

IN THE CIRCUIT COURT OF TANEY COUNTY, MISSOURI  
Associate Division \_\_\_\_

STATE OF MISSOURI,	)	
	)	
Plaintiff,	)	
	)	
	)	Case No. _____
	)	OCN
vs.	)	1502199
	)	
DAWN DECKER,	)	
	)	
Defendant.	)	

State of Missouri	)
	) ss.
County of Taney	)

FELONY COMPLAINT

COMES NOW the Prosecuting Attorney of the County of Taney, State of Missouri, being duly sworn upon oath upon information and belief, and states that there is probable cause to believe that the accused committed the following crimes:

COUNT 1

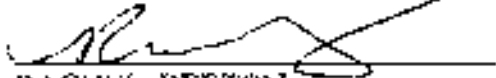
The Prosecuting Attorney of the County of Taney, State of Missouri, charges that the defendant, in violation of Section 570.030, RSMo, committed the class C felony of stealing, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between the 1<sup>st</sup> day of January, 2006 and the 31<sup>st</sup> day of December, 2006, in the County of Taney, State of Missouri, the defendant, DAWN DECKER, appropriated currency of a value of at least five hundred dollars, which said property was in the possession of the Hollister Chamber of Commerce, and defendant appropriated such property without the consent of the Hollister Chamber of Commerce and with the purpose to deprive it thereof.

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

**STATE V. DAWN DECKER**

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

**JEFFREY M. MERRELL**  
Prosecuting Attorney of the County of  
Taney, State of Missouri, by



**RACHEL BEETON**  
Assistant Prosecuting Attorney  
County of Taney, State of Missouri  
Missouri Bar #59120

PROBABLE CAUSE STATEMENT  
HOLLISTER POLICE DEPARTMENT

Date \_\_\_\_\_

I, WILLIAM CRAIG, a law enforcement officer, knowing that false statements made in this form are punishable by law, state as follows:

1. I have probable cause to believe that DAWN DECKER, DOB: 10/14/1970, SSN: [REDACTED] committed one or more criminal offenses.

2. The facts supporting this belief are as follows:

Dawn Decker served as President of the Hollister Area Chamber of Commerce until February 2007, at which time she resigned. Upon her resignation, the Board of Directors for the Chamber began a review of all financial records in order to prepare for membership billing and to handle accounts payable for the organization. Invoices were prepared for outstanding balances on memberships dues, ads for a community guide, etc., and sent to Chamber meetings and customers. After the invoices were delivered, several calls were received by the Chamber from members indicating that the invoices had already been paid. After unsuccessfully trying to locate supporting documentation in the Chamber's records, the Board of Directors requested that the members and customers provide documentation showing proof of payment.

Once this documentation was received, it came to the attention of the Board that these unrecorded payments had been deposited into a bank account that the majority (if not all) of the Board was unaware of. This account was named "Hollister Chamber of Commerce CEO Roundtable-Industrial Development." The Board's understanding is that this account had originally been set up for a one-time event that the Chamber co-produced. This account was supposed to only be used for this purpose and was not to be affiliated with the Chamber's operational funds. This account had never been notated or entered into the Hollister Area Chamber of Commerce's Quick Books accounting files (the Chamber's official records), which were maintained by Paula Decker Criss as part of her job duties.

Upon further investigation into this account, it was revealed that the majority of the checks written on it were paid to Dawn Decker. IN addition, several checks written on the account were paid to Alltel, Harter House, Travel Tunes, etc. (almost 30 separate vendors in all) with no supporting documentation for these expenditures. Mileage reimbursement checks written to Dawn Decker from this account were all for a round amount (\$100, \$120, \$300, etc.). It should be noted that mileage almost never equals an exact amount. Even if Dawn Decker were being reimbursed at \$0.40 per mile, she would be traveling over 1,500 miles in a month above normal drive expectations associated with her position based on the above amounts.

In some cases, checks were written for over the amount due in order to receive cash back (check to Harter House). A total of \$100.00 in Return Item Fees and \$325.00 in Paid Item Fees were

paid for bounced checks on this account.

Several auto debits on the "Hollister Chamber of Commerce CEO Roundtable-Industrial Development" account were paid to vendors including Century Tel, Alltel, and Carroll County Electric Cooperative. It should be noted that the Hollister Area Chamber of Commerce is located in Tancy county, and both Dawn Decker and Paula Criss live in Stone County. Also, Century Tel bills were not paid out of the operations account between the months of March and December, but were paid from the account in question in August.

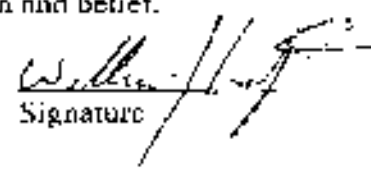
Almost 45 separate customers' (mostly Chamber members) payments for various invoices were deposited into the above account. The additional supporting documentation includes copies of several invoices and credit memos that were entered into the Quick Books file maintained by Paula Decker Criss. There was one invoice that was voided, and one that was deleted altogether. Funds from these invoices were then deposited into the account in question. None of these transactions appear on the Chamber's official balance sheet.

Upon further investigation, and with the cooperation of Metropolitan National Bank, minutes from a November 2006 quarterly meeting of the CEO Roundtable Committee surfaced that specifically state that this account was to be closed. However, the account remained open until January 30, 2007. These minutes do not state what committee members were present, who was absent, or if anyone was there at all. It should be noted that the CEO Roundtable Committee was formed and the account opened in 2005 for an event at College of the Ozarks. The event was not held the following year, and the majority (if not all) of the current Board of Directors was unaware that the committee or account existed at all. The Board members that participated in the planning of the event in 2005 were also unaware that there had been any committee meetings after the event's conclusion.

Over \$11,000 passed through the "Hollister Chamber of Commerce CEO Roundtable-Industrial Development" account while under Dawn Decker's control. A little over \$5,000 in checks were written directly to Dawn Decker from this account. A majority of the checks were signed by Dawn Decker and others were signed by Paula Decker Criss.

The above statements are true to the best of my information and belief.

WILLIAM CRAFT



Signature