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Special Prosecutor

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CLERK OF THE BOURBON COUNTY DISTRICT COURT
CASE NUMBER: BB-2022-CR-000307
PII COMPLIANT

**IN THE DISTRICT COURT OF BOURBON COUNTY, KANSAS
SITTING AT FORT SCOTT**

STATE OF KANSAS,)	
<i>Plaintiff,</i>)	
)	
vs.)	Case No.
)	
ALEXIS LEIGH METCALF)	
SERVE AT:)	
419 W 8 th Street)	
Fort Scott, KS 66701)	
<i>Defendant.</i>)	

COMPLAINT

COMES NOW the State of Kansas, by Nathan R. Coleman, Special Prosecutor, and being first duly sworn on oath, gives the court to understand and be informed as follows:

COUNT 1
THEFT

That on or between August 21, 2017, and September 1, 2021, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, knowingly, and intentionally, obtain or exert unauthorized control over property or services, to-wit: money, having a value of more than \$25,000 but less than \$100,000, with the intent to permanently deprive the owner, to-wit: Mason & Clark Law Office, LLC, a severity level 7 nonperson felony, in violation of K.S.A. 21-5801(a)(1) & (b)(2).

Penalty Range: From a minimum of 11 months to a maximum of 34 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21, 5801(b)(2), 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 2
FORGERY

That on or between August 21, 2017 and September 1, 2017, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2132, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 3
FORGERY

That on or between July 23, 2018, and August 6, 2018, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2391, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 4
FORGERY

That on or between September 1, 2018, and September 10, 2018, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2418, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 5
FORGERY

That on or about October 5, 2018, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2447, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 6
FORGERY

That on or between November 12, 2018, and November 19, 2018, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2492, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 7
FORGERY

That on or between December 3, 2018, and December 13, 2018, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2543, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 8
FORGERY

That on or between May 16, 2019, and May 17, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2680, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 9
FORGERY

That on or between June 3, 2019, and June 4, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2694, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 10
FORGERY

That on or between July 15, 2019, and July 16, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2787, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 11
FORGERY

That on or between October 7, 2019, and October 10, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2766 so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 12
FORGERY

That on or about November 8, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2844, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 13
FORGERY

That on or about December 13, 2019, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2881, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 14
FORGERY

That on or about January 10, 2020, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2912, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 15
FORGERY

That on or about February 10, 2020, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 2935, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 16
FORGERY

That on or between June 29, 2020, and June 30, 2020, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 3020, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 17
FORGERY

That on or between August 30, 2021, and September 1, 2021, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, and with intent to defraud, make, alter, or endorse a written instrument, to-wit: check no. 3348, so it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gayla Mason, of Mason & Clark Law Office, LLC, a severity level 8 nonperson felony, in violation of K.S.A. 21-5823(a)(1) & (b)(1) & (2).

Penalty Range: From a minimum of 7 months to a maximum of 23 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

COUNT 18
THEFT

That on or between July 1, 2018, and September 30, 2021, in Bourbon County, Kansas, ALEXIS LEIGH METCALF did unlawfully, feloniously, knowingly, and intentionally, obtain or exert unauthorized control over property or services, to-wit: money, having a value of more than \$1,500 but less than \$25,000, with the intent to permanently deprive the owner, to-wit: Mason & Clark Law Office, LLC, a severity level 9 nonperson felony, in violation of K.S.A. 21-5801(a)(1) & (b)(3).

Penalty Range: From a minimum of 5 months to a maximum of 17 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21, 5801(b)(3), 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.

ENDORSEMENT OF WITNESSES

Geoffrey Clark
Gayla Mason
Chris Farris, SSA, KBI
Records Custodian, Landmark National Bank
Records, Custodian, Union State Bank

/s/ Nathan R. Coleman
Nathan R. Coleman #20862
Special Prosecutor

STATE OF KANSAS, CHEROKEE COUNTY) SS:

I, Nathan R. Coleman, being first duly sworn, state that I have read the above and foregoing Complaint and know the contents thereof, and that the same is true in substance and in fact to my best information and belief:

/s/ Nathan R. Coleman

Nathan R. Coleman #20862

Special Prosecutor

Subscribed and sworn to before me on this 18th day of August, 2022, by Nathan R. Coleman.



/s/ Heather Adams

Notary Public