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**Attorneys for the State of Utah**

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IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR  
SALT LAKE COUNTY, STATE OF UTAH

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THE STATE OF UTAH,	:	<b>CRIMINAL INFORMATION</b>
Plaintiff,	:	
vs.	:	
<b>DENTON DUNN AND,</b>	:	Case No. _____
DOB: June 28, 1941	:	
<b>BARBARA DUNN,</b>	:	Case No. _____
DOB: June 12, 1951	:	
Defendants.	:	Judge _____

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The undersigned, upon oath, states on information and belief that the defendants have committed the following crimes:

**DENTON DUNN and BARBARA DUNN**

**THEFT  
a second degree felony, 4 counts**

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**COMMUNICATIONS FRAUD**  
**a second degree felony, 5 count**

**PATTERN OF UNLAWFUL ACTIVITY**  
**a second degree felony, 1 count**

**COUNT 1**  
**COMMUNICATIONS FRAUD**  
**a second degree felony**  
**(Parrish)**

Commencing on or about May 2012, in the State of Utah, the defendants devised a scheme or artifice to defraud **Stan and Blake Parrish**, or to obtain from them money, property, or anything of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and they communicated directly or indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice, and the total value of the property, money, or thing obtained or sought to be obtained by the scheme or artifice was more than \$5,000.00 in violation of Utah Code Ann. §76-10-1801. This violation is a second degree felony under Utah law.

**COUNT 2**  
**COMMUNICATIONS FRAUD**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 1, 2014, in the State of Utah, the defendants devised a scheme or artifice to defraud **Brad Hall and Associates**, or to obtain from them money, property, or anything of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and they communicated directly or

indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice, and the total value of the property, money, or thing obtained or sought to be obtained by the scheme or artifice was more than \$5,000.00 in violation of Utah Code Ann. §76-10-1801. This violation is a second degree felony under Utah law.

**COUNT 3**  
**THEFT**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 1, 2014, in the State of Utah, the defendants, obtained or exercised unauthorized control over the property of **Brad Hall and Associates** with a purpose to deprive them thereof, and the value of the property or services is or exceeds \$5,000 in violation of Utah Code Ann. §§76-6-404 and 76-6-412. This violation is a second degree felony under Utah law.

**COUNT 4**  
**COMMUNICATIONS FRAUD**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 3, 2014, in the State of Utah, the defendants devised a scheme or artifice to defraud **Brad Hall and Associates**, or to obtain from them money, property, or anything of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and they communicated directly or indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice, and the total value of the property, money, or thing obtained or

sought to be obtained by the scheme or artifice was more than \$5,000.00 in violation of Utah Code Ann. §76-10-1801. This violation is a second degree felony under Utah law.

**COUNT 5**  
**THEFT**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 3, 2014, in the State of Utah, the defendants, obtained or exercised unauthorized control over the property of **Brad Hall and Associates** with a purpose to deprive them thereof and the value of the property or services is or exceeds \$5,000 in violation of Utah Code Ann. §§76-6-404 and 76-6-412. This violation is a second degree felony under Utah law.

**COUNT 6**  
**COMMUNICATIONS FRAUD**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 4, 2014, in the State of Utah, the defendants devised a scheme or artifice to defraud **Brad Hall and Associates**, or to obtain from them money, property, or anything of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and he communicated directly or indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice, and the total value of the property, money, or thing obtained or sought to be obtained by the scheme or artifice was more than \$5,000.00 in violation of Utah Code Ann. §76-10-1801. This violation is a second degree felony under Utah law.

**COUNT 7**  
**THEFT**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 4, 2014, in the State of Utah, the defendant, obtained or exercised unauthorized control over the property of **Brad Hall and Associates** with a purpose to deprive them thereof, and the value of the property or services is or exceeds \$5,000 in violation of Utah Code Ann. §§76-6-404 and 76-6-412. This violation is a second degree felony under Utah law.

**COUNT 8**  
**COMMUNICATIONS FRAUD**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 5, 2014, in the State of Utah, the defendants devised a scheme or artifice to defraud **Brad Hall and Associates**, or to obtain from them money, property, or anything of value by means of false or fraudulent pretenses, representations, promises, or material omissions, and they communicated directly or indirectly with any person by any means for the purpose of executing or concealing the scheme or artifice, and the total value of the property, money, or thing obtained or sought to be obtained by the scheme or artifice was more than \$5,000.00 in violation of Utah Code Ann. §76-10-1801. This violation is a second degree felony under Utah law.

**COUNT 9**  
**THEFT**  
**a second degree felony**  
**(Brad Hall)**

Commencing on or about March 5, 2014, in the State of Utah, the defendants, obtained or exercised unauthorized control over the property of **Brad Hall and Associates** with a purpose to deprive them thereof, and the value of the property or services is or exceeds \$5,000 in violation of Utah Code Ann. §§76-6-404 and 76-6-412. This violation is a second degree felony under Utah law.

**COUNT 10**  
**PATTERN OF UNLAWFUL ACTIVITY**  
**a second degree felony**

Commencing in or about May 2012 through March 2014, the defendants have engaged in conduct which constituted the commission of at least three episodes of unlawful activity as defined in Utah Code Ann. §76-10-1601. The defendants: (1) received any proceeds derived, directly or indirectly, from a pattern of unlawful activity in which they participated as a principal, to use or invest, directly or indirectly, any part of that income, or the proceeds of the income, or the proceeds derived from the investment or use of those proceeds, in the acquisition of any interest in, or the establishment or operation of, any enterprise; (2) through a pattern of unlawful activity, acquired or maintained, directly or indirectly, any interest in or control of any enterprise; or (3) were employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of that enterprise's affairs through a pattern of

unlawful activity. The alleged unlawful acts which constitute the pattern of unlawful activity include, but are not limited to: (1) the acts as described above in Counts 1 through 9. These acts include three or more acts of unlawful activity as defined by Utah Code Ann. §76-10-1601, §76-10-1602(4), and §76-10-1603.5, et. seq. This violation is a second degree felony under Utah law.

### **BAIL REQUEST**


The State is requesting bail in the amount of \$50,000 for each Defendant. The Dunns engaged in a clear pattern to defraud. They misrepresented the financial condition of Dunn Oil to Stan and Blake Parrish. This pushed the Parrish's to make a large financial contribution to a company that was struggling financially. They also deliberately ran up a large bill with Brad Hall and Associates, disregarding payment requirements put in place by Brad Hall because Dunn Oil already was indebted to Brad Hall for a substantial sum. They did this with the full knowledge they were going to declare bankruptcy and leave Brad Hall without recourse once their malfeasance was discovered. Their financial fraud cost Brad Hall in excess of \$100,000. The couple no longer lives in Utah, having moved to Texas before their bankruptcy was instituted. With no existing Utah ties the State wants to ensure the continued presence of each defendant in Court as the case proceeds. A bail in the amount of \$50,000 will accomplish this purpose.

EXECUTED on this 23<sup>rd</sup> day of July, 2015.

  
Agent CHRISTOPHER WALDEN, Affiant

AUTHORIZED for presentment and filing this 23<sup>rd</sup> day of July, 2015.

SEAN REYES  
Utah Attorney General

By:   
BRIAN WILLIAMS  
Assistant Attorney General