

Elliott

IN THE DISTRICT COURT OF OKLAHOMA COUNTY NOV 21 2019
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA)
)
Plaintiff,)
v.)
)
LAVADA STACY MYERS,)
)
and)
)
ENETRICE MYERS-TARPEH,)
)
Defendants.)

RICK WARREN
COURT CLERK
20_____

Case No.

CF-2019-4715

INFORMATION

In the name and by the authority of the State of Oklahoma, MIKE HUNTER, duly elected, qualified, and acting, Attorney General of the State of Oklahoma, hereby gives information that in the counties of Oklahoma, Seminole, Okfuskee, and Pottawatomie, State of Oklahoma, **Lavada Stacy Myers and Enetrice Myers-Tarpeh**, did then and there, acting conjointly and in concert with each other, committed the crimes of:

COUNT ONE (1)
CONSPIRACY TO COMMIT FINANCIAL NEGLECT BY CARETAKER
21 O.S. § 421(A)(1)(A)(4) and 21 O.S. § 843.1(A)

Commencing on or about the 2nd day of February 2018, through and including the 31st day of May 2019, in Oklahoma, Pottawatomie, Okfuskee, and Seminole Counties, State of Oklahoma, **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, **and Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of

The Rest Haven Management Inc., dba Four See Residential Care Home, jointly and in concert with each other, willfully, knowingly, intentionally, and feloniously conspired, implicitly or explicitly, to commit the offense of Financial Neglect by Caretaker.

Enetrice Myers-Tarpeh, in her capacity as Chief Financial Officer for Four See Residential Care Home, assumed the duty to manage the financial resources of D.B. a vulnerable adult, and **Lavada Stacy Myers**, in her capacities as caretaker, Chief Executive Officer, Director, and Administrator for Four See, through repeated instances, failed to use the resources available to restore or maintain the health and physical well-being of D.B., a vulnerable adult, to wit: by squandering or negligently expending and mismanaging the money, property, or accounts of D.B., a vulnerable adult and/or providing substandard care to D.B., a vulnerable adult, despite the availability of adequate financial resources.

The implicit or explicit agreement was carried out by **Lavada Stacy Myers** obtaining the Wells Fargo debit card, account number ending in 7965, belonging to D.B. under the pretense of using the debit card to pay for D.B.'s monthly living expenses at Four See Care Home. Without the knowledge, permission, or consent of D.B., **Lavada Stacy Myers** conveyed the physical Wells Fargo debit card, ending in 7965, and/or the financial information contained on the Wells Fargo debit card to **Enetrice Renne Myers-Tarpeh**. The fraudulently obtained debit card and/or the information on the debit card was used repeatedly by **Lavada Stacy Myers** and/or **Enetrice Renne Myers-Tarpeh** to make personal purchases, obtain goods, services, money, or transfer funds either in person with the use of the physical debit card belonging to D.B., or electronically, with the aid of a computer, computer system, or computer network to unlawfully make personal purchases, obtain goods, services, money, or transfer funds and falsely representing through

deception, trick, or deceit that D.B. was personally conducting the transaction or that the transaction was conducted with the knowledge, permission, or consent of D.B.

In furtherance of the unlawful agreement to commit Financial Neglect by Caretaker, **Lavada Stacy Myers**, as a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, **and/or Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, jointly and in concert with each other, willfully, knowingly, intentionally, and feloniously, committed one or more of the following acts in Oklahoma, Pottawatomie, Okfuskee, and Seminole County, State of Oklahoma specifically:

1. Through use of the Wells Fargo debit card, ending in 7965, belonging to D.B., a vulnerable adult and resident of Okfuskee County, Oklahoma: the unlawful electronic purchase of items from "Mary Kay, Inc." in a series of twenty-five (25) separate and distinct internet transactions from a location within the State of Ohio, valued at a total of Ten Thousand Four Hundred Fifty-nine Dollars and forty-six cents (\$10,459.46) in United States currency by **Enetrice Myers-Tarpeh**, with the aid and assistance of **Lavada Stacy Myers** as the provider of either the physical debit card, or information contained on the physical debit card of D.B.,
2. Through use of the Wells Fargo debit card, ending in 7965, belonging to D.B the unlawful electronic purchase of items from "MoneyGram International, Inc." in a series of twenty-five (25) separate and distinct internet transactions from a location within the State of Ohio, valued at a total of Five Thousand Two Hundred Twenty-eight Dollars and thirty-one cents (\$5,228.31) in United States currency by **Enetrice Myers-Tarpeh**, with the aid and

assistance of **Lavada Stacy Myers** as the provider of either the physical debit card, or information contained on the physical debit card of D.B, a vulnerable adult;

3. Through use of the Wells Fargo debit card, ending in 7965, belonging to D.B, the unlawful electronic purchase of items from Crystal Airlines, Ocean Airlines, Spirit Airlines, and Frontier Airlines, in a series of seven (7) separate and distinct internet transactions from a location within the State of Ohio, valued at a total of Six Hundred Seventeen Dollars and fifty-eight cents (\$617.58) in United States currency by **Enetrice Myers-Tarpeh**, with the aid and assistance of **Lavada Stacy Myers** as the provider of either the physical debit card, or information contained on the physical debit card of D.B., a vulnerable adult; and
4. Through use of the Wells Fargo debit card, ending in 7965, belonging to D.B, the unlawful in person and/or electronic purchase of items by **Lavada Stacy Myers and/or Enetrice Myers-Tarpeh** from ACME Glass, and Lowe's Home Improvement, in Pottawatomie County, Oklahoma, OKC Locksmith, ABC Pest & Lawn, and MWC Locksmith, in Oklahoma County, Anderson Motorcars & Trading Post of Okemah, and Red Dirt Rich Mobile Automotive Services of Castle, in Okfuskee County, Oklahoma, as well as purchases with OG&E, DirecTV, Infinity Dish, PSI, and AT&T, in the State of Oklahoma, and electronic purchases with AAA Ohio, Geico Insurance, and Rotita Clothing, initiated in a series of thirty-six (36) separate and distinct internet transactions from locations in either the State of Oklahoma or the State of Ohio by **Lavada Stacy Myers and/or Enetrice Myers-Tarpeh**, the aggregate value of which totaled Six Thousand Three Hundred Seventy-one and twelve cents (\$6,371.12) in United States currency;

COUNT TWO (2)
FINANCIAL NEGLECT BY CARETAKER
21 O.S. § 843.1(A)(1)

On or about the 2nd day of February, 2018, through and including the 31st day of May 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of financial neglect by caretaker through repeated instances of squandering or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult.

Specifically: **Lavada Stacy Myers** provided the physical debit card belonging to D.B., or the information contained on the physical debit card belonging to D.B., to **Enetrice Myers-Tarpeh**. **Enetrice Myers-Tarpeh**, with the use of a computer, computer system, and/or computer network, then repeatedly used the Wells Fargo debit card, ending in 7965, belonging to D.B., without his permission or consent to purchase items from "Mary Kay, Inc." in a series of twenty-five (25) separate and distinct internet transactions valued at a total of Ten Thousand Four Hundred Fifty-nine Dollars and forty-six cents (\$10,459.46) in United States currency resulting in **Lavada Stacy Myers and/or Enetrice Myers-Tarpeh** squandering and/or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult, contrary to the provisions of section 843.1(A) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT THREE
FINANCIAL NEGLECT BY CARETAKER
21 O.S. § 843.1(A)(1)

On or about the 21st day of April, 2018, through and including the 31st day of May 2019, after being unlawfully provided with the physical Wells Fargo debit card of D.B., ending in 7965, or alternatively, information from said debit card by **Lavada Stacy Myers, Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Financial Neglect by Caretaker through repeated instances of squandering or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult.

Specifically: **Lavada Stacy Myers** provided the physical debit card belonging to D.B., or the information contained on the physical debit card belonging to D.B., to **Enetrice Myers-Tarpeh**. **Enetrice Myers-Tarpeh**, with the use of a computer, computer system, or computer network, then repeatedly used the Wells Fargo debit card, ending in 7965, belonging to D.B., without his permission or consent to purchase items from "MoneyGram International, Inc." in a series of twenty-five (25) separate and distinct internet transactions valued at a total of Eight Thousand Two Hundred Twenty One Dollars and Twenty Eight Cents (\$8,221.28) in United States currency resulting in **Lavada Stacy Myers and/or Enetrice Myers-Tarpeh** squandering and/or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult, contrary to

the provisions of section 843.1(A) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT FOUR (4)
FINANCIAL NEGLECT BY CARETAKER
21 O.S. § 843.1(A)(1)

On or about the 18th day of June, 2018, through and including the 31st day of May 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Financial Neglect by Caretaker through repeated instances of squandering or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult.

Specifically: **Lavada Stacy Myers** provided the physical debit card belonging to D.B., or the information contained on the physical debit card belonging to D.B., to **Enetrice Myers-Tarpeh**. **Enetrice Myers-Tarpeh**, with the use of a computer, computer system, or computer network, then repeatedly used the Wells Fargo debit card, ending in 7965, belonging to D.B., without his permission or consent to purchase items from multiple airline carriers, namely: Crystal Airlines, Ocean Airlines, Spirit Airlines, and Frontier Airlines, in a series of seven (7) separate and distinct internet transactions valued at a total of Six Hundred Seventeen Dollars and fifty-eight cents (\$617.58) in United States currency, contrary to the provisions of section 843.1(A) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT FIVE (5)
FINANCIAL NEGLECT BY CARETAKER
21 O.S. § 843.1(A)(1)

On or about the 2nd day of February, 2018, through and including the 31st day of May 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, and after being unlawfully provided with the physical Wells Fargo debit card of D.B., ending in 7965, or alternatively, information from said debit card, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Financial Neglect by Caretaker through repeated instances of squandering or negligently mismanaging the money, property, or accounts of D.B., a vulnerable adult.

Specifically: **Lavada Stacy Myers**, and **Enetrice Myers-Tarpeh** unlawfully obtained goods and services through the use of a computer, computer system, and/or computer network, or alternatively, used the information from said debit card, or used the physical debit card without the permission or consent of D.B. and on repeated instances in a series of thirty-eight (38) separate and distinct transactions, purchased items at ACME Glass, and Lowe's Home Improvement, in Pottawatomie County, Oklahoma, OKC Locksmith, ABC Pest & Lawn, and MWC Locksmith, Oklahoma County, Oklahoma, Anderson Motorcars & Trading Post of Okemah, and Red Dirt Rich Mobile Automotive Services of Castle, in Okfuskee County, Oklahoma, as well as purchases with OG&E, DirecTV, Infinity Dish, and AT&T, in the State of Oklahoma, and electronic purchases

with AAA Ohio, Geico Insurance, PSI, and Rotita Clothing, and Hibbett Sports the aggregate value of which totaled Six Thousand Five Hundred Sixty-Eight Dollars and Eighty-Six cents (\$6,568.86) in United States currency; contrary to the provisions of sections 421(A)(1) and (A)(4), and 843.1(A) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT SIX (6)
FRAUDULENTLY OBTAINING PERSONAL IDENTITY OF OTHER PERSONS
21 O.S. § 1533.1(A)

On or about the 2nd day of February, 2018, through and including the 31st day of May, 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, after being unlawfully provided with the physical Wells Fargo debit card of D.B., ending in 7965, or information from said debit card, by **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Fraudulently Obtaining Personal Identity of Other Persons by **Enetrice Myers-Tarpeh and/or Lavada Stacy Myers** willfully and fraudulently obtaining the Wells Fargo debit card ending in 7965, belonging to D.B., with the intent to use or allow any other person to use such personal identifying information of D.B., to obtain or attempt to obtain money, credit, goods, property, or service in the name of the D.B., without the consent of D.B., a vulnerable adult.

Specifically: **Enetrice Myers-Tarpeh and/or Lavada Stacy Myers** unjustly, improperly, and unlawfully obtained money, goods, and services from multiple vendors for their personal

benefit using the Wells Fargo debit card, ending in 7965, belonging to D.B., without the permission or consent of D.B. and contrary to the provisions of section 1533.1(A) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT SEVEN (7)
USING ACCESS TO COMPUTERS TO VIOLATE OKLAHOMA STATUTES
21 O.S. § 1953(A)(2)

On or about the 2nd day of February, 2018, through and including the 31st day of May, 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, having assumed responsibility for the financial affairs of D.B., a vulnerable adult, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Using Access to Computers to Violate Oklahoma Statutes.

Specifically, **Enetrice Myers-Tarpeh and/or Lavada Stacy Myers** intentionally, willfully and unlawfully used a computer, computer system, computer network, or private identification codes or numbers which permitted access to a computer for the purchase of goods and services through the use of the physical debit card and/or the private identification codes or numbers of the Wells Fargo debit card belonging to D.B., a vulnerable adult. Said card and/or information permitted access to a computer for purchase of goods and services,, including but not limited to debit card transactions and telecommunications services and/or permitting electronic fund transfers and other tangible or intangible items of value with the intent to defraud or deceive D.B., or for the purpose of controlling or obtaining money, property, services or other thing of

value belonging to D.B., a vulnerable adult, contrary to the provisions of section 1953(A)(2) of Title 21 of the Oklahoma Statutes, and against the peace and dignity of the State of Oklahoma.

COUNT EIGHT (8)
ENGAGING IN A PATTERN OF CRIMINAL OFFENSES
IN TWO OR MORE COUNTIES
21 O.S. § 425

On or about the 2nd day of February, 2018, through and including the 31st day of May, 2019, **Enetrice Myers-Tarpeh**, a caretaker, Chief Financial Officer, Executive Director of Business Operations, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, located at 368015 Old Highway 62, Boley, Okfuskee County, Oklahoma, and **Lavada Stacy Myers**, a caretaker, Chief Executive Officer, Director, Administrator, and co-owner of The Rest Haven Management Inc., dba Four See Residential Care Home, Boley, Okfuskee County, Oklahoma, conjointly and in concert with each other, committed the crime of Engaging in a Pattern of Criminal Offenses in Two or More Counties.

Specifically, during all times set forth herein, and within the Counties of Oklahoma, Pottawatomie, Seminole, and Okfuskee, State of Oklahoma, **Enetrice Myers-Tarpeh and Lavada Stacy Myers**, acting co-jointly and in concert with each other, did knowingly, intentionally, and feloniously commit the offense of **Conspiracy To Commit Financial Neglect By Caretaker, Financial Neglect by Caretaker, Fraudulently Obtaining Personal Identity Of Other Persons, and Using Access To Computers To Violate Oklahoma Statues**, two (2) or more times as part of the same plan, scheme, or adventure; the offenses were not separated by an interval of more than thirty (30) days between the first and second offenses; and, each offense originated from a single prior incident or pattern of fraud or obtaining property by trick or deception. Said acts by **Enetrice Myers-Tarpeh and Lavada Stacy Myers** are contrary to the

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Agent Mike Hanson, Office of Attorney General 313 NE 21st St., Oklahoma City, Oklahoma 73105

Tracy Baker, Adult Protective Services Investigator, 119 S. 1st Street, Okemah, Oklahoma 74859

D.B., see Office of Attorney General, 313 N.E. 21st St., Oklahoma City, Oklahoma 73105

Custodian of Records, Wells Fargo Bank

Custodian of Records, Acme Glass, Oklahoma City, Oklahoma

Custodian of Records MoneyGram International, Inc.

Custodian of Records Crystal Airlines

Custodian of Records Ocean Airlines

Custodian of Records Spirit Airlines

Custodian of Records Frontier Airlines

Custodian of Records Citizens Bank

Custodian of Records Western Union

Custodian of Records Mary Kay, Inc.

Custodian of Records Lowes's Home Improvement, Pottawatomie County

Custodian of Records OKC Locksmith, Oklahoma County

Custodian of Records ABC Pest & Lawn, Oklahoma County

Custodian of Records Anderson Motorcars & Trading Post of Okemah, Okfuskee County

Custodian of Records Red Dirt Rich Mobile Automotive Services of Castle, Okfuskee County

Custodian of Records OG&E

Custodian of Records, PSI

STATE OF OKLAHOMA)
) SS.
COUNTY OF OKLAHOMA)

**AFFIDAVIT OF PROBABLE CAUSE
FOR ARREST WARRANT FOR**

Lavada Stacy Myers

**CONSPIRACY TO COMMIT FINANCIAL NEGLECT BY CARETAKER, 21 O.S.
§ 421(A)(1)(A)(4) AND 21 O.S. § 843.1(A)**

FINANCIAL NEGLECT BY CARETAKER, 21 O.S. § 843.1(A)(1)

**FRAUDULENTLY OBTAINING PERSONAL IDENTITY OF OTHER PERSONS
21 O.S. § 1533.1(A)**

**USING ACCESS TO COMPUTERS TO VIOLATE OKLAHOMA STATUTES, 21
O.S. § 1953(A)(2);**

**ENGAGING IN A PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE
COUNTIES, 21 O.S. § 425.**

Mike Hanson, being of lawful age and after having affirmed upon his oath to tell the truth, states the following:

I am a certified Peace Officer in Oklahoma, currently employed as an Agent in the Oklahoma Attorney General's Office (OAG), Medicaid Fraud Control Unit (MFCU). My duties include investigating allegations of fraud, abuse, and exploitation by caretakers, providers in long term board and care facilities.

On February 8, 2019, the Okfuskee County District Attorney's Office referred information to the Oklahoma MFCU related to an allegation of financial exploitation at the Four See (4-C) Residential Care Home, located at 368015 Old Highway 62, Boley, Oklahoma in Okfuskee County, OK 74829.

The Four See Residential Care Home is home to approximately 4 - 6 residents. D.B. is one of the residents. He is a private pay individual and maintains his own bank account.

Tracy Baker is an Investigator for the Okfuskee County Adult Protective Services (APS). Investigator Baker had been investigating the Four See Residential Care Home and she identified debits within D.B.'s account for purchases that did not appear to be legitimate. For example, there were charges related to airline tickets and large purchases from Mary Kay (beauty products). It was reported in the complaint that D.B. came into a large sum of money by way of an inheritance which may have paid for these items.

On February 15, 2019, your affiant was assigned to investigate the allegations that the Four See Residential Care Home was financially exploiting D.B. As part of this investigation, your affiant interviewed APS Investigator Baker. During the interview, Investigator Baker provided statements from D.B.'s account with Wells Fargo Bank. Your affiant was able to see charges that caused concern such as charges from airlines, Mary Kay, Western Union, MoneyGram, and others that could not be associated with the needs of D.B. Investigator Baker stated that D.B. is an adult man with the mental understanding and capacity of an eight year old. This fact also contributed to the unlikelihood that D.B. had completed these transactions.

During the investigation, it was also determined that one of the owners of the Four See Residential Care Home is Lavada Stacy Myers (Myers). Myers along with Enetrice Renee Myers-Tarpeh are owners of Rest Haven Management, the company which operates the Four See Residential Care Home. Myers is primary contact for this home and had direct access to the debit card and/or numbers associated with the debit card used in the transactions.

On June 14, 2019, your affiant interviewed Myers in the presence of her legal counsel. During the interview, your affiant reviewed some of the purchases that were believed to have been made by Myers, without D.B.'s knowledge or permission; specifically:

1. March 16, 2018, City Gear in Midwest City, OK: \$152.74
Note: Three minutes later the product was returned: \$152.74.
2. March 16, 2018, Hibbett sports in Midwest City, OK: \$152.74.
3. March 21, 2018, ACME Glass in Shawnee, OK: \$384.31
4. May 26, 2018, Hibbett sports in Seminole, OK: \$45.00

During the interview, Myers admitted to having made the purchases listed above. Myers said that the transactions through City Gear and Hibbett Sports were for D.B.'s new shoes. However, your affiant was able to confirm that the purchased shoes were a size 11 ½ . D.B. wears a 14 — 14 ½ size shoe. Upon further questioning, Myers admitted that the shoes went to another unknown male. Myers signed the receipt as "Lavada Myers".

Myers admitted to making other purchases with D.B.'s card; however, she had no answer as to why she used D.B.'s card. Myers said that the ACME Glass purchase was for a frame and some glass. Myers could not remember the purpose of the purchase. In total, Myers used D.B.'s card without his permission during \$734.79 worth of transactions.

Myers claimed that she was unaware of any other illegal purchases that may have been made with D.B.'s card.

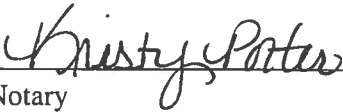
Your affiant requests upon probable cause that the court issue a warrant for the arrest of Lavada Stacy Myers, on the eight felony counts including: one count of Conspiracy to Commit Financial Neglect by Caretaker, 21 O.S. § 421(A)(1)(A)(4) and 21 O.S. § 843.1(A); four counts of Financial Neglect by Caretaker, 21 O.S. § 843.1(A)(1); one count of Fraudulently Obtaining Personal Identity of Other Persons 21 O.S. § 1533.1(A); one count of Using Access to Computers to Violate

Oklahoma Statutes, 21 O.S. § 1953(A)(2); and one count of Engaging in a Pattern of Criminal Offenses in Two or More Counties, 21 O.S. § 425.

Further, your affiant sayeth not.


Mike Hanson

Subscribed and affirmed before me this 21st day of November, 2019.


Notary



My commission expires: _____

STATE OF OKLAHOMA)
) SS.
COUNTY OF OKLAHOMA)

AFFIDAVIT OF PROBABLE CAUSE

FOR ARREST WARRANT FOR

Enetrice Renne Myers-Tarpeh

**EXPLOITATION BY CARETAKE CONSPIRACY TO COMMIT FINANCIAL
NEGLECT BY CARETAKER, 21 O.S. § 421(A)(1)(A)(4) AND 21 O.S. § 843.1(A)**

FINANCIAL NEGLECT BY CARETAKER, 21 O.S. § 843.1(A)(1)

**FRAUDULENTLY OBTAINING PERSONAL IDENTITY OF OTHER PERSONS
21 O.S. § 1533.1(A)**

**USING ACCESS TO COMPUTERS TO VIOLATE OKLAHOMA STATUTES, 21
O.S. § 1953(A)(2);**

**ENGAGING IN A PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE
COUNTIES, 21 O.S. § 425.R 21 O.S. § 843.1**

Mike Hanson, being of lawful age and after having affirmed upon his oath to tell the truth, states the following:

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from D.B.'s account with Wells Fargo Bank. Your affiant was able to see charges that caused concern such as charges from airlines, Mary Kay, Western Union, MoneyGram, and others that could not be associated with the needs of D.B. Investigator Baker stated that D.B. is an adult man with the mental understanding and capacity of an eight year old. This fact also contributed to the unlikelihood that D.B. had completed these transactions.

During the investigation, it was also determined that one of the owners of the Four See Residential Care Home is Enetrice Renee Myers-Tarpeh (Myers-Tarpeh). Myers-Tarpeh along with Lavada Stacy Myers are owners of Rest Haven Management, the company which operates the Four See Residential Care Home. Your affiant also learned that Myers-Tarpeh is a full-time resident of Stow, Ohio but would travel periodically to Oklahoma to conduct business at the Four See Residential Home. Myers-Tarpeh also had at least one family member residing in the Four See home. Upon reviewing D.B.'s finances in greater detail, it was determined that numerous purchases, utilizing D.B.'s account, were made from Ohio.

For example, the following transactions were made from Ohio, where Myers-Tarpeh lives. Many transactions were conducted using the computer program PayPal.

1. Mary Kay: 25 transactions; totaling \$10,459.46
2. Western Union: 22 transactions; totaling \$4,482.81
3. MoneyGram: 25 transactions; totaling \$8,221.28
4. Utilities (OG&E, Direct TV, Infinity Dish, PSI Services , AT&T): 12 transactions; totaling \$2,046.72
5. Pest Control: 8 transactions; totaling \$887.68
6. Airline tickets (Crystal Air, Ocean Air, Spirit Air, Frontier Air): 7 transactions; totaling \$617.58
7. Smoke shops: 49 transactions; totaling \$3,078.90
8. Miscellaneous purchases (AAA Ohio, Geico, Rotita, MWC Locksmith, Anderson Car, OKC Locksmith, Red Dirt, Transport): 12 transactions; totaling \$2,289.31
9. Lowes: 3 transactions; totaling \$763.10

In total, D.B.'s card/account was used in **\$32,846.84** worth of transactions related to items and/or services that were not authorized by D.B. The various locations of these businesses included Oklahoma, Pottawatomie, Seminole and Okfuskee Counties.

On August 5, 2019, your affiant made contact with Myers-Tarpeh via telephone. Your affiant questioned Myers-Tarpeh about the suspicious purchases described above. Myers-Tarpeh confirmed that she was responsible for each of the purchases made. Myers-Tarpeh told your affiant that she made the purchases because D.B. owed Rest Haven Management that money. Your affiant asked Myers-Tarpeh to name specific items or services for which D.B. owed Rest Haven Management money. Myers-Tarpeh stated that D.B. owed money for cigarettes and other items that he wanted to buy. Myers-Tarpeh stated that D.B. spent a lot of money. During the course of the investigation, it was determined that D.B. was consistently current on the expenses for his board and care and in some cases paid in excess of the amount owed.

Your affiant requests upon probable cause that the court issue a warrant for the arrest of Enetrice Renne Myers-Tarpeh, on the eight felony counts including: one count of Conspiracy to Commit Financial Neglect by Caretaker, 21 O.S. § 421(A)(1)(A)(4) and 21 O.S. § 843.1(A); four counts of Financial Neglect by Caretaker, 21 O.S. § 843.1(A)(1); one count of Fraudulently Obtaining Personal Identity of Other Persons 21 O.S. § 1533.1(A); one count of Using Access to Computers to Violate Oklahoma Statutes, 21 O.S. § 1953(A)(2); and one count of Engaging in a Pattern of Criminal Offenses in Two or More Counties, 21 O.S. § 425.

Further, your affiant sayeth not.


Mike Hanson

Subscribed and affirmed before me this 21st day of November, 2019.




Notary

My commission expires: _____