



JUN 25 2024

RICK WARREN
COURT CLERK

27 _____

APPLICATION OF:

FLOYD EASON,
ANDREW FUGATE, &
GINA STANDRIDGE

GT-24-1

CITIZEN RESIDENTS OF THE
COUNTY OF OKLAHOMA;
STATE OF OKLAHOMA,
PETITIONING FOR AN ORDER
DIRECTING A GRAND JURY
TO BE CONVENED.

PETITION TO IMPANEL GRAND JURY

COMES NOW the Applicants to present this petition (“the Petition”) to impanel a grand jury with jurisdiction in Oklahoma County pursuant to Title 38 of the Oklahoma Statutes, § 101, *et seq.* In support, the Applicants assert:

I. ALLEGATIONS OF FACT

1. The undersigned Applicants reside within the boundaries of the County of Oklahoma, State of Oklahoma, and are registered voters of Oklahoma County and Oklahoma State.
2. Myles Davidson (“Mr. Davidson”) has, through the Office of District 3 Commissioner for Oklahoma County, performed several consecutive and related acts, at times in conspiracy with another, for personal or private interest gains, and with no regard for the constituents of Oklahoma County District 3 or the citizens of Oklahoma County.
3. The acts include, but are not limited to, the purchase of real property at or around the area of 1901 East Grand Boulevard, Oklahoma City from the personal friend, acquaintance, and campaign donor of Mr. Davidson utilizing Oklahoma County public funds; agreeing and accepting a paid contractor for Oklahoma County to host a campaign fundraiser on their campus for Mr. Davidson’s election; failing to file and disclose campaign donation reports to the Oklahoma Ethics Commission in excess of one (1) year; failing to comply with the Oklahoma Open Records Act.
4. These injuries include, but are not limited to, the mistrust developed between the citizens of Oklahoma County and the Oklahoma County Commissioners; the loss of integrity in the Office of Oklahoma County Commissioner; the loss of accountability and transparency for the Oklahoma County Government.
5. Throughout the process of selecting an appropriate site for the potential Oklahoma County Detention Center, Mr. Davidson has been advocating for the site at or around 1901 East Grand Boulevard, Oklahoma City which is owned by Mr. Davidson’s personal friend of

30+ years, Patrick Garrett Junior. Mr. Garrett is also an active donor to Mr. Davidson's campaign.

6. The potential jail site was purchased by Mr. Garrett in 2017 for an amount of \$1.4 million and has been placed under a provisional contract to Oklahoma County for \$5.4 million without any noticeable improvements or enhancements.
7. Mr. Davidson is continuing to fundraise for his 2022 Campaign and agreed for an Oklahoma County paid contractor, FlintCo, to host a fundraiser on their campus in March 2024. It was not until the news media reported this inappropriate action that Mr. Davidson moved the location of the event.
8. Mr. Davidson was negligent in his ethical duties to disclose, report, and file all campaign contributions to his 2022 Campaign [or any future campaigns] with the Oklahoma Ethics Commission since January 2023.
9. Mr. Davidson failed to comply with the Oklahoma Open Records Act when requested by an Oklahoma County resident, in writing, to reveal certain documents and electronic communications regarding certain business dealings between Mr. Davidson and various named individuals concerning the 1901 East Grand property and the potential "land swap" for Crooked Oak School District.
10. Based on the foregoing, Mr. Davidson has shown little regard for the moral and ethical integrity of his office as Oklahoma County Commissioner and developed a culture of mistrust between the residents of Oklahoma County and the Oklahoma County Board of Commissioners, as well as a general lack of accountability and transparency which leads many to believe there is corruption of his public office.

II. ACCUSATIONS AGAINST
MYLES DAVIDSON, OKLAHOMA COUNTY DISTRICT 3
COMMISSIONER

11. The allegations set forth in paragraphs 1 through 10 of this Petition are incorporated as if repeated in this paragraph.
12. The Applicants petition for the convening of a grand jury to investigate matters alleged below as they establish grounds of Corruption in Office and Willful Maladministration.
 1. **Corruption in Office**
13. The allegations set forth in paragraphs 1 through 10 of this Petition are incorporated as if repeated in this paragraph.
14. Mr. Davidson should be investigated for Corruption in Office.
15. Mr. Davidson should be investigated for Corruption in Office because of his unethical and wrongful use of his authority as a public official to vote, rather than abstain, from the votes related to 1901 East Grand Boulevard, Oklahoma City as the purchase of real property would directly benefit a personal friend and campaign donor; his allowance of an Oklahoma County paid contractor to host his private campaign functions on their campus; and his failure to disclose campaign donors to the Oklahoma Ethics Commission within the allotted timeframe.

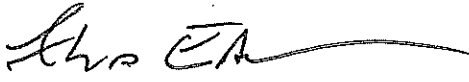
2. Willful Maladministration

16. The allegations set forth in paragraphs 1 through 10 of this Petition are incorporated as if repeated in this paragraph.
17. Mr. Davidson should be investigated for Willful Maladministration.
18. Mr. Davidson should be investigated for Willful Maladministration because of his unethical and wrongful use of his authority as a public official to withhold records requested by a citizen of Oklahoma County through the Oklahoma Open Records Act.

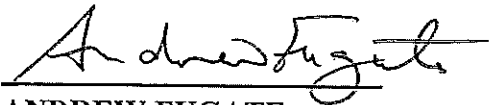
III. RELIEF

19. The allegations set forth in paragraphs 1 through 18 of this Petition are incorporated as if repeated in this paragraph.
20. We, the Applicants, and the undersigned qualified electors of the County of Oklahoma, State of Oklahoma, respectfully request that a grand jury be impaneled, pursuant to Title 38 of the Oklahoma Statutes, § 101, *et seq.*, with all powers and authorities provided to a grand jury under Oklahoma law, to inquire into the subject matter and specific identification of areas described above, to determine whether an action for removal of Myles Davidson, District 3 County Commissioner for Oklahoma County, shall issue.

Respectfully submitted:



FLOYD EASON



ANDREW FUGATE



GINA STANDRIDGE