

ORIGINAL

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FIFTH JUDICIAL DISTRICT COURT
BEAVERHEAD COUNTY
FILED

MAY 01 2018

CARYN JAY ANDERSON, CLERK
BY *[Signature]*

MONTANA FIFTH JUDICIAL DISTRICT COURT, BEAVERHEAD COUNTY

THE STATE OF MONTANA) Case No.: DC-18-3829
Plaintiff,)
-vs-) **MOTION AND AFFIDAVIT**
) **FOR LEAVE TO FILE**
) **INFORMATION**

Alesia Lappe
a/k/a Lisa Lappe,
Defendant.

STATE OF MONTANA)
)
COUNTY OF BEAVERHEAD)
)
:SS.

JED C. FITCH, deposes and says that he is the duly elected and qualified County Attorney for Beaverhead County, Montana, and hereby moves the Court for leave to file an Information direct in the above-entitled Court charging the Defendant, **Alesia Lappe a/k/a Lisa Lappe**, with the offense of:

- **Count I: Theft By Embezzlement, By Common Scheme, a felony committed in violation of Section 45-6-301 (7)(a) and 45-2-101, MCA.**

The following facts were developed by investigating officers, and the affiant has no reason to believe these facts are not true, and believes them to be true. In the affiant's opinion, these facts constitute sufficient probable cause to justify the filing of the charges.

On February 14, 2018, Chief of Police Don Guiberson met with Montana High School Rodeo Association (MHSRA) board members in regards to accounting discrepancies in which a large amount of funds were missing from MHSRA accounts.

1 Chief Guiberson met with MHSRA President Lane Yeager, State Secretary Laurie Harrell, Past
2 National Director Todd Garrison, and board member Travis Sigman. Lane Yeager was accompanied by
3 Pcte Howard.

4 The group informed Chief Guiberson they had located missing funds on MHSRA accounts from
5 Wells Fargo and Stockman Bank, relating to the work of Lisa Lappe, a former contracted Secretary.

6 The group stated that Alesia "Lisa" Lappe was contracted by the board in March of 2015 and
7 would assist at the Jr. High State Finals in the first part of June as co-secretary along with Harrell. She
8 was assigned MHSRA checkbooks, and transferred the accounts to Stockman Bank in Dillon, for her
9 convenience. When this transfer occurred, she simultaneously lifted the double signature requirement
10 from the account.

11 Prior to the discovery of the financial irregularities, Lisa Lappe was alleged, by the Board, to
12 have been illegally recording phone calls and she was dismissed by the Board in December of 2017.

13 The MHSRA Board uncovered a series of questionable financial transactions done by Lisa Lappe,
14 including overpaying herself and purchasing/paying for things not approved by the Board.

15 Chief Guiberson was given copies of several MHSRA cancelled checks, bank statements, and
16 account activity reports.

17 Chief Guiberson also obtained a copy of minutes from the MHSRA board meeting on March 28,
18 2015, in Helena, Montana, which was called to order at 6:09 PM. The attendees were Kelly Orahood,
19 Dewayne Ozark, Laramie Baumann, Mike Williams, Mark Salmond, Lane Yeager, Brad Yerian, Brent
20 Powell, Jay Wagner, Kieran Patten, Darby Yeager, Shelby Rasmussem, Dave Harrell, Todd Garrison,
21 Gary Lesofski, Laurie Harrell, and Heidi Picchietti.

22 A Motion was made to retain Laurie Harrell as co-secretary and the Motion passed. A separate
23 Motion was made to hire Lisa Lappe as co-secretary, at a wage of \$15,000 as an independent contractor.
24 The Motion carried.

1 Chief Guiberson obtained 1099c tax forms for Alesia M. Lappe (Lisa Lappe) for 2015 which had
2 non-employee compensation of \$8,750 and a 2016 1099c tax form paying Aleisa M. Lappe \$15,000 for
3 non-employee compensation.

4 Several checks were written to Lisa Lappe from MHSRA accounts starting in July 2016 and
5 signed by "Alesia Lappe." The wages were contracted to total \$15,000 per year. Checks written in the
6 amount of \$1250 continually reappear throughout Lappe's employment.

7 The following chart lists the checks made payable to Lisa Lappe, signed "Alesia Lappe" for
8 wages from July 2016 to June, 2017.

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<u>DATE</u>	<u>TO:</u>	<u>AMOUNT \$</u>	<u>MEMO:</u>
July 15, 2016	Lisa Lappe	\$750	Wages August
July 20, 2016	Lisa Lappe	\$500	August Wages
July 25, 2016	Lisa Lappe	\$500	Wages
August 23, 2016	Lisa Lappe	\$1250	Sept. Wages
August 10, 2016	Lisa Lappe	\$750	
September 26, 2016	Lisa Lappe	\$1250	
November, 24, 2016	Lisa Lappe	\$1250	
November 8, 2016	Lisa Lappe	\$1250	
January 2, 2017	Lisa Lappe	\$1250	
January 12, 2017	Lisa Lappe	\$2400	
March 4, 2017	Lisa Lappe	\$2500	
April 13, 2017	Lisa Lappe	\$1250	
May 2, 2017	Lisa Lappe	\$1250	
May 16, 2017	Lisa Lappe	\$1250	
June 13, 2017	Lisa Lappe	\$1250	

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June 27, 2017	Lisa Lappe		
TOTAL		\$18,650	

The following debits were made by Lappe without MHSRA Board knowledge or approval between the dates of October 28, 2015, and June 9, 2017. Please see the following chart of those debits:

Date	To:	Amount	Memo
October 28, 2015	Lisa Lappe	\$ 104.71	no memo
May 25, 2016	Dell Calf-A	\$ 22.64	Lunch bought
June 3, 2016	Safeway Fuel	\$ 51.67	no memo
June 3, 2015	Sam's Club	\$ 161.16	no memo
June 8, 2016	Cenex	\$ 181.65	Fuel
August 22, 2016	Yogo Inn	\$ 61.08	Meeting Lewistown
January 13, 2017	Bar S Supper Club	\$ 40.40	Great Falls Meeting
January 14, 2017	Great American grill	\$ 26.90	BOD Great Falls
January 14, 2017	Hilton Garden Inn	\$ 198.88	State Secretary Room
January 15, 2017	Town Pump	\$ 48.24	Great Falls Meeting
May 26, 2017	Cenex	\$ 55.60	JH Finals
May 28, 2017	Fish Tale Townsend	\$ 97.02	Dinner bought JH state
May 30, 2017	Cenex	\$ 68.66	return from JH State
June 9, 2017	Town Pump	\$ 76.61	Fuel
June 9, 2017	Corner Café	\$ 105.50	dinner office
TOTAL		\$ 1,300.72	

Chief Guiberson reviewed checks provided by Harrell as well as documentation provided in Investigative Subpoenas from Stockman Bank High School Money Market Account and the Bank of Commerce.

Chief Guiberson observed Check #0801, dated January 16, 2017, written to the Bank of Commerce for \$10,600 on an MHSRA Stockman bank check. The heading of the check was MHSRA and then written by hand was "/ Alesia Lappe Rodeo Secretary". In the memo section is the number

1 4013910730 and it is signed Alesia Lappe. There is a payment ticket from that account on January 23,
2 2017, that reads "Thomas Lappe" for loan account number 4013910730. The branch initialed is 13/CDT
3 transaction code is written as 10.

4 MHRSA money market check #0802 was dated December 18, 2015, and written to Bank of
5 Commerce in the amount of \$6,000 signed Alesia Lappe for account number 4013910281. The check
6 number is dated prior to the check #0801, written over a year earlier.

7 Those checks appear to be written from MHSRA funds, to directly pay the personal loan of
8 Thomas and Lisa Lappe. It should be known that separately, MHSRA records indicate that Lisa Lappe
9 had already overpaid herself, above and beyond, her contract salary of \$15,000 per year.

10 Harrell informed Chief Guiberson she never saw a money market account checkbook. Board
11 members provided statements indicating the MHSRA Board had never signed any agreement allowing
12 Lappe to pay herself for travel costs or other payments of any kind.

13 On March 3, 2018, Chief Guiberson received an email from Harrell concerning a \$3,500 check
14 provided to Lappe from Pepsi. The check was intended to purchase coats for the MHSRA athletes who
15 had qualified for the National High School Rodeo Finals and would be representing Montana. Pepsi sent
16 the check July 14, 2017, and the check was never deposited into MHSRA accounts.

17 Chief Guiberson looked up the wage payments to Lisa Lappe from June 2015 to June 2016 and
18 found overpayment to be \$500. From July 2016 to the end of June 2017 the over payment of wages was
19 \$4,900. From July 2017, to November 2017 the overpayment of wages was \$3,250.

20 On April 18, 2018, Chief Guiberson conducted a recorded interview with Lisa Lappe after
21 reading her rights per Miranda to which she agreed by signing the form. Ryan McCarty, Lappe's retained
22 defense counsel, was also present.

23 Lappe informed Chief Guiberson she began working for MHSRA in June, 2015. The first check
24 she wrote was to the Bank of Commerce to pay off a personal loan she had in excess of \$6,000. Lappe
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1 stated her truck needed a new engine. Dietrich's College Exxon put the engine in the vehicle. Lappe
2 stated they received a loan and then used money from MHSRA money market account to pay off the loan.

3 Lappe stated in the fall of 2016 they sold their house and she paid off the truck she had at that
4 time from the sale. Lappe stated they bought a horse trailer in 2016 with a loan. Lappe stated she
5 panicked and wrote a check out of the MHSRA money market account at Stockman Bank in the amount
6 of \$10,600 to pay the loan off. Lappe stated her initial intent was to pay back the MHSRA from the tax
7 return she would receive but that did not happen.

8 Lappe informed Chief Guiberson there were times when she was short on money so she would
9 over pay herself to buy things for herself or her kids because she has a difficult time saying no to her kids.

10 The MHSRA Board had provided numerous other checks and questionable transactions to Chief
11 Guiberson. During the interview with Lappe, Chief Guiberson inquired about checks issued to a "Lisa
12 Milliron." Lappe stated those were checks she had written to herself.

13 The MHSRA board also informed Guiberson of money in the amount of \$2,500 for MHSRA
14 student campaign funds and travel expenses for those students running for office. Lappe could not explain
15 the \$2,500 check when first confronted and then stated she used the \$2,500 to hide monies she had
16 previously taken.

17 The MHSRA Board provided a copy of a check in the amount of \$3,000 issued to Lisa Lappe,
18 with Lappe's signature. In the memo line is "Bonus." Chief Guiberson asked Lappe about this check and
19 Lappe could not explain.
20

21 Lappe informed Chief Guiberson she had purchased a canopy for her truck in the amount of \$195
22 and put it under "Todd Garrison."
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24 Upon reviewing all documents received through the MHSRA and Investigative Subpoenas
25 through the Bank of Commerce and Stockman Bank accounts, it appears the total amount of money
26 unlawfully taken by Lappe from MHSRA is at least \$38,614.91. This amount is what can actually be
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1 tracked through deposits and withdrawals. This amount does not include any cash that Lappe may have
2 had access to.

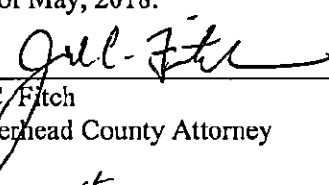
- 3 • Total wages by overpayment was \$8,650
- 4 • Trailer loan payoff from money market account was \$10,600
- 5 • Truck engine loan payoff amount from money market account was \$6,000.
- 6 • Check written to Lisa Lappe, signed by Lisa Lappe issued as "Bonus" in memo line \$3,000
- 7 • Checks written to Lisa Milliron to fraudulently obtain money: \$1,000
- 8 • Check for scholarships not forwarded \$2,500
- 9 • Check from Pepsi Company not deposited to MHSRA \$3,500
- 10 • Debits for fuel, travel, meals, and checks labeled reimbursements from June 2015 to November
11 2017 : \$3,364.91

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13 **TOTAL: 38,614.91**

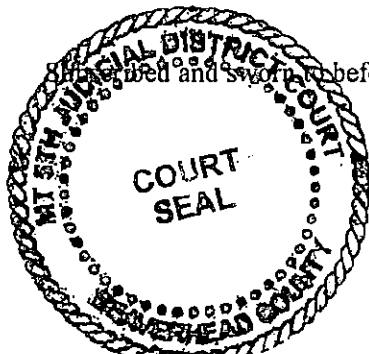
14 **WHEREFORE**, based on the foregoing facts and those contained in the officer's statement and
15 by this reference incorporated herein, your affiant prays that this Court issue an Order Granting Leave to
16 file an Information charging the Defendant, **Alesia Lappe a/k/a Lisa Lappe**, with the offense of:

- 17 • **Count I: Theft By Embezzlement, By Common Scheme, a felony committed in violation of**
18 **Section 45-6-301 (7)(a) and 45-2-101, MCA.**

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20 Respectfully submitted this 1st day of May, 2018.

21 
22 _____
23 Jed C. Fitch
24 Beaverhead County Attorney

25 Subscribed and sworn to before me this 1st day of May, 2018, by Jed C. Fitch.



Carly Jay Anderson
Clerk of District Court

By: 