IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA	)	
	)	**CF-2018-3663**
Plaintiff,	)	
	)	
vs.	)	**Case No. CF-2018-_____**
	)	
JAMIE DIANNA HARPER,	)	
5815 E 101st Pl	)	
Tulsa, OK 74137	)	
DOB: 1972	)	
SSN: xxx-xx-8930	)	

DISTRICT COURT
FILED
AUG 22 2018
DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

STATE OF OKLAHOMA)
) **ss.**
COUNTY OF OKLAHOMA)

AFFIDAVIT OF PROBABLE CAUSE

I, Paul Boyd, do attest that the following is true and factual to the best of my knowledge in regard to the following information. I am currently employed as an Agent for the State of Oklahoma, Office of Attorney General, assigned to the Consumer Protection Unit. An investigation was initiated on about March 14, 2017 regarding a complaint against Jamie Dianna Harper, who allegedly embezzled funds entrusted to her that were intended to be used by a local charity for a benevolent purpose.

The Office of Attorney General, Consumer Protection Unit received a complaint from board members of the Down Syndrome Association of Tulsa (DSAT). DSAT describes itself as "a non-profit organization that exists to enhance the lives of individuals with Down syndrome, their families and communities. This is accomplished by fostering positive attitudes and opportunities for people with Down syndrome via empowerment, inclusion, educational events and purposeful connections while celebrating their extraordinary lives."

The board members alleged that Harper, while serving as president of DSAT, made numerous misrepresentations regarding the financial affairs and status of DSAT. The board reviewed available records. They found that Harper was the only person with access to the bank accounts. She had been reporting information to the other board members which she characterized as coming from their accountant but she had failed to retain an account firm. Harper removed all access to the bank accounts by anyone but herself. They learned that Harper had removed all other board members from having access to the post office box. Harper had sole control of the financial activities of DSAT. Shortly after they discovered the financial discrepancies, the board removed Harper from the Board of Directors for DSAT.

The DSAT board conducted a review of existing bank records for the association. They found a number of checks had been written by Harper and made payable to "cash." In the memo field were descriptions of expenses. The board also found checks written payable to Harper with similar descriptions in the memo field. There was a severe lack of supporting documents or receipts related to these expenses. The board asked Harper to explain the transactions. Harper responded the expenses were related to DSAT events or purchases to support fund raising events. The checks were reimbursements for DSAT expenses she incurred using personal funds according to Harper.

A review of above described checks revealed most were deposited into the same checking account at Arvest Bank. A subpoena was served on Arvest Bank. They provided records showing the account belongs to Harper. I determined that in addition to the above checks, 25 checks were made payable to DSAT and deposited into the Harper account. These checks were deposited between January 7, 2014 and January 21, 2015. The total amount of the deposits was $9,293.61. According to the bank records, none of these funds were returned to DSAT.

In July 2018, I made contact with the issuers of 16 of the checks. In every instance, the payer intended the funds to go to DSAT. The sources of the funds varied. There were direct donations by a company, matching funds from employers, sponsorships by a company or donations by employees through payroll deduction. None of the payers owed money to Harper or intended the funds for her use.

On November 11, 2013, the Tulsa Parrot Head Club wrote check number 1200 for a donation in the amount of $1,110 to the Down Syndrome Association. Records reflect this check was deposited through an ATM into Jamie Harper's checking account at Arvest Bank on February 12, 2014.

On November 17, 2014, the Wegener Foundation Inc. wrote check number 5076 for a donation in the amount of $2,000, made payable to the Down Syndrome Association of Tulsa. Records reflect this check was deposited through an ATM into Jamie Harper's checking account at Arvest Bank on December 19, 2014.

A review of Harper's checking account revealed that from about January 7, 2014 through about January 21, 2015 an additional 23 checks were deposited which were made payable to DSAT. Each check was made payable for less than $1,000. The checks were written by 13 companies: Exposerve Management Corporation, The Kimberly-Clark Foundation, Brinker International Inc., Bank of America, Webco Industries Inc., Booster, McElroy Manufacturing Inc., American Heritage Bank, Steven Groves, M.D., P.C., Reasor's LLC, Ozark Pizza Company LLC, Cimarex Energy Company, Williams Companies Inc and NBC Oklahoma.

Based on my investigation, the information I received, and the conduct displayed by the Defendant Jamie Dianna Harper, your Affiant believes probable cause exists to show that the Defendant committed felony violations of Embezzlement, Title 21 O.S. § 1451. The undersigned asks that this court issue a finding of fact that there is probable cause to believe that the above

named Defendant committed these crimes and issue a warrant for the arrest of Jamie Dianna Harper.

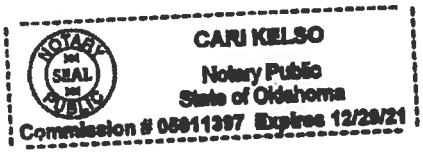
Further affiant sayeth not.

PAUL BOYD, Agent
Oklahoma Office of the Attorney General

SUBSCRIBED AND SWORN to before me this 22nd day of August 2018.

Cari Kelso
Notary Public

Commission Expires: 12-29-2021
Commission Number: 5011397



FINDING OF PROBABLE CAUSE

On this 22 day of August, 2018, the above-styled and numbered cause came before me, the undersigned Judge of the District Court of Tulsa County, Oklahoma, upon the Affidavit of Paul Boyd, Agent with the Consumer Protection Unit of the State of Oklahoma Office of the Attorney General, requesting that a Warrant of Arrest be issued for the within-named Defendant, that she might be arrested and held to answer for the said offenses. Based upon the said Affidavit, I am satisfied and do hereby find that the said offenses have been committed, and that there is probable cause to believe the within-named Defendant has committed these said offenses, and that a Warrant of Arrest should be issued.

Dated this 22 day of August, 2018.

JUDGE OF THE DISTRICT COURT