

**IN THE DISTRICT COURT IN AND FOR WOODWARD COUNTY  
STATE OF OKLAHOMA**

WOODWARD COUNTY, OKLAHOMA  
**LESLIE**  
MAR 27 2008  
DISTRICT COURT  
JENNY HOPKINS, COURT CLERK  
BY \_\_\_\_\_ DEFENDANT

**STATE OF OKLAHOMA,**

**Plaintiff,**

**vs.**

**LESLIE MORTON,**

**Defendant.**

**Case No. CJ-2007-102**

*CJ-2008-31*

**ACCUSATION FOR REMOVAL**

On the 23<sup>rd</sup> day of January, 2008, by order of the Woodward County District Court entered on the 5<sup>th</sup> day of December, the Woodward County Grand Jury was convened to serve from that date until such matters pending before said county grand jury are fully investigated. Said grand jury is composed of good and lawful men and women, legally drawn and summoned according to law and then and there examined, impaneled, sworn and charged according to law to diligently inquire into the true and presentment make of all public offenses against the State of Oklahoma and having been committed in Woodward County, Oklahoma, do upon their oath and in the name and by the authority of the State of Oklahoma, do present and find cause for removal as described fully herein.

That at all times relevant, **LESLIE MORTON**, has been and presently is the duly elected Sheriff for **WOODWARD COUNTY**, Oklahoma, having held office for consecutive terms since his initial election in November 1998. That **LESLIE MORTON** did knowingly, willfully, unlawfully and corruptly commit misconduct in office, to wit:

**CORRUPTION IN OFFICE**

On or about the 1<sup>st</sup> day of July, 2003 A.D., through the 31<sup>st</sup> day of July 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of

**WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of August, 2003 A.D., through the 31<sup>st</sup> day of August 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of September, 2003 A.D., through the 30<sup>th</sup> day of September 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s)

while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of October, 2003 A.D., through the 31<sup>st</sup> day of October 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of November, 2003 A.D., through the 31<sup>st</sup> day of November 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain

to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of December, 2003 A.D., through the 31<sup>st</sup> day of December 2003 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of January, 2004 A.D., through the 31<sup>st</sup> day of January 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of February, 2004 A.D., through the 28<sup>th</sup> day of February 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim

to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of March, 2004 A.D., through the 31<sup>st</sup> day of March 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of April, 2004 A.D., through the 30<sup>th</sup> day of April 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses

within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of May, 2004 A.D., through the 31<sup>st</sup> day of May 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of June, 2004 A.D., through the 30<sup>th</sup> day of June 2004 A.D., **LESLIE MORTON** did make, present, or cause to be presented to an employee or officer of **WOODWARD COUNTY**, State of Oklahoma, or to a department or agency thereof, a false, fictitious or fraudulent claim(s) for payment of public funds upon or against **WOODWARD COUNTY**, State of Oklahoma, or a department thereof, knowing such claim to be false, fictitious or fraudulent and contrary to the provisions of *title 21* of the Oklahoma Statutes Section 358 and/ or Section 1541.1 et seq., and that **LESLIE MORTON** did in fact receive a benefit as a direct result of having made said false, fictitious or fraudulent claim(s) for payment. That **LESLIE MORTON** submitted said false, fictitious or fraudulent claim(s) while knowingly and willfully omitting the performance of an official act and/or duty in relation thereto and/or submitted the referenced claim(s) so as to fraudulently collect a travel allowance intended by law to only be issued in lieu of reimbursement for travel expenses within **WOODWARD COUNTY**. That **LESLIE MORTON**'s intentional submission of false, fictitious or fraudulent claim(s) directly resulted in the preparation and release of a warrant issued by and through the clerk's office in and for **WOODWARD COUNTY** and, therefore, resulted in financial loss to **WOODWARD COUNTY** and personal financial gain to and for **LESLIE MORTON**.

On or about the 1<sup>st</sup> day of July, 2004 A.D., through the 31<sup>st</sup> day of July 2004 A.D., **LESLIE**

