

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.)
)
 CRAIG S. KEY,)
)
 DOB 06-19-1965, SSN [REDACTED])
 Defendant.)

Case No. _____

INDICTMENT

FOR: DELIVERY OF A FORGED NOTE OR INSTRUMENT, 21 O.S. § 1577 [1 Count being Count 1]

EMBEZZLEMENT, 21 O.S. § 1451 [1 Count, being Count 2]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and woman, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

COUNT 1: DELIVERY OF A FORGED NOTE OR INSTRUMENT

On and before the 1st day August, 2012, the crime of **DELIVERY OF A FORGED NOTE OR INSTRUMENT** was committed in **LINCOLN COUNTY**, Oklahoma, by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Carley Bussey, then a minor child, in resolving Ms. Bussey's personal injury claim arising from an automobile accident. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED]. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. The final resolution of the matter resulted in Oklahoma Farm Bureau Mutual Insurance Company issuing Check Number C1305243 on July 27, 2012 in the amount of Two Hundred and Twenty Thousand Dollars (\$200,000.00) and made out to "Carley Bussey and Blue Cross Blue Shield and Craig Key Law Office." On or about August 1, 2012, the Oklahoma Farm Bureau Mutual Insurance Company Check Number C1305243 in the amount of Two Hundred and Twenty Thousand Dollars (\$200,000.00) was deposited into the IOLTA Attorney Trust Account Number 143477. On the back of the Oklahoma Farm Bureau Mutual Insurance Company Check Number C1305243 contained signature endorsements of Carley Bussey, Blue Cross/Blue Shield and C.S. Key. Carley Bussey and Blue Cross/Blue Shield did not sign these endorsement signatures and have denied giving anyone permission to do so on their behalf. The Defendant **CRAIG S. KEY** knowingly delivered and uttered for deposit Oklahoma Farm Bureau Mutual Insurance

Company Check Number C1305243 in the amount of Two Hundred and Twenty Thousand Dollars (\$200,000.00) to his aforementioned IOLTA Attorney Trust Account Number [REDACTED] with the knowledge that it contained the false signatures of Carley Bussey and Blue Cross/Blue Shield, with the intent to defraud Carley Bussey and Blue Cross/Blue Shield. All of said acts being contrary to the provisions of Sections 1577 of Title 21 of the Oklahoma Statutes and against the Peace and Dignity of the State of Oklahoma.

COUNT 2: EMBEZZLEMENT

On and before the inclusive dates from the 27th day July, 2012 through the 30th day of November, 2012, the crime of **EMBEZZLEMENT** was committed in **LINCOLN COUNTY**, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Carley Bussey, then a minor child, in resolving Ms. Bussey's personal injury claim arising from an automobile accident. This representation required the Defendant **CRAIG S. KEY** to deposit settlement proceeds into his IOLTA Attorney Trust Account and to pay medical providers for the medical treatment of Carley Bussey and the client Carley Bussey. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED]. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account.

The final resolution of the matter resulted in Oklahoma Farm Bureau Mutual Insurance Company issuing Check Number C1305243 on July 27, 2012 in the amount of Two Hundred

and Twenty Thousand Dollars (\$200,000.00) and made out to "Carley Bussey and Blue Cross Blue Shield and Craig Key Law Office." On August 1, 2012, the Oklahoma Farm Bureau Mutual Insurance Company Check Number C1305243 in the amount of Two Hundred and Twenty Thousand Dollars (\$200,000.00) was deposited into the IOLTA Attorney Trust Account Number 143477. On or about November 30th, 2012, the aforementioned IOLTA Attorney Trust Account Number 143477 was closed, having been overdrawn in the sum of Five Thousand Four Hundred and Eighty Two Dollars and Twenty Four Cents (\$5482.24) since approximately October 15, 2012. The Defendant **CRAIG S. KEY** knowingly and fraudulently appropriated to a use or purpose not intended or authorized in the course of his legal representation of Carley Bussey an amount in excess of One Hundred Thousand Dollars (\$100,000) of these monies, where these monies had been entrusted to the Defendant for a specific purpose, use, and/or disposition, to wit: to pay the medical providers who had provided medical treatment to Carley Bussey and to pay client Carley Bussey, but were instead used by the Defendant **CRAIG S. KEY** for other purposes. All of said acts being contrary to the provisions of Sections 1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL

NO BILL ()



FOREMAN

OKLAHOMA MULTICOUNTY GRAND JURY

Penalties:

Delivery of a Forged Note or Instrument. By imprisonment in the State Penitentiary for a period not exceeding seven (7) years.

Embezzlement. By imprisonment in the State Penitentiary for a period not exceeding five (5) years and a fine of up to five-thousand dollars (\$5,000.00).

WITNESSES (Before the Grand Jury):

Agent Kent Dowell c/o Oklahoma Department of Agriculture

Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21st Street,
Oklahoma City, Oklahoma 73105

Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

Deputy Larry Stover c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel
Avenue, Chandler, Oklahoma 74834

James Reaves, 870333 South 3300 Road, Wellston, Oklahoma 74881

Rebecca Alley, 870333 South 3300 Road, Wellston, Oklahoma 74881

Judy Morningstar c/o James Hodgens, Esq., 301 West Main Street, Stroud, Oklahoma 74079

Anita Martin, Waurika Livestock Commission Co., S. Hwy 81, Waurika, Oklahoma 73573

Brandon Dawson c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue,
Chandler, Oklahoma 74834

Shanda Chastain. 1731 N. Louisa Avenue, Shawnee, Oklahoma 74804

Evelyn Beaman, 910 E. 1st Street, Chandler, Oklahoma 74834

Sena Prible, 341215 880 Road E, Chandler, Oklahoma 74834

Leslie Bottger, 345944 E. 760 Road, Agra, Oklahoma 74824

Josh Anderson, 344180 E. 930 Road, Agra, Oklahoma 74824

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Brian Sullivan, 2420 N.W. 161st Terrace, Edmond, Oklahoma 73013

Shawna Cruz 4131 N.W. 122nd Street, Oklahoma City, OK

John Eyman, OU Medical Center, 1200 Everett Drive, Oklahoma City, OK 73104

Joyce Hopkins, 210 S.W. 89th Street, Oklahoma City, OK 73139

Shirley Kritz, OCOM Imaging (SW MRI), 401 SW 80th Street, Building D, Oklahoma City, OK

Dorinda Eaton, OU Physicians, University of Oklahoma, 660 Parrington Oval Room 119, Norman Oklahoma 73019

Mary Jane Keiser, 840493 S. Hwy 177, Chandler, Oklahoma 74834

Carley Bussey, 11261 N.S. Road 3570, Prague, Oklahoma 74864

Jana Jacobs c/o REACT EMS, P.O. Box 3700, Shawnee, Oklahoma 74802

Shelly Wilson c/o Stillwater Medical Center, P.O. Box 21042, Tulsa, Oklahoma 74121-1042

Amber VanLoozen, 104928 South 3511, Prague, Oklahoma 3511

Gay VanLoozen, 104928 South 3511, Prague, Oklahoma 3511

Bill Van Loozen, 104928 South 3511, Prague, Oklahoma 3511

Tionna Brauer, 920574 S. 3440 Road, Chandler, Oklahoma, 74834

Lydia Parker c/o Deaconess Hospital, 5501 North Portland, Oklahoma City, Oklahoma 73112

Brian Montecino c/o James Hodgens, Esq., 301 W. Main Street, P.O. Box 686, Stroud, Oklahoma

Melissa Gilbreath c/o EagleMed LLC, 6601 West Pueblo Drive, Wichita, Kansas 67209

Marvel Lewis, 3847 S. Boulevard, Edmond, Oklahoma 73013

Steve Lawson c/o Oklahoma Farm Bureau, 3303 N. Kickapoo, Shawnee, Oklahoma 74804

Betty Makintubbe c/o First Bank of Chandler, P.O. Box 218, Chandler, Oklahoma 74834

Karie Kath c/o Blue Cross Blue Shield, 1215 S. Boulder, P.O. Box 3283, Tulsa, Oklahoma 74102

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INDICTMENT

FOR: EMBEZZLEMENT, 21 O.S. § 1451 [1 Counts, being Count 1]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

COUNT 1: EMBEZZLEMENT

On and before the inclusive dates from the 13th day of March, 2012 through the 31st day of October 2012, the crime of **EMBEZZLEMENT** was committed in Lincoln County, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Amber VanLoozen, then a minor child, in resolving Ms. VanLoozen's personal injury claim arising from an automobile accident. Ms. VanLoozen's guardians at that time were her biological parents William VanLoozen and Gay VanLoozen. This representation required the Defendant **CRAIG S. KEY** to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Amber VanLoozen and the client, then minor child Amber VanLoozen. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED] located in **LINCOLN COUNTY**, Oklahoma. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account.

The final resolution of this matter resulted in Progressive Northern Insurance Company issuing Check Number 473550750 on March 13, 2012 in the amount of Forty Eight Thousand Six Hundred and Thirty Six Dollars and Fifty Cents (\$48,636.50) and made out to "William J. VanLoozen and His Attorneys Law Office of Craig S. Key." On or about March 21, 2012, Progressive Northern Insurance Company Check Number 473550750 in the amount of Forty

Eight Thousand Six Hundred and Thirty Six Dollars and Fifty Cents (\$48,636.50) was deposited into the Defendant **CRAIG S. KEY's** IOLTA Attorney Trust Account Number 143477

The final resolution of this matter also resulted in Oklahoma Farm Bureau Mutual Insurance Company issuing Check Number C1305244 on July 27, 2012 in the amount of One Hundred and Fifty Four Thousand Dollars (\$154,000.00) and made out to "Amber VanLoozen and Craig Key Law." On or about August 2, 2012, the Oklahoma Farm Bureau Mutual Insurance Company Check Number C1305244 in the amount of One Hundred and Fifty Four Thousand Dollars (\$154,000.00) was deposited into the Defendant **CRAIG S. KEY's** IOLTA Attorney Trust Account Number 143477. On or about November 30th, 2012, the aforementioned IOLTA Attorney Trust Account Number [REDACTED] was closed, having been overdrawn in the sum of Five Thousand Four Hundred and Eighty Two Dollars and Twenty Four Cents (\$5482.24) since approximately October 15, 2012.

On and before the inclusive dates from the 13th day March 2012 through the 30st day of November, 2012, the Defendant **CRAIG S. KEY** knowingly and fraudulently appropriated to a use or purpose not intended or authorized in the course of his legal representation of then minor child Amber VanLoozen an amount in excess of Fifty Five Thousand Dollars(\$55,000.00) of these monies, where these monies had been entrusted to the Defendant for a specific purpose, use, and/or disposition, to wit: to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Amber VanLoozen and to pay the client Amber VanLoozen, but were instead used by the Defendant **CRAIG S. KEY** for other purposes. The Defendant **CRAIG S. KEY** did not pay the medical providers of Amber VanLoozen, OU Medical and OU Physicians, who were paid a fraction of the true costs of these

medical services by Equity Plan Services/QuickPrint, the health insurance provider of William VanLoozen, resulting in a write down by OU Medical Center and OU Physicians in an amount in excess of Fifty Thousand Dollars (\$50,000). The Defendant Craig S. Key also failed to honor and pay Equitable Plan Services/QuickPrint than amount in excess of Five Thousand Dollars (\$5,000), the amount of their subrogation rights. All of said acts being contrary to the provisions of Sections 1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL

NO BILL



FOREMAN
OKLAHOMA MULTICOUNTY GRAND JURY

Penalties:

Embezzlement If the Value of the Property Embezzled is More Than Twenty-five Thousand Dollars (\$25,000.00). By imprisonment in the State Penitentiary for a period not exceeding ten (10) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00)

WITNESSES (Before the Grand Jury):

Agent Kent Dowell c/o Oklahoma Department of Agriculture

Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21st Street,
Oklahoma City, Oklahoma 73105

Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

Deputy Larry Stover c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue, Chandler, Oklahoma 74834

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STATE OF OKLAHOMA,)
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INDICTMENT

FOR: EMBEZZLEMENT, 21 O.S. § 1451 [1 Counts, being Count 1]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

COUNT 1: EMBEZZLEMENT

On and before the inclusive dates from the 13th day of March, 2012 through the 31st day of October 2012, the crime of **EMBEZZLEMENT** was committed in Lincoln County, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Amber VanLoozen, then a minor child, in resolving Ms. VanLoozen's personal injury claim arising from an automobile accident. Ms. VanLoozen's guardians at that time were her biological parents William VanLoozen and Gay VanLoozen. This representation required the Defendant **CRAIG S. KEY** to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Amber VanLoozen and the client, then minor child Amber VanLoozen. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED] located in **LINCOLN COUNTY**, Oklahoma. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account.

The final resolution of this matter resulted in Progressive Northern Insurance Company issuing Check Number 473550750 on March 13, 2012 in the amount of Forty Eight Thousand Six Hundred and Thirty Six Dollars and Fifty Cents (\$48,636.50) and made out to "William J. VanLoozen and His Attorneys Law Office of Craig S. Key." On or about March 21, 2012, Progressive Northern Insurance Company Check Number 473550750 in the amount of Forty

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On and before the inclusive dates from the 13th day March 2012 through the 30st day of November, 2012, the Defendant **CRAIG S. KEY** knowingly and fraudulently appropriated to a use or purpose not intended or authorized in the course of his legal representation of then minor child Amber VanLoozen an amount in excess of Fifty Five Thousand Dollars (\$55,000.00) of these monies, where these monies had been entrusted to the Defendant for a specific purpose, use, and/or disposition, to wit: to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Amber VanLoozen and to pay the client Amber VanLoozen, but were instead used by the Defendant **CRAIG S. KEY** for other purposes. The Defendant **CRAIG S. KEY** did not pay the medical providers of Amber VanLoozen, OU Medical and OU Physicians, who were paid a fraction of the true costs of these

medical services by Equity Plan Services/QuickPrint, the health insurance provider of William VanLoozen; resulting in a write down by OU Medical Center and OU Physicians in an amount in excess of Fifty Thousand Dollars (\$50,000). The Defendant Craig S. Key also failed to honor and pay Equitable Plan Services/QuickPrint than amount in excess of Five Thousand Dollars (\$5,000), the amount of their subrogation rights. All of said acts being contrary to the provisions of Sections 1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL

NO BILL



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Penalties:

Embezzlement If the Value of the Property Embezzled is More Than Twenty-five Thousand Dollars (\$25,000.00). By imprisonment in the State Penitentiary for a period not exceeding ten (10) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00)

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Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21st Street,
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Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

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Joyce Hopkins, 210 S.W. 89th Street, Oklahoma City, OK 73139

Shirley Kritz, OCOM Imaging (SW MRI), 401 SW 80th Street, Building D, Oklahoma City, OK

Dorinda Eaton, OU Physicians, University of Oklahoma, 660 Parrington Oval Room 119, Norman Oklahoma 73019

Mary Jane Keiser, 840493 S. Hwy 177, Chandler, Oklahoma 74834

Carley Bussey, 11261 N.S. Road 3570, Prague, Oklahoma 74864

Jana Jacobs c/o REACT EMS, P.O. Box 3700, Shawnee, Oklahoma 74802

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Melissa Gilbreath c/o EagleMed LLC, 6601 West Pueblo Drive, Wichita, Kansas 67209

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DOB 06-19-1965, SSN: [REDACTED])
Defendant.)

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INDICTMENT

FOR: DELIVERY OF A FORGED NOTE OR INSTRUMENT, 21 O.S. § 1577 [2 Counts, being Counts 1 and 2]

EMBEZZLEMENT, 21 O.S. § 1451 [2 Counts, being Counts 3 and 4]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

COUNT 1: DELIVERY OF A FORGED NOTE OR INSTRUMENT

On or about the 11th day October, 2011, the crime of **DELIVERY OF A FORGED NOTE OR INSTRUMENT** was committed in **LINCOLN COUNTY**, Oklahoma, by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Mary Jane Keiser in resolving Ms. Keiser's personal injury claim arising from an automobile accident with a Shawna Stastny. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED] located in **LINCOLN COUNTY**, Oklahoma . The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. The final resolution of the matter resulted in Farmers Insurance Exchange issuing Check Number 1107547801 on October 7, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law and Mary Jane Keiser and Medicare." The final resolution of this matter also resulted in Liberty Mutual Insurance Company issuing Check Number 28236499 on October 13, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law & Mary Jane Keiser & Eaglemed & Medicare & Deaconess Hospital ..." On or about October 11, 2011, the Farmers Insurance Exchange issuing Check Number 1107547801 in the amount of One Hundred Thousand Dollars (\$100,000.00) was deposited into the IOLTA Attorney Trust Account Number 143477. On the back of the Farmers Insurance Exchange issuing Check Number 1107547801 contained the signature endorsements of "Mary Jane Keiser,

Medicare and C.S. Key.” Mary Jane Keiser did not sign this endorsement signature and has denied giving anyone permission to do so on her behalf. The Defendant **CRAIG S. KEY** knowingly delivered and uttered for deposit Farmers Insurance Exchange issuing Check Number 1107547801 in the amount of One Hundred Thousand Dollars (\$100,000.00) to his aforementioned IOLTA Attorney Trust Account Number [REDACTED] at First Bank of Chandler, with the knowledge that it contained the false signatures of Mary Jane Keiser without her consent and knowledge, with the knowledge that said check was false, with the intent to defraud Farmers Insurance Exchange and Mary Jane Keiser. All of said acts being contrary to the provisions of Sections 1577 of Title 21 of the Oklahoma Statutes and against the Peace and Dignity of the State of Oklahoma.

COUNT 2: DELIVERY OF A FORGED NOTE OR INSTRUMENT

On or about the 20th day October, 2011, the crime of **DELIVERY OF A FORGED NOTE OR INSTRUMENT** was committed in **LINCOLN COUNTY**, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Mary Jane Keiser in resolving Ms. Keiser’s personal injury claim arising from an automobile accident with a Shawna Stastny. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED], located in **LINCOLN COUNTY**, Oklahoma. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. At this time, the Defendant **CRAIG S. KEY** maintained a personal

checking account with Stroud National Bank, Account Number [REDACTED]. The only signatory on the aforementioned Stroud National Bank Checking Account, Account Number [REDACTED] for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid Stroud National Bank Checking Account, Account Number 623902. The final resolution of the matter resulted in Farmers Insurance Exchange issuing Check Number 1107547801 on October 7, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law and Mary Jane Keiser and Medicare." The final resolution of this matter also resulted in Liberty Mutual Insurance Company issuing Check Number 28236499 on October 13, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law & Mary Jane Keiser & EagleMed & Medicare & Deaconess Hospital ...". On the back of the Liberty Mutual Insurance Company issuing Check Number 28236499 contained signature endorsements of Mary Jane Keiser, Craig Key, EagleMed, Deaconess and Medicare. Mary Jane Keiser, EagleMed and Deaconess Hospital did not sign these endorsement signatures and have denied giving anyone permission to do so on their behalf. The Defendant **CRAIG S. KEY** knowingly delivered and uttered for deposit Liberty Mutual Insurance Company issuing Check Number 28236499 in the amount of One Hundred Thousand Dollars (\$100,000.00) to his Stroud National Bank Checking Account, Account Number [REDACTED] with the knowledge that it contained the false signatures of Mary Jane Keiser, EagleMed and Deaconess Hospital without their consent and knowledge, with the knowledge that said check was false, with the intent to defraud Liberty Mutual Insurance Company, Mary Jane Keiser, EagleMed and Deaconess

Hospital. All of said acts being contrary to the provisions of Sections 1577 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

COUNT 3: EMBEZZLEMENT

On and before the inclusive dates from the 7th day October, 2011 through the 31st day of October 2012, the crime of **EMBEZZLEMENT** was committed in Lincoln County, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Mary Jane Keiser in resolving Ms. Keiser's personal injury claim arising from an automobile accident with a Shawna Stastny. This representation required the Defendant **CRAIG S. KEY** to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Mary Jane Keiser and the client Mary Jane Keiser. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED]. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. At this time, the Defendant **CRAIG S. KEY** maintained a personal checking account with Stroud National Bank, Account Number [REDACTED]. The only signatory on the aforementioned Stroud National Bank Checking Account, Account Number [REDACTED] for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid Stroud National Bank Checking Account, Account Number [REDACTED]. The final resolution of the matter resulted in Farmers

Insurance Exchange issuing Check Number 1107547801 on October 7, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law And Mary Jane Keiser And Medicare." On or about October 11, 2011, Defendant **CRAIG S. KEY** delivered and uttered for deposit Farmers Insurance Exchange issuing Check Number 1107547801 in the amount of One Hundred Thousand Dollars (\$100,000.00) to his aforementioned IOLTA Attorney Trust Account Number [REDACTED]. On or about November 30th, 2012, the aforementioned IOLTA Attorney Trust Account Number [REDACTED] was closed, having been overdrawn in the sum of Five Thousand Four Hundred and Eight Two Dollars and Twenty Four Cents (\$5482.24) since approximately October 15, 2012.

On and before the inclusive dates from the 7th day October, 2011 through the 31st day of November, 2011, the Defendant **CRAIG S. KEY** knowingly and fraudulently appropriated to a use or purpose not intended or authorized in the course of his legal representation of Mary Jane Keiser an amount in excess of Twenty Five Thousand Dollars (\$25,000.00) of these monies, where these monies had been entrusted to the Defendant for a specific purpose, use, and/or disposition, to wit: to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Mary Jane Keiser and the client Mary Jane Keiser, but were instead used by the Defendant **CRAIG S. KEY** for other purposes. All of said acts being contrary to the provisions of Sections 1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

COUNT 4: EMBEZZLEMENT

On and before the inclusive dates from the 13th day October, 2011 through the 21st day of October, 2011, the crime of **EMBEZZLEMENT** was committed in Lincoln County,

Oklahoma by the Defendant **CRAIG S. KEY**. That is to say, on and before said date, Defendant **CRAIG S. KEY** was an attorney retained to represent Mary Jane Keiser in resolving Ms. Keiser's personal injury claim arising from an automobile accident with a Shawna Stastny. This representation required the Defendant **CRAIG S. KEY** to deposit settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Mary Jane Keiser and the client Mary Jane Keiser. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED] located in LINCOLN COUNTY, Oklahoma. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. At this time, the Defendant **CRAIG S. KEY** maintained a personal checking account with Stroud National Bank, Account Number [REDACTED]. The only signatory on the aforementioned Stroud National Bank Checking Account, Account Number 623902, for purposes of signing checks and making deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid Stroud National Bank Checking Account, Account Number [REDACTED]. The final resolution of this matter resulted in Liberty Mutual Insurance Company issuing Check Number 28236499 on October 13, 2011 in the amount of One Hundred Thousand Dollars (\$100,000.00) and made out to "Craig S. Key Attorney At Law & Mary Jane Keiser & Eaglemed & Medicare & Deaconess Hospital ..." The aforementioned funds were entrusted to Defendant **CRAIG S. KEY** for a specific purpose, use, and/or disposition, to wit: to deposit the

aforementioned settlement proceeds into his IOLTA Attorney Trust Account, and to pay medical providers for medical treatment of Mary Jane Keiser and the client Mary Jane Keiser

On or about October 20, 2011, the Defendant **CRAIG S. KEY** knowingly delivered and uttered for deposit Liberty Mutual Insurance Company issuing Check Number 28236499 in the amount of One Hundred Thousand Dollars (\$100,000.00) to his Stroud National Bank Checking Account, Account Number [REDACTED], a personal checking account maintained by Defendant **CRAIG S. KEY**, without the knowledge or consent of his client Mary Jane Keiser. knowingly and fraudulently appropriating to a use or purpose not intended or authorized in the course of his legal representation of Mary Jane Keiser an amount in One Hundred Thousand Dollars (\$100,000.00). All of said acts being contrary to the provisions of Sections 1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL

NO BILL ()



FOREMAN

OKLAHOMA MULTICOUNTY GRAND JURY

Penalties:

Delivery of a Forged Note or Instrument. By imprisonment in the State Penitentiary for a period not exceeding seven (7) years.

Embezzlement If the Value of the Property Embezzled is More Than Twenty-five Thousand Dollars (\$25,000.00). By imprisonment in the State Penitentiary for a period not exceeding ten (10) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00)

WITNESSES (Before the Grand Jury):

Agent Kent Dowell c/o Oklahoma Department of Agriculture

Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21st Street,
Oklahoma City, Oklahoma 73105

Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

Deputy Larry Stover c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel
Avenue, Chandler, Oklahoma 74834

James Reaves, 870333 South 3300 Road, Wellston, Oklahoma 74881

Rebecca Alley, 870333 South 3300 Road, Wellston, Oklahoma 74881

Judy Morningstar c/o James Hodgens, Esq., 301 West Main Street, Stroud, Oklahoma 74079

Anita Martin, Waurika Livestock Commission Co., S. Hwy 81, Waurika, Oklahoma 73573

Brandon Dawson c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue,
Chandler, Oklahoma 74834

Shanda Chastain. 1731 N. Louisa Avenue, Shawnee, Oklahoma 74804

Evelyn Beaman, 910 E. 1st Street, Chandler, Oklahoma 74834

Sena Prible, 341215 880 Road E, Chandler, Oklahoma 74834

Leslie Bottger, 345944 E. 760 Road, Agra, Oklahoma 74824

Josh Anderson, 344180 E. 930 Road, Agra, Oklahoma 74824

Pam Hammers, Lincoln Co. District Attorney's Office, 811 Manvel Ave., Suite B, Chandler,
Oklahoma 74834

Pete Newsom, 333675 Timber Trail, Wellston, Oklahoma 74881

Edna Melson, 910030 S. 3470 Road, Chandler, Oklahoma 74834

Brian Sullivan, 2420 N.W. 161st Terrace, Edmond, Oklahoma 73013

Shawna Cruz 4131 N.W. 122nd Street, Oklahoma City, OK

John Eyman, OU Medical Center, 1200 Everett Drive, Oklahoma City, OK 73104

Joyce Hopkins, 210 S.W. 89th Street, Oklahoma City, OK 73139

Shirley Kritz, OCOM Imaging (SW MRI), 401 SW 80th Street, Building D, Oklahoma City, OK

Dorinda Eaton, OU Physicians, University of Oklahoma, 660 Parrington Oval Room 119,
Norman Oklahoma 73019

Mary Jane Keiser, 840493 S. Hwy 177, Chandler, Oklahoma 74834

Carley Bussey, 11261 N.S. Road 3570, Prague, Oklahoma 74864

Jana Jacobs c/o REACT EMS, P.O. Box 3700, Shawnee, Oklahoma 74802

Shelly Wilson c/o Stillwater Medical Center, P.O. Box 21042, Tulsa, Oklahoma 74121-1042

Amber VanLoozen, 104928 South 3511, Prague, Oklahoma 3511

Gay VanLoozen, 104928 South 3511, Prague, Oklahoma 3511

Bill Van Loozen, 104928 South 3511, Prague, Oklahoma 3511

Tionna Brauer, 920574 S. 3440 Road, Chandler, Oklahoma, 74834

Lydia Parker c/o Deaconess Hospital, 5501 North Portland, Oklahoma City, Oklahoma 73112

Brian Montecino c/o James Hodgens, Esq., 301 W. Main Street, P.O. Box 686, Stroud,
Oklahoma

Melissa Gilbreath c/o EagleMed LLC, 6601 West Pueblo Drive, Wichita, Kansas 67209

Marvel Lewis, 3847 S. Boulevard, Edmond, Oklahoma 73013

Steve Lawson c/o Oklahoma Farm Bureau, 3303 N. Kickapoo, Shawnee, Oklahoma 74804

Betty Makintubbe c/o First Bank of Chandler, P.O. Box 218, Chandler, Oklahoma 74834

Karie Kath c/o Blue Cross Blue Shield, 1215 S. Boulder, P.O. Box 3283, Tulsa, Oklahoma
74102

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.) Case No. _____
)
 CRAIG S. KEY,)
)
 DOB 06-19-1965, SSN: [REDACTED])
 Defendant.)

INDICTMENT

FOR: EMBEZZLEMENT, 21 O.S. § 1451 [1 Counts, being Count 1]

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

COUNT 1: EMBEZZLEMENT

On and before the inclusive dates from the November 6, 2008 through the 31st day of November, 2012, the crime of **EMBEZZLEMENT** was committed in **LINCOLN COUNTY**, Oklahoma by the Defendant **CRAIG S. KEY**. That is to say that on December 4, 2007, Tyler Mathew Gourley and Crystal Shalea Gourley died in an automobile accident occurring in Caddo County, Oklahoma leaving as sole heir L.G., DOB: 11/14/2007. On January 16, 2008, Brian Montecino and Travis Gourley were appointed co-guardians of minor child L.G., DOB: 11/14/2007. On April 9, 2008, Michael S. Gourley and M. Sue Gourley, paternal grandparents of L.G., DOB: 11/14/2007, were appointed as personal representatives of the Estate of Tyler Mathew Gourley, Caddo Co. PB-2008-7, and on that same date Brian Keith Montecino and Jean Montecino, maternal grandparents of L.G., DOB: 11/14/2007, were appointed as personal representatives of the Estate of Crystal Shalea Gourley, Caddo Co. PB-2008-7.

Prior to January 16, 2008, Defendant **CRAIG S. KEY** was retained as an attorney to represent Brian Keith Montecino and Jeana Montecino, maternal grandparents of L.G., DOB: 11/4/2007 in Caddo Co. PB-2008-7, Canadian Co. PG-2007-72 and Lincoln County FA-2009-221, and Marvel E. Lewis was retained as an attorney to represent Michael S. Gourley and M. Sue Gourley, paternal grandparents of L.G., DOB: 11/14/2007 in Caddo Co. PB-2008-7, Canadian Co. PG-2007-72 and Lincoln County FA-2009-221

On September 25, 2008, Farmers Insurance Company issued three separate checks, all made payable to "Brian Montecino, Jeana Montecino, Michael Gourley, And M. Sue Gourley As Administrators And Personal Representatives of the Estate", with the total sum of the three aforementioned checks totaling Fifty Seven Thousand Eight Hundred and Forty Five Dollars

(\$57,845.00). The checks issued by Farmers Insurance Company on September 25, 2008 to “Brian Montecino, Jeana Montecino, Michael Gourley, And M. Sue Gourley As Administrators And Personal Representatives of the Estate were as follows, to wit: Farmers Insurance Check No. 1372005360 in the amount of Seventeen Thousand Eight Hundred and Forty Five Dollars (\$17,845.00); Farmers Insurance Company Check No. 1372005361 in the amount of Twenty Thousand Dollars (\$20,000.00) and Farmers Insurance Company Check No. 1372005362 in the amount of Twenty Thousand Dollars (\$20,000.00).

On October 6, 2008, Equity Insurance Company issued Check No. 0391354 in the amount of Twenty Five Thousand Dollars (\$25,000.00) made payable to the “Estates of Crystal Shalea Gourley, deceased, and attorney Marvel E. Lewis”. On that same date, October 6, 2008, Equity Insurance Company also issued Check No. 391355 in the amount of Twenty Five Thousand Dollars (\$25,000.00) made payable to “Estate Tyler Mathew Gourley and His Attorney, Craig S. Key.”

On or before November 6, 2008, all of the aforementioned funds, totaling One Hundred and Eight Thousand Three Hundred and Forty Five Dollars and Ninety Nine Cents (\$108,345.99) were entrusted to Defendant **CRAIG S. KEY** for a specific purpose, use, and/or disposition, to wit: to deposit the aforementioned settlement proceeds into his IOLTA Attorney Trust Account, to pay funeral expenses for the Estate of Tyler Mathew Gourley and Crystal Shalea Gourley and pay minor child L.G., DOB: 11/14/2007. At this time, the Defendant **CRAIG S. KEY** maintained his IOLTA Attorney Trust Account with the First Bank of Chandler, Account Number [REDACTED], located in **LINCOLN COUNTY**, Oklahoma. The only signatory on this IOLTA Attorney Trust Account for purposes of signing checks and making

deposits and/or transfers was **CRAIG S. KEY**. The Defendant **CRAIG S. KEY** maintained exclusive possession and control of the checkbook and deposit slips of the aforesaid IOLTA Attorney Trust Account. On or about November 30th, 2012, the aforementioned IOLTA Attorney Trust Account Number 143477 was closed, having been overdrawn in the sum of Five Thousand Four Hundred and Eight Two Dollars and Twenty Four Cents (\$5482.24) since approximately October 15, 2012.

On or about November 6, 2008, the following checks were deposited into the Defendant **CRAIG S. KEY'S** IOLTA Attorney Trust Account Number [REDACTED] to wit: Farmers Insurance Check No. 1372005360 in the amount of Seventeen Thousand Eight Hundred and Forty Five Dollars (\$17,845.00); Farmers Insurance Company Check No. 1372005361 in the amount of Twenty Thousand Dollars (\$20,000.00), Farmers Insurance Company Check No. 1372005362 in the amount of Twenty Thousand Dollars (\$20,000.00), Equity Insurance Company Check No. 0391354 in the amount of Twenty Five Thousand Dollars (\$25,000.00) and Equity Insurance Company Check No. 391355 in the amount of Twenty Five Thousand Dollars (\$25,000.00).

The Defendant **CRAIG S. KEY** knowingly, fraudulently appropriated to a use or purpose not intended or authorized in the course of his legal representation of Brian Keith Montecino and Jean Montecino an amount in excess of Ninety Three Thousand One Hundred and Five Dollars and Thirty Nine Cents (\$93,105.39) of these monies, where these monies had been entrusted to the Defendant for a specific purpose, use, and/or disposition, to wit: to pay the funeral expenses for the Estate of Tyler Mathew Gourley and Crystal Shalea Gourley and pay minor child L.G., DOB: 11/14/2007. All of said acts being contrary to the provisions of Sections

1451 of Title 21 of the Oklahoma Statutes, and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL ()

NO BILL ()



FOREMAN
OKLAHOMA MULTICOUNTY GRAND JURY

Penalties:

Embezzlement If the Value of the Property Embezzled is More Than Twenty-five Thousand Dollars (\$25,000.00). By imprisonment in the State Penitentiary for a period not exceeding ten (10) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00)

WITNESSES (Before the Grand Jury):

Agent Kent Dowell c/o Oklahoma Department of Agriculture

Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21st Street, Oklahoma City, Oklahoma 73105

Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

Deputy Larry Stover c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue, Chandler, Oklahoma 74834

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Rebecca Alley, 870333 South 3300 Road, Wellston, Oklahoma 74881

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