

IN THE CIRCUIT COURT OF HARRISON COUNTY, MISSOURI

STATE OF MISSOURI,
Plaintiff,

vs.

LEEANN MILES

Case No.

ant.

FILED

10/16/2026

SHERECE EIVINS
CLERK, CIRCUIT COURT
HARRISON COUNTY

COMPLAINT AND REQUEST FOR A WARRANT

Comes now, the Special Prosecuting Attorney of the County of Harrison, State of Missouri, being duly sworn upon oath and upon information and belief, and states that there is probable cause to believe that on or between December 1, 2019, through June 30th, 2026, the accused committed the following crimes:

**COUNT I: FINANCIAL EXPLOITATION OF THE ELDERLY
CLASS A FELONY**

Charge Code: 570.145-001Y20202602.0

The Special Prosecuting Attorney of the County of Harrison, State of Missouri, charges that the defendant, in violation of Section 570.145, RSMo, committed the class A felony of financial exploitation of the elderly, punishable upon conviction under Sections 558.002, RSMo, in that on or between December 1, 2019, through June 30th, 2026, in the County of Harrison, State of Missouri, the defendant knowingly obtained control over the property of Confidential Victim, who is over 60 years of age, with the intent to deprive Confidential Victim of the possession of her property, namely funds in excess of \$75,000, and defendant did so using deceit, by writing checks and transferring funds directly to defendant's checking account.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**COUNT II: STEALING - 25,000 OR MORE
CLASS C FELONY**

Charge Code: 570.030-034Y20232399.0

The Special Prosecuting Attorney of the County of Harrison, State of Missouri, charges that the defendant, in violation of Section 570.030, RSMo, committed the class C of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between December 1, 2019, through June 30th, 2026, in the County of Harrison, State of Missouri, the defendant, with the intent to deprive the defendant thereof, appropriated funds by writing checks to herself, and the value of the funds taken was in excess of \$25,000.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine.

The facts that form the basis for this information and belief are contained in the attached statement of facts 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.

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

/s/Andrea B Gibson

Annie Gibson, #56523

102 N Main

Gallatin, MO 64640

660-663-3300 ext 6

660-663-3374 facsimile

annie.gibson@prosecutors.mo.gov

Witnesses:

Corporal C. Wright, DDCC – MSHP

Confidential Victim

Custodian of Records – BTC Bank