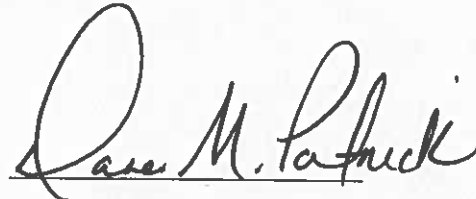
I request upon probable cause, the court issue a warrant for the arrest of Todd D. Briggs on charges of **Pattern of Criminal Offenses Title 21 § 425**, two (2) felony counts **Embezzlement, Title 21 § 1451(A-1)(B-3)**, and fifteen (15) felony counts **Embezzlement, Title 21 § 1451(A-1)(B-4)**.

Further, your Affiant sayeth not.

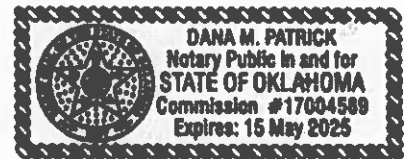

Justin Hokett

Subscribed and affirmed before me this 8th day of August, 2024.

My commission expires: May 15, 2025



Notary Public



FINDING OF PROBABLE CAUSE

On this 12 day of August, 2024, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court, and upon the Affidavit of Justin Hokett, requesting that a warrant of arrest be issued for the within named Defendant, that he might be arrested and held to answer for the offenses of **Pattern of Criminal Offenses Title 21§ 425, two (2) felony counts Embezzlement, Title 21 § 1451(A-1)(B-3), and fifteen (15) felony counts Embezzlement, Title 21 § 1451(A-1)(B-4).**

The Court finds that the offenses of **Pattern of Criminal Offenses Title 21§ 425, two (2) felony counts Embezzlement, Title 21 § 1451(A-1)(B-3), and fifteen (15) felony counts Embezzlement, Title 21 § 1451(A-1)(B-4)** has been committed and there is probable cause to believe that the within Defendant has committed said offenses and that a warrant of arrest should be issued.

Dated this 12 day of Aug, 2024.



JUDGE OF THE DISTRICT COURT

Exhibit 1

Complaint 1: Patricia Mann

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
March 9, 2023	\$7,500.00	Check 7515	T Briggs Construction	House Plans	First Priority Bank; Acct 4980	Todd Briggs
May 2, 2023	\$6,161.70	Check 7519	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
June 9, 2023	\$30,000.00	Check 5886	T Briggs Construction	Lot Prep	First Priority Bank; Acct 4980	Todd Briggs
July 10, 2023	\$14,924.14	Check 7525	T Briggs Construction		Prosperity Bank; Acct 7787	Todd Briggs
July 18, 2023	\$12,500.00	Check 5887	T Briggs Construction	Construction Draw	First Priority Bank; Acct 4980	Todd Briggs
July 18, 2023	\$12,500.00	Check 8726	T Briggs Construction	Construction Draw	First Priority Bank; Acct 4980	Todd Briggs
TOTAL	\$83,585.84					

Complaint 2: Melissa Boman

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
September 16, 2022	\$17,707.50	Cashier's Check 6292	T Briggs Construction	N/A	First Priority Bank; Acct 4980	Todd Briggs
November 28, 2022	\$16,567.56	Money Wire	Integrity Title & Closing LLC (who then paid T Briggs Construction)	Principal Advance	TTCU	Integrity Title & Closing LLC
November 29, 2022	\$40,077.88	Electronic Transfer	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs

December 7, 2022	\$27,424.29	Electronic Transfer	T Briggs Construction	Payment made for footing	First Priority Bank; Acct 4980	Todd Briggs
December 19, 2022	\$16,690.00	Electronic Transfer	T Briggs Construction	Payment made for plumbing rough out	First Priority Bank; Acct 4980	Todd Briggs
January 5, 2023	\$17,176.28	Electronic Transfer	T Briggs Construction	Payment made for slab	First Priority Bank; Acct 4980	Todd Briggs
January 10, 2023	\$37,787.81	Electronic Transfer	T Briggs Construction	Payment made for framing delivery	First Priority Bank; Acct 4980	Todd Briggs
January 20, 2023	\$38,932.89	Electronic Transfer	T Briggs Construction	Payment made for framing installation-roof	First Priority Bank; Acct 4980	Todd Briggs
January 23, 2023	\$34,352.55	Electronic Transfer	T Briggs Construction	Payment made for windows	First Priority Bank; Acct 4980	Todd Briggs
January 30, 2023	\$17,176.28	Electronic Transfer	T Briggs Construction	Payment made for plumbing top out	First Priority Bank; Acct 4980	Todd Briggs
February 8, 2023	\$24,900.00	Electronic Transfer	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
February 16, 2023	\$22,901.70	Electronic Transfer	T Briggs Construction	Payment made for audio/video	First Priority Bank; Acct 4980	Todd Briggs
February 23, 2023	\$80,155.23	Electronic Transfer	T Briggs Construction	Payment made HVAC Rough Out	First Priority Bank; Acct 4980	Todd Briggs
March 6, 2023	\$22,901.70	Electronic Transfer	T Briggs Construction	Payment made for audio/video	First Priority Bank; Acct 4980	Todd Briggs
March 9, 2023	\$11,450.85	Electronic Transfer	T Briggs Construction	Payment made for insulation installation	First Priority Bank; Acct 4980	Todd Briggs
March 17, 2023	\$11,450.85	Electronic Transfer	T Briggs Construction	Payment made for security system	First Priority Bank; Acct 4980	Todd Briggs
March 24, 2023	\$17,176.28	Electronic Transfer	T Briggs Construction	Payment made for drywall	First Priority Bank; Acct 4980	Todd Briggs
March 31, 2023	\$17,176.28	Electronic Transfer	T Briggs Construction	Payment made for drywall	First Priority Bank; Acct 4980	Todd Briggs
April 7, 2023	\$4,950.00	Electronic Transfer	T Briggs Construction	Payment made for garage doors	First Priority Bank; Acct 4980	Todd Briggs

April 26, 2023	\$6,400.00	Electronic Transfer	T Briggs Construction	Payment made for garage doors	First Priority Bank; Acct 4980	Todd Briggs
May 8, 2023	\$17,176.28	Electronic Transfer	T Briggs Construction	Payment made for wood floors	First Priority Bank; Acct 4980	Todd Briggs
May 15, 2023	\$11,450.85	Electronic Transfer	T Briggs Construction	Payment made for tile	First Priority Bank; Acct 4980	Todd Briggs
May 17, 2023	\$4,800.00	Check 1099	T Briggs Construction	change order for hardwood on stairs	First Priority Bank; Acct 4980	Todd Briggs
May 31, 2023	\$28,627.13	Electronic Transfer	T Briggs Construction	Payment made for shower, plumbing fixtures, HVAC, electrical, lights	First Priority Bank; Acct 4980	Todd Briggs
June 9, 2023	\$5,725.43	Electronic Transfer	T Briggs Construction	Payment made for carpet.	First Priority Bank; Acct 4980	Todd Briggs
June 30, 2023	\$5,725.43	Electronic Transfer	T Briggs Construction	Payment made for cabinets.	First Priority Bank; Acct 4980	Todd Briggs
July 7, 2023	\$2,800.00	Temporary Check	T Briggs Construction	Payment made for invoice 1952 (shower doors)	First Priority Bank; Acct 4980	Todd Briggs
July 13, 2023	\$34,352.55	Electronic Transfer	T Briggs Construction	Payment made for appliances.	First Priority Bank; Acct 4980	Todd Briggs
July 24, 2023	\$3,836.40	Electronic Transfer	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
Total:	\$597,850.00					

Complaint 3: Carrie Garrett

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
May 8, 2023	\$14,850.00	Cashier's Check 1012227	T Briggs Construction	1st 25% to schedule	First Priority Bank; Acct 4980	Todd Briggs
July 13, 2023	\$14,800.00	Check 3003	T Briggs Construction	2nd payment	Prosperity Bank; Acct 7787	Todd Briggs
Total:	\$29,650.00					

Complaint 4: Shannon Williams

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
June 15, 2023	\$40,000.00	Check 2258	Oasis Pools	Pool Down Pmt.	First Priority Bank; Acct 1782	Todd Briggs
July 13, 2023	\$46,400.00	Check 2259	Oasis Pools	2nd installment, Gunite	First Priority Bank; Acct 1782	Todd Briggs
Total:	\$86,400.00					

Complaint 5: Christian Lour

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
April 25, 2023	\$9,247.50	Check 1043	T Briggs Construction	Down Payment	First Priority Bank; Acct 4980	Todd Briggs
June 30, 2023	\$22,917.50	Check 69607	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
July 13, 2023	\$21,500.00	Electronic Transfer	T Briggs Construction	\$11,500.00 for site grading and \$10,000.00 for site trenching	First Priority Bank; Acct 4980	Todd Briggs
Total:	\$53,665.00					

Complaint 6: Loy Hall

Date	Amount	Payment Type	Paid To	Check Memo	Destination Bank	Account Signatory
April 8, 2022	\$13,338.60	Check# 1030	T Briggs Construction	Down Payment	First Priority Bank; Acct 5663	Todd Briggs
March 9, 2023	\$9,854.23	Check# 5178	T Briggs Construction	Loy Hall Plans and Permit	First Priority Bank; Acct 4980	Todd Briggs
March 13, 2023	\$19,708.46	Check# 1044	T Briggs Construction	3320 West Jamestown Circle	First Priority Bank; Acct 4980	Todd Briggs

March 20, 2023	\$97,556.86	Check# 1007	T Briggs Construction	3320 Jamestown Advance	First Priority Bank; Acct 4980	Todd Briggs
April 13, 2023	\$50,000.00	Check# 1128	T Briggs Construction	Jamestown	First Priority Bank; Acct 4980	Todd Briggs
April 13, 2023	\$315,591.86	Check# 1008	T Briggs Construction	Jamestown Full Amount	First Priority Bank; Acct 4980	Todd Briggs
Total:	\$506,050.01					

Complaint 7: Heidi Puglia

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
July 6, 2023	\$23,000.00	check 1954	Oasis Pools		First Priority Bank; Acct 1782	Todd Briggs
July 20, 2023	\$34,500.00	check 1084	Oasis Pools		First Priority Bank; Acct 1782	Todd Briggs
Total:	\$57,500.00					

Complaint 8: Ken Morton

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
July 21, 2023	\$26,460.00	check 2974	Oasis Pools		First Priority Bank; Acct 1782	Todd Briggs
Total:	\$26,460.00					

Complaint 9: Siera Schwarz

Date	Amount	Payment Type	Paid to	Memo	Destination Bank	Account Signatory
July 17, 2023	\$37,178.00	check 1000	T Briggs Construction		Prosperity Bank; Acct 7787	Todd Briggs
Total:	\$37,178.00					

Complaint 10: Mackayla Baggett

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
May 15, 2023	\$16,506.60	check 1015	T Briggs Construction	3% down payment	First Priority Bank; Acct 4980	Todd Briggs
June 30, 2023	\$38,515.40	check 069599	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
July 21, 2023	-\$27,500.00	Electronic Transfer		(Payment Reversed)	First Priority Bank; Acct 4980	Todd Briggs
Total	\$55,022.00					

Complaint 11: Julie Patrick

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
May 11, 2023	\$9,399.75	Cashier's Check 273519	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
July 21, 2023	\$25,156.75	Cashier's Check 070268	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
Total	\$ 34,556.50					

Complaint 12: Travis Krimbill

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
June 19, 2023	\$61,750.00	check 1254	Oasis Pools	Pool	First Priority Bank; Acct 1782	Todd Briggs
Total:	\$61,750.00					

Complaint 13: Jarad Fisher

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
June 29, 2022	\$16,290.00	Check 2687	T Briggs Construction	3% to start contract	First Priority Bank; Acct 4980	Todd Briggs

August 08, 2022	\$4,755.90	Check 2689	T Briggs Construction	Additional down	First Priority Bank; Acct 4980	Todd Briggs
November 15, 2022	\$20,480.00	Check 2787	Todd Briggs (Oasis Pools)	House addition	First Priority Bank; Acct 1782	Todd Briggs
February 06, 2023	\$2,400.00	Check 2789	T Briggs Construction	Change Order #2	First Priority Bank; Acct 4980	Todd Briggs
April 18, 2023	\$5,550.00	Check 2790	T Briggs Construction	Change Order #3	First Priority Bank; Acct 4980	Todd Briggs
May 12, 2023	\$6,900.00	Check 2793	T Briggs Construction	Change Order #4	First Priority Bank; Acct 4980	Todd Briggs
May 23, 2023	\$570,400.00	Cashier Check 069354	First Priority Bank/T Briggs		First Priority Bank; Acct 4980	Todd Briggs
May 31, 2023	\$108,687.93	Electronic Transfer	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
Total:	\$735,463.83					

Complaint 14: Jenna Harkreader

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
August 24, 2022	\$37,700.00	Check 157	Oasis Pools		First Priority Bank; Acct 1782	Todd Briggs
March 8, 2023	\$20,500.00	Check 167	Oasis Pools	slab & gas line	First Priority Bank; Acct 1782	Todd Briggs
April 15, 2023	\$33,450.00	Check 172	Oasis Pools	T Briggs	First Priority Bank; Acct 1782	Todd Briggs
June 9, 2023	\$10,000.00	Check 180	T Briggs Construction	paint	First Priority Bank; Acct 4980	Todd Briggs
July 21, 2023	\$800.00	Check 183	Oasis Pools	Electric Box	First Priority Bank; Acct 1782	Todd Briggs
Total:	\$102,450.00					

Complaint 15: Joshua Miller

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
March 3, 2023	\$33,297.50	Check 2610	T Briggs Construction	Refundable Deposit	First Priority Bank; Acct 4980	Todd Briggs
April 21, 2023	\$66,595.00	Cashier's Check 067407	T Briggs Construction		First Priority Bank; Acct 4980	Todd Briggs
May 16, 2023	\$24,000.00	Electronic Transfer	T Briggs Construction	Draw 1 Excavating Site Build Driveway/Utilities	First Priority Bank; Acct 4980	Todd Briggs
June 9, 2023.	\$39,000.00	Electronic Transfer	T Briggs Construction	Draw 2 Trenching Footings Plumbing Rough Driveway/Utilities Move Foundation Pad	First Priority Bank; Acct 4980	Todd Briggs
June 23, 2023	\$58,475.00	Electronic Transfer	T Briggs Construction	Draw 3 Zip Wall on Ext. Sheathing Extended Garage Interior and Exterior framing Concrete Slab Material and Labor	First Priority Bank; Acct 4980	Todd Briggs
Total:	\$221,367.50					

Complaint 16: Jamie Mehas

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
June 4, 2023	\$21,370.00	Check 3134	Oasis Pools	Pool Payment 1 of 5	First Priority Bank; Acct 1782	Todd Briggs
June 19, 2023	\$32,055.00	Check 3135	Oasis Pools	Pool check #2 framing & excavation	First Priority Bank; Acct 1782	Todd Briggs
July 6, 2023	\$32,055.00	Check 3138	Oasis Pools	Pool Payment & Gunite	First Priority Bank; Acct 1782	Todd Briggs
Total:	\$85,480.00					

Complaint 17: Sushil Hatkar

Date	Amount	Payment Type	Paid To	Memo	Destination Bank	Account Signatory
December 2, 2023	\$22,200.00	check 301	Oasis Pools	pool deposit	First Pryority Bank; Acct 1782	Todd Briggs
February 7, 2023	\$20,000.00	check 304	Oasis Pools		First Pryority Bank; Acct 1782	Todd Briggs
February 24, 2023	\$13,300.00	check 264	Oasis Pools		First Pryority Bank; Acct 1782	Todd Briggs
March 15, 2023	\$17,500.00	check 307	Oasis Pools	Oasis Pools	First Pryority Bank; Acct 1782	Todd Briggs
March 28, 2023	\$33,300.00	check 265	T Briggs Construction	Oasis Pools	First Pryority Bank; Acct 4980	Todd Briggs
June 27, 2023	\$9,500.00	check 313	Oasis Pools		First Pryority Bank; Acct 1782	Todd Briggs
June 27, 2023	\$19,980.00	check 314	Oasis Pools		First Pryority Bank; Acct 1782	Todd Briggs
Total:	\$135,780.00					