

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
IN THE 14TH JUDICIAL DISTRICT
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA)
Plaintiff,)
)
v.)
)
TRACY LYNN BORMAN)
3139 S. 401 W. Ave.)
Mannford, Oklahoma, 74044)
SSN: XXX-XX-0030)
DOB: 07/--/1976)
)
Defendant.)

CF- 20 17 - 5658

Case No.

DISTRICT COURT
FILED
OCT 30 2017
DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA CO. OK.

INFORMATION

In the name and by the authority of the State of Oklahoma, **MIKE HUNTER**, the duly appointed and acting Attorney General of the State of Oklahoma, hereby gives information that in **TULSA COUNTY and PAWNEE COUNTY**, State of Oklahoma, **TRACY LYNN BORMAN**, did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

COUNT 1: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES, 21 O.S. §425, a FELONY, on or about the 13th day of February, 2017 through February 20th, 2017, the defendant **TRACY LYNN BORMAN**, did willfully, knowingly, wrongfully, and feloniously commit a sequence of two or more of the criminal offenses to wit: **FINANCIAL EXPLOITATION BY CARETAKER**, in violation of 21 O.S. §843.1, in two or more counties in the State of Oklahoma, including the aforementioned **TULSA COUNTY**, as part of the same plan, scheme, or adventure and/or a sequence of two or more of the same criminal offenses committed and are not separated by an interval of more than thirty (30) days between the first and second offense,

the second and third, and so on. All said acts being contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 2: FINANCIAL EXPLOITATION BY CARETAKER, 21 O.S. § 843.1, a FELONY, on or about the 13th day of February 2017, in **TULSA County**, Oklahoma, the defendant **TRACY LYNN BORMAN**, a Certified Nurse Aide, (CNA) committed the crime of Financial Exploitation by Caretaker, by willfully and knowingly, using a bank debit card owned by V.S., an elderly and/or vulnerable person entrusted to the Defendant's care, to make a cash withdrawal from a bank account owned by V.S., using said bank debit card at an Arvest Bank Automated Teller Machine (ATM), without the consent of V.S., the owner of said bank debit card and the bank account associated with said bank debit card, for the profit or advantage, pecuniary or otherwise, of a person other than said elderly and/or vulnerable person V.S., which is an unjust or improper use of the resources of a vulnerable adult, contrary to the provisions of section 843.1 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

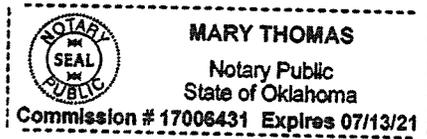
COUNT 3: FINANCIAL EXPLOITATION BY CARETAKER, 21 O.S. § 843.1, a FELONY, on or about the 13th day of February 2017, in **TULSA County**, Oklahoma, the defendant **TRACY LYNN BORMAN**, a Certified Nurse Aide, (CNA) committed the crime of Financial Exploitation by Caretaker, by willfully and knowingly, using a bank debit card owned by V.S., an elderly and/or vulnerable person entrusted to the Defendant's care, to make retail purchases at a Walmart Supercenter store without the consent of V.S., the owner of said bank debit card and the bank account associated with said bank debit card, for the profit or advantage,

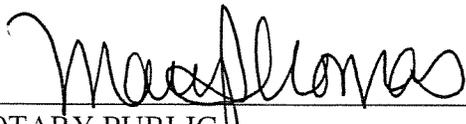
pecuniary or otherwise, of a person other than said elderly and/or vulnerable person V.S., which is an unjust or improper use of the resources of a vulnerable adult, contrary to the provisions of section 843.1 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT 4: FINANCIAL EXPLOITATION BY CARETAKER, 21 O.S. § 843.1, a FELONY, on or about the 14th day of February 2017, in **PAWNEE County**, Oklahoma, the defendant **TRACY LYNN BORMAN**, a Certified Nurse Aide, (CNA) committed the crime of Financial Exploitation by Caretaker, by willfully and knowingly, using a bank debit card owned by V.S., an elderly and/or vulnerable person entrusted to the Defendant's care, to pay an Indian Electric Cooperative utility bill, without the consent of V.S., the owner of said bank debit card and the bank account associated with said bank debit card, for the profit or advantage, pecuniary or otherwise, of a person other than said elderly and/or vulnerable person V.S., which is an unjust or improper use of the resources of a vulnerable adult, contrary to the provisions of section 843.1 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT 5: FINANCIAL EXPLOITATION BY CARETAKER, 21 O.S. § 843.1, a FELONY, on or about the 20th day of February 2017, in **TULSA County**, Oklahoma, the defendant **TRACY LYNN BORMAN**, a Certified Nurse Aide, (CNA) committed the crime of Financial Exploitation by Caretaker, by willfully and knowingly, using a bank debit card owned by V.S., an elderly and/or vulnerable person entrusted to the Defendant's care, to pay a Tulsa Bone & Joint Associates medical co-payment bill, without the consent of V.S., the owner of said

Subscribe and sworn to before me this 30 day of October, 2017.




NOTARY PUBLIC

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Kelly Birch, Oklahoma Attorney General's Office Agent, 15 West 6th Street, Suite 1000, Tulsa OK 74119.

V.S., 2300 W. Broadway Street, Collinsville, OK 74055.

Paula Underwood, 201 W. 20th Street, Owasso, OK 74055.

Henry Scalley, 3139 S. 401 W. Avenue, Mannford, OK 74044.

Meghan Duty, 514 12th Street South, Collinsville, OK 74021.

Rebecca Murray-Glasgow, 2304 Skyline Drive, Bartlesville, OK 74006.

Matt Burke, Collinsville Police Department, 1023 W. Center Street, Collinsville, OK 74021.

Jamie Pierre, 8001 S. Mingo Road, Apt. 3108, Tulsa, OK 74133.

North County Center for Nursing & Rehabilitation Representative, 2300 W. Broadway Street, Collinsville, OK 74055.

North County Senior Living, LLC Representative, 2300 W. Broadway Street, Collinsville, OK 74055.

Bank of Oklahoma Representative, P.O. Box 2300, Tulsa, OK 74192.

Walmart Representative, 220 S. Highway 97, Sand Springs, OK 74063.

Arvest Bank Representative, 502 S. Main Street, Tulsa, OK 74103.

Indian Electric Cooperative Representative, 2506 E. Old Highway 64, Cleveland, OK 74020.

Tulsa Bone & Joint Associates Representative, 4802 S. 109th E. Avenue, Suite 300, Tulsa, OK 74146.