

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA )  
PLAINTIFF, )  
 )  
vs. )  
 )  
WAYNE ROYCE JUNGHANNS, )  
DEFENDANT, )  
W/M. 03/01/1952 )  
 )  
 )  
 )  
 )

Case No.

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AFFIDAVIT OF PROBABLE CAUSE

I, Paul Boyd, do attest that the following is true and factual to the best of my knowledge in regards to the following information. I am currently employed as an Investigator for the State of Oklahoma, Office of Attorney General, assigned to the Public Protection Unit.

On March 6, 2013, an investigation was initiated regarding a complaint against **Wayne Royce Junghanns**, Executive Director for Rainbow Fleet, Inc, a not for profit company located in Oklahoma County, Oklahoma. The Office of Attorney General, Public Protection Unit received a complaint from Michael Gibson, President of Rainbow Fleet, that **Junghanns** had embezzled money from them. The complaint involved the submissions of falsified requests for reimbursement for expenses Junghanns claimed to have incurred on behalf of the company from about November 2007 through October 2012.

In November 2012, Rainbow Fleet received the results of their outside annual audit for their fiscal year which ended June 30, 2012. The audit disclosed insufficient supporting documents attached to Junghanns' requests for reimbursement of expenses. On review, there were no receipts for expenses but attached were on-line order review pages or shopping cart reviews. On about November 15, 2012, during a meeting with the Rainbow Fleet executive committee, Junghanns admitted he created the false supporting documents in order to be reimbursed for the claimed expenses.

Based on the findings of the external audit, a review of reimbursements paid to Junghanns from November 2007 through October 2012 disclosed payments totaling \$21,538.23. After noting the pattern of submissions, Rainbow Fleet management did additional reviews of Junghanns' reimbursement requests and found additional questioned payments in the amount of \$5,185.51 for a total potential loss of \$26,723.74.

On May 8, 2013, I interviewed Junghanns regarding the embezzlement. He accepted responsibility for the loss incurred by Rainbow Fleet caused by his submission of false claims and did not contest the total payment of \$21,538.23. He admitted he created the falsified supporting documents which he represented as proof of expenses when he submitted claims for reimbursement.

Based on my investigation, the information I received, and the pattern of conduct displayed by the Defendant **Wayne Royce Junghanns**, your Affiant believes probable cause exists to show that the Defendant committed felony violations of Embezzlement, Title 21 O.S. § 1451 and the Oklahoma Computer Crimes Act, Title 21 O.S. § 1953(A) (2). The undersigned asks that this court issue a finding of fact that there is probable cause to believe that the above named Defendant committed these crimes and issue a warrant for the arrest of **Wayne Royce Junghanns**.

Further affiant sayeth not.

\_\_\_\_\_  
Paul Boyd

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_ 2013.

\_\_\_\_\_  
Notary Public

Commission Expires: \_\_\_\_\_ Commission Number: \_\_\_\_\_