

**IN THE SUPREME COURT OF THE STATE OF OKLAHOMA**

THE STATE OF OKLAHOMA,	)	
Plaintiff,	)	
	)	
v.	)	Case No. CF-2024-
	)	
PAUL WAYNE BAXTER,	)	
DOB: 10/05/1956	)	
SSN: XXX-XX-3394	)	
	)	
BENG DI CHAN,	)	
DOB: 10/14/1977	)	
SSN: XXX-XX-1527	)	
	)	
MIN YONG CHEN,	)	
DOB: 03/08/1968	)	
SSN: XXX-XX-9092	)	
	)	
ZENG CHEN LAU,	)	
DOB: 07/04/1969	)	
SSN: XXX-XX-3067	)	
	)	
CHEN FU LIN,	)	
DOB: 01/16/1988	)	
SSN: XXX-XX-3959	)	
	)	
Defendants.	)	

**INDICTMENT**

***FOR:***

- COUNT 1: CONSPIRACY TO DEFRAUD THE STATE, 21 O.S. § 424, a FELONY**
  
- COUNT 2: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**
  
- COUNT 3: POSSESSION OF AN OFFENSIVE WEAPON WHILE IN THE COMMISSION OF A FELONY, 21 O.S. § 1287, a FELONY**
  
- COUNT 4: POSSESSION OF PROCEEDS FROM UNLAWFUL ACTIVITY, 21 O.S. § 2001, a FELONY**
  
- COUNT 5: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

**COUNT 6: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

**COUNT 7: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

**COUNT 8: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

**COUNT 9: POSSESSION OF UNLAWFUL PROCEEDS, 21 O.S. § 2001, a FELONY**

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

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding judge determines the Twentieth Multi-County 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 said Multi-County 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:

**COUNT 1: CONSPIRACY TO DEFRAUD THE STATE, 21 O.S. § 424, a FELONY**

On or between September 8, 2021, through November 16, 2023, the crime of CONSPIRACY TO DEFRAUD THE STATE was committed by **PAUL WAYNE BAXTER, BENG DI CHANG, MIN YONG CHEN, ZENG CHEN LAU, and CHEN FU LIN** who, acting conjointly, entered into an agreement to defraud the State of Oklahoma. In furtherance of their conspiracy to defraud the State of Oklahoma, a member or members of the conspiracy did commit one or more of the following overt acts:

- (a) Paul Baxter and Chen Fu Lin knowingly submitted or caused to be submitted false information to the Oklahoma Medical Marijuana Authority regarding the true beneficial ownership of Cannabaxter Farms, LLC operating at 9074 NS 3510 Road, Prague, Oklahoma.
- (b) Paul Baxter and Beng Di Chan knowingly submitted or caused to be submitted false information to the Oklahoma Medical Marijuana Authority regarding the true beneficial ownership of Cannabaxter Farms, LLC operating at 8524 NS 3510 Road, Prague, Oklahoma.
- (c) Paul Baxter and Min Yong Chen knowingly submitted or caused to be submitted false information to the Oklahoma Medical Marijuana Authority regarding the true beneficial ownership of Cannabaxter Farms, LLC operating at 8612 NS 3510 Road, Prague, Oklahoma.
- (d) Paul Baxter and Zeng Chen Lau knowingly submitted or caused to be submitted false information to the Oklahoma Medical Marijuana Authority regarding the true beneficial ownership of Evergreen Farms, LLC operating at 8871 NS 3510 Road, Prague, Oklahoma.

All contrary to the provisions of Section 424 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

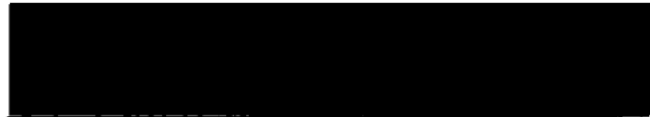
NO BILL ( )

  
FOREMAN  
OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 2: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

On or about November 16, 2023, the crime of **AGGRAVATED MANUFACTURING OF MARIJUANA**, was committed by **PAUL WAYNE BAXTER** and **BENG DI CHAN** who acting together and with others, both known and unknown to the Grand Jury, produced, prepared, propagated, compounded and/or processed marijuana, a Schedule I controlled dangerous substance, at 8524 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, in an amount of one thousand (1,000) or more plants containing a detectable amount of marijuana, contrary to the provisions Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL   
NO BILL



FOREMAN *[Handwritten initials]*  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 3: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

On or about November 16, 2023, the crime of **AGGRAVATED MANUFACTURING OF MARIJUANA**, was committed by **PAUL WAYNE BAXTER** and **MIN YONG CHEN** who acting conjointly together and with others, both known and unknown to the Grand Jury, produced, prepared, propagated, compounded and/or processed marijuana, a Schedule I controlled dangerous substance, at 8612 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, in an amount of one thousand (1,000) or more plants containing a detectable amount of marijuana, contrary to the provisions Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL



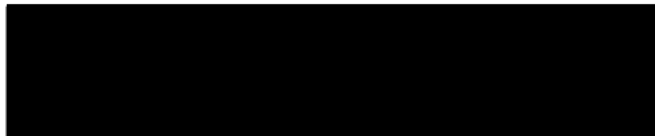
FOREMAN *DD*  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 4: POSSESSION OF AN OFFENSIVE WEAPON WHILE IN THE COMMISSION OF A FELONY, 21 O.S. § 1287, a FELONY**

On or about November 16, 2023, the crime of **POSSESSION OF AN OFFENSIVE WEAPON WHILE IN COMMISSION OF A FELONY**, was committed by **MIN YONG CHEN**, who willfully and knowingly possessed a Para-Ordnance, Model P13-45, .45 caliber pistol, bearing serial number RM342, a Glock, Model 42, .380 caliber pistol, bearing serial number ABBU167, and a Diamondback Firearms, Model DB15, 300 Blackout rifle, bearing serial number DB2485966 while committing the crime of Manufacturing of Marijuana in violation of Section 2-401(G) of Title 63 of the Oklahoma Statutes, at 8612 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, contrary to the provisions of Section 1287 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL ( )



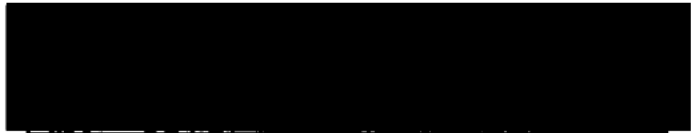
FOREMAN  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 5: POSSESSION OF PROCEEDS DERIVED FROM ILLEGAL DRUG ACTIVITY, 63 O.S. § 2-503.1, a FELONY**

On or about November 16, 2023, the crime of **POSSESSION OF PROCEEDS DERIVED FROM ILLEGAL DRUG ACTIVITY**, was feloniously committed by **MIN YONG CHEN** who knowingly or intentionally received or acquired and concealed United States Currency, or engaged in transactions involving proceeds which were derived from the illegal Manufacturing of Marijuana, in violation of Section 2-401(G) of Title 63 of the Oklahoma Statutes, contrary to the provisions of Section 2001 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )



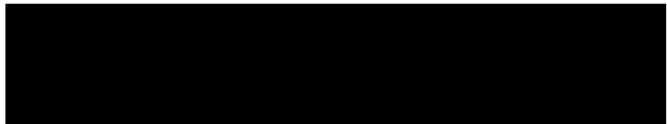
FOREMAN *DD*  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 6: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

On or about November 16, 2023, the crime of **AGGRAVATED MANUFACTURING OF MARIJUANA**, was committed by **PAUL WAYNE BAXTER** who acting with others, both known and unknown to the Grand Jury, produced, prepared, propagated, compounded and/or processed marijuana, a Schedule 1 controlled dangerous substance, at 8746 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, in the amount of one thousand (1,000) or more plants containing a detectable amount of marijuana, contrary to the provisions of Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL ( )



FOREMAN  
OKLAHOMA MULTI-COUNTY GRAND JURY

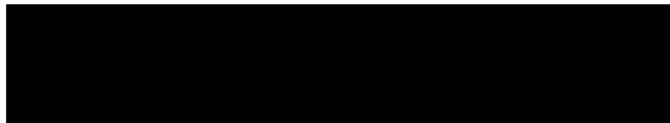


**COUNT 7: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

On or about November 16, 2023, the crime of **AGGRAVATED MANUFACTURING OF MARIJUANA**, was committed by **PAUL WAYNE BAXTER** and **ZENG CHEN LAU** who acting together and with others, both known and unknown to the Grand Jury, produced, prepared, propagated, compounded and/or processed marijuana, a Schedule 1 controlled dangerous substance, at 8871 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, in an amount of one thousand (1,000) or more plants containing a detectable amount of marijuana, contrary to the provisions Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL

NO BILL




FOREMAN *[Signature]*  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 8: AGGRAVATED MANUFACTURING OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, 63 O.S. § 2-401(G), a FELONY**

On or about November 16, 2023, the crime of **AGGRAVATED MANUFACTURING OF MARIJUANA**, was committed by **PAUL WAYNE BAXTER** and **CHEN FU LIN** who acting together and with others, both known and unknown to the Grand Jury, produced, prepared, propagated, compounded and/or processed marijuana, a Schedule 1 controlled dangerous substance, at 8746 NS 3510 Road, Prague, in Pottawatomie County, Oklahoma, in an amount of one thousand (1,000) or more plants containing a detectable amount of marijuana, contrary to the provisions Section 2-401(G) of Title 63 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )

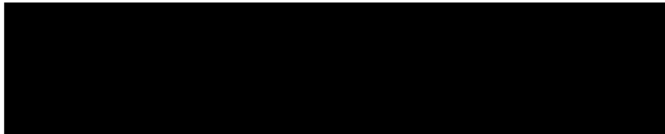
  
FOREMAN  
OKLAHOMA MULTI-COUNTY GRAND JURY

**COUNT 9: POSSESSION OF UNLAWFUL PROCEEDS, 21 O.S. § 2001, a FELONY**

On, about, or between April 18, 2022 and November 16, 2023, the crime of **POSSESSION OF UNLAWFUL PROCEEDS**, was committed by **PAUL WAYNE BAXTER** who knowingly acquired and concealed funds or engaged in transactions involving funds knowing that those funds were derived from unlawful activity, to wit: conspiracy to defraud the state of Oklahoma, in violation of 21 O.S. § 424 and/or the illegal manufacturing of marijuana, in violation of 63 O.S. § 2-401(G), totaling in excess of \$50,000 of illegal proceeds, contrary to the provisions of Section 2001 of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ( )



FOREMAN  
OKLAHOMA MULTI-COUNTY GRAND JURY

**WITNESSES (Before the Grand Jury):**

Adam Good, Oklahoma Attorney General's Office  
Chris Edwards, Oklahoma Attorney General's Office  
Anthony Libel, Oklahoma Attorney General's Office  
Jonathan Wellden, Oklahoma Attorney General's Office  
Travis Wano, 14211 Transportation Way, Apt. 328, Shawnee, OK 74804