

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

STATE OF OKLAHOMA)	
Plaintiff,)	
)	
vs.)	CASE NO. CF-2013-137
)	CF-2013-138
CRAIG S. KEY)	CF-2013-139
Defendant.)	

MOTION TO REVOKE BOND

COMES NOW, E. Scott Pruitt, Attorney General for the State of Oklahoma, Megan B.

Tilly and Vincent Antonioli, Assistant Attorneys General, and makes application to set aside the Bond that was given to the defendant for said cases for the following reason(s):

1. On April 19th, 2013, Defendant Craig S. Key was indicted by the Fourteenth Multicounty Grand Jury in Lincoln Co. CF-13-137 with *Delivery of a Forged Note or Instrument* in violation of Title 21 O.S. § 1451, and *Embezzlement* in violation of Title 21 O.S. § 1577; in Lincoln Co. CF-13-138 with *Conspiracy to Commit Larceny of Domestic Animals and Implements of Husbandry* in violation of Title 21 O.S. § 421, and *Larceny of Domestic Animals of Implements of Husbandry* in violation of title 21 O.S. § 1716; and in Lincoln Co. CF-13-139 with *Delivery of a Forged Note or Instrument* in violation of Title 21 O.S. § 1451, and *Embezzlement* in violation of Title 21 O.S. § 1577.
2. On April 25th, 2013, Defendant Craig S. Key, appearing with attorney Cheryl Ramsey, was arraigned in Lincoln Co. CF-13-137, CF-13-138 and CF-13-139 before the Honorable Lee Turner, Special Judge for Kay County, assigned magistrate judge in the above –styled and numbered causes, and bond was set as follows:

. . . . BOND SET IN THE AMOUNT OF \$10,000.00 CASH; DEFENDANT ORDERED TO WEAR AN ANKLE MONITOR WITH ZOOM GPS TRACKING; DEFENDANT ORDERED TO OBTAIN SUCH MONITOR BY APRIL 26, 2013; DEFENDANT MUST REMAIN WITHIN 100 MILES OF CHANDLER, OKLAHOMA WITH THE EXCEPTION THAT SAME MAY BE EXTENDED OR LIFTED BY COURT FOR A SHORT TIME; DEFENDANT TO SURRENDER ANY PASSPORT HE MAY HAVE AND CANNOT APPLY FOR ANY PASSPORT; DEFENDANT IS NOT TO HAVE ANY CONTACT WITH ANY LISTED WITNESS OR ANY CO-DEFENDANTS WITH THE EXCEPTION OF EVELYN BEAMAN FOR PURPOSES OF COMMUNICATION OF EMPLOYMENT BUT NOT TO DISCUSS THE

CURRENT CASE . . . (a certified copy of said court minutes are attached herein as State's Exhibits A.1, A.2 and A.3)

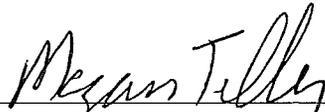
3. On or about April 25th, 2013, Defendant Key, through his attorney Cheryl Ramsey, represented to this Honorable Court that Defendant Key does not have a passport.
4. On or about June 13th, 2009, the United States Department of State issued Defendant Craig S. Key Passport #455779905. See State's Exhibits B.1 & B.2
5. On or about May 13, 2013, Department of State Diplomatic Special Agent Howard Marcott advised the Office of the Attorney General that Defendant Key had used Passport #455779905 to travel to Cozumel, Mexico on July 22, 2009, and to travel to Barcelona Spain on May 29, 2010.

WHEREFORE, premises considered, this movant prays that the bond be revoked and the Defendant be ordered to come before the Court.

Dated this 23rd day of May, 2013.

Respectfully submitted,

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA



MEGAN B. TILLY [O.B.A. # 22655]
ASSISTANT ATTORNEY GENERAL
CHIEF, MULTICOUNTY GRAND JURY


VINCENT ANTONIOLI
ASSISTANT ATTORNEY GENERAL
CHIEF, WORKERS COMPENSATION FRAUD UNIT
313 N.E. 21st Street
Oklahoma City, OK 73105
(405) 522-2975 [voice]
(405) 522-2795 [fax]
ATTORNEYS FOR THE STATE

CERTIFICATE OF DELIVERY

I do hereby certify that on the 23rd day of May, 2013, I mailed a true and correct copy of the above and foregoing Motion to Revoke Bond to:

Cheryl A. Ramsey
801 South Main Street
P.O. Box 1206
Stillwater, Oklahoma 74076
Cheryl.ramsey@szlichtaandramsey.com
ATTORNEY FOR DEFENDANT CRAIG S. KEY

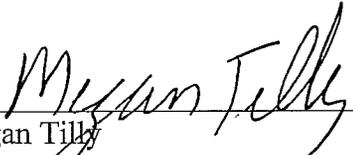
Al Hoch
803 Robert S. Kerr Ave.
Oklahoma City, OK 73106
ATTORNEY FOR DEFENDANT JOSHUA ANDERSON

Royce Hobbs
801 S. Main Street
P.O. Box 1455
Stillwater, Oklahoma 74074
ATTORNEY FOR DEFENDANT LESLIE BOTTGER

An additional copy was emailed to Cheryl Ramsey, attorney for Defendant Craig S. Key, that same date.

E. SCOTT PRUTT
ATTORNEY GENERAL OF OKLAHOMA

by:



Megan Tilly
Assistant Attorney General

IN THE DISTRICT COURT OF LINCOLN COUNTY, STATE OF OKLAHOMA

Case No. CF-2013-00139

STATE OF OKLAHOMA

Plaintiff(s)

E. SCOTT PRUITT
Attorney(s) for Plaintiff(s)

FILED

APR 25 2013

--VS--

CRAIG S KEY

Defendant(s)

DEPUTY COURT CLERK
LINCOLN COUNTY, OKLA.

Attorney(s) for Defendant(s)

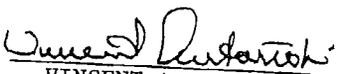
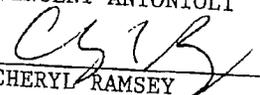
Judge: HONORABLE STEPHEN R KISTLER
LEE TURNER

04/25/2013

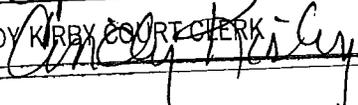
CM: JUDGE LEE
ATTORNEY GENERAL PRESENT BY VINCENT ANTONIOLI;
ASSISTANT GENERAL COUNSEL; DEFENDANT PRESENT AND BY
ATTORNEY CHERYL RAMSEY; RECORD BY SHERRIE POWELL;
DEFENDANT ADVISED OF RIGHTS; DEFENDANT WAIVES
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WITH THE EXCEPTION OF EVELYN BEAMAN FOR PURPOSES OF
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CURRENT CASE; CASE SCHEDULE FOR A TELEPHONIC SCHEDULING
CONFERENCE ON JUNE 7, 2013 AT 9:00 A.M.;

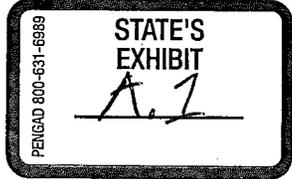
APPROVED:


HONORABLE LEE TURNER


VINCENT ANTONIOLI

CHERYL RAMSEY

I, Cindy Kirby, Court Clerk of Lincoln County
Oklahoma hereby certify that the foregoing is a
true, correct and complete copy of the instrument
herewith set out as appears of record and on file
in my office of Lincoln County, Okla. this 25 day
of April 2013

CINDY KIRBY COURT CLERK
By  Deputy



IN THE DISTRICT COURT OF LINCOLN COUNTY, STATE OF OKLAHOMA

Case No. CF-2013-00137

STATE OF OKLAHOMA

Plaintiff(s)

E. SCOTT PRUITT
Attorney(s) for Plaintiff(s)

FILED
APR 25 2013

--VS--

CRAIG S KEY

Defendant(s)

COURT CLERK
LINCOLN COUNTY OKLA

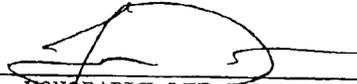
Attorney(s) for Defendant(s)

Judge: HONORABLE STEPHEN R KISTLER
LEE TURNER

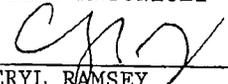
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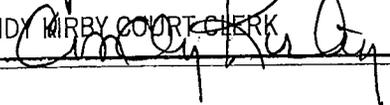
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VINCENT ANTONIOLI


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of April 2013

CINDY KIRBY COURT CLERK
By  Deputy

STATE'S
EXHIBIT
A2
PENGAD 800-631-6989

IN THE DISTRICT COURT OF LINCOLN COUNTY, STATE OF OKLAHOMA

Case No. CF-2013-00138

STATE OF OKLAHOMA

Plaintiff(s)

FILED

APR 25 2013

E. SCOTT PRUITT
Attorney(s) for Plaintiff(s)

--VS--

CRAIG S KEY

Defendant(s)

CINDY KIRBY COURT CLERK
LINCOLN COUNTY, OKLA.

Attorney(s) for Defendant(s)

Judge: HONORABLE STEPHEN R KISTLER
LEE TURNER

04/25/2013 CM: JUDGE LEE

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APPROVED:

Vincent Antonoli
VINCENT ANTONIOLI

Cheryl Ramsey
CHERYL RAMSEY

Lee Turner
HONORABLE LEE TURNER

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CINDY KIRBY COURT CLERK
By Cindy Kirby Deputy

