

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-001536
PROSECUTOR NO. :	095453832
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

KRISTIE L. COLLINS

12512 E. 58th Terrace

Kansas City, MO 64133

DOB: 02/16/1967

Race/Sex: W/F

DEFENDANT.)

COMPLAINT
SUMMONS REQUESTED

Count I. Stealing - \$750 Or More (570.030-035Y20172399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the **class D felony of stealing**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 1, 2018, in the County of Jackson, State of Missouri, the defendant appropriated U.S. Currency of the value of at least seven hundred fifty dollars, which property was owned by Raytown Quality School District, and defendant appropriated such property without the consent of Raytown Quality School District and with the purpose to deprive Raytown Quality School District thereof.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and 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.

State vs. Kristie L. Collins

The facts that form the basis for this information and belief are contained in the attached statement(s) 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 a summons be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeremy J. Baldwin

Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

1. Deborah L. Hershey, Raytown Quality School District, 6608 Raytown Road, Raytown, MO 64133
2. Hy-Vee, 4545 S. Noland, Independence, MO 64055
3. PO Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
4. LT Randy Hudspeth,
5. Allan Markley, Raytown Quality School District, 6608 Raytown Road, Raytown, MO 64133
6. Madeline McCready, Hy-Vee, 4545 S. Noland, Independence, MO 64055
7. Raytown Quality School District, 6608 Raytown Road, Raytown, MO 64133
8. Panera Bread, 18800 E. 40 Highway, Independence, MO 64055
9. Jacqui Vernon, Raytown Quality School District, 6608 Raytown Road, Raytown, MO 64133
10. Jennifer Willis, Raytown Quality School District, 6608 Raytown Road, Raytown, MO 64133

Probable Cause Statement Form

Date: 7/17/2019

Report: 19-1536

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

I have probable cause to believe that between April 1st 2018 and May 9th 2019, at 6608 Raytown Road, Raytown, Missouri 64133, Kristie L. Collins a white female born 2/16/1967, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 5/29/2019 at 1335 hours, Raytown Police Department Chief Randy Hudspeth responded to the Raytown Quality School Administrative Office located at 6608 Raytown Road, Raytown, Missouri 64133 in regard to a stealing report.

Upon arrival, Chief Hudspeth made contact with Raytown Quality School Superintendent Dr. Markley. Dr. Markley described a series of incidents in which the President of the Raytown School Board, Kristie Collins, utilized a district purchasing card to make fraudulent purchases. The school board of education employed the use of an audit to examine Kristie Collins' purchasing card usage between April 1st 2018 and March 31st 2019 following the discovery. The discovery was made by members of the Raytown Quality School District Finance Department when Kristie Collins submitted a receipt for HyVee Market Grille in Belton, Missouri. Members of the Finance Department had prior knowledge that the Belton, Missouri HyVee does not have a Market Grille.

A spiral bound printed copy of the accountant's examination, which was completed by KPM accounting firm, was provided. The spiral bound documentation contained receipts provided by Kristie Collins, which were created to disguise personal shopping as work-related lunch or dinner meetings with various individuals listed as being in attendance. An examination of the book revealed there were 44 of the 88 total listed transactions during the examined timeframe which "demonstrated improper or questionable use" of the purchasing card. Thirty-one (31) of the 44 transactions listed showed receipts submitted by cardholder Kristie Collins which were not consistent with the receipts provided by the specific vendors, which totaled \$3,329.39 USD. Additionally, 13 of the 44 transactions included receipts that did not match the credit card statements, which totaled \$1,926.70 USD.

The confirmed fraudulent purchases were conducted at the following businesses:

- HyVee – 4545 S. Noland Road, Independence, Missouri 64055
- HyVee – 9400 E. 250 Highway, Raytown, Missouri 64133
- HyVee – 1307 E. North Ave, Belton, Missouri 64012
- Panera Bread – 18800 E. US 40 Highway, Independence, Missouri 64055

- Applebee's – 9330 E. 350 Highway, Raytown, Missouri 64133
- On The Border – 19921 S. Jackson Drive, Independence, MO 64057
- Barnes & Noble – 19120 E. 39th Street, Independence, Missouri 64057
- Salvatore's – 12801 E. 40 Highway, Independence, Missouri 64055
- 54th Street Grill – 18700 E. 38th Terrace S., Independence Missouri 64057
- Casa Mexico – 19321 E. 40 Highway, Independence, Missouri 64055
- Olive Garden – 650 NW Blue Parkway, Lee's Summit, Missouri 64063

Kristie Collins attempted to conceal the fraudulent purchases by submitting cashier's checks for payments totaling \$959.43USD claiming the funds were reimbursement from the Missouri School Board Association (MSBA), which was later determined to be untruthful.

On 5/20/2019, Kristie Collins was informed of the fraud investigation at which time she turned the district purchasing card over to Dr. Markley at his request. On 5/21/2019, Kristie Collins resigned from her position as the President of the Raytown Quality School Board. In her resignation letter, Kristie Collins wrote "I have made mistakes, I'll be the first to acknowledge that, and I have tried to correct them when possible. Some I cannot correct, only apologize for and ask forgiveness."

On 6/5/2019 at 1330 hours, I responded to the Raytown Quality School Administration Office and contacted Dr. Markley. Dr. Markley explained the purchasing card process and policies. When a purchase is made, the cardholder is required to submit a receipt to Rachel Johnston, Administrative Assistant to the Raytown School Board members. The submission of receipts must also have a description with a reason for the purchase as well as additional individuals present, if applicable. The receipt is confirmed against the credit card statement and then forwarded to the Raytown School Finance Department whom is responsible for organizing the card balance payment. Purchasing cards are strictly used "to make purchase for the district or to pay for reasonable travel expenses incurred when performing job duties". Additionally, the purchasing card policy, which each school board member is required to sign advising they understand and agree to, states "under no circumstances may employees use district funds to make unauthorized or personal purchases". Using the district card to purchase items such as alcohol and gift cards is also prohibited.

Interviews were conducted with employees of the Belton HyVee, Raytown HyVee, Independence HyVee and Independence Panera Bread. At each location, inconsistencies with the receipts provided by Kristie Collins to include formatting, location information, server names, menu items and pricing were discovered.

Three (3) interviews were conducted with individuals whom were most-frequently listed as being in attendance to the lunch or dinner meetings shown listed on receipts which were provided by Kristie Collins. Each of the three (3) individuals stated they had never been in attendance to any of the lunch or dinner meetings with the other people listed on the receipts to include Kristie Collins.

Video of the fraudulent transaction conducted by Kristie Collins on 5/9/2019 at the HyVee located at 4545 S. Noland Road, Independence, Missouri 64055 was obtained. In the video, Kristie Collins can be seen purchasing the following grocery and non-grocery items: multiple 2 liters bottles of pink lemonade, multiple bags of candy, orange juice, two (2) gallons of milk, apples, garbage bags and four (4) gift cards. The purchase totaled \$318.33 USD. The video also shows Kristie Collins making the fraudulent purchase in the presence of a juvenile male.

Multiple additional vendor receipts which were not originally provided by the Raytown School District, were obtained from the Independence HyVee throughout the investigation. The value of additional fraudulent charges made with vendor receipt confirmation totaled: \$1,120.44 USD.

The value of fraudulent purchases made by Kristie Collins using the school district purchasing card with vendor verification totaled \$4,359.83 USD. The value of transactions examined without third party verification totaled \$3995.00 USD. In totality, the dollar amount examined equaled \$8,354.83 USD.

On 7/15/2019, I requested to schedule an interview through the attorney representing Kristie Collins, which was denied. Kristie Collins' attorney offered an interview to be scheduled at a later time with the assigned Prosecuting Attorney once the case has been presented to the Jackson County Prosecutor's Office.

Name: Det. E. Hopper #1680

Signature: Det. E. Hopper #1680