IN THE DISTRICT COURT OF ROGERS COUNTY
STATE OF OKLAHOMA

JANICE STEIDLEY, an individual;
DAVID ISKI, an individual; and
M. BRYCE LAIR, an individual

Plaintiffs,

v.

JOHN SINGER, an individual;
SCOTT WALTON, an individual;
STEVE COX, an individual;
RUSSELL GUILFOYLE, an individual;
BILLY D. JONES, an individual;
MYRON GRUBOWSKI, an individual; and
JOHN DOE NOS. 1-25, individuals,

Defendants.

Case No. CJ-2013-485

JURY TRIAL DEMANDED

PETITION

Plaintiffs, Janice Steidley, David Iski, and M. Bryce Lair, for their claims against Defendants, John Singer, Scott Walton, Steve Cox, Russell Guilfoyle, Billy D. Jones, Myron Grubowski, and John Doe Nos. 1-25, allege and state as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Janice Steidley is an individual resident of Rogers County, Oklahoma. Ms. Steidley is the duly-elected District Attorney for the Twelfth Judicial District. District Attorney Steidley has been a member of the bar of the State of Oklahoma since 1999.

2. Plaintiff David Iski is an individual resident of Tulsa County, Oklahoma. Mr. Iski is an Assistant District Attorney for the Twelfth Judicial District. Assistant District Attorney Iski has been a member of the bar of the State of Oklahoma since 1988.

3. Plaintiff M. Bryce Lair is an individual resident of Craig County, Oklahoma. Mr. Lair is the First Assistant District Attorney for the Twelfth Judicial District. Assistant District Attorney Lair has been a member of the bar of Oklahoma since 2000.

4. Plaintiffs are dedicated public servants, and have reputations for integrity, truthfulness, and assuring the fair administration of justice within the Twelfth Judicial District of the State of Oklahoma.

5. Defendant John Singer, an individual, is an investigator with the Claremore Police Department. Mr. Singer resides in Rogers County, Oklahoma.

6. Defendant Scott Walton, an individual, is the Sheriff of Rogers County, Oklahoma. Sheriff Walton resides in Rogers County, Oklahoma.

7. Defendant Steve Cox is an individual resident of Rogers County, Oklahoma.

8. Defendant Russell Guilfoyle is an individual resident of Rogers County, Oklahoma.

9. Defendant Billy D. Jones is an individual resident of Rogers County, Oklahoma.

10. Defendant Myron Grubowski is an individual resident of Rogers County, Oklahoma.

11. John Doe Nos. 1-25 are residents of Rogers County who created, drafted, circulated, or otherwise republished the defamatory publications concerning Plaintiffs as alleged herein. As discovery reveals the identities of the John Does referred to herein, they **shall be added** as named defendants.

12. The egregious acts and omissions of Defendants, as more particularly described hereafter, occurred in Rogers County, Oklahoma.

13. This Court has jurisdiction over the Defendants, and venue is proper in this Court.

BACKGROUND ALLEGATIONS

14. On August 26, 2013 the Defendants Singer, Walton, Cox, Guilfoyle, Jones and Grubowski signed and filed with the District Court Clerk a "Petition for Grand Jury Investigation." *See In re: A Petition to Impanel Grand Jury*, Rogers County Case No. GJ-13-1 (the "Grand Jury Case"). The Petition is attached as Exhibit A, and is hereafter referred to as the "Grand Jury Petition."

15. Defendants Singer, Walton, Cox, Guilfoyle, Jones and Grubowski each also verified under oath that the facts alleged in the Grand Jury Petition were "true and correct to the best of his knowledge and belief." (Exhibit A, pp. 8-13).

16. In the Grand Jury Petition, the Defendants remarkably alleged that Plaintiffs and others were involved in (i) criminal misconduct, and (ii) the violation of civil statutes. Specifically, the Defendants leveled false and reckless allegations against Plaintiff Steidley of "witness tampering," illegal "wiretapping," criminal "threats," destruction of government records, conspiracy to falsely report crimes, "obtaining money by false pretenses," "oppression and corruption in office," and "willful maladministration." (Exhibit A, pp. 1-3, 5-6). Defendants also falsely stated that Plaintiff Lair engaged in illegal "wiretapping" and filing false crimes. Finally, the Defendants made claims, without any factual basis, that Plaintiff Iski destroyed government records and "intentionally misled a judge."

17. On August 29, 2013 the Rogers County District Court, through the Honorable Richard G. Van Dyck, approved the Grand Jury Petition pursuant to 38 *Okla. Stat.* § 102, permitting Defendants to circulate it to obtain the signatures required for the impaneling of a grand jury to inquire into the allegations contained in the Grand Jury Petition.

18. On or before the Grand Jury Petition was approved in the Grand Jury Case, the Defendants prepared a separate document to be used to solicit petition signatures entitled "Rogers County Grand Jury Petition." (*See* "Rogers County Grand Jury Petition," attached as Exhibit B, hereafter the "Unauthorized Petition.") The Unauthorized Petition was never submitted to the Court for approval pursuant to 12 *Okla. Stat.* § 101.

19. The body of the Unauthorized Petition contained accusations that Plaintiffs were guilty of "various crimes including WITNESS TAMPERING, WIRETAPPING, THREATS, DESTRUCTION OF GOVERNMENT RECORDS, FILING FALSE CRIME REPORTS, ATTEMPTING TO OBTAIN MONEY BY FALSE PRETENSES, LYING IN COURT, VIOLATIONS OF THE VICTIMS RIGHTS ACT, BID-SPLITTING, and VIOLATION OF CAMPAIGN FINANCE LAWS". (Exhibit B, emphasis in original). The Unauthorized Petition further accused District Attorney Steidley of oppression and corruption in office and willful maladministration. (*Id.*)

20. The Defendants then caused the Grand Jury Petition and Unauthorized Petition to be circulated and re-published to thousands of individuals in Rogers County. In fact, through the illegal, defamatory and unauthorized conduct of Defendants, approximately seven thousand (7,000) individuals signed the Unauthorized Petition.

21. On or before October 2, 2013 Defendant Singer and the other Defendants conspired to cause the spoliation of evidence related to the circulation of the Grand Jury Petition and Unauthorized Petition. The documents destroyed included folders of information that were presented to citizens of Rogers County. However, in light of the inexplicable destruction of these materials, they were not filed with, or presented to, the District Court Clerk in accordance with law.

22. On October 2, 2013 Defendants submitted approximately 640 copies of the Unauthorized Petition to the Rogers County Court Clerk. The Defendants also filed, on an *ex parte* basis, a "Motion to Seal Completed Petitions" in the Grand Jury Case seeking to conceal the contents of the Unauthorized Petitions from the public and the Plaintiffs. Although the request was initially granted, Judge Van Dyck later vacated that ruling and allowed the public access to the Unauthorized Petitions.

23. On October 15, 2013, upon hearing, the Assigned Judge in the Grand Jury Case, the Honorable Jefferson D. Sellers, dismissed the Grand Jury Petition based upon Defendants' failure to comply with the requirements of Oklahoma law. The Order dismissing the Grand Jury Petition states that Defendants "collected and filed signatures on an unauthorized form, not the judicially approved petition."

24. Defendants knew that the allegations concerning Plaintiffs contained in the Grand Jury Petition and Unauthorized Petition were false and highly misleading, and published such statements with malice and with an ulterior and illicit purpose.

CLAIMS FOR RELIEF

COUNT I

(Libel – 38 *Okla. Stat.* § 108 – Against all Defendants)

25. Plaintiffs re-allege and incorporate the allegations contained in paragraphs 1 through 24 of the Petition.

26. This Count states a claim for libel as described under 38 *Okla. Stat.* § 108 against all Defendants.

27. The Grand Jury Petition created, drafted, and circulated by Defendants contained materially false allegations against Plaintiffs, included faulty citations to state statutes, and included specific civil statutes that do not carry criminal penalties.

28. These false allegations were made in bad faith, with malice, and with an ulterior and illicit purpose.

29. As a direct and proximate result of the Defendants' creating, drafting and circulating of the false allegations contained in the Grand Jury Petition, Plaintiffs have been damaged in an amount to be proved at trial in excess of $10,000.00. Plaintiffs' damages also exceed the amount-in-controversy required of 28 U.S.C. § 1332.

30. In addition, the above-described conduct of Defendants rises to the level of willful, wanton, heinous, grossly negligent, or reckless conduct for which they should be punished by an award to Plaintiffs of exemplary and punitive damages in an amount sufficient, taking into consideration the assets and worth of Defendants to render the consequences of their conduct an example to themselves and others. In this regard, and under the specific facts of this case, Defendants are liable for both Category I and Category II punitive damages, as described in 23 *Okla. Stat.* § 9.1. Under Category I, Defendants plainly acted in reckless disregard of the rights of others, thereby entitling Plaintiffs to a potential jury award in the amount equal to the actual damages awarded by the jury for Defendants' defamatory conduct.

31. Defendants are also liable for Category II punitive damages because they acted intentionally and with malice toward others. Requisite malice may be inferred from gross negligence that indicates conscious indifference to consequences of one's acts or reckless disregard for safety of others. *Silkwood v. Kerr-McGee Corp.*, 769 F.2d 1451 (10th Cir. (Okla.)

1985). Accordingly, and in accordance with 23 *Okla. Stat.* § 9.1(C), Defendants should be liable for punitive damages in an amount not to exceed the greatest of:

(a) Five Hundred Thousand Dollars ($500,000.00),

(b) twice the amount of actual damages awarded, or

(c) the increased financial benefit derived by the defendant or insurer as a direct result of the conduct causing the injury to the plaintiff and other persons or entities.

COUNT II

(Defamation – Libel *Per Se* –Against all Defendants)

32. Plaintiffs re-allege and incorporate the allegations contained in paragraphs 1 through 31 of the Petition.

33. This Count states a claim for libel *per se* against all defendants under applicable state and common law.

34. The Unauthorized Petition prepared, drafted, published and re-published by Defendants contained materially false statements regarding Plaintiffs. The Unauthorized Petition was also, contrary to law, tailored in a manner to induce approval of the Unauthorized Petition rather than to inform the public of the actual court-approved petition. This conduct was fraudulent and establishes the malicious intent of the false charges of criminal conduct.

35. The false statements contained in the Unauthorized Petition were made by Defendants in bad faith, with malice, and with the specific intent of harming Plaintiffs' reputations and careers. The Defendants also made the false statements concerning Plaintiff Steidley with reckless disregard to their falsity.

36. The false statements of Defendants in the Unauthorized Petition constitute libel *per se* because they falsely represent the Plaintiffs to have engaged in criminal conduct.

37. In light of the fact that the Defendants engaged in libel *per se*, damages are presumed.

38. As a direct and proximate result of the Defendants' libel *per se*, Plaintiffs have been damaged in an amount to be proved at trial in excess of $10,000.00. Plaintiffs' damages also exceed the amount-in-controversy required of 28 U.S.C. § 1332.

39. In addition, the above-described conduct of Defendants rises to the level of willful, wanton, heinous, grossly negligent, or reckless conduct for which they should be punished by an award to Plaintiffs of exemplary and punitive damages in an amount sufficient, taking into consideration the assets and worth of Defendants to render the consequences of their conduct an example to themselves and others. In this regard, and under the specific facts of this case, Defendants are liable for both Category I and Category II punitive damages, as described in 23 *Okla. Stat.* § 9.1. Under Category I, Defendants plainly acted in reckless disregard of the rights of others, thereby entitling Plaintiffs to a potential jury award in the amount equal to the actual damages awarded by the jury for Defendants' defamatory conduct.

40. Defendants are also liable for Category II punitive damages because they acted intentionally and with malice toward others. Requisite malice may be inferred from gross negligence that indicates conscious indifference to consequences of one's acts or reckless disregard for safety of others. *Silkwood v. Kerr-McGee Corp.*, 769 F.2d 1451 (10th Cir. (Okla.) 1985). Accordingly, and in accordance with 23 *Okla. Stat.* § 9.1(C), Defendants should be liable for punitive damages in an amount not to exceed the greatest of:

(a) Five Hundred Thousand Dollars ($500,000.00),

(b) twice the amount of actual damages awarded, or

(c) the increased financial benefit derived by the defendant or insurer as a direct result of the conduct causing the injury to the plaintiff and other persons or entities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, Janice Steidley, David Iski, and M. Bryce Lair, request that the Court enter judgment against Defendants, John Singer, Scott Walton, Steve Cox, Russell Guilfoyle, Billy D. Jones, Myron Grubowski, and John Doe Nos. 1-25, as follows:

A. On Count I for libel as authorized by 38 Okla. Stat. § 108, actual damages against Defendants in an amount to be proved at trial, but in any event in excess of $10,000.00 and in excess of the amount-in-controversy requirement of 28 U.S.C. § 1332;

B. On Count II for libel *per se*, damages against Defendants in an amount to be proved at trial, but in any event in excess of $10,000.00 and in excess of the amount-in-controversy requirement of 28 U.S.C. § 1332;

C. Punitive and exemplary damages in an amount sufficient to render the consequences of Defendants' conduct an example to themselves and others, and in any event, in an amount at least equal to the greater of $500,000.00, or twice the actual damages awarded to each;

D. An award of all costs incurred by Plaintiffs in defending, bringing, and prosecuting this action; including reasonable attorney's fees;

E. Pre- and post-judgment interest as allowed by applicable Oklahoma law; and

F. All other relief to which Plaintiffs are entitled at law or in equity.

Respectfully submitted,

Joel L. Wohlgemuth, OBA #9811
David R. Ross, OBA # 19930
Valery O. Giebel, OBA #31560
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Attorneys for Plaintiffs Janice Steidley, David Iski and M. Bryce Lair.

Exhibit A

FILED IN THE DISTRICT COURT
ROGERS COUNTY OKLAHOMA

AUG 26 2013

KIM HENRY, COURT CLERK
KH
DEPUTY

IN THE DISTRICT COURT OF ROGERS COUNTY
STATE OF OKLAHOMA

In re: A PETITION TO IMPANEL A GRAND JURY	)	**Case No.** GJ-13-1

PETITION FOR GRAND JURY INVESTIGATION

It is resolved that the undersigned qualified elector[1] of this county, pursuant to the Oklahoma Constitution, Article 2, § 18, and Title 38 O.S. §§ 101-108 of the Oklahoma Statutes, does hereby call upon the District Court therein to approve the following petition requesting the impaneling of a Grand Jury to investigate:

1) Whether District Attorney Janice Steidley conspired with others to commit witness tampering in violation of 21 O.S. §§ 421 and 452, involving the following allegations;
    a. Steidley's husband and brother were being investigated by the Oklahoma Department of Wildlife in or about December, 2012, for violations of law.
    b. A co-conspirator was provided a copy of the Oklahoma Department of Wildlife investigative report that outlined the violations.
    c. A witness in the investigation was approached by the co-conspirator who reported having been sent by Steidley. The co-conspirator attempted to change the witnesses' testimony by making false allegations that the investigating game warden had engaged in misconduct and that the investigation had been conducted for political purposes.

[1]WARNING: It is a felony for anyone to sign a petition for the convening of a grand jury with any name other than his own, or knowingly to sign his name more than once for the convening of a grand jury, or to sign such petition when he is not a legal voter of the county. 22 Ok. Stat. 311.1.

d. Steidley made similar bogus allegations against the investigating game warden to another person.

2) Whether District Attorney Janice Steidley and Assistant District Attorney Bryce Lair conspired with others in 2011 to intercept wire, oral, or electronic communications by endeavoring to wiretap employee workspaces in the courthouse in violation of 21 O.S. § 421 and 13 O.S. § 176.3.

3) Whether District Attorney Janice Steidley sent threatening text messages to a deputy sheriff on or about May 8, 2012, threatening "war" with the officer over criticisms made of her professional performance in violation of 21 O.S. § 1172(A)(2).

4) Whether District Attorney Janice Steidley, Assistant District Attorney M. Bryce Lair, and others conspired to falsely report a crime in 2013 in violation of 21 O.S. §§ 421 and 589(A), involving the following facts:

a. A Claremore police officer publicly criticized the District Attorney's Office for poor performance and corruption. Steidley and Lair learned that the officer's wife was considering running against Steidley for District Attorney.

b. Steidley and Lair manufactured bogus allegations of perjury against the officer relating to a rape the officer investigated eighteen (18) months earlier.

c. Steidley and Lair reported their bogus allegations to the United States Attorney, on or about January 7, 2013, in an effort to generate a federal investigation into the officer for perjury. After this effort failed, Steidley, as well as other representatives of the District Attorney's Office, publicly acknowledged that the Claremore police officer did not, in fact, commit perjury. Subsequent to these public statements and using the same evidence as in the first attempted perjury

investigation, Steidley and Lair approached the Oklahoma Attorney general and another Oklahoma District attorney in an effort to generate a state perjury investigation.

d. The Oklahoma State Bureau of Investigation, the Oklahoma Attorney General and another Oklahoma district attorney concluded that no evidence of perjury existed as Steidley and Lair had alleged.

5) Whether District Attorney Janice Steidley and Assistant District Attorney David Iski conspired to willfully omit to perform a duty required of them by the Oklahoma Records Management Act, found at 67 O.S. § 201-217, by, in or about Summer, 2012, ordering another person to destroy government emails that were the subject of an Open Records request in violation of 21 O.S. §§ 421 and 345.

6) Whether District Attorney Janice Steidley attempted to obtain money by false pretenses in or about May, 2013 by using fraudulent data to obtain grant money from the United States Bureau of Justice Assistance in violation of 21 O.S. § 1541.2.

7) Whether Assistant District Attorney David Iski intentionally misled a judge of the District Court by statements made in filings on March 4, 2013, in JD2012-17 and on March 5, 2013, in CF2012-655, both in violation of 21 O.S. § 554.

8) Whether Assistant District Attorney Timothy Wantland willfully omitted to perform duties required of him by the Oklahoma Victim's Rights Act, found at 21 O.S. § 142A, by depriving child victims' parents knowledge of plea bargains and depriving the child victims' parents the right to victim impact statements, all in violation of 21 O.S. § 345, in at least the following cases.

a. On or about May 31, 2012, in Rogers County CF-2009-499, State of Oklahoma vs. Thomas Dougan, and

b. On or about March 27, 2013, in Rogers County CF-2012-23, State of Oklahoma vs. Mary Applegarth.

9) Whether Assistant District Attorney Timothy Wantland intentionally misled a judge of the District Court in statements on May 31, 2012 in CF2009-499, by representing to the judge that the family of a child molestation victim had agreed to a plea agreement that included reducing the crime and dramatically reducing the minimum punishment, all in violation of 21 O.S. § 554.

10) Whether Rogers County Commissioners Mike Helm and Kirt Thacker committed "bid splitting" in late 2009 by structuring purchase orders totaling approximately $100,000 for the purchase of equipment, materials, and/or services from vendors in violation of 19 O.S. § 1501(A)(3)(a), and then accepting gratuities from some of those same vendors in the form of dinners and gifts several months later.

11) Whether Commissioner Mike Helm violated the County Purchasing Act, found at 19 O.S. § 1505, in the summer of 2012 by purchasing materials and/or services in excess of $10,000, specifically including purchase order #301164, without submitting the purchases for bid in violation of 21 O.S. § 345.

12) Whether Commissioner Kirt Thacker performed work on private property without the consent of the Board of County Commissioners, as is required by 19 O.S. § 3, in at least the following instances;

a. In July of 2011 by using a county-owner bulldozer and other equipment to dig a pond on land he had leased for his cattle, and,

b. In the summer of 2012 by using county equipment, manpower, and resources to do road work on private property, both in violation of 21 O.S. § 345.

13) Whether Commissioner Mike Helm received campaign contributions in 2012 from various corporations in violation of 21 O.S. § 187.2, including from corporations that received millions of dollars in contracts from Rogers County.

14) Whether District Attorney Janice Steidley should be removed from office, pursuant to 22 O.S. § 1181, for oppression and corruption in office and willful maladministration, including:

a. Whether each crime described above supports Steidley's removal from the office of District Attorney.

b. Whether, in April, 2013, Steidley refused to argue against parole for a child molester in Rogers County CF2009-499 in an effort to punish the victim's parents for criticizing her office.

c. Whether, in or about January, 2013, Steidley manufactured bogus ethical allegations against an Oklahoma Department of Wildlife game warden as punishment for the game warden investigating crimes committed by Steidley's husband and brother.

d. Whether, on or about January 9, 2013, Steidley filed an administrative complaint against a Pryor Police officer for seeking a candidate to run for the office of District Attorney in the next election.

e. Whether, in or about 2012, Steidley lied to investigators of the US Department of Justice in an investigation relating to a former employee's termination.

f. Whether, on or about March 7, 2013, Steidley provided the name and telephone number of the father of two child rape victims to a Tulsa World reporter in violation of the father's wishes to remain anonymous.

g. Whether Steidley administered over violations of 21 O.S. § 142A-2(A)(1) by regularly causing victims and witnesses to be unnecessarily subpoenaed to court.

h. Whether Steidley administered over violations of 21 O.S. § 142A-2(A)(17) by regularly allowing sex crimes and other prosecutions to be delayed for years.

Title 38 O.S. §§ 101-108 provide the procedural framework for the impaneling of a grand jury. Section 101 requires a filing with the Court Clerk of the petition to impanel a grand jury prior to the obtaining of any signatures. Section 102 requires a determination by the presiding district judge of the sufficiency of the petition within four (4) days of the filing of the petition. Upon the entry of an order finding the petition to be sufficient, Section 103 provides that the circulators of the petition have forty-five (45) days to obtain sufficient signatures to authorize the entry of an order impaneling a grand jury. If the number of signatures of qualified electors on the petition, as certified by the Election Board to the Court Clerk, is sufficient, and all other requirements of Sections 101-108 are met, Section 107 mandates that the presiding district judge shall order the impaneling of a grand jury to convene within thirty (30) days of the date the certification was received by the Court Clerk from the Election Board.

WHEREFORE, premises considered, the undersigned petitioners respectfully petition the Court for an order finding that the face of this petition sufficiently states the subject matter or matters of the prospective grand jury, states a reasonably specific identification of issues to be inquired into, and states sufficient general allegations to warrant a finding that such

inquiry may lead to information which, if true, would warrant a true bill of indictment or action for removal of a particular public official.

RESPECTFULLY SUBMITTED

John Singer-Petitioner

Scott Walton -Petitioner

Steve Cox-Petitioner

Russell Guilfoyle-Petitioner

Billy D. Jones-Petitioner

Myron Grubowski-Petitioner

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

Billy D. Jones, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

Billy D. Jones

Subscribed and sworn to before me this 24 day of August, 2013.

CRYSTAL L. HOLMES NOTARY PUBLIC STATE OF OKLAHOMA Comm. #07007977 Exp. 08-20-2015

Notary Public

My Commission Expires:

3-20-2015

(SEAL)

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

John Singer, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

John Singer

Subscribed and sworn to before me this 15 day of August, 2013.

CRYSTAL L. HOLMES NOTARY PUBLIC STATE OF OKLAHOMA Comm. #07007977 Exp. 08-20-2015

Notary Public #07007977

My Commission Expires:

08 20 2015

(SEAL)

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

Scott Walton, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

Scott Walton

Subscribed and sworn to before me this 15th day of August, 2013.

Notary Public

My Commission Expires: 2-6-16

(SEAL)

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

Steve Cox, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

Steve Cox

Subscribed and sworn to before me this 25 day of August, 2013.

Notary Public

My Commission Expires: 2-6-16

(SEAL)

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

Russell Guilfoyle, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

Russell Guilfoyle
Russell Guilfoyle

Subscribed and sworn to before me this 25th day of August, 2013.

Notary Public

My Commission Expires: 2-6-16

(SEAL)

VERIFICATION

STATE OF OKLAHOMA)
) **SS.**
COUNTY OF ROGERS)

Myron Grubowski, as petitioner, being first duly sworn upon oath, deposes and states that he has read the above and foregoing Petition to Impanel a Grand Jury, that he is familiar with the contents thereof, and that the facts therein set forth are true and correct to the best of his knowledge and belief.

Myron Grubowski

Subscribed and sworn to before me this 25 day of August, 2013.

Notary Public

My Commission Expires: 2-6-16

(SEAL)

Exhibit B

ROGERS COUNTY GRAND JURY PETITION

This is a petition to empanel a Grand Jury to investigate Rogers County officials, including District Attorney Janice Steidley, Assistant District Attorneys Bryce Lair, David Iski, and Timothy Wantland, and County Commissioners Mike Helm and Kirt Thacker, for various crimes including WITNESS TAMPERING, WIRETAPPING, THREATS, DESTRUCTION OF GOVERNMENT RECORDS, FILING FALSE CRIME REPORTS, ATTEMPTING TO OBTAIN MONEY BY FALSE PRETENSES, LYING IN COURT, VIOLATIONS OF THE VICTIMS RIGHTS ACT, BID-SPLITTING, and VIOLATION OF CAMPAIGN FINANCE LAWS, as well as removal allegations against Steidley that include OPPRESSION AND CORRUPTION IN OFFICE and WILLFUL MALADMINISTRATION. The detailed allegations are public documents, filed in the District Court of Rogers County as GJ-2013-1.

*It is a felony for anyone to sign a petition for the convening of a grand jury with any name other than his own, or knowingly to sign his name more than once for the convening of the grand jury, or to sign such petition when he is not a legal voter of Rogers County. 22 O.S. § 311.1

	Printed name	Signature	Address
1.	PAUL D. SOARES	Paul D Soares	8236 23rd St N Claremore OK
2.	PAUL R. DENIS	Paul R Denis	1205 N. Muskogee Claremore OK
3.	LEROY C REAVIS	Leroy C Reavis	1010 S. REAVIS RD. 74017
4.	Greenville A. Williams		16750 S 4170 Rd.
5.	Sandra W. Haughby	Sandra W Haughby	21437 S 4170 RD
6.	[illegible]	[illegible]	[illegible]
7.	Nathan Underwood		103 E 9th St S
8.	Scott F. Reid	Scott F Reid	24972 S. Meadow Ridge Rd
9.	Natasha Reid	Natasha Reid	24972 S Meadow Ridge Rd
10.	Alicia Fox	Alicia Fox	1610 N E Oak Ridge Dr.
11.	JEREMY ARMBRISTER		26455 BELVEDERE DR. CLAREMORE, O
12.	LES BRIGGS		1201 ANDRE CIR CLAREMORE
13.	Ana Osborn	Ana E Osborn	23855 S. Hwy 66 Claremore, OK
14.	Sharon Caldwell	SHARON CALDWELL	1011 N. Faulkner Dr. 74017
15.	Duane Caldwell	Duane Caldwell	1011 N. Faulkner Dr. 74017