IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR KINGFISHER COUNTY

THE STATE OF OKLAHOMA,)		Kingfisher County Oklahoma FILED
Plaintiff,) }	1.1	OCT 1 7 2023
vs.		Case No. CF-2023-1	LISA MARKUS, EQUIT CHERK
JEFFREY KENT MYERS			DER UTY
ADDR:	į (
DL: ****	;		
SSN: DOB:)		
Defendant.)		

INFORMATION

COUNT 1: CHILD NEGLECT ~ 21 O.S. § 843.5(C), a FELONY

STATE OF OKLAHOMA, COUNTY OF KINGFISHER:

I, Michael J. Fields, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Kingfisher and in the State of Oklahoma, JEFFREY KENT MYERS did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

COUNT 1: CHILD NEGELCT ~ a FELONY, on or between the 1st day of August 2015 and the 31st day of December, 2021, by, while being the head football coach for the Kingfisher High School football team, a person who voluntarily accepted responsibility for the care and/or supervision of the children under the age of 18 who were student-athletes at Kingfisher High School and who played football on the Kingfisher Highschool football team, the Defendant willfully and/or maliciously failed and/or omitted to provide adequate supervision to protect said children from harm and/or threatened harm of which any reasonable and prudent person responsible for said children's health, safety or welfare would be aware, to wit: the Defendant condoned, permitted, deliberately ignored and/or neglected recurring, premediated, and planned boxing and/or wrestling matches between minor children who were players on the Kingfisher High School football team and which occurred in the football locker room and during the course of official team activities.

This crime is punishable by imprisonment for up to Life, or up to 1 year in the county jail, and/or by a fine of \$500 -\$5,000.

MICHAEL J. FIELDS DISTRICT ATTORNEY

3y: <u>. .</u>

Bv:

Hope Bryant

Assistant District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

Hope Bryant

Assistant District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Clayton Abercrombie

Keaton Abercrombie, 412 N. Cheyenne, Hennesey, OK 73742

Mark Adams, Heritage Hall High School, 1800 NW 122nd St., Oklahoma City, OK 73120

Kyle Bartelli, 15248 E770 Road, Kingfisher, OK 73750

Richard Brown, 701 South Lewis, Stillwater, OK 74076

David Buck, D&R Reporting and Video, INC. 400 N. Walker Ave # 160,, Oklahoma City, OK 73102

Chief David Catron, Kingfisher Police Department, 117 W. Miles Ave., Kingfisher, OK 73750

Daniel Craig, 1202 Francis Ln, Kingfisher, OK 73750

Caleb Dick, 1304 Brook Stone Dr., Kingfisher, OK 73750

Brayden French, 12006 Rush St., Oklahoma City, OK 73131

Mayce Gibson, 20468 N 2810th Rd., Kingfisher, OK 73750

David Glover, Kingfisher School District, 602 West Chisholm Drive, Kingfisher, OK 73750

Dana Golbek, 1010 Francis Cir., Kingfisher, OK 73750

Zackary Goodwin, 512 E. Redfork Dr., Dover, OK 73734

Declan Haub, 1208 Curran Avenue, Kingfisher, OK 73750

Conner Hine, 103 32nd Ave., Stillwater, OK 74074

Hunter Hoffman, 904 W. Kings Dr., Kingfisher, OK 73750

Eric Janzen, 525 South Main, Suite 700, Tulsa, OK 74103

Martha Justice, 4Justice, LLC, P.O. Box #5352, Edmond, OK 73083

Kingfisher High School Rep. and/or Records Custodian, 602 West Chisholm Drive, Kingfisher, OK 73750

Kingfisher Police Department Rep. and/or Records Custodian, 102 Coronado, Kingfisher, OK 73750

Ross Leonoudakis, 8701 Bee Cave Road, Building 1, Suite 500, Austin, TX 78746

Jarvis Maddox

Jett Matson, 1407 Peter Pan St., Norman, OK 73072

Hayden Matthews

Justin Mecklenburg, 1206 Cobblestone LN, Kingfisher, OK 73750

Lyndy Mecklenburg, 1206 Cobblestone LN., Kingfisher, OK 73750

Mason Mecklenburg, 1206 Cobblestone Ln, Kingfisher, OK 73750

Alan Munoz, 22227 N. 2860th Rd., Kingfisher, OK 73750 Micah Nall, 11732 NW 135th Ter., Piedmont, OK 73078

Angelica Orozco

Agent Phillip Ott, OSBI, OSBI, 701 S. Lewis, Stillwater, OK 74076

Tommy Parker, 212 Center St., Alva, OK 73717

Derek Patterson, 802 N. Main, Cashion, OK 73016

Cody Payne, 403 W. Will Rodgers Drive, Kingfisher, OK 73750

Garrett Payne, 403 W. Will Rodgers Drive, Kingfisher, OK 73750

Terry Payne, 403 W. Will Rogers drive, Kingfisher, OK 73750

Easton Pine, 1601 Brentwater Drive, Kingfisher, OK 73750

Mark Rains, 525 South Main, Suite 700, Tulsa, OK 74103

Bruce Rodgers, D&R Reporting & Video, Inc., 400 N. Walker, Ave. #160;, Oklahoma City, OK 73102

Gunner Snider, 826 Lucinda Ln., Kingfisher, OK 73750

Mark Snodgrass, 1110 W. Will Rodgers Dr., Kingfisher, OK 73750

Cameron Spradling, 500 N Walker, Suite 100, Oklahoma City, OK

Brayden States

Garrett States

Cade Stephenson, 1301 Stonemill Dr., Kingfisher, OK 73750

Justin Stephenson, 1301 Stonemill Dr., Kingfisher, OK 73750

Jett Sternberger, 1210 Walton Trail, Kingfisher, OK 73750

Jason Sternberger, 1210 Walton Trail, Kingfisher, OK 73750

William Taylor, 14973 E.0770 Road, Kingfisher, OK 73750

Tate Taylor, 149763 E 0770 Rd., Kingfisher, OK 73750

Justin Trumbley, 102 Coronado, Kingfisher, OK 73750

Calvin Vincent

Kate White, 630 N.E. 63rd St., Oklahoma City, OK 73105

Joe White, 630 N.E. 63rd St., Oklahoma City, OK 73105

Derek White, OSBI, 723 S. Lewis, Stillwater, OK 74074

Bailey Willson, 1614 Casaview Dr., Kingfisher, OK 73750

Jay Wood, 201 North Taylor St., Dover, OK 73734

IN THE DISTRICT COURT OF KINGFISHER COUNTY STATE OF OKLAHOMA

	AFETDAY	OCT 1 7 2023
	,	Kingflaher County Oklahemat FILED
JEFFREY KENT MYERS	Defendant,)	Case No. <u>CF-2023-U</u>
vs.)	50 2022 1.1
THE STATE OF OKLAHOMA,) Plaintiff,)	

The undersigned upon oath deposes and states as follows: to-wit:



- (1) Your affiant is a Special Agent with the Oklahoma State Bureau of Investigation (OSBI). Your affiant became a certified peace officer in the State of Oklahoma in Your Affiant has participated in specialized training concerning the investigation of illegal drug offenses, homicides, sex crimes, and frauds. Your affiant is an advanced certified Police Officer in the State of Oklahoma being so certified by the Oklahoma Council on Law Enforcement Education and Training; Your affiant has a Bachelor's Degree in Criminal Justice. Your affiant has conducted and participated in numerous criminal investigations, these investigations have resulted in the arrest and conviction of individuals involved in the substantive and conspiratorial criminal offenses of murder, sex crimes, fraud, and other serious felony offenses.
- (2) Your affiant has investigated this case, read certain official documents and reports, received statements from witnesses, and from these statements, documents, and/or reports. The investigation revealed the following information pertaining to a child neglect and child abuse investigation:
- (3) On February 8, 2022, the Oklahoma State Bureau of Investigation received a request for investigative assistance from Sergeant JUSTIN TRUMBLEY of the Kingfisher Police Department. TRUMBLEY requested assistance with an assault of Kingfisher High School Football players. The Kingfisher Police Department received notification of the assaults after a lawsuit was filed against Kingfisher Public Schools.
- (4) During the course of the investigation, Oklahoma State Bureau of Investigation Special Agents learned that football players were left alone and most of the time not supervised by an adult or faculty member while inside the Donovan Boutwell Center, also known as the DBC, located at 1500 S 13th Street in Kingfisher.

Oklahoma, locker room. Agents learned Kingfisher Football players participated in "The Ring" while inside the DBC locker room. "The Ring" was described where football players wrestled or boxed each other to settle differences that they had had on the field. The challenges for the ring were made around Kingfisher Head Football Coach JEFF MYERS and other Kingfisher Assistant Football Coaches.

- a. Agents interviewed fourteen former Kingfisher Football players who admitted knowledge, witnessing, and/or participating in "The Ring". Your affiant interviewed one Football Manager who also admitted knowledge, and/or witnessing "The Ring".
- b. Agent interviewed four former players who witnessed MYERS watching "The Ring" wrestling matches. Five additional former football players stated that MYERS knew about "The Ring".
- c. On August 2, 2023, MYERS completed a Deposition as part of an ongoing federal lawsuit. During the deposition, MYERS admitted that he was responsible for the football program, and the conduct of the players while they were with him. MYERS admitted that as the head football coach, he was responsible for the conduct of his assistant coaches.
- d. MYERS confirmed he knew about the "The Ring". MYERS denied knowledge about any boxing; however, admitted to knowledge and confirmed he had witnessed "one" of the wrestling matches. MYERS did not see any difference between the football players wrestling in "The Ring" versus them wrestling as part of the Kingfisher Public Schools Wrestling Program.
- e. During one of "The Ring" boxing matches, an individual only identified as M.M. boxed another individual known only as J.M. M.M. ended up giving J.M. a black eye. This was reported to OSBI Agents through the course of this investigation by former Kingfisher Football players.
- (5) On July 20, 2023, MICAH NALL, former Kingfisher Assistant Football Coach from 2013 through 2020, completed a deposition on a pending federal lawsuit. Your affiant was able to obtain a copy of this deposition.
 - a. NALL admitted all coaches knew about "The Ring".
 - b. NALL heard MYERS call players "cancers". NALL believed it was possible that MYERS made these statements around the players. NALL confirmed MYERS called players "cancers" while speaking with other coaches. NALL stated, "...I mean, we all understood what the term cancer meant, something from the inside that can harm things on the outside."
- (6) August 23, 2023, DEREK PATTERSON, Kingfisher Public Schools Assistant Football Coach completed a deposition on a pending federal lawsuit. Your affiant was able to obtain a copy of this deposition. PATTERSON had been an assistant football coach under MYERS since 2017.
 - a. PATTERSON confirmed he knew what "The Ring" was and confirmed he had seen the video that had been on the news. PATTERSON confirmed

"The Ring" happened inside the DBC locker room.

- b. PATTERSON confirmed he was present when NALL and a student identified only as G.S. wrestled.
- c. PATTERSON confirmed the football players would challenge each other on the football field to participate inside "The Ring".
- d. PATTERSON graduated from Kingfisher High School in 2011 and played football for head coach JEFF MYERS. PATTERSON confirmed that when he was in high school, "The Ring" was going on; however, he never participated in "The Ring". When he was in school, no one was forced to fight in "The Ring". This was only wrestling and there was no Boxing. This went on all four years PATTERSON attended Kingfisher High School.
- e. PATTERSON confirmed that before practice, while football players were getting ready, they were unsupervised inside the locker room. PATTERSON would peek into the room and blow the whistle on his way to the practice field.
- (7) JEFF MYERS, being a school employee and head football coach for the Kingfisher Public Schools, was in charge of the health, safety, and welfare of each student under his care. MYERS was responsible for the health, safety, and welfare of each football player who was participating in extracurricular activities while attending Kingfisher Public Schools. MYERS allowed students to be unsupervised and participate in fights where injuries occurred. MYERS admitted knowledge of these fights and continued to allow them to go on.

(8) JEFFREY KENT MYERS is a white male, DOB:

(9) The offense(s) occurred in the City of Kingfisher, County of Kingfisher, State of Oklahoma.

WHEREFORE, affiant prays this Honorable Court to issue a warrant for the arrest of the within-named Defendant, that he may be brought before a magistrate and held to answer for the offense(s) Child Neglect, 21 OS 843.5.

Special Agent Phillip D. Ott, Affiant

Subscribed and sworth to be the me this day of	ochser	,20_23
# 21003180	AR	
EXP. 3/8/15		Notary Public
My commission expression 3/8/25		

FINDING OF PROBABLE CAUSE

	The undersign	red Judge	of this	Court,	upon	sworn	testimony	and/or	affidavit,
hereby	y determines th	nere to be	probat	ole cau	se to	detain	the defend	lant.	·

Dated this 17th day of October

JUDGE OF THE DISTRICT COURT

1800

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR KINGFISHER COUNTY

THE STATE OF OKLAHOMA,

Plaintiff,

VS.

Case No. CF-2023-62

MICAH RYAN NALL

ADDR: DL: SSN: DOB:

Defendant.

Kingfisher County Oklahoma
FILED

OCT 1 7 2023

LISA NARKUS, COURT CLERK

INFORMATION

COUNT 1: CHILD ABUSE ~ 21 O.S. § 843.5(A), a FELONY

COUNT 2: PERJURY BY CONTRADICTORY STATEMENTS ~ 21 O.S. § 496, a FELONY

STATE OF OKLAHOMA, COUNTY OF KINGFISHER:

I, Michael J. Fields, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Kingfisher and in the State of Oklahoma, MICAH RYAN NALL did then and there unlawfully, willfully, knowingly and wrongfully commit the crimes of:

COUNT 1: CHILD ABUSE ~ a FELONY, on or between the 1st day of August 2015 and the 31st day of May, 2021, by, while being an assistant football coach for the Kingfisher High School football team, a person who voluntarily accepted responsibility for the care and/or supervision of the children under the age of 18 who were student-athletes at Kingfisher High School and who played football on the Kingfisher High School football team, the Defendant willfully and/or maliciously harmed and/or threatened harm to the health, safety, or welfare of said children under the age of 18, to wit: first: the Defendant condoned, permitted, and/or participated in recurring, premediated, and planned boxing and/or wrestling matches with and/or between minor children who were players on the Kingfisher High School football team and which occurred in the football locker room and during the course of official team activities; and/or, second: the Defendant committed repeated instances of verbal abuse upon one or more minor children who were players on the Kingfisher High School football team, including, but not limited to H.H., B.W., and/or G.S., which caused or threatened to cause mental and/or emotional injury or damage to said minor children and which occurred during the course of official team activities; and/or, third: the Defendant punched B.F. in his face one or more times when he was a minor child and which occurred when he was a player on the Kingfisher High School football team and during the course of official team activities.

This crime is punishable by imprisonment for up to Life, or up to 1 year in the county jail, and/or by a fine of \$500 -\$5,000.

COUNT 2: PERJURY ~ a FELONY, on or between the 12th day of May, 2021 and the 20th day of July, 2023, the Defendant knowingly made two or more statements under oath and under penalty of perjury which directly contradicted each other, to wit: a sworn statement under oath at the Defendant's sentencing hearing in Kingfisher County Oklahoma case number CM-2020-159 on May 12, 2021, and a sworn statement under oath in a deposition taken in United States District Court for the Western District of Oklahoma case number CIV-22-089-G on July 20, 2023.

This crime is punishable by imprisonment for up to 5 years.

MICHAEL J. FIELDS DISTRICT ATTORNEY

By: / Hope Bryant

Assistant District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

Hope Bryant

Assistant District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Clayton Abercrombie

Keaton Abercrombie, 412 N. Cheyenne, Hennesey, OK 73742

Mark Adams, Heritage Hall High School, 1800 NW 122nd St., Oklahoma City, OK 73120

Kyle Bartelli, 15248 E770 Road, Kingfisher, OK 73750

Richard Brown, 701 South Lewis, Stillwater, OK 74076

David Buck, D&R Reporting and Video, INC. 400 N. Walker Ave # 160,, Oklahoma City, OK 73102

Chief David Catron, Kingfisher Police Department, 117 W. Miles Ave., Kingfisher, OK 73750

Daniel Craig, 1202 Francis Ln, Kingfisher, OK 73750

Department Human Services Rep. and/or Records Custodian, 2409 N. Kelley Ave., OKC, OK 73111

Caleb Dick, 1304 Brook Stone Dr., Kingfisher, OK 73750

Brayden French, 12006 Rush St., Oklahoma City, OK 73131

Mayce Gibson, 20468 N 2810th Rd., Kingfisher, OK 73750

David Glover, Kingfisher School District, 602 West Chisholm Drive, Kingfisher, OK 73750

Dana Golbek, 1010 Francis Cir., Kingfisher, OK 73750

Zackary Goodwin, 512 E. Redfork Dr., Dover, OK 73734

Declan Haub, 1208 Curran Avenue, Kingfisher, OK 73750

Conner Hine, 103 32nd Ave., Stillwater, OK 74074

Hunter Hoffman, 904 W. Kings Dr., Kingfisher, OK 73750

Eric Janzen, 525 South Main, Suite 700, Tulsa, OK 74103

Martha Justice, 4Justice, LLC, P.O. Box #5352, Edmond, OK 73083

Representative and / or Kingfisher County Court Clerk, 101 S. Main, Room 24, Kingfisher, OK 73750

Kingfisher High School Rep. and/or Records Custodian, 602 West Chisholm Drive, Kingfisher, OK 73750

Kingfisher Police Department Rep. and/or Records Custodian, 102 Coronado, Kingfisher, OK 73750

Ross Leonoudakis, 8701 Bee Cave Road, Building 1, Suite 500, Austin, TX 78746

Jarvis Maddox

Jett Matson, 1407 Peter Pan St., Norman, OK 73072

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Justin Mecklenburg, 1206 Cobblestone LN, Kingfisher, OK 73750

Lyndy Mecklenburg, 1206 Cobblestone LN., Kingfisher, OK 73750

Mason Mecklenburg, 1206 Cobblestone Ln, Kingfisher, OK 73750

Alan Munoz, 22227 N. 2860th Rd., Kingfisher, OK 73750

Myers, Jeff, 1207 Walton Trl., Kingfisher, OK 73750

Angelica Orozco

Agent Phillip Ott, OSBI, OSBI, 701 S. Lewis, Stillwater, OK 74076

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Garrett Payne, 403 W. Will Rodgers Drive, Kingfisher, OK 73750

Terry Payne, 403 W. Will Rogers drive, Kingfisher, OK 73750

Easton Pine, 1601 Brentwater Drive, Kingfisher, OK 73750

Mark Rains, 525 South Main, Suite 700, Tulsa, OK 74103 Kingfisher County Representative and/or Records Custodian, 1001 Victory Rd., Kingfisher, OK 73750 Bruce Rodgers, D&R Reporting & Video, Inc., 400 N. Walker, Ave. #160; Oklahoma City, OK 73102 Gunner Snider, 826 Lucinda Ln., Kingfisher, OK 73750 Mark Snodgrass, 1110 W. Will Rodgers Dr., Kingfisher, OK 73750 Cameron Spradling, 500 N Walker, Suite 100, Oklahoma City, OK Brayden States **Garrett States** Cade Stephenson, 1301 Stonemill Dr., Kingfisher, OK 73750 Justin Stephenson, 1301 Stonemill Dr., Kingfisher, OK 73750 Jett Sternberger, 1210 Walton Trail, Kingfisher, OK 73750 Jason Sternberger, 1210 Walton Trail, Kingfisher, OK 73750 William Taylor, 14973 E.0770 Road, Kingfisher, OK 73750 Tate Taylor, 149763 E 0770 Rd., Kingfisher, OK 73750 Justin Trumbley, 102 Coronado, Kingfisher, OK 73750 Calvin Vincent

Kate White, 630 N.E. 63rd St., Oklahoma City, OK 73105 Joe White, 630 N.E. 63rd St., Oklahoma City, OK 73105 Derek White, OSBI, 723 S. Lewis, Stillwater, OK 74074 Bailey Willson, 1614 Casaview Dr., Kingfisher, OK 73750 Jay Wood, 201 North Taylor St., Dover, OK 73734

IN THE DISTRICT COURT OF KINGFISHER COUNTY STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,)	
VS.	Plaintiff,)	
V3 1)	222 22 122
MICAH RYAN NALL)	Case No CF-2023 - 42
	Defendant,)	Kingfisher County Oklehoms
	,)	FILED
		OCT 1 7 2023
		LASA DAGAMOS, GOURT CLERK
The undersigned upon eath den	AFFIDAV	

- The undersigned upon oath deposes and states as follows: to-wit:
 - (1) Your affiant is a Special Agent with the Oklahoma State Bureau of Investigation (OSBI). Your affiant became a certified peace officer in the State of Oklahoma in 2005. Your Affiant has participated in specialized training concerning the investigation of illegal drug offenses, homicides, sex crimes, and frauds. Your affiant is an advanced certified Police Officer in the State of Oklahoma being so certified by the Oklahoma Council on Law Enforcement Education and Training; Your affiant has a Bachelor's Degree in Criminal Justice. Your affiant has conducted and participated in numerous criminal investigations, these investigations have resulted in the arrest and conviction of individuals involved in the substantive and conspiratorial criminal offenses of murder, sex crimes, fraud, and other serious felony offenses.
 - (2) Your affiant has investigated this case, read certain official documents and reports, received statements from witnesses, and from these statements, documents, and/or reports. The investigation revealed the following information:
 - (3) On February 8, 2022, the Oklahoma State Bureau of Investigation received a request for investigative assistance from Sergeant JUSTIN TRUMBLEY of the Kingfisher Police Department. TRUMBLEY requested assistance with an assault of Kingfisher High School Football players. The Kingfisher Police Department received notification of the assaults after a lawsuit was filed against Kingfisher Public Schools.
 - (A) On February 17, 2023, Oklahoma State Bureau of Investigation Special Agent DEREK WHITE interviewed a former Kingfisher High School football player known only as C.A. C.A. was a freshman when a student only known as B.F. was a senior. During the 2015-2016 football season, C.A. witnessed Kingfisher Assistant Football Coach MICAH NALL, grab B.F by his facemask and punch B.F. in the face three to four times.

(B) During the course of the investigation, Agents learned of "The Ring". The Ring was an area within the locker room where wrestling and boxing matches between football players would take place.

a. OSBI Agents interviewed six former Kingfisher High School Football players who reported NALL, an adult, wrestled with a student football player, known only as G.S. This allegedly happened when G.S. was a freshman, under the age of eighteen, at Kingfisher High School.

b. NALL completed a deposition on July 20, 2023. NALL admitted he wrestled G.S. in the Kingfisher locker room. NALL admitted it was a "very, very, poor decision..." on his part. NALL admitted he told the other students to put their phones away because he did not want anyone videotaping the incident with G.S.

c. NALL admitted during his deposition he knew about, "The Ring". NALL, along with all of the other coaches had knowledge of the ring because they would hear the football players call each other out on the football practice field. NALL admitted that he had watched the minors participate in "The Ring" on more than one occasion. NALL admitted he had the opportunity to stop "The Ring" but never did anything to stop the wrestling and boxing matches.

(C) Agents were told NALL was verbally abusing minors during the course of his tenure at Kingfisher Public Schools. NALL was a teacher and coach at Kingfisher from 2013 through 2020.

- a. H.H. was a student and football player at Kingfisher High School and graduated in 2019. H.H. was on an Individualized Education Program, also known as an IEP. H.H. was on the IEP for deficit hyperactive disorder which made it hard to concentrate and retain information. NALL was H.H.'s remedial English teacher.
- b. During NALL'S deposition, he admitted he knew H.H. was on an IEP. NALL admitted H.H. had approached NALL his freshman year and requested NALL to put plays on the cards so he could go home and study them in order to get better. This was something that was done for H.H. in Middle School football.
- c. NALL denied H.H.'s request to put the plays on cards for H.H. to study at home. NALL told H.H. that this was something they did not do. When H.H. would miss an assignment on the football field or mess up, NALL would get in his face and call him a "Fat worthless piece of shit". During NALL'S deposition, he admitted by stating, "I probably said some hurtful things to Hunter that I deeply regret saying."
- d. H.H. has since reported he has flashbacks of NALL calling him a "Fat worthless piece of shit" when he messes up at work. NALL was asked during his deposition, "You understand, you appreciate now the harm that that sort of verbal abuse has on young children. Right?" NALL stated, "Yes sir."

- e. NALL admitted it was possible that he called players, "faggot" while at Kingfisher Public Schools, during football practice.
- (D)On July 20, 2023, NALL completed a deposition as part of an ongoing federal lawsuit. The deposition was provided to your affiant as part of an ongoing criminal investigation. During the course of this deposition, NALL made several contradictory statements under oath regarding events that had already been proven during the course of a previous criminal investigation in 2020.
 - a. On November 30, 2020, One Count of Obstructing an Officer was filed in Kingfisher County, Oklahoma Against NALL. During the course of the investigation, Kingfisher Police Officer CHARLES TROUT reviewed video footage of a juvenile male only identified as W.K. being struck and "speared" while on the ground. NALL ultimately pleaded guilty to the charge of lying to an officer and obstructing his investigation.
 - b. During the deposition NALL was questioned about lying to TROUT about the allegations of the case. NALL was asked, "You do not agree that you have lied at all about the allegations in that case, in this case. Is that your testimony?" NALL replied, "About the bull in the ring incident?" Then he goes on to state, "Okay, I do not, I do not believe that I have lied about that incident. Later in the deposition, NALL was asked if he lied to the victim's family and to the police, which he pleaded guilty to doing. NALL changed his reply and admitted he lied to the police and to the victim's family.
- (4) MICAH NALL, being a school employee and assistant football coach for the Kingfisher Public Schools, was in charge of the health and welfare of each student under his care. NALL was responsible for the health, safety, and welfare of each football player who was participating in extracurricular activities while attending Kingfisher Public Schools. NALL allowed students to be unsupervised and participate in fights where injuries occurred. NALL admitted to participating in one of these fights with a student who was a minor. NALL participated in this fight with other students around. NALL admitted knowledge of these fights and continued to allow them to go on.

(5) MICAH RYAN NALL is a white male, DOB: (6) The offense(s) occurred in the City of Kingfisher, County of Kingfisher, State of

Oklahoma,

WHEREFORE, affiant prays this Honorable Court to issue a warrant for the arrest of the within-named Defendant, that he may be brought before a magistrate and held to answer for the offense(s) Child Abuse, 21 OS 843.5, Perjury, 21 OS 496.

FINDING OF PROBABLE CAUSE

The undersigned Judge of this Court, upon sworn testimony and/or affidavit, hereby determines there to be probable cause to detain the defendant.

Dated this day of

JUDGE OF THE DISTRICT COURT

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR KINGFISHER COUNTY

THE S	TATE OF OKLAHOMA,	}
	Plaintiff,	}
vs.		Case No. CM-2023-
JUSTIN	N MECKLENBURG	
ADDR:	The second secon	Kingfisher County Oklahoma FILE D
DL: SSN: DOB:	***_**_	OCT 1 72023
	Defendant.	LISA MARKUS SMURT CLERK BY DEPUTY
		INFORMATION

FAILURE TO REPORT CHILD ABUSE OR NEGLECT ~ 10A O.S. § 1-2-101, a COUNT 1: **MISDEMEANOR**

STATE OF OKLAHOMA, COUNTY OF KINGFISHER:

I, Michael J. Fields, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Kingfisher and in the State of Oklahoma, JUSTIN MECKLENBURG did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

FAILURE TO REPORT CHILD ABUSE OR NEGLECT ~ a MISDEMEANOR, on or between the 1st day August, 2018 and the 8th day of February, 2022, by failing to immediately report suspected child abuse and/or child neglect of M.M., a person who was a minor child during the time of suspected abuse and/or neglect, to the Department of Human Services.

This crime is punishable by imprisonment for up to 1 year and/or by a fine of up to \$500.

MICHAEL J. FIELDS DISTRICT ATTORNEY

By:

Hope Bryant

Assistant District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

Hope Bryant

Assistant District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Mark Adams, Heritage Hall High School, 1800 NW 122nd St., Oklahoma City, OK 73120 Richard Brown, 701 South Lewis, Stillwater, OK 74076 David Buck, D&R Reporting and Video, INC. 400 N. Walker Ave # 160,, Oklahoma City, OK 73102 Chief David Catron, Kingfisher Police Department, 117 W. Miles Ave., Kingfisher, OK 73750 Daniel Craig, 1202 Francis Ln, Kingfisher, OK 73750 Department Human Services Rep. and/or Records Custodian, 2409 N. Kelley Ave., OKC, OK 73111 David Glover, Kingfisher School District, 602 West Chisholm Drive, Kingfisher, OK 73750 Dana Golbek, 1010 Francis Cir., Kingfisher, OK 73750 Eric Janzen, 525 South Main, Suite 700, Tulsa, OK 74103 Martha Justice, 4Justice, LLC, P.O. Box #5352, Edmond, OK 73083 Representative and / or Kingfisher County Court Clerk, 101 S. Main, Room 24, Kingfisher, OK 73750 Kingfisher High School Rep. and/or Records Custodian, 602 West Chisholm Drive, Kingfisher, OK 73750 Kingfisher Police Department Rep. and/or Records Custodian, 102 Coronado, Kingfisher, OK 73750 Kingfisher County Sherrif's Depart. Rep. and/or Records Custodian, 1001 Victory Rd, Kingfisher, OK 73750 Ross Leonoudakis, 8701 Bee Cave Road, Building 1, Suite 500, Austin, TX 78746 Lyndy Mecklenburg, 1206 Cobblestone LN., Kingfisher, OK 73750 Mason Mecklenburg, 1206 Cobblestone Ln, Kingfisher, OK 73750 Laurie Morris, Oklahoma Department Human Services (DHS); P.O. Box 25352, Oklahoma City, OK 73125 Jeffrey Myers, 1207 Walton Trail, Kingfisher, OK 73750 Micah Nall, 11732 NW 135th Ter., Piedmont, OK 73078 Agent Phillip Ott, OSBI, OSBI, 701 S. Lewis, Stillwater, OK 74076 Tommy Parker, 212 Center St., Alva, OK 73717 Derek Patterson, 802 N. Main, Cashion, OK 73016 Terry Payne, 403 W. Will Rogers drive, Kingfisher, OK 73750 Mark Rains, 525 South Main, Suite 700, Tulsa, OK 74103 Bruce Rodgers, D&R Reporting & Video, Inc., 400 N. Walker, Ave. #160;, Oklahoma City, OK 73102 Mark Snodgrass, 1110 W. Will Rodgers Dr., Kingfisher, OK 73750 Cameron Spradling, 500 N Walker, Suite 100, Oklahoma City, OK Justin Stephenson, 1301 Stonemill Dr., Kingfisher, OK 73750 Jason Sternberger, 1210 Walton Trail, Kingfisher, OK 73750 Justin Trumblev, 102 Coronado, Kingfisher, OK 73750

Kate White, 630 N.E. 63rd St., Oklahoma City, OK 73105 Joe White, 630 N.E. 63rd St., Oklahoma City, OK 73105 Derek White, OSBI, 723 S. Lewis, Stillwater, OK 74074 Jay Wood, 201 North Taylor St., Dover, OK 73734 IN THE DISTRICT COURT OF KINGFISHER COUNTY I L E D

STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

Vs.

JUSTIN MECKLENBURG

Defendant,

Defendant,

AFFIDAVIT

The undersigned upon oath deposes and states as follows: to-wit:

- (1) Your affiant is a Special Agent with the Oklahoma State Bureau of Investigation (OSBI). Your affiant became a certified peace officer in the State of Oklahoma in 2005. Your Affiant has participated in specialized training concerning the investigation of illegal drug offenses, homicides, sex crimes, child abuse, and fraud. Your affiant is an advanced certified Police Officer in the State of Oklahoma being so certified by the Oklahoma Council on Law Enforcement Education and Training; Your affiant has a Bachelor's Degree in Criminal Justice. Your affiant has conducted and participated in numerous criminal investigations, these investigations have resulted in the arrest and conviction of individuals involved in the substantive and conspiratorial criminal offenses of murder, sex crimes, child abuse and neglect, fraud, and other serious felony offenses.
- (2) Your affiant has investigated this case, read certain official documents and reports, received statements from witnesses, and from these statements, documents, and/or reports. The investigation revealed the following information regarding the Failure to Report Child Abuse of the victim known as M.M.:
- (3) On February 8, 2022, the Oklahoma State Bureau of Investigation received a request for investigative assistance from Sergeant JUSTIN TRUMBLEY of the Kingfisher Police Department. TRUMBLEY requested assistance with an assault of Kingfisher High School Football players. The Kingfisher Police Department received notification of the assaults after a lawsuit was filed against Kingfisher Public Schools.
- (4) On March 11, 2022, an Oklahoma State Bureau of Investigation Special Agent interviewed M.M. with his attorney CAMERON SPRADLING. During the course of the interview, M.M. detailed the physical and verbal abuse he endured while a student at Kingfisher Public Schools, specifically from 2017 through 2021 when

he attended Kingfisher High School. According to M.M. the physical and verbal abuse occurred specifically during football and was inflicted by students and coaches. M.M. alleged that the coaching staff knew about the physical and verbal abuse and did nothing to stop it.

- (5) JUSTIN and LYNDY MECKLENBURG provided a statement through their attorney to an OSBI Special Agent regarding why they did not report the abuse of M.M. The statement revealed that JUSTIN and LYNDY first found out about the abuse of M.M. when he was approximately 15 years old. The statement detailed their reasoning for never reporting the physical and verbal abuse committed by his teammates and coaches.
- (6) JUSTIN and LYNDY met with Kingfisher Head Coach JEFF MYERS on or about October 25, 2019, which they audio recorded. JUSTIN and LYNDY spoke with MYERS about the abuse happening within the football program and then spoke to MYERS about the playing time of M.M.
- (7) On February 24, 2023, OSBI Agents interviewed DANA GOLBEK by telephone. GOLBEK recalled JUSTIN and M.M. came over to her residence and provided a packet of information to GOLBEK. GOLBEK did not recall if the allegations included the sexual assault. GOLBEK took the packet of information to Kingfisher Public Schools Superintendent Dr. DAN GRAIG. GOLBEK believed CRAIG contacted law enforcement shortly thereafter.
- (8) Your affiant interviewed Dr. CRAIG on February 17, 2023. On May 13, 2021, CRAIG was at a baseball tournament when JUSTIN approached him. JUSTIN told CRAIG that once he settled in as the new Superintendent of Kingfisher Public Schools, he wanted to talk to him about some things.
 - a. On June 4, 2021, CRAIG and JAY WOOD, Kingfisher High School Principal, met with JUSTIN and LYNDY. JUSTIN showed CRAIG and WOOD a picture of M.M. covered in bruises. JUSTIN explained how M.M. was abused during his first two years of high school. JUSTIN denied any of the coaches touching M.M. JUSTIN told them that coaches degraded M.M. and were mean to M.M. JUSTIN told them he wanted the coaches fired and LYNDY told them she wanted them to go to jail.
- (9) On February 17, 2023, OSBI Agents interviewed JUSTIN and LYNDY at their residence in Kingfisher, Oklahoma. JUSTIN and LYNDY confirmed that the statement provided to OSBI Agents by their attorney CAMERON SPRADLING was true and accurate.
 - a. JUSTIN explained that he had gone to Kingfisher Police Chief DAVID CATRON and inquired if anyone had filed any reports on the abuse occurring within the Kingfisher football program. JUSTIN did not report M.M.'s abuse to CATRON. JUSTIN did not want to report the incident

because M.M. was still in school. JUSTIN asked CATRON, "off the record" what he could do if he had complaints. CATRON explained it would have to go through the process. JUSTIN had reservations about reporting to local law enforcement for fear they would tell their sons and nephews who were on the football team. JUSTIN worried about the reprisal of M.M. JUSTIN never contacted the District Attorney's Office either.

- (10) On August 17, 2023, your affiant interviewed MARK SNODGRASS at his residence in Kingfisher, Oklahoma. During M.M.'s freshman and sophomore years of High School, JUSTIN and SNODGRASS had multiple conversations about the incidents that were happening to M.M. SNODGRASS had seen the picture of M.M.'s back; however, the picture looked different when it was shown to him by JUSTIN. SNODGRASS recalled JUSTIN being kind of excited about M.M. being in "The Ring" because it was going to toughen him up.
 - a. SNODGRASS recalled JUSTIN telling him about the sexual assault during M.M.'s freshman or sophomore year. SNODGRASS recalled JUSTIN telling him how these kids were ruthless these days. M.M. had gotten into an argument with a guy twice his size. M.M. was body slammed and the individual who M.M. had gotten into it with rubbed his genitals on M.M.'s head.
- (11) On October 16, 2023, your affiant contacted the Kingfisher Police Department. Your affiant inquired if any child abuse reports regarding M.M. had been made to the Kingfisher Police Department by JUSTIN. As of this date, JUSTIN had not filed any child abuse reports regarding M.M. to the Kingfisher Police Department.
- (12) On October 16, 2023, your affiant contacted the Kingfisher County Sheriff's Office. Your affiant inquired if any child abuse reports regarding M.M. had been made to the Kingfisher County Sheriff's Office by JUSTIN. As of this date, JUSTIN had not filed any child abuse reports regarding M.M. to the Kingfisher County Sheriff's Office.
- (13) Based on this investigation, JUSTIN learned about the physical and verbal abuse of M.M. being perpetrated by students and coaches during M.M.'s freshman year. JUSTIN, by his own admissions, knew this abuse continued through M.M.'s sophomore year. JUSTIN and LYNDY spoke to school officials on multiple occasions regarding the abuse; however, they never reported the abuse to law enforcement. JUSTIN and/or LYNDY documented the abuse by taking photographs of M.M.'s injuries and saving recordings of threatening messages.
- (14) JUSTIN MECKLENBURG is a white male, DOB:
- (15) The offense(s) occurred in the City of Kingfisher, County of Kingfisher, State of Oklahoma.

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR KINGFISHER COUNTY

THE STATE OF OKLAHOMA,)
Plaintiff,))
vs.) Case No. CM-2023-
DANA GOLBEK	
ADDR:)
DL: ****	FILED
SSN: ***-**-	OCI 17 2023,
DOB:	LISA MARKUS, COURT CLERK
Defendant.	DEPUTY
	IMPORMATION

INFORMATION

COUNT 1: FAILURE TO REPORT CHILD ABUSE OR NEGLECT ~ 10A O.S. § 1-2-101, a MISDEMEANOR

STATE OF OKLAHOMA, COUNTY OF KINGFISHER:

I, Michael J. Fields, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Kingfisher and in the State of Oklahoma, DANA GOLBEK did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

FAILURE TO REPORT CHILD ABUSE OR NEGLECT ~ a MISDEMEANOR, on or between the 1st day June, 2021 and the 8th day of February, 2022, by failing to immediately report suspected child abuse and/or child neglect of M.M., a person who was a minor child during the time of suspected abuse and/or neglect, to the Department of Human Services and to local law enforcement.

This crime is punishable by imprisonment for up to 1 year and/or by a fine of up to \$500.

MICHAEL J. FIELDS DISTRICT ATTORNEY

Hope Bryant

Assistant District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

Hope Bryant

By:

Assistant District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Mark Adams, Heritage Hall High School, 1800 NW 122nd St., Oklahoma City, OK 73120

Richard Brown, 701 South Lewis, Stillwater, OK 74076

David Buck, D&R Reporting and Video, INC. 400 N. Walker Ave # 160,, Oklahoma City, OK 73102

Chief David Catron, Kingfisher Police Department, 117 W. Miles Ave., Kingfisher, OK 73750

Daniel Craig, 1202 Francis Ln, Kingfisher, OK 73750

Department Human Services Rep. and/or Records Custodian, 2409 N. Kelley Ave., OKC, OK 73111

David Glover, Kingfisher School District, 602 West Chisholm Drive, Kingfisher, OK 73750

Eric Janzen, 525 South Main, Suite 700, Tulsa, OK 74103

Martha Justice, 4Justice, LLC, P.O. Box #5352, Edmond, OK 73083

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Ross Leonoudakis, 8701 Bee Cave Road, Building 1, Suite 500, Austin, TX 78746

Justin Mecklenburg, 1206 Cobblestone LN, Kingfisher, OK 73750

Lyndy Mecklenburg, 1206 Cobblestone LN., Kingfisher, OK 73750

Mason Mecklenburg, 1206 Cobblestone Ln, Kingfisher, OK 73750

Laurie Morris, Oklahoma Department Human Services (DHS); P.O. Box 25352, Oklahoma City, OK 73125

Jeffrey Myers, 1207 Walton Trail, Kingfisher, OK 73750

Micah Nall, 11732 NW 135th Ter., Piedmont, OK 73078

Agent Phillip Ott, OSBI, OSBI, 701 S. Lewis, Stillwater, OK 74076

Tommy Parker, 212 Center St., Alva, OK 73717

Derek Patterson, 802 N. Main, Cashion, OK 73016

Terry Payne, 403 W. Will Rogers drive, Kingfisher, OK 73750

Mark Rains, 525 South Main, Suite 700, Tulsa, OK 74103

Bruce Rodgers, D&R Reporting & Video, Inc., 400 N. Walker, Ave. #160;, Oklahoma City, OK 73102

Mark Snodgrass, 1110 W. Will Rodgers Dr., Kingfisher, OK 73750

Cameron Spradling, 500 N Walker, Suite 100, Oklahoma City, OK

Jason Sternberger, 1210 Walton Trail, Kingfisher, OK 73750

Justin Trumbley, 102 Coronado, Kingfisher, OK 73750

Kate White, 630 N.E. 63rd St., Oklahoma City, OK 73105

Joe White, 630 N.E. 63rd St., Oklahoma City, OK 73105

Derek White, OSBI, 723 S. Lewis, Stillwater, OK 74074

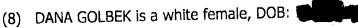
Jay Wood, 201 North Taylor St., Dover, OK 73734

IN THE DISTRICT COURT OF KINGFISHER COUNTY STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,	Plaintiff,))	
vs.	,		
DANA GOLBEK	Defendant,) Case No. <u>@</u>	1. 23.168
		j	Kingfisher County Oklahoma
			OCT 1 7 2023
The undersigned upon oath depo	AFFIDA oses and states		LISA MARKUS, COURT CLERK BY DEPUTY

- (1) Your affiant is a Special Agent with the Oklahoma State Bureau of Investigation (OSBI). Your affiant became a certified peace officer in the State of Oklahoma in 2005. Your Affiant has participated in specialized training concerning the investigation of illegal drug offenses, homicides, sex crimes, child abuse, and fraud. Your affiant is an advanced certified Police Officer in the State of Oklahoma being so certified by the Oklahoma Council on Law Enforcement Education and Training; Your affiant has a Bachelor's Degree in Criminal Justice. Your affiant has conducted and participated in numerous criminal investigations, these investigations have resulted in the arrest and conviction of individuals involved in the substantive and conspiratorial criminal offenses of murder, sex crimes, child abuse and neglect, fraud, and other serious felony offenses.
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- (4) DANA GOLBEK was a teacher at Kingfisher Public Schools for approximately 30 years. GOLBEK was elected to the Kingfisher School Board in 2014 after she had retired from being a teacher.

- (5) On June 27, 2021, JUSTIN MECKLENBURG and M.M. went to DANA GOLBEK's residence. They provided GOLBEK a packet and spoke with her about the abuse that happened to M.M. while playing football for Kingfisher High School. They outlined the specific abuse that was inflicted by other students and the verbal abuse that was inflicted by the Kingfisher High School coaching staff. They spoke with GOLBEK about Coach JEFF MYERS specifically knowing about the abuse and allowing it to go on.
- (6) On February 24, 2023, OSBI Agents interviewed DANA GOLBEK by telephone. GOLBEK recalled that JUSTIN and M.M. came over to her residence in May or June 2021. They provided a packet of information to GOLBEK. GOLBEK did not recall if the allegations included the sexual assault. GOLBEK took the packet of information to Kingfisher Public Schools Superintendent Dr. DAN GRAIG. GOLBEK believed CRAIG contacted law enforcement shortly thereafter.
- (7) On May 10, 2023, DANA GOLBEK was deposed as part of a federal lawsuit pertaining to Kingfisher Public Schools. During the course of the deposition, GOLBEK admitted she had received training on when to report child abuse and who to report child abuse to. GOLBEK admitted that teachers have a duty to report child abuse.
 - a. GOLBEK was shown a picture of bruises on the back of an individual. GOLBEK confirmed that M.M. had come to her home and showed her this picture and told her it was him in the picture. GOLBEK admitted JUSTIN MECKLENBURG had told her about the physical abuse, sexual abuse, verbal abuse, bullying, and hazing that was going on during football practice. GOLBEK admitted she first learned that M.M. was sexually assaulted at Kingfisher High School Locker Room when they came to her residence. GOLBEK did not report this to DHS or the police.
 - b. GOLBEK was asked about her responsibility to report as a school board member when a student comes to her about "physical abuse, verbal abuse, bullying..." GOLBEK stated her job was to report this to the Superintendent of the school so that an investigation could be started.
 - c. GOLBEK took the packet provided to her by JUSTIN MECKLENBURG and M.M. to Kingfisher Schools Superintendent Dr. DAN GRAIG. GOLBEK did not report what M.M. and JUSTIN MECKLENBURG had told her to the police but believed Dr. CRAIG had.
 - d. Based on the deposition, GOLBEK only reported the physical, sexual, and verbal abuse of M.M. to the Superintendent. GOLBEK never reported this to the police or to the Department of Human Services. GOLBEK admitted as a School Board Member she is responsible for the health, safety, and welfare of the children of Kingfisher schools when allegations are brought to the School Board.





JUDGE OF THE DISTRICT COURT