

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE

DEC 03 2024

WESTERN DISTRICT OF OKLAHOMA

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY JKW, DEPUTY

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

JENNIFER BAXTER,
ALESHA INGRAM,
PAULA KELLEY,
VINCENT MATTHEWS,
MELISSA MELTON, and
LYNNSEE NOEL,

Defendants.)

No.

CR 24-516 R

Violation:

18 U.S.C. § 242

INDICTMENT

The Federal Grand Jury Charges:

Introduction

At all times relevant to this Indictment:

1. The Garvin County Jail (“GCJ”) was a jail in Garvin County, Oklahoma, that housed individuals awaiting adjudication of state and tribal

criminal charges against them.

2. Detention Deputies (“DDs”) were GCJ employees who were responsible for the well-being of the pretrial detainees housed at the GCJ.

3. Corrections Nurses (“CNs”) were Turn Key Health employees contracted to work at the GCJ. CNs were also responsible for the well-being of the pretrial detainees housed at the GCJ.

4. **JENNIFER BAXTER** was employed as a DD at the GCJ and held the rank of Detention Sergeant in August 2023. **BAXTER** had supervisory authority over DDs and CNs who worked the same shift as her. On or about August 6, 2023, **BAXTER** supervised the day shift at the GCJ.

5. On or about August 6, 2023, DDs **ALESHA INGRAM** and **VINCENT MATTHEWS**, as well as CN **LYNNSEE NOEL**, worked the day shift at the GCJ.

6. **MELISSA MELTON** was employed as a DD at the GCJ and held the rank of Detention Sergeant in August 2023. **MELTON** had supervisory authority over the DDs and CNs who worked the same shift as her. On or about August 6 to 7, 2023, **MELTON** supervised the night shift at GCJ.

7. On or about August 6 to 7, 2023, DD **PAULA KELLEY** worked the night shift at the GCJ.

8. K.T. was a pretrial detainee held in the custody and care of the GCJ in August 2023, prior to any trial or adjudication of the tribal charges against her.

Count One
(Deprivation of Rights under Color of Law)

9. The Federal Grand Jury incorporates Paragraphs 1 through 8 by reference.

10. On or about August 6, 2023, in Garvin County, Oklahoma, within the Western District of Oklahoma,

_____ **JENNIFER BAXTER,**
ALESHA INGRAM,
VINCENT MATTHEWS, and
LYNNSEE NOEL, _____

while acting under color of law, willfully deprived K.T. of the right, secured and protected by the Constitution and laws of the United States, not to be deprived of liberty without due process of law, which includes the right to be free from a DD's or CN's deliberate indifference to a substantial risk of serious

harm. Specifically, **BAXTER, INGRAM, MATTHEWS, and NOEL** knew that K.T., a pretrial detainee in their care and custody, faced a risk of serious physical harm at the hands of other inmates in K.T.'s GCJ cell, and willfully failed to take reasonable measures to abate that risk, thereby acting with deliberate indifference to a substantial risk of serious harm to K.T. This offense resulted in bodily injury to K.T.

All in violation of Title 18, United States Code, Section 242.

Count Two
(Deprivation of Rights under Color of Law)

11. The Federal Grand Jury incorporates Paragraphs 1 through 8 by reference.

12. On or about August 6 and August 7, 2023, in Garvin County, Oklahoma, within the Western District of Oklahoma,

_____ **JENNIFER BAXTER,**
ALESHA INGRAM,
PAULA KELLEY,
VINCENT MATTHEWS,
MELISSA MELTON, and
LYNNSEE NOEL,_____

while acting under color of law, willfully deprived K.T. of the right, protected

and secured by the Constitution and laws of the United States, not to be deprived of liberty without due process of law, which includes the right to be free from a DD's or CN's deliberate indifference to serious medical needs. Specifically, **BAXTER, INGRAM, KELLEY, MATTHEWS, MELTON, and NOEL** knew that K.T., a pretrial detainee in their care and custody, had serious medical needs, and willfully failed to ensure that K.T. was provided with necessary medical care, thereby acting with deliberate indifference to a substantial risk of serious harm to K.T. This offense resulted in bodily injury to K.T. and resulted in K.T.'s death.

All in violation of Title 18, United States Code, Section 242.

A TRUE BILL:



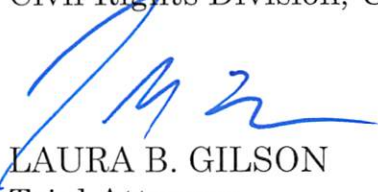
FOREPERSON OF THE GRAND JURY

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