STATE OF OKLAHOMA
LOGAN COUNTY SS
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RICHARD A. ELLIS
COUNTY CLERK
BY _____ DEPUTY

IN THE DISTRICT COURT OF LOGAN COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA, **Plaintiff,**	)	
vs.	)	**Case No. CF-2013-** 293
JODI ANNETTE ALEXANDER, **ADDR: P.O. Box 69** **Crescent, OK 73028-0069** **SSN: xxx-xx-8164** **DOB: 11/27/1975**	)	
DALE STEVEN MARKUS, **ADDR: DOC Inmate # 640098** **Lawton Correctional Facility;** **8607 S.E. Flower Mound Rd.;** **Lawton OK 73501** **SSN: xxx-xx-8121** **DOB: 2/19/84** **Defendants.**	)	

INFORMATION

STATE OF OKLAHOMA, COUNTY OF LOGAN:

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

I, **E. SCOTT PRUITT**, the duly elected, qualified, and acting Attorney General of the State of Oklahoma, and on his official oath informs the District Court that **on or between the 1st day of August, 2011, and the 29th day of February, 2012,** in said County of Logan and in the State of Oklahoma, **JODI ANNETTE ALEXANDER**, and **DALE STEVEN MARKUS** did then and there unlawfully, willfully, knowingly, and wrongfully commit the crimes of:

COUNT 1: LARCENY OF CONTROLLED DANGEROUS SUBSTANCE, a felony, in violation of Oklahoma State Statute 63 O.S. § 2-403(A); **JODI ANNETTE ALEXANDER** did with intent to steal take and carry away by fraud or stealth FENTANYL, a controlled dangerous substance in Schedule II of the Uniform Controlled Dangerous Substances Act; HYDROCODONE (Lortab), a CDS in Schedule II of the UCDSA; HYDROMORPHONE (Dilaudid), a CDS in Schedule II of the UCDSA; MORPHINE, a CDS in Schedule II of the UCDSA; and ALPRAZOLAM (Xanax), a CDS in Schedule IV of the UCDSA; from Crescent Care Center residents through her employment as a Certified Medication Aide at Crescent Care Center.

Larceny of Controlled Dangerous Substance for Schedule II substances is punishable by imprisonment not less than five years nor more than life, and by a fine not to exceed $100,000.00, or by both such imprisonment and fine. Schedule IV substances are punishable by imprisonment not less than two years nor more than life, and by a fine not to exceed $20,000, or by both such imprisonment and fine.

COUNT 2: DISTRIBUTION OF CONTROLLED DANGEROUS SUBSTANCE, a felony, in violation of Oklahoma State Statute 63 O.S. § 2-401(A)(1); **JODI ANNETTE ALEXANDER** did knowingly and intentionally distribute FENTANYL, a controlled dangerous substance in Schedule II of the Uniform Controlled Dangerous Substances Act; HYDROCODONE (Lortab), a CDS in Schedule II of the UCDSA; HYDROMORPHONE (Dilaudid), a CDS in Schedule II of the UCDSA; MORPHINE, a CDS in Schedule II of the UCDSA; and ALPRAZOLAM (Xanax), a CDS in Schedule IV of the UCDSA.

COUNT 3: DISTRIBUTION OF CONTROLLED DANGEROUS SUBSTANCE AFCF, a felony, in violation of Oklahoma State Statute 63 O.S. § 2-401(A)(1); **DALE STEVEN MARKUS** did knowingly and intentionally distribute FENTANYL, a controlled dangerous substance in Schedule II of the Uniform Controlled Dangerous Substances Act; HYDROCODONE (Lortab), a CDS in Schedule II of the UCDSA; HYDROMORPHONE (Dilaudid), a CDS in Schedule II of the UCDSA; MORPHINE, a CDS in Schedule II of the UCDSA; and ALPRAZOLAM (Xanax), a CDS in Schedule IV of the UCDSA.

Distribution of Controlled Dangerous Substance for Schedule II is punishable by imprisonment not less than two years nor more than life, and by a fine not to exceed $100,000.00, or by both such imprisonment and fine. Schedule IV substances are punishable by imprisonment not less than two years nor more than life, and by a fine not to exceed $20,000, or by both such imprisonment and fine.

All of which is contrary to the form of the Statutes in such cases made and provided, and against the peace and dignity of the State of Oklahoma.

Dated this 26 day of July, 2013

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

BY: Lory Dewey
LORY DEWEY, OBA# 19340
Assistant Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-4468

State of Oklahoma)
County of Oklahoma) ss.

I, David Williams, being duly sworn upon oath, state that I have read the above and foregoing Information and know the contents thereof, and that the facts stated herein are true.

Investigator
Medicaid Fraud Control Unit

Subscribed and sworn to before me this 26 day of July, 2013.

Notary Public

KRISTY PORTER NOTARY # 10010494 EXP. 12/20/14 PUBLIC STATE OF OKLAHOMA

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Linden Avery Boles – 204 S. Euclid AVE.; Cashion, OK 73016-9563

Shannon Dunn - Crescent Care Center; Director of Nursing; 208 E. Sanderson ST.; Crescent, OK 73028-9027

Christopher Lee Maple – 204 S. Euclid AVE.; Cashion, OK 73016-9563

Charles Oliver - Pharmacy Solutions, LLC; 4350 Will Rogers PKWY, STE. 200; Oklahoma City, OK 73108-1836

Agent William Diaz – Oklahoma Bureau of Narcotics; Medicaid Fraud Control Unit; 313 NE 21st ST; Oklahoma City, OK 73105-3207

Detective John Gilbert – Crescent Police Department; 205 N. Grand ST.; Crescent, OK 73028-9103

Investigator David Williams – Attorney General's Office; Medicaid Fraud Control Unit; 313 NE 21st ST; Oklahoma City, OK 73105-3207

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Logan County, State of Oklahoma

Now appears E. Scott Pruitt, Attorney General of the State of Oklahoma, who does upon official oath inform the Court that prior to the commission of DISTRIBUTION OF CONTROLLED DANGEROUS SUBSTANCE in the aforesaid Information, the defendant, **DALE STEVEN MARKUS**, has previously been convicted of a felony offense; to wit:

That on or about June 20, 2011, **DALE STEVEN MARKUS**, was convicted in CF-2011-39 in the District Court of Kingfisher County, of the crime of **DOMESTIC ABUSE BY STRANGULATION**, while being represented by counsel and the judgment is final.

That on or about March 15, 2013, **DALE STEVEN MARKUS**, was convicted in CF-2012-23 in the District Court of Logan County, of the crimes of **ASSAULT AND BATTERY WITH A DANGEROUS WEAPON** and **THROWING AN OBJECT AT A MOVING VEHICLE**, while being represented by counsel and the judgment is final.

Distribution of Controlled Dangerous Substance for Schedule II, after former conviction of two felonies, is punishable by imprisonment not less than fifteen years nor more than life. Schedule IV substances are punishable by imprisonment not less than six years nor more than life.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

BY: Lory Dewey

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Assistant Attorney General
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