

IN THE DISTRICT COURT OF GRADY COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
)  
PLAINTIFF, )  
)  
vs. )  
)  
PARIS STEPHON BILBRO, )  
B/M DOB: JUNE 1995 )  
SSN: xxx-xx-5405 )  
)  
DEFENDANT. )

Case No. CF-2024-173

FILED IN DISTRICT COURT  
Grady County, Oklahoma

AUG 26 2024

LISA HANNAH, Court Clerk  
By Deputy

**INFORMATION**

**COUNTS 1-2:**

**EMBEZZLEMENT ~ 21 O.S. §1451(B)(3), FELONY**

This crime is punishable by not more than 5 years imprisonment and a fine up to \$5,000

**COUNT 3:**

**EMBEZZLEMENT ~ 21 O.S. §1451(B)(4), FELONY**

This crime is punishable by not more than 8 years imprisonment and a fine up to \$10,000

**COUNT 4:**

**PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. §425, FELONY**

This crime is punishable by not more than 2 years imprisonment or up to 1 year in the county jail and/or a fine up to \$25,000

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**COMES NOW** Gentner Drummond, the duly elected, qualified and acting Attorney General of the State of Oklahoma, in the name and by the authority of the State of Oklahoma, and on his official oath gives information as follows:

**COUNT 1:**

That on or between September 2023 and November 2023, the crime of **EMBEZZLEMENT** was feloniously committed in COMANCHE COUNTY, State of Oklahoma, by **PARIS STEPHON BILBRO, d/b/a AMG Construction Group**, to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500, belonging to Jose Morales which had been entrusted to the Defendant as payment to replace the roof on his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Morales; and/or to any use or purpose not intended or authorized by Mr. Morales.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

**COUNT 2:**

That on or between August 2023 and October 2023, the crime of **EMBEZZLEMENT** was feloniously committed in POTTAWATOMIE COUNTY, State of Oklahoma, by **PARIS STEPHON BILBRO, d/b/a AMG Construction Group**, to wit:

The Defendant fraudulently appropriated an amount in excess of \$2,500, belonging to Anthony LoGiudice and/or Amanda LoGiudice which had been entrusted to the Defendant as payment to replace the roof on their residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Anthony LoGiudice and/or Amanda LoGiudice; and/or to any use or purpose not intended or authorized by Anthony LoGiudice and/or Amanda LoGiudice.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

**COUNT 3:**

That on or between August 2023 and October 2023, the crime of **EMBEZZLEMENT** was feloniously committed in GRADY COUNTY, State of Oklahoma, by **PARIS STEPHON BILBRO, d/b/a AMG Construction Group**, to wit:

The Defendant fraudulently appropriated an amount in excess of \$15,000, belonging to Deloris Burris and/or Gayland Burris and which had been entrusted to the Defendant as a payment for services and materials to replace the roof on their residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Deloris Burris and/or Gayland Burris; and/or to any use or purpose not intended or authorized by Deloris Burris and/or Gayland Burris.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.


**COUNT 4:**

That on or between August 2023 and October 2023, the crime of **PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE COUNTIES** was committed in the counties of COMANCHE, POTTAWATOMIE, AND GRADY, State of Oklahoma, by **PARIS STEPHON BILBRO, d/b/a AMG Construction Group**, to wit:

The Defendant engaged in a pattern of Embezzlement as alleged in Counts 1-3 as part of the same plan, scheme, or adventure.

Said actions and practices are contrary to the provisions of Sections 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.













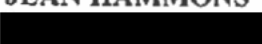

**GENTNER DRUMMOND  
ATTORNEY GENERAL OF OKLAHOMA**

By:   
Leann C. Paczkowski, OBA #21519  
Assistant Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
Telephone: (405) 522-3061  
Facsimile: (405) 522-0085

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**WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA**

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1. **AGENT RANDA ORQUIZ**  
Oklahoma Office of the Attorney General  
Consumer Protection Unit  
313 N.E. 21<sup>st</sup> Street  
Oklahoma Office of the Attorney General
2. **JOSE MORALES**  
  
Lawton, OK 
3. **AMANDA LoGIUDICE**  
  
McLoud, OK 
4. **ANTHONY LoGIUDICE**  
  
McLoud, OK 
5. **SAMANTHA HOWARD**  
  
McLoud, OK 
6. **DELORIS BURRIS**  
  
Tuttle, OK 
7. **GAYLAND BURRIS**  
  
Tuttle, OK 
8. **JEAN HAMMONS**  
  
Corpus Christi, TX 

9. **SHAINA HRDY**  
██████████  
Oklahoma City, OK ██████████
10. **CUSTODIAN OF RECORDS**  
**MIDFIRST BANK**  
501 NW Grand Blvd.  
Oklahoma City, OK 73118
11. **CUSTODIAN OF RECORDS**  
**PLS FINANCIAL SOLUTIONS**  
2317 N. Pennsylvania Ave.  
Oklahoma City, OK 73104

IN THE DISTRICT COURT OF GRADY COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
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 Plaintiff, )  
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 vs. )  
 )  
 PARIS STEPHON BILBRO, )  
 B/M, DOB: June, 1995, )  
 SSN: xxx-xx-5405, )  
 )  
 Defendant. )  
 )  
 COUNTY OF GRADY )  
 )  
 ) ss.  
 STATE OF OKLAHOMA )

Case No. CF- 24-173

FILED IN DISTRICT COURT  
Grady County, Oklahoma

AUG 26 2024

LISA HANNAH, Court Clerk  
By Deputy

**AFFIDAVIT OF PROBABLE CAUSE**

I, Randa Orquiz, do attest that the following is true and factual to the best of my knowledge with regard to the following information. This Affidavit does not include each and every fact known to the government, but only those facts necessary to support a finding of probable cause. I am currently employed as an Agent for the State of Oklahoma, Office of the Attorney General, assigned to the Consumer Protection Unit.

In May of 2024, I was assigned case number CINV-24-0008. The Consumer Protection Unit received several complaints against the defendant, Paris Bilbro ("P. Bilbro"), d/b/a AMG Construction Group. During my investigation, I conducted interviews, and reviewed various documents. From my review, I learned that P. Bilbro maintains the following accounts:

BancFirst	Name on Account	Signatories
#4269	AMG Construction Group LLC	Paris Bilbro
#4400	Porter Family Investments LLC	Paris Bilbro

MidFirst	Name on Account	Signatories
#4438	AMG Construction Group LLC	Paris Bilbro

1. On September 28, 2023, Jose Morales ("J. Morales") entered into a written contract with AMG Construction Group to replace the roof on his residence located at [REDACTED], Lawton, OK [REDACTED], in Comanche County. Defendant quoted victim a price of \$9,586.77. J. Morales signed over the insurance check # 1710129876 from American Modern Property and Causality Insurance Company to P. Bilbro as full payment. This check was given to P. Bilbro at the job site. This check was deposited into AMG Construction Group, LLC BancFirst account # ...4269 on September 28, 2023. P. Bilbro did not do any work he was contracted to do. J. Morales tried reaching out to P. Bilbro through text and was told they were busy with other jobs and would get to it. By November of 2023, no work had been done and all communication with P. Bilbro went unanswered. P. Bilbro never refunded any of the money he was paid nor were any materials provided.
2. On August 28, 2023, Anthony LoGiudice entered into a written contract with AMG Construction Group to replace the roof on his residence located at [REDACTED], McLoud, OK [REDACTED], in Pottawatomie County. Defendant quoted victim a price of \$19,000.00. On October 31, 2023, Amanda LoGiudice ("A. LoGiudice") wrote a check payable to AMG Construction Group or Paris Bilbro for the amount of \$9,401.57 as a half payment with Bank of America Cashier's Check # 1105000389. This check was given to Paris Bilbro, at [REDACTED], McLoud, OK [REDACTED], in Pottawatomie County. This check was cashed at PLS Financial Solution of Oklahoma on October 31, 2023. P. Bilbro did not do any work he was contracted to do. A. LoGiudice tried reaching out to P. Bilbro through phone calls and text messages with no success. P. Bilbro never refunded any of the money he was paid nor were any materials provided.
3. On August 23, 2023, Deloris Burris ("D. Burris") entered into a written contract with AMG Construction Group to replace the roof on her rental duplex located at [REDACTED], Tuttle, OK [REDACTED], in Grady County. Defendant quoted victim a price of \$13,332.22. On September 18, 2023, D. Burris paid AMG Construction Group \$13,332.22 as full payment with check #518 on the Sooner State Bank account of Gayland G. or Deloris Burris. This check was given to Paris Bilbro, at 702 Pecan Street, Tuttle, OK 73089, in Grady County. This check was deposited into AMG Construction Group LLC BancFirst account # ...4269 on September 19, 2023. On September 22, 2023, D. Burris paid AMG Construction Group \$6,790.76 as payment for material with check #519 on the Sooner State Bank account of Gayland G. or Deloris Burris. This check was given to Paris Bilbro, at [REDACTED], Tuttle, OK [REDACTED], in Grady County. This check was deposited into AMG Construction Group, LLC BancFirst account # ...4269 on September 25, 2023. D. Burris paid a total of \$20,122.98 to P. Bilbro. P. Bilbro did not do any work he was contracted to do. D. Burris tried reaching out to P. Bilbro through text messages with no success. P. Bilbro never refunded any of the money he was paid nor were any materials provided.
4. Based on my investigation, the information I received, and the pattern displayed by the Defendant, Paris Bilbro, your Affiant believes the defendant committed three

separate acts of Embezzlement in the total amount of \$39,111.32 in Comanche County, Pottawatomie County and Grady County that spanned a two-month time period. I believe P. Bilbro to have committed a pattern of criminal offenses by employing a similar scheme of Embezzlement against J. Morales, A. LoGiudice and D. Burris.

Your Affiant believes probable cause exists to show that the Defendant committed three (3) counts **Embezzlement Title 21 § 1451** and one (1) count **Pattern of Criminal Offenses, Title 21 § 425**. The undersigned asks that this Court issue a finding of fact that there is probable cause to believe that the above-named Defendant committed these crimes and issue a warrant for the arrest of Paris Bilbro.

Further Affiant sayeth not.

Oklahoma Office of the Attorney General

By: Randa Orquiz  
Randa Orquiz, Agent #205

SUBSCRIBED AND SWORN to before me this 23<sup>rd</sup> day of August 2024.

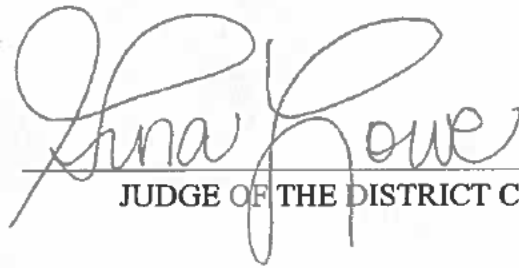
J-L  
Notary Public

Commission Expires: 2/22/28  
Commission Number: 24002566



**FINDING OF PROBABLE CAUSE**

On this 16 day of AUGUST, 2024 the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Grady County, State of Oklahoma, upon the above Affidavit, requesting that a Warrant of Arrest be issued for the within-named Defendant, and that he might be arrested and held to answer for the offenses of three (3) counts of **Embezzlement Title 21 § 1451** and one (1) count of **Pattern of Criminal Offenses Title 21 § 425**. Based upon said Affidavit, I am satisfied and do hereby find that there is probable cause to believe that the within-named Defendant, Paris Bilbro has committed said offenses and that a Warrant of Arrest should be issued.

A handwritten signature in cursive script, appearing to read "Anna Howe", is written over a horizontal line. The signature is fluid and somewhat stylized.

JUDGE OF THE DISTRICT COURT