FILED IN DISTRICT COURT CREEK COUNTY SAPULPA OK

AUG 1 2 2024

	STATE OF OKLAHOMA	TIME 1:540m Amanda Vanorsdol, COURT CLERK
STATE OF OKLAHOMA,)	A COUNTY OF THE PARTY OF THE PA
Plaintiff, v.)))) Case N	-2024-180 o. CF-2024-
TODD DOUGLAS BRIGGS, W/M, DOB: NOVEMBER 197 SSN: XXX-XX-1702))))	
Defendan) it.)	

IN THE DISTRICT COURT OF CREEK COUNTY

INFORMATION

COUNTS 1-2:

EMBEZZLEMENT ~ 21 O.S. §1451(B)(3), FELONY

This crime is punishable by not more than 5 years imprisonment and a fine up to \$5,000.00

COUNTS 3-17:

EMBEZZLEMENT ~ 21 O.S. §1451(B)(4), FELONY

This crime is punishable by not more than 8 years imprisonment and a fine up to \$10,000.00

COUNT 18:

PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. §425, FELONY

This crime is punishable by not more than 2 years imprisonment or up to 1 year in county jail and/or a fine up to \$25,000

COMES NOW Gentner Drummond, the duly elected, qualified, and acting Attorney General of the State of Oklahoma, in the name and by the authority of the State of Oklahoma, and on his official oath gives information as follows:

COUNT 1:

That on or about May 12, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in CREEK COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Patricia and Rex Mann and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by Patricia and/or Rex Mann; and/or to any use or purpose not intended or authorized by Patricia and/or Rex Mann.

COUNT 2:

That on or about August 24, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Jenna and Jack Harkreader and had been entrusted to the Defendant to pay for labor and materials on a pool remodel project, to the Defendant's own use and benefit, a purpose not intended or authorized by Jenna and/or Jack Harkreader; and/or to any use or purpose not intended or authorized by Jenna and/or Jack Harkreader.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 3:

That on or about May 08, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in ROGERS COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500.00, which belonged to Carrie Garrett and had been entrusted to the Defendant to pay for labor and materials to build a detached garage, to the Defendant's own use and benefit, a purpose not intended or authorized by Carrie Garrett; and/or to any use or purpose not intended or authorized by Carrie Garrett.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 4:

That on or about April 06, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Loy Hall and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by Loy Hall; and/or to any use or purpose not intended or authorized by Loy Hall.

COUNT 5:

That on or about August 07, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Jarad and Rhonda Fisher and had been entrusted to the Defendant to pay for labor and materials to construct a new home and a pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Jarad and/or Rhonda Fisher; and/or to any use or purpose not intended or authorized by Jarad and/or Rhonda Fisher.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 6:

That on or about the September 13, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Melissa and Shea Boman and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by Melissa and/or Shea Boman; and/or to any use or purpose not intended or authorized by Melissa and/or Shea Boman.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 7:

That on or about December 2, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Sushil Hatkar and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Sushil Hatkar; and/or to any use or purpose not intended or authorized by Sushil Hatkar.

COUNT 8:

That on or about February 15, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Joshua and Nicole Miller and had been entrusted to the Defendant to pay for labor and materials to construct a new home and pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Joshua and/or Nicole Miller; and/or to any use or purpose not intended or authorized by Joshua and/or Nicole Miller.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 9:

That on or about April 24, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Christian and Jovanna Kenney- Lour and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by Christian and/or Jovanna Lour; and/or to any use or purpose not intended or authorized by Christian and/or Jovanna Lour.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 10:

That on or about May 11, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in ROGERS COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Julie and David Patrick and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by Julie and/or David Patrick; and/or to any use or purpose not intended or authorized by Julie and/or David Patrick.

COUNT 11:

That on or about May 12, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in OKMULGEE COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to MacKayla and Dylan Baggett and had been entrusted to the Defendant to pay for labor and materials to construct a new home, to the Defendant's own use and benefit, a purpose not intended or authorized by MacKayla and/or Dylan Baggett; and/or to any use or purpose not intended or authorized by MacKayla and/or Dylan Baggett.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 12:

That on or about June 04, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Jamie and Nicholas Mehas and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Jamie and/or Nicholas Mehas; and/or to any use or purpose not intended or authorized by Jamie and/or Nicholas Mehas.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 13:

That on or about June 15, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Shannon Williams and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Shannon Williams; and/or to any use or purpose not intended or authorized by Shannon Williams.

COUNT 14:

That on or about June 19, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Travis and Kelsey Krimbill and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Travis and/or Kelsey Krimbill; and/or to any use or purpose not intended or authorized by Travis and/or Kelsey Krimbill.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 15:

That on or about July 06, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Heidi and Frank Puglia and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Heidi and/or Frank Puglia; and/or to any use or purpose not intended or authorized by Heidi and/or Frank Puglia.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 16:

That on or about July 12, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba T Briggs Construction, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Siera and Michael Schwarz and had been entrusted to the Defendant to pay for labor and materials on a home renovation project, to the Defendant's own use and benefit, a purpose not intended or authorized by Michael and/or Siera Schwarz; and/or to any use or purpose not intended or authorized by Michael and/or Siera Schwarz.

COUNT 17:

That on or about July 21, 2023, the crime of **EMBEZZLEMENT** was feloniously committed in TULSA COUNTY, State of Oklahoma, by **TODD BRIGGS** dba Oasis Pools and Outdoor Living, LLC, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000.00, which belonged to Ken and Rachel Morton and had been entrusted to the Defendant to pay for labor and materials to install an inground pool, to the Defendant's own use and benefit, a purpose not intended or authorized by Ken and/or Rachel Morton; and/or to any use or purpose not intended or authorized by Ken and/or Rachel Morton.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 18:

That approximately between April 06, 2022, and July 21, 2023, the crime of PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE COUNTIES was feloniously committed in the counties of CREEK, ROGERS, OKMULGEE and TULSA, State of Oklahoma, by TODD BRIGGS d/b/a T Briggs Construction, LLC and Oasis Pools and Outdoor Living, LLC to wit:

The Defendant engaged in a pattern of Embezzlement as alleged in Counts 1 through 17, as part of the same plan, scheme, or adventure.

Said actions and practices are contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

GENTNER DRUMMOND ATTORNEY GENERAL OF OKLAHOMA

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