

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA
FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

MAY 23 2012

INFORMATION

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

THE STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.)
)
 DEE CHIEN,)
)
 Defendant.)

No.

CF-2012-3228

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

Now comes **E. SCOTT PRUITT, ATTORNEY GENERAL**, in and for the State and County aforesaid, and gives the court to know and be informed as follows:

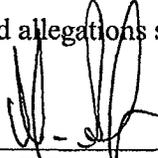
COUNT 1: On or about July 12, 2009, in Oklahoma County, State of Oklahoma, **DEE CHIEN**, did wilfully, intentionally, knowingly and feloniously commit the crime of **FALSE CLAIM FOR INSURANCE**, a felony in violation of **Title 21 O.S. §1662**, by providing a false estimate of repair to Central Mutual Insurance Company; to-wit, providing estimate quote number EWP67A from E.W.P. for \$11,927.14, that was not created, generated or authorized by E.W.P. Car Wash Equipment to Central Mutual in support of a pending insurance claim, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

Mark S. Pate, OBA #10567
Assistant Attorney General
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
(405) 522-0055

STATE OF OKLAHOMA)
OKLAHOMA COUNTY) ss

I do solemnly swear that the statements and allegations set forth in the within information are true.



Marc S. Pate
Assistant Attorney General

Signed and sworn to before me by Marc S. Pate on the 23rd day of May,
2012.



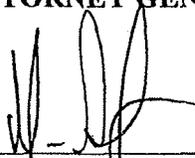
Notary Public

(SEAL)

My Commission Expires _____



E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA



By: _____

Marc S. Pate
Assistant Attorney General

Violation and Penalty:

21 O.S §1662: Not exceeding three (3) years and/or not exceeding \$1,000.00 fine

Witnesses

Lauren Tait
Central Mutual Insurance
7301 N. State HWY 161
Suite 320
Irving, Texas 75039

Morgan Carpenter
Investigator
Office of Attorney General
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105

Kristi Gross
E.W.P.
9105 Wingspread
Oklahoma City, Oklahoma 73159

Debbie Chamberlain
Investigator
Office of Attorney General
313 N.W. 21st Street
Oklahoma City, Oklahoma 73105

Tait called Chien to ascertain where he obtained the estimate for the fifth machine and he told her E.W.P. would not return his calls or come out and give him a quote for a new unit. Chien told Tait he modified the first invoice from E.W.P. and came up with the misc. fees and labor costs. Tait learned Chien did not have E.W.P. fix or replace the units and when she asked who did the replacements and repairs, Chien would only tell her a guy by the name of Roberto took care of it. During Tait's conversation with Chien, he told her he called Wintrax to obtain the price of the vac & scent-station to replace the fifth unit. Chien quoted the replacement price at \$7,500.00. After Tait spoke with Chien, she called Wintrax to ask the replacement cost for a vac & scent-station and she was told \$3,850.83. The gentleman at Wintrax told Tait \$7,500.00 is the retail price but no one would have told him they would charge him the full \$7,500.00.

On May 2, 2012, I spoke with Kristi Gross who was the Office Manager and Sales Representative of E.W.P. Car Wash Equipment in 2009. E.W.P. has since gone out of business, but Gross remembered Chien due to the fact she went to his business numerous times and after she gave him the quote via email he stopped taking her calls and would hide in the business when she would be waiting for him at his business. Gross said Chien called her several time requesting she email him the quote and at one time told her to make it high because it was an insurance claim. I presented Gross with a copy of invoice EWP67A and she said that was not a number they would use for a quote and the quotes were way too high for the type of machine. Gross said she did not provide this quote to Chien. Gross was afforded the opportunity to look at invoice EWP67 and she said that was the one and only quote she gave him, but she thought the amount seemed higher than what she remembered.

During an interview with Dee Chien, he said he modified the EWP invoice when he needed additional work and he was unable to make contact with anyone from E.W.P.. Chien said since it was just for parts he got the numbers off the internet that he used for the quote. Chien said he told the lady at the insurance company he modified the EWP quote before they paid off on it and if they had a problem they should not have paid.

Based on the above information, I believe that probable cause exist to show that **DEE CHIEN** committed the crime of **FALSE CLAIM FOR INSURANCE** in violation of **TITLE 21 O.S. 1662**, a felony, and therefore request that a warrant issue for his arrest.

FURTHER AFFIANT SAYETH NOT.


Debbie Chamberlain, AFFIANT

STATE OF OKLAHOMA)
) SS
COUNTY OF OKLAHOMA)

Subscribed and sworn to before me this 23rd day of May,
2012, by Debbie Chamberlain.

Angela R McAllister

Notary Public

(SEAL)

My Commission Expires _____



FINDING OF PROBABLE CAUSE

On this _____ day of _____, 2012, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Oklahoma County, Oklahoma, upon the Affidavit of Debbie Chamberlain, Investigator with the State Attorney General's Office, requesting that a warrant of arrest be issued for the within named defendant, Dee Chien, that he might be arrested and held to answer for the offense of . Based upon said Affidavit, I am satisfied and do hereby find that the offense of False Claim for Insurance, 21 os 1662 has been committed, and that there is probable cause to believe the within named defendant has committed said offense, and that a warrant of arrest should issue.

Dated this _____ day of _____, 2012 .

Judge of the District Court