

8741
m. mcelwee

IN THE DISTRICT COURT, IN AND FOR OKLAHOMA COUNTY, STATE OF OKLAHOMA

State of Oklahoma	PLAINTIFF,)
VS.)
JOY HOFMEISTER)
STEPHANIE DAWN MILLIGAN)
STEVEN CRAWFORD)
LELA ODOM)
ROBERT FOUNT HOLLAND)
	DEFENDANTS.)

INFORMATION

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

CF - 2016 - 8741

NOV 03 2016

RICK WARREN
COURT CLERK

12

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA, COMES NOW
DAVID W. PRATER THE DULY ELECTED, QUALIFIED AND ACTING DISTRICT ATTORNEY IN
AND FOR OKLAHOMA COUNTY, DISTRICT NO. 7, STATE OF OKLAHOMA, AND ON HIS OFFICIAL OATH INFORMS THE
DISTRICT COURT THAT

COUNT 1 : BETWEEN APRIL, 2013 AND NOVEMBER, 2014 THE CRIME OF KNOWINGLY ACCEPTING CONTRIBUTIONS IN EXCESS OF THE MAXIMUM AMOUNTS PROVIDED BY LAW WAS COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA BY JOY LYNN HOFMEISTER, A CANDIDATE FOR SUPERINTENDENT OF PUBLIC INSTRUCTION, WHO THROUGH COORDINATION WITH OKLAHOMANS FOR PUBLIC SCHOOL EXCELLENCE, KNOWINGLY ACCEPTED MONETARY OR IN-KIND CONTRIBUTIONS IN ACCESS OF THE MAXIMUM AMOUNTS PROVIDED BY LAW, IN VIOLATION OF TITLE 21 § 187.1 OF THE OKLAHOMA STATUTES;

COUNT 2 : BETWEEN APRIL, 2013 AND NOVEMBER, 2014 THE CRIME OF KNOWINGLY ACCEPTING CORPORATE CONTRIBUTIONS WAS COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA BY JOY LYNN HOFMEISTER, A CANDIDATE FOR SUPERINTENDENT OF PUBLIC INSTRUCTION, WHO THROUGH COORDINATION WITH OKLAHOMANS FOR PUBLIC SCHOOL EXCELLENCE, KNOWINGLY ACCEPTED CORPORATE MONETARY OR IN-KIND CONTRIBUTIONS, SPECIFICALLY MONETARY OR IN KIND CONTRIBUTIONS FROM AMERICAN FIDELITY ASSURANCE COMPANY, IN VIOLATION OF TITLE 21 § 187.2 OF THE OKLAHOMA STATUTES;

COUNT 3 : BETWEEN APRIL, 2013 AND NOVEMBER, 2014 THE CRIME OF CONSPIRACY TO COMMIT A FELONY IN VIOLATION OF TITLE 21 SECTION 421 OF THE OKLAHOMA STATUTES WAS KNOWINGLY AND WILLFULLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA BY JOY LYNN HOFMEISTER, ROBERT FOUNT HOLLAND, STEPHANIE DAWN MILLIGAN, STEVEN CRAWFORD AND LELA ODOM WHO, ACTING CONJOINTLY AND IN CONCERT WITH ONE ANOTHER, ENTERED INTO AN AGREEMENT AMONG THEMSELVES OR BECAME PARTIES TO SAID AGREEMENT AT SOME TIME AFTER IT WAS MADE, TO KNOWINGLY SOLICIT AND ACCEPT MONETARY OR IN-KIND CONTRIBUTIONS TO JOY HOFMEISTER, A CANDIDATE FOR SUPERINTENDENT OF PUBLIC INSTRUCTION, IN EXCESS OF THE MAXIMUM AMOUNTS PROVIDED BY LAW, SPECIFICALLY BY COORDINATING ACTIVITIES BETWEEN THE CANDIDATE COMMITTEE OF FRIENDS OF JOY HOFMEISTER 2014 AND THE OKLAHOMANS FOR PUBLIC SCHOOL EXCELLENCE COMMITTEE AND CHANNELLING SAID EXCESS CONTRIBUTIONS TO OKLAHOMANS FOR PUBLIC SCHOOL EXCELLENCE TO BE USED TO DIRECTLY BENEFIT FRIENDS OF JOY HOFMEISTER 2014, IN VIOLATION OF TITLE 21 § 187.1 OF THE OKLAHOMA STATUTES AND IN FURTHERANCE OF SAID CONSPIRACY HOFMEISTER

COMMUNICATED BY TEXT MESSAGE ON OR ABOUT JANUARY 15, 2014 WITH RYAN OWENS AND FOUNT HOLLAND TO ARRANGE COMMUNICATIONS BETWEEN THE HOFMEISTER CAMPAIGN AND OKLAHOMA EDUCATION ASSOCIATION EXECUTIVE DIRECTOR LELA ODOM FOR THE PURPOSE OF DISCUSSING HOW HOFMEISTER COULD DEFEAT THE INCUMBANT STATE SUPERINTENDENT OF PUBLIC INSTRUCTION IN THE ELECTION;

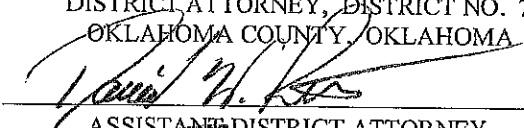
COUNT

- 4 : BETWEEN APRIL, 2013 AND NOVEMBER, 2014 THE CRIME OF CONSPIRACY TO COMMIT A FELONY IN VIOLATION OF TITLE 21 SECTION 421 OF THE OKLAHOMA STATUTES WAS KNOWINGLY AND WILLFULLY COMMITTED IN OKLAHOMA COUNTY, OKLAHOMA BY JOY LYNN HOFMEISTER, ROBERT FOUNT HOLLAND, STEPHANIE DAWN MILLIGAN, STEVEN CRAWFORD AND LELA ODOM WHO, ACTING CONJOINTLY AND IN CONCERT WITH ONE ANOTHER, ENTERED INTO AN AGREEMENT AMONG THEMSELVES OR BECAME PARTIES TO SAID AGREEMENT AT SOME TIME AFTER IT WAS MADE, TO KNOWINGLY SOLICIT AND ACCEPT MONETARY OR IN-KIND CONTRIBUTIONS TO FRIENDS OF JOY HOFMEISTER 2014 FROM CORPORATIONS IN VIOLATION OF TITLE 21 SECTION 187.2 OF THE OKLAHOMA STATUTES, AND IN FURTHERANCE OF SAID CONSPIRACY LELA ODOM MET SOMETIME IN MARCH OF 2014 WITH EXECUTIVES OF AMERICAN FIDELITY ASSURANCE COMPANY AND ARRANGED FOR THE PAYMENT OF \$50,000 EACH TO THE OKLAHOMA EDUCATION ASSOCIATION AND THE COOPERATIVE COUNCIL FOR OKLAHOMA SCHOOL ADMINISTRATION, WHICH FUNDS WERE THEN USED BY OKLAHOMAN FOR PUBLIC SCHOOL EXCELLENCE IN COORDINATION WITH AND FOR THE BENEFIT OF FRIENDS OF JOY HOFMEISTER 2014;

DAVID W. PRATER

DISTRICT ATTORNEY, DISTRICT NO. 7
OKLAHOMA COUNTY, OKLAHOMA

BY



ASSISTANT DISTRICT ATTORNEY