

STATE OF MISSOURI		
VS		
Greitens, Eric		
DIV #:	CA#: 510704037	CAUSE#:
DESTINATION:		
DEFENDANT INFORMATION		
ADDRESS: 7733 Forsyth Blvd, # 1900, Clayton, MO 63105		
PEDIGREE:	RACE: W	DOB: 04/10/1974
	SEX: M	AGE: 44
		HGT: 5'09"
		WGT: 200
ID #s:	COMPLAINT#:	LID:
ARREST#:	DIST:	OCN:
ALIASES:		
SSNs:		

STATE OF MISSOURI)
CITY OF ST. LOUIS)^{ss}

COMPLAINT

The Circuit Attorney of the City of St. Louis, State of Missouri, upon information and belief, charges that

Count 1: Tampering With Computer Data To Defraud Or Obtain Property (value \$500 Or More)
(Class D FELONY) RSMo 569.095 ON 4/22/2015 Time: **Place:** City of St. Louis, MO
(SCC 569.095-001Y200229)

The defendant, in violation of Section 569.095, RSMo, committed the class D felony of tampering with computer data, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about April 22, 2015, in the City of St. Louis, State of Missouri, the defendant, acting with others, knowingly and without authorization for the purpose of devising or executing a scheme or artifice to defraud or obtain property of a value of five hundred dollars or more disclosed data, specifically a donor list owned by Mission Continues residing and existing internal to a computer utilized by K.T. for the Greitens Group or Greitens for Missouri.

Or, in the alternative to Count 1:

Count 2: Tampering With Computer Data To Defraud Or Obtain Property (value \$500 Or More)
(Class D FELONY) RSMo 569.095 ON 4/22/2015 Time: **Place:** City of St. Louis, MO
(SCC 569.095-001Y200229)

The defendant, in violation of Section 569.095, RSMo, committed the class D felony of tampering with computer data, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about April 22, 2015, in the City of St. Louis, State of Missouri, the defendant, acting with others, knowingly and without authorization for the purpose of devising or executing a scheme or artifice

to defraud or obtain property of a value of five hundred dollars or more disclosed data, specifically a donor list owned by Mission Continues, which the defendant knew and believed was taken by a person who did not have authorization to do so.

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 Circuit Attorney prays that an arrest warrant be issued as provided by law.

Kimberly M. Gardner
Circuit Attorney of the City of St. Louis,
State of Missouri
By: /s/ Christopher W. Hinckley #50572
Assistant Circuit Attorney

PROBABLE CAUSE STATEMENT

DATE: April 20, 2018

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

1. I have probable cause to believe that Eric Greitens, a WHITE MALE DOB: 4/XX/74 Age: 44, committed one or more criminal offense(s).

Count 1 Tampering With Computer Data To Defraud Or Obtain Property (value \$500 Or More) (Class D Felony) RSMO 569.095

ON 4/22/2015 Time: PLACE: City of St. Louis, MO (SCC 569.095-001Y200229)

Or, in the alternative to Count 1:

Count 2 Tampering With Computer Data To Defraud Or Obtain Property (value \$500 Or More) (Class D Felony) RSMO 569.095

ON 4/22/2015 Time: PLACE: City of St. Louis, MO (SCC 569.095-001Y200229)

2. The facts supporting this belief are as follows:

I learned through an investigation that the defendant, acting with others, took and used data specifically owned by the Mission Continues for the purpose of soliciting funds for his political campaign.

At the direction of the defendant, on April 22, 2015, K.T. disclosed data, specifically a donor list owned by The Mission Continues, to a political fundraiser (the "Fundraiser") working on behalf of Greitens for Missouri. The defendant directed this disclosure. The President of The Mission Continues explained neither the defendant nor K.T. had permission from The Mission Continues to disclose the donor list to the Fundraiser or to use the donor list for political purposes. The Mission Continues employee handbook and the non-disclosure agreements prohibited the disclosure of the donor list and the retention of it by anyone not employed by and working on behalf of The Mission Continues. The Mission Continues conflict of interest agreement signed by board members prohibited the personal use of The Mission Continues assets, including the donor list.

The defendant and K.T. knew that the donor list disclosed on April 22, 2015, was taken without the permission of The Mission Continues. The defendant was aware that K.T. retained or used the list without the permission or consent of The Mission Continues and the defendant directed K.T. to send the donor list in an April 22, 2015 email to the Fundraiser.

At the time of the April 22, 2015 disclosure of the donor list, the donor list resided and existed internal to a computer or computer system used by K.T. for the purpose of conducting business on behalf of The Greitens Group and/or Greitens for Missouri, as well as a computer or computer system belonging to the Mission Continues. The defendant and K.T. disclosed the donor list to the Fundraiser for the purpose of obtaining property of five hundred dollars or more.