



STATEMENT OF PROBABLE CAUSE

STATE OF MISSOURI  
 COUNTY OF Jasper

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Date: 11/14/2023

I, Lieutenant Trevor Hole, 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 the dates of 1/1/2020-09/30/2022 at 2000 Richard Webster Drive , City of Carthage, County of Jasper, State of Missouri, Mark Peterson a white male, committed one or more criminal offense(s) of : Stealing (RSMO 570.010), Stealing (RSMO 570.010), Stealing (RSMO 570.010) and Money Laundering (RSMO 574.105)

Name: Mark D. Peterson

Arrested: NOT IN CUSTODY, ;

- The facts supporting this belief are as follows:

On 12/20/2022 the Carthage Police Department was contacted in reference to a possible theft of fuel at the Carthage Parks Department. During the course of the initial investigation, it was determined that there were also issues with the financials of the Parks Department. After several interviews with Parks Department and City of Carthage golf course employees, it was determined that a large amount of currency missing from the City of Carthage bank account that should have been deposited from the golf course.

A subsequent investigation occurred, and during that investigation, Mark Peterson had been identified as the suspect for the theft of city funds. During this investigation, an investigative subpoena was sent to multiple banks for the financial information of Peterson. It was later discovered that Peterson had multiple different accounts of "Mark Peterson DBA Petes Pro Shop". After speaking with several employees at the Carthage Golf Course it was discovered that Mark Peterson was the only person that handled large amounts of cash used for payments, tournament checks, and the daily cash deposits (until near the end of 2022). Peterson was also responsible for providing the City of Carthage with spreadsheets, transaction reports, and revenue reports.

An accounting firm, BerganKDV, was contacted in reference to a forensic audit of the city accounts and subpoena information that had been obtained for Mark Peterson. BerganKDV later sent a Summary Report for their findings. Through the course of the forensic audit it was determined that there had been multiple areas throughout the city bank accounts, related to the Carthage Golf Course, that had funds missing. There were discrepancies between cash sales/checks deposited, tournament

checks deposited, and gift card purchases/transactions. The amount missing from the city bank account that was the largest was for golf tournaments paid during the years of 2020-2022. The city did not have \$90,844.00 dollars deposited into the expected city account. The bank accounts belonging to Mark Peterson during the same time period had \$91,896.73 additional dollars deposited into them with no explanation as to why there was such a large increase in his personal accounts (receipts, payroll changes, etc.).

The amount of missing funds from the city bank account that was reported by the point of sale software as gift cards was \$14,225.67 dollars during the project period of 2020-2022.

The amount of missing funds from the city bank account that was reported by the point of sale software as cash sales for day to day golf services at the Carthage Golf Course was \$37,392.82 dollars.

The point of sale software, transaction documentation, gift cards, credit/debit sales, and cash/check sales were all examined for the time period of 2020-2022. The total amount of money that was not deposited into City of Carthage bank accounts relating to the Carthage Golf Course was \$142,462.49.

A review of Peterson's personal bank accounts and "Mark Peterson DBA Petes Pro Shop" accounts showed large deposits, frequent transfers between the accounts, and several large purchases of cryptocurrency that correlated to the missing funds from the City of Carthage during the same time frame that was reviewed by BerganKDV.

3. **MISDEMEANORS AND FELONIES:** (If seeking a warrant) I am requesting issuance of an arrest warrant based on the following:

I believe that the defendant will not appear in court in response to a criminal summons because: Peterson took over \$142,000 dollars that should have been deposited into the City of Carthage bank accounts, and did not provide any type of documentation, ledgers, or transaction records in an attempt to dispute any of the above mentioned information. Peterson, nor his counsel representation have been in contact with law enforcement, after several attempts to follow up for further cooperation or information.

I believe that the defendant poses a danger to  a crime victim /  the community or to any other person because:

Print Name: Trevor Hole

Signature:



Agency Name: Carthage Police Department

Agency Case Number: 22-5427

OCN:

IN THE CIRCUIT COURT OF JASPER COUNTY, MISSOURI  
ASSOCIATE DIVISION, AT JOPLIN

STATE OF MISSOURI )

Plaintiff, )

v. )

MARK D. PETERSON )  
2121 Laura Street )  
Carthage, MO 64836 )

Defendant. )

Case No.  
OCN:  
PA File #: 096599

AGENCY: Carthage Police Department  
CHARGE CODE: 574.105-001Y19922699.  
574.105-001Y19922699.  
570.030-034Y20172399.  
570.030-034Y20172399.  
570.030-035Y20172399.

COMPLAINT

State of Missouri )  
) ss  
County of Jasper )

Count I

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 574.105, RSMo, committed the class B felony of money laundering, punishable upon conviction under Sections 558.002, 558.011, and 574.105, RSMo, in that on or between January 1, 2020, and February 28, 2023, in the County of Jasper, State of Missouri, the defendant conducted a currency transaction with the purpose to conceal and disguise ownership and control of the proceeds of felony criminal activity, by moving stolen funds among five business accounts and into untraceable cryptocurrency accounts.

Count II

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 574.105, RSMo, committed the class B felony of money laundering, punishable upon conviction under Sections 558.002, 558.011, and 574.105, RSMo, in that on or between January 1, 2020 and February 28, 2023, in the County of Jasper, State of Missouri, the defendant conducted a currency transaction with the purpose to aid the carrying on of felony criminal activity, namely stealing as charged in counts III, IV, and V, by depositing stolen funds into personal accounts.

Count III

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class C Felony of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between January 1, 2020, and February 28, 2023, in the County of Jasper, State of Missouri, the defendant appropriated money, the value of which is twenty-five thousand dollars or more, by receiving cash payments for golf course services on behalf of the City of Carthage and converting the funds to personal use.

Count IV

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class C Felony of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between January 1, 2020, and February 28, 2023, in the County of Jasper, State of Missouri, the defendant appropriated money, the value of which is twenty-five thousand dollars or more, by receiving golf tournament fees on behalf of the City of Carthage and converting the funds to personal use.

Count V

The Prosecuting Attorney of the County of Jasper, 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 between January 1, 2020 through February 28, 2023, in the County of Jasper, State of Missouri, the defendant appropriated money of a value of at least seven hundred fifty dollars, by taking customers' money paid to the City of Carthage in exchange for gift cards that the City was obliged to honor with services from the Carthage Municipal Golf Course.

The facts that form the basis for this information and belief are contained in the attached statement 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 an arrest warrant be issued as provided by law.

Theresa Kenney  
Prosecuting Attorney of the  
County of Jasper, State of Missouri, by



Office of Prosecuting Attorney