

THE STATE OF OKLAHOMA,

Plaintiff,

vs.

DAVID ANTHONY WARE,

Defendants.

DISTRICT COURT
FILED

FEB 15 2022

RON NEWBERY, Court Clerk
OF OKLA. TULSA COUNTY

OVERVIEW OF THE STRUCTURAL ERROR

Since Oklahoma's statutory scheme for compensation of conflict death penalty counsel creates a conflict of interest between Mr. Ware and any court

1 of 15

appointed counsel and that conflict permeates every aspect of Mr. Ware's death penalty defense, the only remedy this Court has is to prohibit the State of Oklahoma from seeking the death penalty in this case.

For this Court to do otherwise, would be the judicial sanctioning of this unconstitutional and immoral practice.

**OKLAHOMA'S STATUTORY COMPENSATION FOR DEATH PENALTY
WHEN THE PUBLIC DEFENDER'S OFFICE HAS A CONFLICT**

Title 19 O.S. Section 138.7 provides as follows:

In those counties subject to the provisions of Section 138.1a² of this title, if the court determines that a conflict of interest exists between a defendant and the county indigent defender, the case may be reassigned by the court to another county indigent defender, an attorney who represents indigents pursuant to contract, or a private attorney who has agreed to accept such appointments.

Title 19 O.S. Section 138.7a **Maximum Statutory Attorney Fees in Death**

Penalty Cases provides as follows:

- A. In every case in which the defendant is subject to the death penalty and an attorney other than a county indigent defender is assigned to the case as provided by Section 138.7 of Title 19 of the Oklahoma Statutes, total compensation for attorneys who serve as lead counsel and co-counsel shall not exceed the limits set in Section 1355.13 of Title 22 of the Oklahoma Statutes.
- B. The maximum statutory fee established pursuant to this section may be exceeded only when counsel establishes that the case is an exceptional one which requires an extraordinary amount of time to litigate and that the request for extraordinary attorney fees is reasonable.

² Tulsa County has a population over three hundred thousand (300,000) and is therefore subject to the provisions of Title 19 O.S. Section 138.1a.

Title 22 O.S. Section 1355.13-Death Penalty Cases-Compensation of Counsel

provides as follows:

A. In every case in which the defendant is subject to the death penalty and an attorney or attorneys other than an attorney or attorneys employed by the Indigent Defense System are assigned to the case by the System to provide representation, an attorney must submit a claim in accordance with the provisions of the Indigent Defense Act in such detail as required by the System. Except as provided in subsection B of this section, total compensation for non-System attorneys who serve as lead counsel in capital cases shall not exceed Twenty Thousand Dollars (\$20,000.00) per case. Total compensation for a non-System attorney who is co-counsel with a System or non-System attorney in a capital case shall not exceed Five Thousand Dollars (\$5,000.00) per case.

THE REASON FOR THE CONFLICT

On July 10, 2020 the Tulsa County Public Defender's Office filed a Notice of Conflict of Interest. On July 14, 2020 Kevin Adams was appointed to represent Mr. Ware.

While it is not reflected anywhere in the record, and has not been reported publicly³ to counsel's knowledge, it is counsel's understanding that the reason the Tulsa County Public Defender's Office is unable to represent David Ware in this matter is because Sergeant Craig Johnson had a romantic relationship and was living with Tulsa County Public Defender, Stephanie Collingwood, at the time he was killed. And that in addition to the relationship with Ms. Collingwood, that Sergeant Johnson spent a lot of time drinking alcohol, socializing with, and was personal friends with so many other public defenders; that the Chief Public Defender felt it would be a conflict of interest for his office to represent David Ware. (See Attached A

screenshot from Ms. Collingwood's Facebook Page and a photograph of the couple found on her Facebook Page.)

Counsel believes that this failure to tell the general public the reason for the conflict of interest is part of a concerted effort by the local law enforcement community⁴ and the local media to control the narrative surrounding this case⁵. Not only has it not been publicly reported until now that Sergeant Johnson was estranged from his wife and living with another woman it was not reported that Sergeant Johnson had filed for a divorce. (See Attached B, *Craig V. Johnson v. Kristi J Johnson*, Tulsa County Case FD-2019-2509 Docket Sheet) Despite Sergeant Johnson's co-habitation with a younger woman and his pending divorce the Cox Media Group Tulsa and the TPD Foundation organized a fundraiser for Sergeant Johnson's family and Aurush Zarkeshan's and his family, with all the money going to the newly-created Johnson-Zarkeshan Family Fund. (See Attached C, *Fundraiser for fallen Tulsa Police Sergeant and injured officer raises \$500,000+*, July 8, 2020, <https://www.krmg.com/news/local/fundraiser-fallen-tulsa-police-sergeant-injured-officer-raises-500000/TG5MB4YAYJHXBjNONMGAVEUWSU/> ; accessed on February 14, 2022)

Because the Court found that "a conflict of interest exists between a defendant and the county indigent defender" and Mr. Ware has been appointed a "private attorney who has agreed

⁴ Including the Tulsa County District Attorney's Office

⁵ Just like at the beginning of this case when the chief of Police mislead the members of this community regarding the facts of the shooting that were clearly disproved by the video that the Tulsa County District Attorney's Office successfully requested a judge to seal before Mr. Ware had an attorney to object.

to accept” the appointment the statutory pay for compensation of counsel there is a statutory maximum of \$20,000 for first chair and \$5,000 for second chair.⁶

OKLAHOMA’S STATUTORY COMPENSATION FOR CONFLICT DEATH PENALTY COUNSEL IS UNCONSTITUTIONALLY INADEQUATE

ABA Guidelines for the Appointment and Performance of Defense Counsel in Death Penalty Cases (hereinafter “ABA Guidelines”), Commentary to Guideline 9.1—Funding and Compensation provides the following:

GUIDELINE 9.1—FUNDING AND COMPENSATION

- A. The Legal Representation Plan must ensure funding for the full cost of high quality legal representation, as defined by these Guidelines, by the defense team and outside experts selected by counsel.
- B. Counsel in death penalty cases should be fully compensated at a rate that is commensurate with the provision of high quality legal representation and reflects the extraordinary responsibilities inherent in death penalty representation.
 - 1. Flat fees, caps on compensation, and lump-sum contracts are improper in death penalty cases.
 - 2. Attorneys employed by defender organizations should be compensated according to a salary scale that is commensurate with the salary scale of the prosecutor’s office in the jurisdiction.
 - 3. Appointed counsel should be fully compensated for actual time and service performed at an hourly rate commensurate with the prevailing rates for similar services performed by retained counsel in the

⁶ Because Kevin Adams, first chair counsel wanted to obtain the best possible second chair to assist him in providing the best representation of Mr. Ware, Mr. Adams is planning on splitting the total fee with the second chair Mr. Robert Gifford. Mr. Gifford is a former ADA, AUSA, JAG Officer and is currently a judge for multiple tribes around the State of Oklahoma. Mr. Gifford is highly qualified and as counsel have been instructed to block off the entire month of April for the trial, Mr. Adams believes it would be unconscionable to ask a lawyer of Mr. Gifford’s experience and ability to work the entire month for \$5,000, not to mention the overwhelming amount of time necessary to prepare for the trial in a matter such as this. Therefore, Mr. Adams has agreed to split the fee with Mr. Gifford. (\$12,500 each) Counsel plans to request the payment of the fee immediately before trial so both counsel can financially survive what could be a month long trial.

jurisdiction, with no distinction between rates for services performed in or out of court. Periodic billing and payment should be available.

Oklahoma's compensation scheme blatantly runs afoul of the prevailing professional norms⁷ described in the ABA Guidelines in the following ways.

1. Oklahoma has a lump-sum, flat fee, with a cap on compensation and as guideline 9.1 B 1 states it is "improper in death penalty cases".
2. "Appointed counsel should be fully compensated for actual time and service performed at an hourly rate commensurate with the prevailing rates for similar services performed by retained counsel in the jurisdiction, with no distinction between rates for services performed in or out of court. Periodic billing and payment should be available."

Oklahoma's compensation rate for death qualified appointed counsel is an obscene embarrassment to the American criminal justice system and has to be the lowest or among the lowest in the country. Lead counsel, Kevin Adams, could have earned more money delivering pizzas or tending bar than he will earn in this case.

⁷ It is not a coincidence that the ABA's use of the phrase "prevailing professional norms" matches the language used by the Supreme Court in *Strickland v. Washington*, 466 U.S. 668, 688(1984) ("The proper measure of attorney performance remains simply reasonableness under prevailing professional norms.") when addressing the standard to which defense counsel are held in a claim of ineffective assistance of counsel. Indeed, in *Strickland*, the Court noted that the prevailing norms of practice reflected in ABA standards are guides in addressing the "reasonableness [of representation] under prevailing professional norms." *Id.* And, since *Strickland*, the Supreme Court has found that mitigation investigations which do not comply with the ABA Guidelines in place at the time can constitute deficient performance by counsel. *Wiggins v. Smith*, 539 U.S. 510, 524-526 (2003); *see also*, *Williams v. Taylor*, 529 U.S. 362, 396 (1999); *Cannan v. McBride*, 395 F.3d 376, 384-385 (7th Cir. 2005).

The Private investigator in this matter is being compensated at a rate of \$80 per hour. The Mitigation Specialist in this case is being compensated at a rate of \$100 per hour. The Neuropsychologist in this matter is being compensated at a rate of \$350 per hour. Lead counsel will average something less than \$20.00 per hour.

However, to say that lead counsel in this case will earn \$20 per hour is misleading. In actuality lead counsel is losing at least \$135 per hour for every hour worked. Both counsel in this matter are members of the Criminal Justice Act Panel and the current rate of compensation for CJA panel attorneys is \$155 per hour. Lead counsel has had to refuse appointments⁸ from the CJA for months because of his obligations to Mr. Ware in this case.

And this is just the money lead counsel has sacrificed that he could have earned through appointments. Lead counsel has refused to accept dozens of private pay cases because of his obligations on Mr. Ware's case. It is not a question of how much lead counsel will earn on this case, it is a question of how much can he afford to lose and still meet his financial obligations.

While undersigned counsel has actually sacrificed tens of thousands of dollars to attempt to meet his professional obligations to Mr. Ware, it would be a

⁸ As a result of the *McGirt* case there is more federal appointment work than can be done by local federal lawyers. Lawyers are being brought in from around the country just to handle the caseload.

fantasy to say that his representation of Mr. Ware has not been seriously effected by the lack of adequate compensation and access to regular payments⁹.

The alternative is even more unacceptable, that alternative would be to stand by and watch Mr. Ware escorted to death row without a fighting chance. Anyway you look at it, the State of Oklahoma is shirking its responsibility to Mr. Ware and those “similarly situated”, and the State is doing so in the most serious category of cases the criminal justice systems has, death penalty cases.

The Death-is-Different, jurisprudence in Oklahoma is a little different than the rest of the country, here it is different because conflict counsel will go broke trying to save their clients from the death penalty.

Unfortunately, counsel believes that is just how some people in the power structure want it to be. The state of Oklahoma wants to kill whomever they want to kill and they don’t want some pesky private lawyer getting in their way. While this may seem like a harsh assessment, counsel would just say, “if people believed what they claimed to believe they would not act the way that they do”.

The commentary of the ABA guidelines addresses this issue:

In order to fulfill its constitutional obligation to provide effective legal representation for poor people charged with crimes, “[g]overnment has the responsibility to fund the full cost of quality legal representation.” This means that it must **“firmly and unhesitatingly resolve any conflicts between the treasury and the fundamental constitutional rights in favor of the latter.”** (See ABA Guidelines,

⁹ Counsel has been on this case since July of 2020 and has not taken a single payment. Because if counsel took a portion of the fee, he would not be able to financially survive during the trial.

Commentary to Guideline 9.1—Funding and Compensation, emphasis added)

The commentary goes on to describe undersigned counsel's dilemma that is described above:

Low fees make it economically unattractive for competent attorneys to seek assignments and to expend the time and effort a case may require. A 1993 study of capital representation in Texas, for example, showed that "more and more experienced private criminal attorneys are refusing to accept court appointments in capital cases because of the time involved, the substantial infringement on their private practices, the lack of compensation for counsel fees and experts/expenses and the enormous pressure that they feel in handling these cases." Similarly, a survey of Mississippi attorneys appointed to represent indigent defendants in capital cases found that eighty-two percent would either refuse or be very reluctant to accept another appointment because of financial considerations. A 1998 study of federal death penalty cases reported that "[a]lthough the hourly rates of compensation in federal capital cases are higher than those paid in non-capital federal criminal cases, they are quite low in comparison to hourly rates for lawyers generally, and to the imputed hourly cost of office overhead." (See ABA Guidelines, Commentary to Guideline 9.1—Funding and Compensation)

The opinion expressed above is not just the opinion of the drafters of the ABA Guidelines it is the opinion of several Justices of the United States Supreme Court:

Indeed, problems with the quality of defense representation in death penalty cases have been so profound and pervasive that several Supreme Court Justices have openly expressed concern. Justice Ginsburg told a public audience that she had "yet to see a death case among the dozens coming to the Supreme Court on eve-of -execution stay applications in which the defendant was well represented at trial" and that "people who are well represented at trial do not get the death penalty." Similarly, Justice O'Connor expressed concern that the system "may well be allowing some

innocent defendants to be executed” and suggested that “[p]erhaps it’s time to look at minimum standards for appointed counsel in death cases and adequate compensation for appointed counsel when they are used.” As Justice Breyer has said, “the inadequacy of representation in capital cases” is “a fact that aggravates the other failings” of the death penalty system as a whole. (See ABA Guidelines, Commentary to Guideline 9.1—Funding and Compensation)

The state of Oklahoma has failed in its obligation to Mr. Ware and other indigent defendants being represented in Tulsa County on death penalty cases by conflict defenders. This isn’t just counsel’s opinion or common sense, this is the opinion reached by the Oklahoma Death Penalty Review Commission, a Bi-Partisan commission Co-chaired by former Governor Brad Henry, Andy Lester (former member of Ronald Reagan’s transition team, former federal magistrate, adjunct professor and an Oklahoma State Regent) and Judge Reta Strubhar (the first woman to sit on the Oklahoma Court of Criminal Appeals). In *The Report of the Oklahoma Death Penalty Review Commission*, released in March of 2017 the commission recommended:

Adequate compensation should be provided to conflict counsel in capital cases, and the existing compensation cap should be lifted. (See Recommendation 4 pg. Vii, of *The Report of the Oklahoma Death Penalty Review Commission*; filed into this record on December 11, 2020)

Counsel is not saying that the state of Oklahoma can not use its criminal justice system to kill people, counsel is only saying that if we truly believe in the principles expressed in the United States and Oklahoma Constitutions that these principals are not

free. Those principles were purchased with the blood of patriots and have to be sustained by the adequate funding from the state.

OKLAHOMA'S INADEQUATE FUNDING IS BAD FOR EVERYONE

Oklahoma's inadequate funding is bad for everyone, defendants and victim's families alike. Re-trials are costly, both emotionally and financially. How can the state and the family members of Sergeant Johnson have any confidence in a death verdict with such an inadequate funding system and the decisions that have come out of the federal courts over the last couple of decades regarding death penalty cases, particularly Oklahoma death penalty cases?

It is time for the Oklahoma Legislature to do the right thing. Nut first the Courts must do the right thing and then the Oklahoma Legislature will be forced to act.

Why should the state and federal judicial systems be burdened with cleaning up the mess created by the Oklahoma legislature's refusal to follow the directives of the United States Supreme Court?

LEADERS IN THE TULSA COUNTY CRIMINAL JUSTICE COMMUNITY HAVE BEEN AWARE OF THE REQUIREMENTS OF THE ABA GUIDELINES FOR ALMOST TWENTY (20) YEARS

On August 26, 2004, D. Gregory Bledsoe, counsel for defendant Jeremey Williams filed a Civil Rights lawsuit (42 U.S.C. § 1983) against the Tulsa County District Judges, the Associate Tulsa County Judge, the Special Judges in Tulsa County District Court over funding of death penalty counsel. (See *Williams v. District Judges, et al.*; Tulsa County case no. CJ-2004-5346). In paragraph nineteen (19) of that Petition it describes

the ABA Guidelines and the Supreme Court's referencing of them in *Wiggins v. Smith*, 539 U.S. 510, 524-526 (2003).

Not only have the leaders of the criminal justice system in Tulsa County had actual knowledge of the requirements for fair pay of conflict death penalty counsel, since "everyone is presumed to know the law", (See *State v Thomason*, 33 P.3d 930, paragraph 11 (Okla.Cr.2001)) the leaders of Tulsa County criminal justice system and the Oklahoma State Legislature must be presumed to know the law as well.

Since these "leaders" have know of this problem for many many years and have taken no action to correct the problem, reason and commons sense dictates a conclusion that our local criminal justice system leaders like the system the way that it is.

Counsel believes they like it that way because it makes it easier to kill whomever they want to kill. How many defendants are sitting on Oklahoma's death row that received their sentences of death under this constitutionally flawed system of appointing conflict death penalty counsel? The more difficult question is, "How many have been executed under this constitutionally flawed system of appointing conflict death penalty counsel?" Don't our local criminal justice leaders believe in a fair fight? Perhaps they prefer to have the deck so stacked in their favor that only a few are able to escape their deadly grasp?

At the end of the day the criminal justice system kills poor people, people without the resources to fight. When is the last time the state of Oklahoma (or any state for that matter) executed a rich man? Despite the United States Supreme Court telling the states

that they must adequately fund the defense of indigent defendants facing the death penalty, the state of Oklahoma has just ignored that obligation, and in Tulsa County they leaders have knowingly ignored that obligation for almost two decades.

THE ABA GUIDELINES ARE WELL ROOTED IN FEDERAL CRIMINAL JURISPRUDENCE

Since the United States Supreme Court cited the ABA Guidelines in the *Wiggins v. Smith*, 539 U.S. 510, 524-526 (2003), the Court has repeatedly referred to those guidelines. (See *Florida v. Nixon*, 543 U.S. 175 (2004), *Rompilla v. Beard*, 545 U.S. 374 and (2005), *Bobby v. Van Hook*, 558 U.S. 4 (2009).)

The Tenth Circuit Court of Appeals has also repeatedly cited the ABA Guidelines. (See *Harris v. Sharp*, 941 F.3d 963 (10th Cir. 2019), *Hooks v. Workman*, 551 F.3d 942 (10th Cir. 2008), and *Grant v. Royal*, 886 F.3d 874 (10th Cir. 2018) just to name a few.

OKLAHOMA'S STATUTORY COMPENSATION FOR CONFLICT DEATH PENALTY COUNSEL IN TULSA COUNTY IS STRUCTURAL ERROR

The lack of adequate funding to defend against the State's attempt to execute Defendants represented by conflict counsel in Tulsa County is a structural statutory error of a constitutional magnitude. Such a policy as described above creates a financially based "conflict of interest" between appointed counsel and death penalty defendants.

This conflict of interest requires conflict counsel to ignore their own financial wellbeing (to whatever degree they are able) so that they can focus on their client's interest of receiving effective assistance of counsel so they can avoid being killed by their state government. In such a system, whether or not a client lives or dies may be determined by their appointed lawyer's willingness to suffer financial ruin to save their client's life.

The system described above effects the entire death penalty process, from the filing of a Bill of Particulars seeking the death penalty to the execution of a defendant.

This is a "constitutional error" of the greatest magnitude and in accordance with the principles delineated in *Chapman v. California* and its progeny the State's quest to seek the execution of Mr. Ware cannot be allowed to proceed. (See *Chapman v. California*, 386 U.S. 18, 23 (1967) "[T]here are some constitutional rights so basic to a fair trial that their infraction can never be treated as harmless error.")

CONCLUSION

Therefore, for the reasons stated above Counsel urges this Court to dismiss the Bill of Particulars in this matter.

Respectfully Submitted,



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CERTIFICATE OF DELIVERY

I hear by certify that a copy of the foregoing instrument was mailed or delivered on Feb 15, 2022 to the office of the following:

Steve Kunzweiler
Kevin Gray
Tulsa County District Attorney's Office
500 S Denver Ave, 9th Floor
Tulsa, OK 74103



Kevin Adams

Exhibit A



Stephanie Collingwood updated her profile picture.

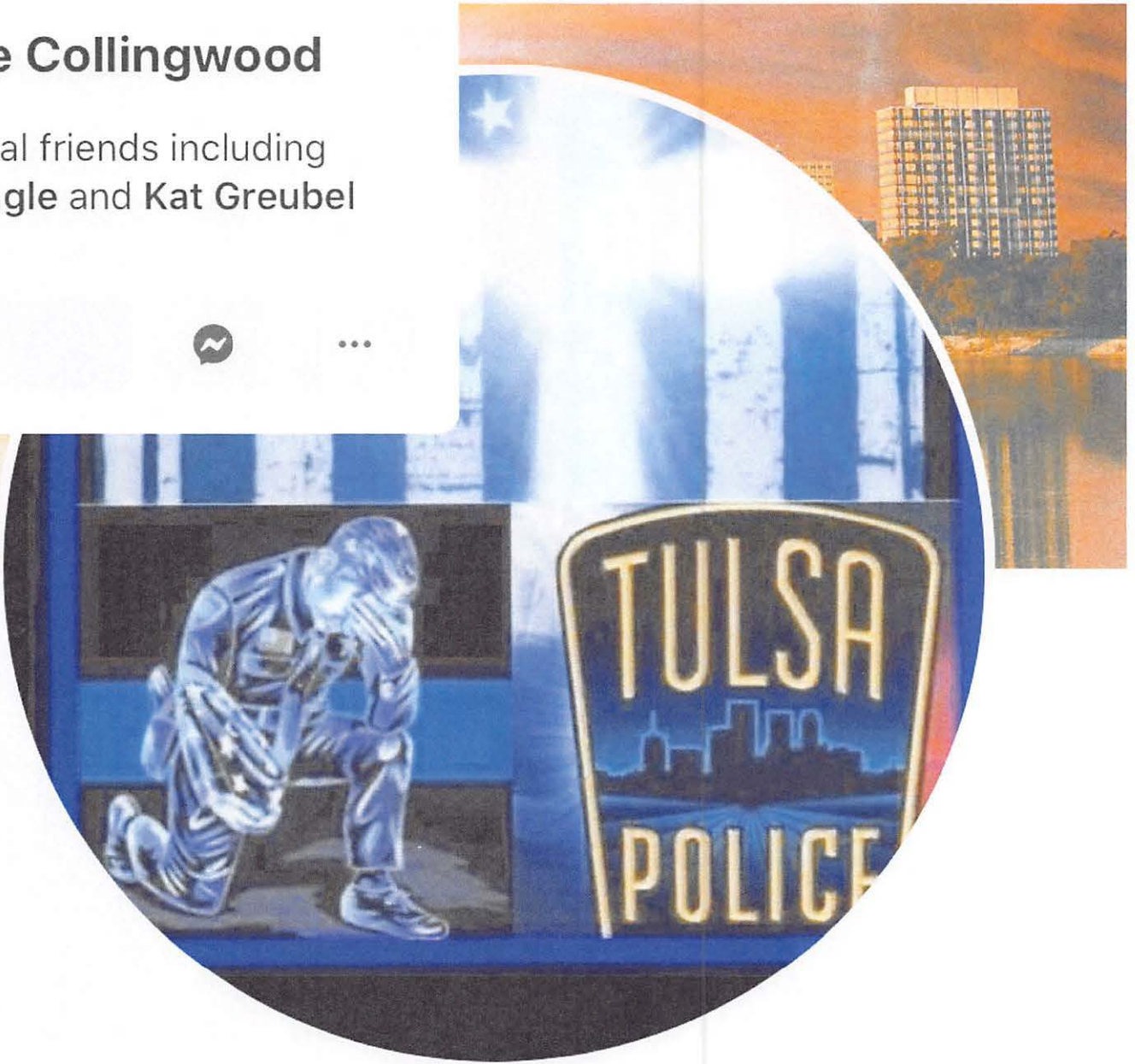


July 2 at 2:44 PM · 🌐

Stephanie Collingwood

9 mutual friends including
Mark Cagle and Kat Greubel
Ross

and



80

28 Comments



Exhibit B



OKLAHOMA State Courts Network

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IN THE DISTRICT COURT IN AND FOR TULSA COUNTY, OKLAHOMA

In Re the marriage of
CRAIG V JOHNSON,
Petitioner,
v.
KRISTI J JOHNSON,
Respondent.

No. FD-2019-2509

**(Family and Domestic: DIVORCE WITH MINOR
CHILDREN)**

Filed: 10/28/2019

Closed: 05/28/2021

Judge: FD Docket A

PARTIES

JOHNSON, CRAIG V, Petitioner
JOHNSON, KRISTI J, Respondent

ATTORNEYS

Attorney

Morton, James C (Bar #13601)
1630 South Main
Tulsa, OK 74119

Price, Alexander (Bar #33588)

Represented Parties

JOHNSON, CRAIG V

JOHNSON, KRISTI J

EVENTS

Event	Party	Docket	Reporter
Thursday, November 14, 2019 at 9:00 AM			

Parenting Plan Conference

FD Docket F

Thursday, December 19, 2019 at 9:30 AM

Parenting Plan Conference..PET JAMES MORTON...RESP ALEXANDER PRICE

FD Docket F

Wednesday, January 22, 2020 at 9:30 AM

Parenting Plan Conference...PET JAMES MORTON...RESP ALEXANDER PRICE

FD Docket F

ISSUES

For cases filed before 1/1/2000, ancillary issues may not appear except in the docket.

Issue # 1.

Issue: DIVORCE WITH MINOR CHILDREN (DIVMC)

Filed By: JOHNSON, CRAIG V

Filed Date: 10/28/2019

Party Name

Disposition Information

Respondent:

Disposed: OTHER, 05/28/2021. Other

JOHNSON, KRISTI J

DOCKET



Date	Code	Description	Party	Count	Amount
10-28-2019	[TEXT]			#1	
		FAMILY AND DOMESTIC INITIAL FILING.			
10-28-2019	[DIVMC]				
		DIVORCE WITH MINOR CHILDREN			
10-28-2019	[DMFE]				\$ 7.00
		DISPUTE MEDIATION FEE			
10-28-2019	[PFE1]				\$ 183.00
		PETITION FOR DISSOLUTION OF MARRIAGE AND APPLICATION FOR TEMPORARY ORDER			
		Document Available (#1045164636)  TIFF  PDF			
10-28-2019	[PFE7]				\$ 6.00
		LAW LIBRARY FEE			
10-28-2019	[OCISR]				\$ 25.00
		OKLAHOMA COURT INFORMATION SYSTEM REVOLVING FUND			
10-28-2019	[OCJC]				\$ 1.55
		OKLAHOMA COUNCIL ON JUDICIAL COMPLAINTS REVOLVING FUND			

10-28-2019 [OCASA]	\$ 5.00
10-28-2019 [SSFCHSCPC]	\$ 10.00
SHERIFF'S SERVICE FEE FOR COURTHOUSE SECURITY PER BOARD OF COUNTY COMMISSIONER	
10-28-2019 [CCADMINCSF]	\$ 1.00
COURT CLERK ADMINISTRATIVE FEE ON COURTHOUSE SECURITY PER BOARD OF COUNTY COMMISSIONER	
10-28-2019 [CCADMIN0155]	\$ 0.16
COURT CLERK ADMINISTRATIVE FEE ON \$1.55 COLLECTION	
10-28-2019 [SJFIS]	\$ 0.45
STATE JUDICIAL REVOLVING FUND - INTERPRETER AND TRANSLATOR SERVICES	
10-28-2019 [DCADMIN155]	\$ 0.23
DISTRICT COURT ADMINISTRATIVE FEE ON \$1.55 COLLECTIONS	
10-28-2019 [DCADMIN05]	\$ 0.75
DISTRICT COURT ADMINISTRATIVE FEE ON \$5 COLLECTIONS	
10-28-2019 [DCADMINCSF]	\$ 1.50
DISTRICT COURT ADMINISTRATIVE FEE ON COURTHOUSE SECURITY PER BOARD OF COUNTY COMMISSIONER	
10-28-2019 [CCADMIN04]	\$ 0.50
COURT CLERK ADMINISTRATIVE FEE ON COLLECTIONS	
10-28-2019 [LTF]	\$ 10.00
LENGTHY TRIAL FUND	
10-28-2019 [SMF]	\$ 10.00
SUMMONS FEE	
10-28-2019 [RPPC]	
REQUEST FOR PARENTING PLAN CONFERENCE SET 11-14-2019 9AM BEFORE JUDGE JULIE DOSS ROOM 605	
Document Available (#1045164632)  TIFF  PDF	
10-28-2019 [TEXT]	
OCIS HAS AUTOMATICALLY ASSIGNED JUDGE FD DOCKET A TO THIS CASE.	
10-28-2019 [ACCOUNT]	
RECEIPT # 2019-4013393 ON 10/28/2019.	
PAYOR: JAMES CRAIG MORTON TOTAL AMOUNT PAID: \$ 262.14.	
LINE ITEMS:	

FD-2019-2509: \$193.00 ON AC01 CLERK FEES.
FD-2019-2509: \$6.00 ON AC23 LAW LIBRARY FEE CIVIL AND CRIMINAL.
FD-2019-2509: \$1.66 ON AC31 COURT CLERK REVOLVING FUND.
FD-2019-2509: \$5.00 ON AC58 OKLAHOMA COURT APPOINTED SPECIAL ADVOCATES.
FD-2019-2509: \$1.55 ON AC59 COUNCIL ON JUDICIAL COMPLAINTS REVOLVING FUND.
FD-2019-2509: \$7.00 ON AC64 DISPUTE MEDIATION FEES CIVIL ONLY.
FD-2019-2509: \$0.45 ON AC65 STATE JUDICIAL REVOLVING FUND, INTERPRETER SVCS.
FD-2019-2509: \$2.48 ON AC67 DISTRICT COURT REVOLVING FUND.
FD-2019-2509: \$25.00 ON AC79 OCIS REVOLVING FUND.
FD-2019-2509: \$10.00 ON AC81 LENGTHY TRIAL FUND.
FD-2019-2509: \$10.00 ON AC88 SHERIFF'S SERVICE FEE FOR COURT HOUSE SECURITY.



11-14-2019 [EAA]

ENTRY OF APPEARANCE - ALEXANDER PRICE FOR RESPONDENT

Document Available (#1045341858)  

11-14-2019 [TEXT]

VERIFICATION BY ATTORNEY OF RECORD OF DISCLAIMER OF INTEREST BY DHS

Document Available (#1045341883)  

11-14-2019 [CTFREE]



JUDGE JULIE C. DOSS: (PARENTING PLAN CONFERENCE): PETITIONER PRESENT, REPRESENTED BY JAMES MORTON, PRESENT. RESPONDENT PRESENT, REPRESENTED BY ALEXANDER PRICE, PRESENT.

BOTH PARTIES WATCHED THE VIDEO AND HAVE BEEN ORDERED TO SIGN UP FOR THE PARENTING PROGRAM THAT'S WITHIN COMPLIANCE OF OUR LOCAL COURT RULE.

CONFERENCE SET FOR DECEMBER 19, 2019 AT 9:30 AM BEFORE JUDGE JULIE DOSS IN COURTROOM 605.



11-18-2019 [TOA]

RESPONDENT'S ANSWER TO PETITION FOR DISSOLUTION OF MARRIAGE AND APPLICATION FOR TEMPORARY ORDER AND COUNTERCLAIM

Document Available (#1045342122)  

11-18-2019 [TOA]



RESPONDENT'S APPLICATION FOR TEMPORARY ORDERS

Document Available (#1045342119)  


12-12-2019 [DIEPC]

JOHNSON, CRAIG V 



DIVORCE IMPACT EDUCATIONAL PROGRAM COMPLETION

Document Available (#1045582856)  

12-12-2019 [DIEPC]

JOHNSON, KRISTI J 

DIVORCE IMPACT EDUCATIONAL PROGRAM COMPLETION

Document Available (#1045582852)  TIFF  PDF

12-19-2019 [CTFREE]

JUDGE JULIE C. DOSS: (PARENTING PLAN CONFERENCE): PETITIONER REPRESENTED BY JAMES MORTON, PRESENT. RESPONDENT PRESENT, REPRESENTED BY ALEXANDER PRICE, PRESENT.



PARENTING PLAN CONFERENCE RESET OT JANUARY 22, 2020 AT 9:30 AM BEFORE JUDGE JULIE C. DOSS IN COURTROOM 605.

12-20-2019 [CTFREE]

JUDGE JULIE C. DOSS: AGREED TEMPORARY ORDER, ENTERED.



01-10-2020 [O]

AGREED TEMPORARY ORDER

Document Available (#1045583007)  TIFF  PDF

01-22-2020 [CSCC]

CHILD SUPPORT COMPUTATION

Document Available (#1045992037)  TIFF  PDF

01-22-2020 [CTFREE]



JUDGE JULIE C. DOSS: (PARENTING PLAN CONFERENCE): PETITIONER NOT PRESENT, REPRESENTED BY JAMES MORTON, NOT PRESENT. RESPONDENT NOT PRESENT, REPRESENTED BY ALEXANDER PRICE, PRESENT.

PARENTING PLAN CONFERENCE STRICKEN AS TEMPORARY ORDER PREVIOUSLY SIGNED.

CHILD SUPPORT COMPUTATION ENTERED TODAY.

01-24-2020 [CSCC]

CHILD SUPPORT COMPUTATION

Document Available (#1045992037)  TIFF  PDF

05-28-2021 [DISPOTHER]

JOHNSON, KRISTI J  #1

BRUCE, TAMMY: THIS CASE HAS BEEN CLOSED DUE TO INACTIVITY.

Exhibit C

Sections

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Fundraiser for fallen Tulsa police sergeant and injured officer raises \$500,000+

The event held Wednesday raised hundreds of thousands of dollars

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4:00

4:30

44

46

51



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41st St

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FOX ACROSS AMERI
TUESDAY THROUGH

Fundraiser for the Johnson-Zarkeshan Family Fund, July 8, 2020

July 08, 2020 at 8:30 pm CDT

By Russell Mills

TULSA — Tulsa police officers often work second jobs, and sometimes face long shifts, but dozens of them showed up Wednesday to volunteer their time, and help raise money for two of their own.

Among them, Tulsa Police Chief Wendell Franklin, who spent much of the day at LaFortune Park where Cox Media Group Tulsa and the TPD Foundation had organized a fundraiser.

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Fundraiser for the Johnson-Zarkeshan Family Fund, July 8, 2020 The event helped raise money for the families of two Tulsa police officers gunned down during a traffic stop. (Russell Mills)

The money, all of it, will go to the newly-created Johnson-Zarkeshan Family Fund, established to help the family of Sgt. Craig Johnson, as well as Ofcr. Aurash Zarkeshan and his family.

Johnson died as a result of gunshot wounds suffered during a traffic stop that turned violent in the early morning hours of June 29th.

Zarkeshan has managed a recovery described by some as miraculous, and remains hospitalized.

By late Wednesday, KRMG was able to confirm donations totaling well over \$500,000, with donations still coming in from the special text line set up for that purpose.

Donors can still text TPD to 70123 to get back a link and donate safely.

KRMG is part of the Cox Media Group in Tulsa, along with FOX23 Television, K-95.5 Tulsa's New Country Leader, 103.3 The Eagle, Tulsa's Only Classic Rock, Mix 96.5, Today's Best Music, and 105.7 The Bone, Tulsa's Real Rock.

All five radio stations, and FOX23, participated in the fundraising effort, which was spearheaded by KRMG's Rick Couri, along with TPD Foundation President Matt Skinner.

Sergeant Johnson's funeral will be held Thursday, and thousands are expected to line the path of the procession, east along 61st Street, from Victory Christian to Floral Haven Cemetery in Broken Arrow.

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