

WATSON  
FILED IN THE DISTRICT COURT  
OKLAHOMA COUNTY, OKLA.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

MAY 25 2012

PATRICIA PRESLEY, COURT CLERK  
by \_\_\_\_\_  
DEPUTY

INFORMATION

THE STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 vs. ) No.  
 )  
 JEANETTE HARRIS JACKSON, )  
 )  
 Defendant. )

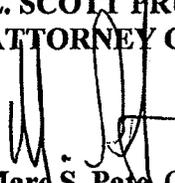
CF-2012-3291

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 August 11, 2011, in Oklahoma County, State of Oklahoma, **JEANETTE HARRIS JACKSON**, 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 falsely reporting an automobile accident occurring on August 9, 2011; to-wit, by reporting an accident that occurred on August 8, 2011, when there was no insurance coverage, as occurring on August 9, 2011, after reinstating the lapsed policy, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

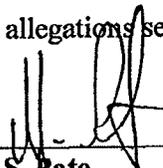
**E. SCOTT PRUITT**  
**ATTORNEY GENERAL OF OKLAHOMA**



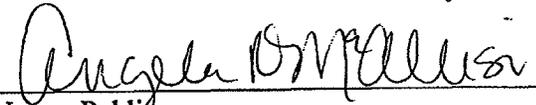
Marc S. Pate, OBA #10567  
Assistant Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
(405) 522-3921

STATE OF OKLAHOMA )  
OKLAHOMA COUNTY ) ss

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

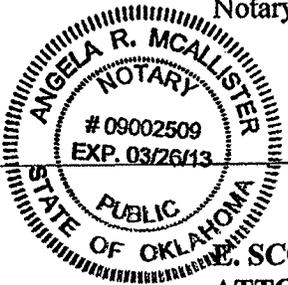
  
\_\_\_\_\_  
Marc S. Pate  
Assistant Attorney General

Signed and sworn to before me by Marc S. Pate on the 3<sup>rd</sup> day of May,  
2012.

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

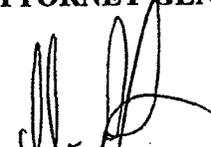
(SEAL)

My Commission Expires:



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**

**Shawn Spaeth  
Farmers Insurance Company  
2028 E. Memorial Rd.  
Edmond, Oklahoma 73013**

**Mike Thornton  
B&M Collision  
3011 SW Summit Ave.  
Lawton, Ok. 73505**

**Bryan Cnossen  
Farmers Insurance Company  
2028 E. Memorial Rd.**

**Debbie Chamberlain  
Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105**

**Shawn Martin  
702 SW Sedalia Ave.  
Lawton, Oklahoma 73505**

**Colin Daugherty  
Colorado State Patrol  
15055 South Golden Rd.  
Golden, Co. 80401**

**Mark Wenthold  
N.I.C.B.  
P.O. Bos 891257  
Oklahoma City, Oklahoma 73189**

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA**

**THE STATE OF OKLAHOMA**

**Plaintiff,**

**vs.**

**Jeanette Jackson  
DOB: 03/17/57  
SSN: ██████████**

**CASE NO.**

**AFFIDAVIT OF  
PROBABLE CAUSE**

**STATE OF OKLAHOMA )**

**) ss.**

**OKLAHOMA COUNTY )**

The undersigned, being first duly sworn and upon oath, does depose and state as follows:

I, Debbie Chamberlain, am employed as an investigator with the Workers' Compensation and Insurance Fraud Unit in the Office of the Attorney General. I was assigned to investigate a complaint alleging Jeanette Jackson made a false claim for insurance benefits to Farmers Insurance Company.

I reviewed the documentation of an investigation conducted by Shaun Spaeth, Special Investigations Unit for Farmers Insurance Company. The documentation showed Jeanette Jackson's Policy #0186961452, had been cancelled in May of 2011, for non-payment. On August 8, 2011, Jeanette Jackson attempted to make an auto accident claim but was denied due to her policy was not in force. Jackson telephonically renewed her policy, by making a payment with a credit card on August 8, 2011. Jackson contacted Farmers on August 11, 2011 to report another accident that occurred on August 9, 2011. This time Jackson reported she was driving on I-240 when she pulled off to the side of the roadway due to a storm. An unknown driver in a red pickup hit her vehicle while she was parked on the side of the roadway. The red pickup did not stop and Jackson did not call the police. The claims office paid for Jackson's vehicle repairs and her rental car before they realized her policy had been reinstated after denying the claim on August 8, 2011. Farmers Insurance paid B&M Collision \$6,826.00 for repairs to Jackson's vehicle.

I reviewed a copy of a traffic collision report from Ponca City Police Department. The report states a collision involving Jeanette Jackson's vehicle (2008 Blue Chrysler Lic/602-BTH) occurred on August 8, 2011 at 1834 hours. Shawn Martin was listed as the driver at the

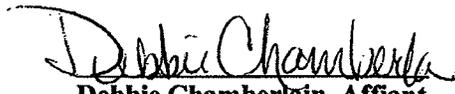
time of the collision. Officer Daugherty worked the collision and photographed the vehicles involved. After reviewing the collision photographs and the repair photographs from B&M Collision Center it is apparent the damage is the same that was caused by the collision on August 8, 2011, in Ponca City.

I interviewed Jeanette Jackson on April 6, 2012. Jackson said on August 9, 2011, she was driving westbound on I-240 near CrossRoads Mall when a rain storm blew in. The rainfall was so heavy she could not see to drive so she pulled to the side of the roadway. While Jackson was parked on the side of the road, a red pickup hit her and kept going. When Jackson completed her story, she was confronted with the collision report from Ponca City. Jackson then said she would tell the truth. Jackson said her son (Shawn Martin) was driving her vehicle in Ponca City when a car stopped and waved him out of a private drive. When Martin pulled out onto the roadway a red pickup came around the car that waved him out of the private drive and hit him.

Jackson said she did not know her insurance had been cancelled until she called to report the collision. Once she was made aware her insurance was cancelled for nonpayment, she renewed it over the phone with a credit card. Jackson said she didn't know what to do about her car so she called and made another claim.

Based on the above information, I believe that probable cause existed to show that JEANETTE JACKSON 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 her arrest.

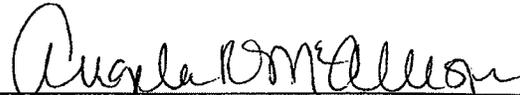
FURTHER AFFIANT SAYETH NOT.

  
Debbie Chamberlain, Affiant

This affidavit was subscribed and sworn to before me 25<sup>th</sup> day of May, 2011,  
Debbie Chamberlain.

(SEAL)



  
Notary Public

My commission Expires \_\_\_\_\_.

**FINDING OF PROBABLE CAUSE**

On the \_\_\_\_\_, day of \_\_\_\_\_, 2012, the above captioned case came before me, the undersigned Judge of the District of Oklahoma County, Oklahoma, upon the Affidavit of Probable Cause of Debbie Chamberlain, Investigator with the Office of Attorney General, requesting that a Warrant of Arrest issue for the within named Defendant, Jeanette Jackson, that she might be arrested and held to answer for the offenses of False Claim for Insurance Claim. Based upon said Affidavit, I am satisfied and do hereby find that the offense of False Claim for Insurance Claim has been committed, 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 \_\_\_\_\_, 2011.

\_\_\_\_\_  
Judge of the District Court