

FILED IN THE DISTRICT COURT  
OKLAHOMA COUNTY, OKLA.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

DEC 07 2011

THE STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 JOHNNY LEE CROWDER, )  
 )  
 Defendant. )

PATRICIA PRESLEY, COURT CLERK  
by \_\_\_\_\_  
DEPUTY

Case No. CF-11-6703

INFORMATION

In the name and by the authority of the State of Oklahoma:

*Truong*

E. SCOTT PRUITT, Attorney General of Oklahoma, in and for the State and County aforesaid,  
gives the court to know and be informed as follows:

**JOHNNY LEE CROWDER**, in Oklahoma County, State of Oklahoma, on or about July 22,  
2010, at and within the said County and State aforesaid, did then and there unlawfully, willfully,  
intentionally, knowingly, and feloniously commit the crime of **WORKERS' COMPENSATION  
FRAUD**, in violation of Title 21 O.S. § 1663 (C)(1), **after former conviction of a felony**, in the  
manner and form as follows, to-wit:

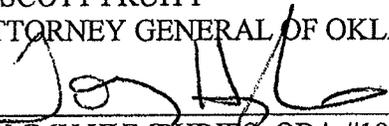
Said defendant, with the intent to deceive the Oklahoma Workers' Compensation Court, and  
to injure, defraud, and deceive Classic Carpet and The Hartford Insurance Co., with respect to a claim  
for payment or other workers' compensation benefits pursuant to a contract of insurance, did  
knowingly, intentionally, and fraudulently make misstatements concerning facts material to his  
workers' compensation claim, specifically as follows:

On July 22, 2010, the Defendant filed a Form 3 filed with the Oklahoma Workers'  
Compensation Court for benefits for an injury to his left hand, which he alleged to  
have occurred on May 31, 2010, while working for Classic Carpet in Lawton,  
Oklahoma. The Defendant alleged on his Form 3 that he sustained a work-related  
injury on May 31, 2010 to his left hand when he tripped & fell ripping left hand on

grate while at his place of employment. Defendant made these statements with the intent to deceive the Oklahoma Workers' Compensation Court, and injure, defraud, and deceive Classic Carpet and The Hartford Insurance Co., when he then and there knew that the said statements were false, incomplete, or misleading,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

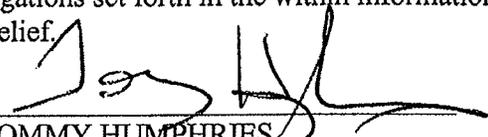
E. SCOTT PRUITT  
ATTORNEY GENERAL OF OKLAHOMA

By:   
TOMMY HUMPHRIES, OBA #19130  
Assistant Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
(405) 522-3403

STATE OF OKLAHOMA     )  
  )  
COUNTY OF OKLAHOMA    )

ss.

I do solemnly swear that the statements and allegations set forth in the within information are true and correct to the best of my information and belief.

  
TOMMY HUMPHRIES  
Assistant Attorney General

Signed and sworn to before me on the 2nd day of Dec., 2011, by Tommy Humphries.

(SEAL)

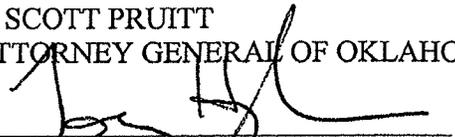


  
Notary Public

My Commission Expires: \_\_\_\_\_

I have examined the facts in this case and recommend that a warrant do issue.

E. SCOTT PRUITT  
ATTORNEY GENERAL OF OKLAHOMA

By:   
TOMMY HUMPHRIES  
Assistant Attorney General

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA, )  
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 Defendant. )

SUPPLEMENTAL INFORMATION

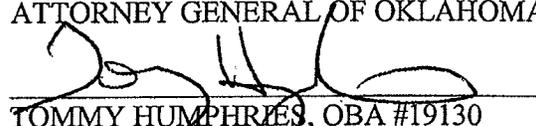
E. SCOTT PRUITT, Attorney General for the State of Oklahoma, in and by the authority of the State of Oklahoma, and in addition to the original Information filed herein, further informs the Court as follows:

The defendant, **JOHNNY LEE CROWDER**, was heretofore on the 26th day of November, 2007, in Case No. 1142533, in the District Court of Harris County, State of Texas, convicted of the felony offense of POSSESSION OF COCAINE LESS THAN ONE GRAM, said defendant being represented by counsel at the time and said conviction being a final judgment in the case.

That the felony offenses relied upon have not arisen out of the same transaction or occurrence or series of events closely related in time or location.

E. SCOTT PRUITT  
ATTORNEY GENERAL OF OKLAHOMA

By:

  
TOMMY HUMPHRIES, OBA #19130  
Assistant Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
(405) 522-3403

**Violation and Penalty:**  
21 O.S. § 51.1: 2 years to Life

**The witnesses in support thereof are:**  
Custodian of Records  
Harris County District Clerk  
201 Caroline  
P.O. Box 4651  
Houston, TX 77210-4651

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA**

<b>THE STATE OF OKLAHOMA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO.</b>
	)	
<b>Johnny Crowder</b>	)	
<b>DOB: 10/06/69</b>	)	
<b>Defendant.</b>	)	

**AFFIDAVIT OF PROBABLE CAUSE**

The undersigned, being first duly sworn and upon oath, does depose and state as follows:

I, Carl Reed, am employed as an investigator with the Workers' Compensation and Insurance Fraud Unit in the Office of Attorney General. I was assigned to investigate an alleged case of workers' compensation fraud involving Johnny Crowder, DOB:10/06/69.

In the course of my investigation I obtained and reviewed various medical records, an ambulance report, Workers' Compensation Court files, and interviewed witnesses. The claimant filed a Form 3 (Employees First Notice of Accidental Injury and Claim for Compensation) with the clerk of the Oklahoma Workers' Compensation Court in Oklahoma City, Oklahoma on July 22, 2010, listing a date of injuries or last exposure to his left hand on May 31, 2010, while working for Classic Carpet, 1301 SW Sheridan, Lawton, Oklahoma.

I interviewed David Baxter, co-owner of Classic Carpet. Baxter stated that Crowder told him he fell in the shop of Classic Carpet, located at 1903 Washington, Lawton, Oklahoma on May 31, 2010. Crowder also stated that an ambulance picked him up in front of the shop. I also interviewed David Ryan Baxter, son of David Baxter and employee of Classic Carpet. Baxter advised that Classic Carpet was closed on May 31, 2010 for Memorial Day. It was a paid holiday and none of the employees were authorized to be in the shop.

Records from Kirks Emergency Service, 322 SW G Ave., Lawton, Oklahoma show the paramedics were called to a private residence, 1711 SW B Ave., Lawton, Oklahoma on May 31, 2010 to help Crowder, who had cut his left hand while trying to fix a window on his car.

I obtained and reviewed medical records from the Southwest Medical Center, 5601 Southwest Lee Blvd., Lawton, Oklahoma. Records from the Southwest Medical Center shows Crowder was treated in their emergency room for a cut to his left wrist. The report shows the mechanism of cut: window. Patient's address and address of relative Amanda Crowder were listed as 1711 SW B Ave, Lawton, Oklahoma. The attending doctor was Mittal Bharat, DO.

Based on the above information, I believe that probable cause exists to show Johnny Crowder committed the crimes of Workers' Compensation Fraud, in violation of 21 O.S. § 1663 (C)(1) when he filed a false claim for workers' compensation benefits. Therefore, I request that a warrant be issued for his arrest.

Carl Reed  
Carl Reed, AFFIANT

STATE OF OKLAHOMA    )  
                                  ) ss.  
COUNTY OF OKLAHOMA )

Subscribed and sworn to before me this 2nd day of Dec., 2011, by  
Carl Reed.

Tonya L. Lawson

Notary Public

(SEAL)



My Commission Expires: \_\_\_\_\_