

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

HERBERT LEE MORRIS, JR.,

DOB: 01/24/2004

SSN: XXX-XX-0478

Defendant.

Case No. CF-2024- 238

FILED DISTRICT COURT
Stephens County, Okla.

NOV - 8 2024

MELODY HARPER
Court Clerk

INDICTMENT

FOR:

- COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY
- COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3, a FELONY
- COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021, § 425, a FELONY
- COUNT 10: FELON IN POSSESSION OF A FIREARM ~ 21 O.S.Supp.2022, § 1283, a FELONY

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding

judge determines the Twentieth Multi-County Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY

On or about June 25, 2024, in Stephens County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **HERBERT LEE MORRIS, JR.**, who conspired with others, both known and unknown to the Grand Jury, including **GEANE JW JOHNSON, JR., AMEIL JORDAN ELIJAH RAINGER**, and **ANTHONY JERMAINE RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 25, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Butter Cookies, LLC, 3705 Duncan Lake Road,

Marlow, Oklahoma 73055 for the purpose of perpetrating a robbery in the first degree against the occupants at that location.

- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** brought multiple firearms to the Butter Cookies property for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.
- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** attempted to pry open two windows on the east side of the dwelling in order to gain entry to the dwelling. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** then cut the east kitchen window screen in order to successfully effect entry into the dwelling.
- d. **HERBERT MORRIS** knowingly and unlawfully gained entry to the dwelling house at the Butter Cookies property through the east kitchen window screen. **HERBERT MORRIS** then unlocked the front door to the dwelling house and let inside **GEANE JOHNSON, AMEIL RAINGER, ANTHONY RAINGER,** and other individuals both known and unknown to the Grand Jury.
- e. Once inside the dwelling, a co-conspirator unplugged the surveillance camera positioned in the kitchen in order to conceal the movements of the conspirators inside the dwelling.
- f. Subsequently, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** wrongfully took and carried away U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- h. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** fled the Butter Cookies property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(/)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21
O.S.2021, § 421, a FELONY**

On or about June 29, 2024, in Grady County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **HERBERT LEE MORRIS, JR.**, who conspired with others, both known and unknown to the Grand Jury, including **GEANE JW JOHNSON, JR., AMEIL JORDAN ELIJAH RAINGER**, and **ANTHONY JERMAINE RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did form an agreement as follows:

- a. On the afternoon of June 28, 2024, **HERBERT LEE MORRIS, JR.**, sent GPS coordinates which plotted the location of Fuda2020, LLC, to a text message group chat containing phone numbers associated with **AMEIL RAINGER, ANTHONY RAINGER**, and other individuals. **HERBERT MORRIS** accompanied the coordinates with the comment "That's the on." **AMEIL RAINGER** replied, "Looking at this mf rn," and **ANTHONY RAINGER** "loved" the image. **HERBERT MORRIS** had previously named the group chat with a money bag symbol and had changed the profile picture to depict U.S. currency.

Likewise, in furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 29, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, for the purpose of perpetrating a robbery in the first degree against the occupants at that location.
- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** brought one or more firearms to the Fuda2020 property

for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.

- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** knowingly and unlawfully gained entry to the Fuda2020 property through the fence-line of the compound.
- d. Immediately thereafter, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** broke and entered into a dwelling located at Fuda2020 for the purpose of perpetrating a robbery in the first degree against the occupants of that dwelling.
- e. Once inside the dwelling, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** wrongfully took and carried away U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- f. Subsequently, **HERBERT MORRIS** and **GEANE JOHNSON** led Peifeng Sun into a grow barn at gunpoint and directed his movements. Such acts were recorded on Blink video surveillance footage.
- g. After law enforcement arrived on the scene, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** fled the Fuda2020 property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 25, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, from the person and/or immediate presence of said individuals, and when, in the course of the robbery, threatened said individuals with serious bodily injury and/or intentionally put said individuals in fear of immediate serious bodily injury. These acts occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 29, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and when, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury. Said acts occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

On or about June 25, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, who broke and entered a dwelling of another, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, which was occupied by Qiu Li and Li Zhao Zhong, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

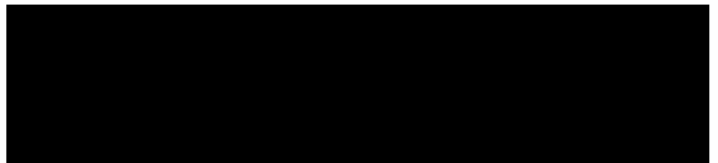
On or about June 29, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, who broke and entered a dwelling of another, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, which was occupied by Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu and/or others, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a
FELONY**

On or about June 29, 2024, the crime of **ASSAULT WHILE MASKED OR IN
DISGUISE** was feloniously committed in Grady County, Oklahoma, by **HERBERT LEE
MORRIS, JR.**, who assaulted Peifeng Sun with a dangerous weapon to wit: a pistol, while masked
and/or in disguise, said crime occurring at Fuda2020, LLC, 2255 County Road 1410, Alex,
Oklahoma 73002, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes
and against the peace and dignity of the State of Oklahoma.

TRUE BILL

[Signature]

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3,
a FELONY**

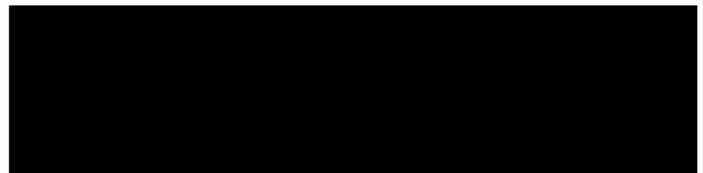
On or about June 29, 2024, the crime of **COMMISSION OF A GANG-RELATED OFFENSE** was feloniously committed at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, by perpetrating the gang-related offense of Robbery in the First Degree (by force or fear) in association with the Murder 1 Blood street gang, an ongoing organization that specifically promotes, sponsors, assists in, or participates in, and requires as a condition of membership or continued membership, the commission of certain enumerated felonies, including Robbery in the First Degree (by force or fear), and/or in association with other members of the Murder 1 Blood street gang, contrary to the provisions of Section 856.3 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021,
§ 425, a FELONY**

On or about or between June 25, 2024, and June 29, 2024, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was feloniously committed by **HERBERT LEE MORRIS, JR.**, by perpetrating two or more criminal offenses—including the burglary and robbery offenses which occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, in Stephens County, and the burglary and robbery offenses which occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County—each proceeding from or having an antecedent element a single prior incident or pattern of robbery and/or burglary, constituting a pattern of criminal offenses occurring in two or more counties of the State of Oklahoma, contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL ☒

NO BILL ()


OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 10: FELON IN POSSESSION OF A FIREARM ~ 21 O.S.Supp.2022, § 1283, a
FELONY**

On or about June 29, 2024, the crime of **FELON IN POSSESSION OF A FIREARM** was feloniously committed in Grady County, Oklahoma, by **HERBERT LEE MORRIS, JR.**, who knowingly and willfully possessed a pistol at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, after former conviction of a felony in District Court of Cleveland County Case No. CF-2023-295, contrary to the provisions of Section 1283 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

IN THE SUPREME COURT OF THE
STATE OF OKLAHOMA

PAGE 2

INDICTMENT

I, THE UNDERSIGNED ASSISTANT ATTORNEY GENERAL OF THE STATE OF OKLAHOMA ATTORNEY GENERAL'S OFFICE, DO UPON MY OFFICIAL OATH, FURTHER GIVE SAID COURT TO KNOW AND BE INFORMED THAT THE OFFENSES OF:

COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE;

COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE;

COUNT 3: ROBBERY IN THE FIRST DEGREE;

COUNT 4: ROBBERY IN THE FIRST DEGREE;

COUNT 5: BURGLARY IN THE FIRST DEGREE;

COUNT 6: BURGLARY IN THE FIRST DEGREE;

COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE;

COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE;

COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

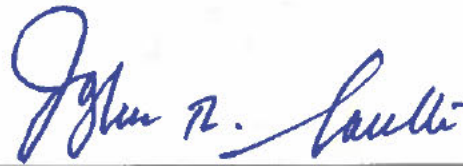
COUNT 10: FELON IN POSSESSION OF A FIREARM;

AS CHARGED IN THE INDICTMENT IN THIS CASE WERE COMMITTED BY THE DEFENDANT *HERBERT LEE MORRIS, JR.*, NAMED THEREIN, AFTER HAVING BEEN CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT:

UNLAWFUL POSSESSION OF CONTROLLED DRUG WITH INTENT TO DISTRIBUTE (COUNT I); BURGLARY IN THE SECOND DEGREE (COUNT II); ELUDING/ATTEMPTING TO ELUDE POLICE OFFICER (COUNT III); ON THE 4TH DAY OF OCTOBER, 2023, IN THE DISTRICT COURT OF CLEVELAND COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2023-295.

ENDANGERING OTHERS WHILE ELUDING/ATTEMPTING TO ELUDE POLICE OFFICER (COUNT I); POSSESSION OF A FIREARM AFTER DELINQUENT ADJUDICATION (COUNT IV); ON THE 25TH DAY OF SEPTEMBER, 2023, IN THE DISTRICT COURT OF CANADIAN COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2023-324.

GENTNER F. DRUMMOND
ATTORNEY GENERAL OF OKLAHOMA



Joshua R. Fanelli
Assistant Attorney General

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

AMEIL JORDAN ELIJAH RAINGER,

DOB: 12/04/2003

SSN: XXX-XX-4310

Defendant.

Case No. CF-2024-241

FILED DISTRICT COURT
Stephens County, Okla.
NOV 08 2024
MELODY HARPER
Court Clerk

INDICTMENT

FOR:

- COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY
- COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3, a FELONY
- COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021, § 425, a FELONY

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding judge determines the Twentieth Multi-County Grand Jury has reached reasonable completion of

its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

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- a. In the early morning hours of June 25, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055 for the purpose of perpetrating a robbery in the first degree against the occupants at that location.

- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** brought multiple firearms to the Butter Cookies property for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.
- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** attempted to pry open two windows on the east side of the dwelling in order to gain entry to the dwelling. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** then cut the east kitchen window screen in order to successfully effect entry into the dwelling.
- d. **HERBERT MORRIS** knowingly and unlawfully gained entry to the dwelling house at the Butter Cookies property through the east kitchen window screen. **HERBERT MORRIS** then unlocked the front door to the dwelling house and let inside **GEANE JOHNSON, AMEIL RAINGER, ANTHONY RAINGER, and** other individuals both known and unknown to the Grand Jury.
- e. Once inside the dwelling, a co-conspirator unplugged the surveillance camera positioned in the kitchen in order to conceal the movements of the conspirators inside the dwelling.
- f. Subsequently, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** wrongfully took and carried away U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- h. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** fled the Butter Cookies property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21
O.S.2021, § 421, a FELONY**

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- a. On the afternoon of June 28, 2024, **HERBERT LEE MORRIS, JR.**, sent GPS coordinates which plotted the location of Fuda2020, LLC, to a text message group chat containing phone numbers associated with **AMEIL RAINGER, ANTHONY RAINGER**, and other individuals. **HERBERT MORRIS** accompanied the coordinates with the comment "That's the on." **AMEIL RAINGER** replied, "Looking at this mf m," and **ANTHONY RAINGER** "loved" the image. **HERBERT MORRIS** had previously named the group chat with a money bag symbol and had changed the profile picture to depict U.S. currency.

Likewise, in furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 29, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, for the purpose of perpetrating a robbery in the first degree against the occupants at that location.
- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** brought one or more firearms to the Fuda2020 property

for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.

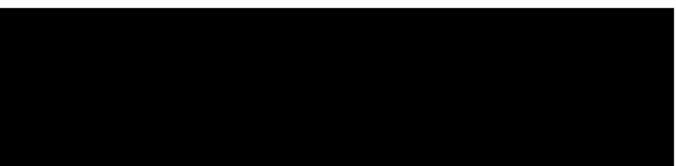
- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** knowingly and unlawfully gained entry to the Fuda2020 property through the fence-line of the compound.
- d. Immediately thereafter, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** broke and entered into a dwelling located at Fuda2020 for the purpose of perpetrating a robbery in the first degree against the occupants of that dwelling.
- e. Once inside the dwelling, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** wrongfully took and carried away U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- f. Subsequently, **HERBERT MORRIS** and **GEANE JOHNSON** led Peifeng Sun into a grow barn at gunpoint and directed his movements. Such acts were recorded on Blink video surveillance footage.
- g. After law enforcement arrived on the scene, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** fled the Fuda2020 property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 25, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **AMEIL JORDAN ELIJAH RAINGER**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, from the person and/or immediate presence of said individuals, and when, in the course of the robbery, threatened said individuals with serious bodily injury and/or intentionally put said individuals in fear of immediate serious bodily injury. These acts occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 29, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **AMEIL JORDAN ELIJAH RAINGER**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and when, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury. Said acts occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL (✓)
NO BILL ()


OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

On or about June 25, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **AMEIL JORDAN ELIJAH RAINGER**, who broke and entered a dwelling of another, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, which was occupied by Qiu Li and Li Zhao Zhong, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL ☒

NO BILL ()



OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

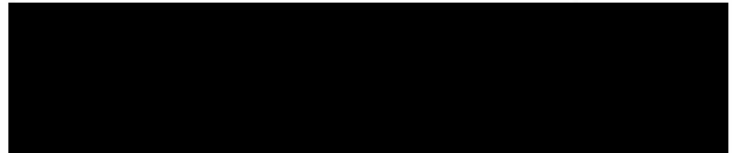
On or about June 29, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **AMEIL JORDAN ELIJAH RAINGER**, who broke and entered a dwelling of another, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, which was occupied by Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu and/or others, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a
FELONY**

On or about June 29, 2024, the crime of **ASSAULT WHILE MASKED OR IN
DISGUISE** was feloniously committed in Grady County, Oklahoma, by **AMEIL JORDAN
ELIJAH RAINGER**, who assaulted Peifeng Sun with a dangerous weapon to wit: a pistol, while
masked and/or in disguise, said crime occurring at Fuda2020, LLC, 2255 County Road 1410, Alex,
Oklahoma 73002, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes
and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3,
a FELONY**

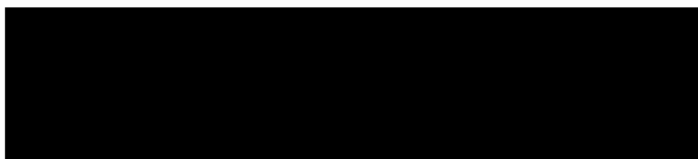
On or about June 29, 2024, the crime of **COMMISSION OF A GANG-RELATED OFFENSE** was feloniously committed at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County, Oklahoma, by **AMEIL JORDAN ELIJAH RAINGER**, by perpetrating the gang-related offense of Robbery in the First Degree (by force or fear) in association with the Murder 1 Blood street gang, an ongoing organization that specifically promotes, sponsors, assists in, or participates in, and requires as a condition of membership or continued membership, the commission of certain enumerated felonies, including Robbery in the First Degree (by force or fear), and/or in association with other members of the Murder 1 Blood street gang, contrary to the provisions of Section 856.3 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒ (X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021,
§ 425, a FELONY**

On or about or between June 25, 2024, and June 29, 2024, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was feloniously committed by **AMEIL JORDAN ELIJAH RAINGER**, by perpetrating two or more criminal offenses—including the burglary and robbery offenses which occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, in Stephens County, and the burglary and robbery offenses which occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County—each proceeding from or having an antecedent element a single prior incident or pattern of robbery and/or burglary, constituting a pattern of criminal offenses occurring in two or more counties of the State of Oklahoma, contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL ☒)

NO BILL ()


OKLAHOMA MULTICOUNTY GRAND JURY

NOV 08 2024

MELODY HARPER
Court Clerk

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

ANTHONY JERMAINE RAINGER,

DOB: 11/22/2002

SSN: XXX-XX-3118

Defendant.

Case No. CF-2024-240

INDICTMENT

FOR:

- COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY
- COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3, a FELONY
- COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021, § 425, a FELONY

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding judge determines the Twentieth Multi-County Grand Jury has reached reasonable completion of

its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY

On or about June 25, 2024, in Stephens County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **ANTHONY JERMAINE RAINGER**, who conspired with others, both known and unknown to the Grand Jury, including **HERBERT LEE MORRIS, JR., GEANE JW JOHNSON, JR., and AMEIL JORDAN ELIJAH RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 25, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055 for the purpose of perpetrating a robbery in the first degree against the occupants at that location.

- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** brought multiple firearms to the Butter Cookies property for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.
- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** attempted to pry open two windows on the east side of the dwelling in order to gain entry to the dwelling. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** then cut the east kitchen window screen in order to successfully effect entry into the dwelling.
- d. **HERBERT MORRIS** knowingly and unlawfully gained entry to the dwelling house at the Butter Cookies property through the east kitchen window screen. **HERBERT MORRIS** then unlocked the front door to the dwelling house and let inside **GEANE JOHNSON, AMEIL RAINGER, ANTHONY RAINGER, and** other individuals both known and unknown to the Grand Jury.
- e. Once inside the dwelling, a co-conspirator unplugged the surveillance camera positioned in the kitchen in order to conceal the movements of the conspirators inside the dwelling.
- f. Subsequently, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** wrongfully took and carried away U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- h. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** fled the Butter Cookies property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21
O.S.2021, § 421, a FELONY**

On or about June 29, 2024, in Grady County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **ANTHONY JERMAINE RAINGER**, who conspired with others, both known and unknown to the Grand Jury, including **HERBERT LEE MORRIS, JR., GEANE JW JOHNSON, JR., and AMEIL JORDAN ELIJAH RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did form an agreement as follows:

- a. On the afternoon of June 28, 2024, **HERBERT LEE MORRIS, JR.**, sent GPS coordinates which plotted the location of Fuda2020, LLC, to a text message group chat containing phone numbers associated with **AMEIL RAINGER, ANTHONY RAINGER**, and other individuals. **HERBERT MORRIS** accompanied the coordinates with the comment "That's the on." **AMEIL RAINGER** replied, "Looking at this mf m," and **ANTHONY RAINGER** "loved" the image. **HERBERT MORRIS** had previously named the group chat with a money bag symbol and had changed the profile picture to depict U.S. currency.

Likewise, in furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 29, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, for the purpose of perpetrating a robbery in the first degree against the occupants at that location.
- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** brought one or more firearms to the Fuda2020 property

for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.

- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** knowingly and unlawfully gained entry to the Fuda2020 property through the fence-line of the compound.
- d. Immediately thereafter, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** broke and entered into a dwelling located at Fuda2020 for the purpose of perpetrating a robbery in the first degree against the occupants of that dwelling.
- e. Once inside the dwelling, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** wrongfully took and carried away U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- f. Subsequently, **HERBERT MORRIS** and **GEANE JOHNSON** led Peifeng Sun into a grow barn at gunpoint and directed his movements. Such acts were recorded on Blink video surveillance footage.
- g. After law enforcement arrived on the scene, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** fled the Fuda2020 property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 25, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, from the person and/or immediate presence of said individuals, and when, in the course of the robbery, threatened said individuals with serious bodily injury and/or intentionally put said individuals in fear of immediate serious bodily injury. These acts occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 29, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and when, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury. Said acts occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL ☒

NO BILL ☐


OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

On or about June 25, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, who broke and entered a dwelling of another, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, which was occupied by Qiu Li and Li Zhao Zhong, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

On or about June 29, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, who broke and entered a dwelling of another, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, which was occupied by Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu and/or others, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY

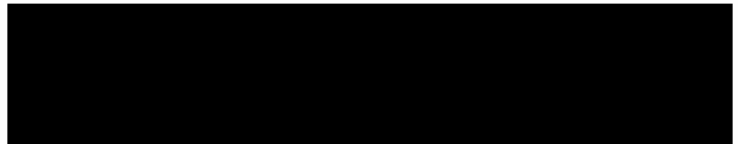
On or about June 29, 2024, the crime of **ASSAULT WHILE MASKED OR IN DISGUISE** was feloniously committed in Grady County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, who assaulted Peifeng Sun with a dangerous weapon to wit: a pistol, while masked and/or in disguise, said crime occurring at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3,
a FELONY**

On or about June 29, 2024, the crime of **COMMISSION OF A GANG-RELATED OFFENSE** was feloniously committed at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County, Oklahoma, by **ANTHONY JERMAINE RAINGER**, by perpetrating the gang-related offense of Robbery in the First Degree (by force or fear) in association with the Murder 1 Blood street gang, an ongoing organization that specifically promotes, sponsors, assists in, or participates in, and requires as a condition of membership or continued membership, the commission of certain enumerated felonies, including Robbery in the First Degree (by force or fear), and/or in association with other members of the Murder 1 Blood street gang, contrary to the provisions of Section 856.3 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021,
§ 425, a FELONY**

On or about or between June 25, 2024, and June 29, 2024, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was feloniously committed by **ANTHONY JERMAINE RAINGER**, by perpetrating two or more criminal offenses—including the burglary and robbery offenses which occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, in Stephens County, and the burglary and robbery offenses which occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County—each proceeding from or having an antecedent element a single prior incident or pattern of robbery and/or burglary, constituting a pattern of criminal offenses occurring in two or more counties of the State of Oklahoma, contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

GEANE JW JOHNSON, JR.,

DOB: 01/08/1999

SSN: XXX-XX-6022

Defendant.

Case No. CF-2024-

239

FILED DISTRICT COURT
Stephens County, Okla.

NOV 08 2024

MELODY HARPER
Court Clerk

INDICTMENT

FOR:

- COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY
- COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY
- COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY
- COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY
- COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3, a FELONY
- COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021, § 425, a FELONY
- COUNT 10: FELON IN POSSESSION OF A FIREARM ~ 21 O.S.Supp.2022, § 1283, a FELONY

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:

By the order of the Supreme Court of Oklahoma, the Twentieth Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from June 27, 2023, for eighteen (18) months, or until the designated presiding

Judge determines the Twentieth Multi-County Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That said Multi-County Grand Jury of the State of Oklahoma, being composed of good and lawful men and women, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into, and true presentment make, of all public offenses against the State of Oklahoma committed within the State of Oklahoma, upon their oath, and in the name and by the authority of the State of Oklahoma, do present and find:

COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 421, a FELONY

On or about June 25, 2024, in Stephens County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **GEANE JW JOHNSON, JR.**, who conspired with others, both known and unknown to the Grand Jury, including **HERBERT LEE MORRIS, JR., AMEIL JORDAN ELIJAH RAINGER**, and **ANTHONY JERMAINE RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 25, 2024, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Butter Cookies, LLC, 3705 Duncan Lake Road,

Marlow, Oklahoma 73055 for the purpose of perpetrating a robbery in the first degree against the occupants at that location.

- b. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** brought multiple firearms to the Butter Cookies property for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.
- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** attempted to pry open two windows on the east side of the dwelling in order to gain entry to the dwelling. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** then cut the east kitchen window screen in order to successfully effect entry into the dwelling.
- d. **HERBERT MORRIS** knowingly and unlawfully gained entry to the dwelling house at the Butter Cookies property through the east kitchen window screen. **HERBERT MORRIS** then unlocked the front door to the dwelling house and let inside **GEANE JOHNSON, AMEIL RAINGER, ANTHONY RAINGER,** and other individuals both known and unknown to the Grand Jury.
- e. Once inside the dwelling, a co-conspirator unplugged the surveillance camera positioned in the kitchen in order to conceal the movements of the conspirators inside the dwelling.
- f. Subsequently, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** wrongfully took and carried away U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- h. **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER, and ANTHONY RAINGER** fled the Butter Cookies property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE ~ 21
O.S.2021, § 421, a FELONY**

On or about June 29, 2024, in Grady County, the crime of **CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE** was committed by **GEANE JW JOHNSON, JR.**, who conspired with others, both known and unknown to the Grand Jury, including **HERBERT LEE MORRIS, JR.**, **AMEIL JORDAN ELIJAH RAINGER**, and **ANTHONY JERMAINE RAINGER**, by agreeing to wrongfully take and carry away personal property, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, belonging to individuals located at that place, from the person and/or immediate presence of those individuals, by threat of serious bodily injury and/or by intentionally placing those individuals in fear of immediate serious bodily injury, in violation of Section 797 of Title 21, contrary to the provisions of Section 421 of Title 21. In furtherance of their conspiracy, a member or members of the conspiracy did form an agreement as follows:

- a. On the afternoon of June 28, 2024, **HERBERT LEE MORRIS, JR.**, sent GPS coordinates which plotted the location of Fuda2020, LLC, to a text message group chat containing phone numbers associated with **AMEIL RAINGER**, **ANTHONY RAINGER**, and other individuals. **HERBERT MORRIS** accompanied the coordinates with the comment "That's the on." **AMEIL RAINGER** replied, "Looking at this mf rn," and **ANTHONY RAINGER** "loved" the image. **HERBERT MORRIS** had previously named the group chat with a money bag symbol and had changed the profile picture to depict U.S. currency.

Likewise, in furtherance of their conspiracy, a member or members of the conspiracy did commit one or more of the following overt acts:

- a. In the early morning hours of June 29, 2024, **HERBERT MORRIS**, **GEANE JOHNSON**, **AMEIL RAINGER**, and **ANTHONY RAINGER** traveled from Oklahoma City, Oklahoma to Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, for the purpose of perpetrating a robbery in the first degree against the occupants at that location.
- b. **HERBERT MORRIS**, **GEANE JOHNSON**, **AMEIL RAINGER**, and **ANTHONY RAINGER** brought one or more firearms to the Fuda2020 property

for the purpose of effecting the robbery by force or fear, and wore masks/disguises to conceal their identities.

- c. Upon arrival, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** knowingly and unlawfully gained entry to the Fuda2020 property through the fence-line of the compound.
- d. Immediately thereafter, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** broke and entered into a dwelling located at Fuda2020 for the purpose of perpetrating a robbery in the first degree against the occupants of that dwelling.
- e. Once inside the dwelling, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** wrongfully took and carried away U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury.
- f. Subsequently, **HERBERT MORRIS** and **GEANE JOHNSON** led Peifeng Sun into a grow barn at gunpoint and directed his movements. Such acts were recorded on Blink video surveillance footage.
- g. After law enforcement arrived on the scene, **HERBERT MORRIS, GEANE JOHNSON, AMEIL RAINGER,** and **ANTHONY RAINGER** fled the Fuda2020 property in an effort to avoid apprehension, thereby evincing a consciousness of guilt in completion of the conspiracy.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 3: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 25, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency belonging to Qiu Li and/or Li Zhao Zhong, from the person and/or immediate presence of said individuals, and when, in the course of the robbery, threatened said individuals with serious bodily injury and/or intentionally put said individuals in fear of immediate serious bodily injury. These acts occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 4: ROBBERY IN THE FIRST DEGREE ~ 21 O.S.2021, § 797, a FELONY

On or about June 29, 2024, the crime of **ROBBERY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who wrongfully took and carried away the personal property of another, to wit: U.S. currency and/or bundles of packaged marijuana from the persons and/or immediate presences of Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu, and when, in the course of said robbery, threatened those individuals with serious bodily injury and/or intentionally put those individuals in fear of immediate serious bodily injury. Said acts occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, and were committed contrary to the provisions of Section 797 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 5: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

On or about June 25, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Stephens County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who broke and entered a dwelling of another, located at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, which was occupied by Qiu Li and Li Zhao Zhong, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 6: BURGLARY IN THE FIRST DEGREE ~ 21 O.S.2021, § 1431, a FELONY

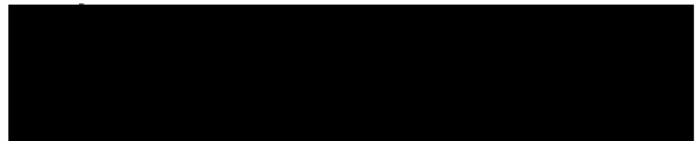
On or about June 29, 2024, the crime of **BURGLARY IN THE FIRST DEGREE** was feloniously committed in Grady County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who broke and entered a dwelling of another, located at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, which was occupied by Bao Hua Li and/or Wenhua Gao and/or Xiang Lian Wu and/or others, with the intent to commit the crime of robbery therein, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL



NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE ~ 21 O.S.2021, § 1303, a FELONY

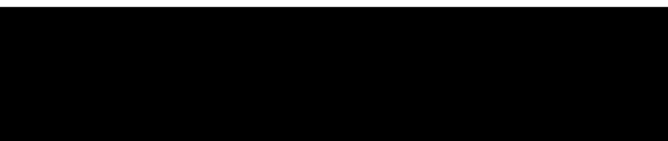
On or about June 29, 2024, the crime of **ASSAULT WHILE MASKED OR IN DISGUISE** was feloniously committed in Grady County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who assaulted Peifeng Sun with a dangerous weapon to wit: a pistol, while masked and/or in disguise, said crime occurring at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, contrary to the provisions of Section 1431 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE ~ 21 O.S.2021, § 856.3,
a FELONY**

On or about June 29, 2024, the crime of **COMMISSION OF A GANG-RELATED OFFENSE** was feloniously committed at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County, Oklahoma, by **GEANE JW JOHNSON, JR.**, by perpetrating the gang-related offense of Robbery in the First Degree (by force or fear) in association with the Murder 1 Blood street gang, an ongoing organization that specifically promotes, sponsors, assists in, or participates in, and requires as a condition of membership or continued membership, the commission of certain enumerated felonies, including Robbery in the First Degree (by force or fear), and/or in association with other members of the Murder 1 Blood street gang, contrary to the provisions of Section 856.3 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

☒ (X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S.2021,
§ 425, a FELONY**

On or about or between June 25, 2024, and June 29, 2024, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was feloniously committed by **GEANE JW JOHNSON, JR.**, by perpetrating two or more criminal offenses—including the burglary and robbery offenses which occurred at Butter Cookies, LLC, 3705 Duncan Lake Road, Marlow, Oklahoma 73055, in Stephens County, and the burglary and robbery offenses which occurred at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, in Grady County—each proceeding from or having an antecedent element a single prior incident or pattern of robbery and/or burglary, constituting a pattern of criminal offenses occurring in two or more counties of the State of Oklahoma, contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

**COUNT 10: FELON IN POSSESSION OF A FIREARM ~ 21 O.S.Supp.2022, § 1283, a
FELONY**

On or about June 29, 2024, the crime of **FELON IN POSSESSION OF A FIREARM** was feloniously committed in Grady County, Oklahoma, by **GEANE JW JOHNSON, JR.**, who knowingly and willfully possessed a pistol at Fuda2020, LLC, 2255 County Road 1410, Alex, Oklahoma 73002, after former conviction of a felony in District Court of Jefferson County Case No. CF-2021-44, contrary to the provisions of Section 1283 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

TRUE BILL

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NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

IN THE SUPREME COURT OF THE
STATE OF OKLAHOMA

PAGE 2

INDICTMENT

I, THE UNDERSIGNED ASSISTANT ATTORNEY GENERAL OF THE STATE OF OKLAHOMA ATTORNEY GENERAL'S OFFICE, DO UPON MY OFFICIAL OATH, FURTHER GIVE SAID COURT TO KNOW AND BE INFORMED THAT THE OFFENSES OF:

COUNT 1: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE;

COUNT 2: CONSPIRACY TO COMMIT ROBBERY IN THE FIRST DEGREE;

COUNT 3: ROBBERY IN THE FIRST DEGREE;

COUNT 4: ROBBERY IN THE FIRST DEGREE;

COUNT 5: BURGLARY IN THE FIRST DEGREE;

COUNT 6: BURGLARY IN THE FIRST DEGREE;

COUNT 7: ASSAULT WHILE MASKED OR IN DISGUISE;

COUNT 8: COMMISSION OF A GANG-RELATED OFFENSE;

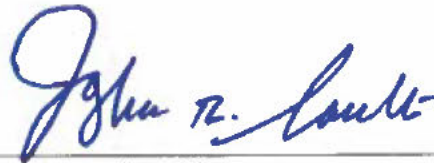
COUNT 9: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

COUNT 10: FELON IN POSSESSION OF A FIREARM;

AS CHARGED IN THE INDICTMENT IN THIS CASE WERE COMMITTED BY THE DEFENDANT *GEANE JW JOHNSON, JR.*, NAMED THEREIN, AFTER HAVING BEEN CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT:

POSSESSION OF A FIREARM AFTER FORMER FELONY CONVICTION; ON THE 29TH DAY OF AUGUST, 2022, IN THE DISTRICT COURT OF JEFFERSON COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2021-44.

GENTNER F. DRUMMOND
ATTORNEY GENERAL OF OKLAHOMA



Joshua R. Fanelli
Assistant Attorney General