

FILED
In the District Court
PAWNEE COUNTY, OKLAHOMA

APR 7 2025

ILA POTTS, Court Clerk
BY: _____ DEPUTY

STATE OF OKLAHOMA,)
)
 PLAINTIFF,)
)
)
vs.)
)
Echohawk, Christine J)
W/F, DOB: April 1971)
SSN: xxx-xx- 3278)
)
 DEFENDANT.)
)
COUNTY OF PAWNEE)
 SS:)
STATE OF OKLAHOMA)

Case No. CF-2025- 26

AFFIDAVIT OF PROBABLE CAUSE

Justin Hokett, being of lawful age and after having been affirmed upon his oath to tell the truth, states as follows:

I am a certified Advanced Peace Officer in the State of Oklahoma, employed as an Agent in the Office of Oklahoma Attorney General (OAG). I attest that the following is true and factual to the best of my knowledge. This Affidavit does not include every fact known, but only those facts necessary to support a finding of probable cause.

1. Your Affiant, Agent Justin Hokett, has been a law enforcement officer for the OAG since 2018. Your affiant is assigned to the Consumer Protection Unit and frequently works fraud cases. Affiant's duties include investigating various types of fraud related crimes including Romance Scams. Your affiant is currently investigating the crimes of Unlawful Proceeds, as defined in Title 21 § 2001 (D) and Using Access to Computers to Violate Oklahoma Statutes as defined in Title 21 § 1983(A)(2).

2. The OAG received a referral on or about January 8, 2025, from Bill Muller of MidFirst Bank. The referral outlined that Christine Echohawk (Echohawk) was suspected of laundering proceeds originating from Romance Scam(s). On March 18, 2025, your affiant contacted Muller concerning this referral that involved an ongoing romance scam Muller had uncovered which involved elderly women.

3. Muller informed your affiant that on October 1, 2024, Echohawk had opened accounts with MidFirst Bank, which she was the sole signatory of. The accounts were opened at a MidFirst Bank branch located at 111 N. Perkins Road, Stillwater, Payne County, Oklahoma. Echohawk listed her address as 732 Harrison Street, Pawnee, OK. After being opened, the accounts began receiving large deposits from multiple out-of-State individuals. Following the funds being deposited, they would be transferred out of the accounts. Muller described one such account they were transferred to as an account at Community Federal Savings Bank which was also in Echohawk's name. Echohawk used a specific mailing address for the account(s) which was located in Pawnee, OK.

4. Muller advised that he contacted the sources of these deposits, identified as [REDACTED] of Florida, [REDACTED] of Utah, [REDACTED] of Texas, and [REDACTED] of Texas. Muller discovered all subjects were elderly women who believed they were sending funds to or for the benefit of a male subject who they believed to be in an online romantic relationship with.

5. Muller provided documentation to your affiant which substantiated his referral and allegation. Muller stated that on or about December 26, 2024, MidFirst Bank intercepted and held a transfer of \$120,000.00 from Bank of America account ending 9130, held by [REDACTED], on suspicion of fraud. The funds were intended to go to MidFirst Account ending 0288, in the name of Mauristine Ventures LLC. Muller submitted documentation dated December 18, 2024, to your affiant showing the beneficial ownership of Mauristine Ventures LLC to belong to Echohawk. Your affiant also verified with the Oklahoma Secretary of State that Echohawk is listed as the registered agent for Mauristine Ventures LLC.

6. On December 31, 2024, Echohawk submitted an invoice from Mauristine Ventures LLC to MidFirst bank from email address "CEchohawk1014@gmail.com." Mauristine Ventures' listed address is Echohawk's personal address as listed on her MidFirst Bank signatory card as well as on her Oklahoma Driver's License, 732 Harrison Street, Pawnee, OK. The invoice was dated as created December 26, 2024, and due by December 28, 2024. The invoice claimed to be for the purchase of an unnamed, unlisted, undescribed property for \$120,000.00. Following this, Muller spoke with [REDACTED], she told him as well as her bank that the funds were for the purchase of land in the Pawnee Oklahoma area for her and her "fiancé."

7. On March 25, 2025, your affiant contacted Chief Wesley Clymer of the Pawnee Police Department. Chief Clymer stated on January 24, 2024, he interviewed Echohawk for an out-of-State agency. Chief Clymer also advised Echohawk currently resides at 732 Harrison Street, Pawnee, OK. Chief Clymer provided your affiant with a copy of the interview report. Echohawk had told Chief Clymer that she had deposited and transferred numerous funds for an individual she was in an online romantic relationship with an individual she identified as Maurice Deniro (alias). Echohawk stated that she logged into a bank account belonging to alias and transferred funds from one account to another for him. Chief Clymer explained to Echohawk that alias had Echohawk log into his bank accounts because the IP address of her computer was traceable. Alias would then deceive victims into sending him funds via Echohawk so they can be laundered through her bank accounts.

8. On March 24, 2025, your affiant contacted [REDACTED] via telephone. [REDACTED] advised that in 2024 she had entered into an online romantic relationship with an individual she believed to be named Jason Morris (alias). Between the time of first contact and the time your affiant contacted [REDACTED], [REDACTED] paid approximately \$40,000.00 in apple gift cards and \$170,000.00 via two wire payments to alias. One of which was the \$120,000.00 payment mentioned above.

9. [REDACTED] stated in December 2024 she was convinced by alias to send \$120,000.00 to an account which belonged to Echohawk at MidFirst Bank. [REDACTED] advised the purpose of the payment was allegedly to pay for fuel for an alleged oil vessel in Alaska which alias allegedly owned. [REDACTED] stated that alias claimed the vessel was loaded with 700,000 barrels of oil and he claimed it needed fuel to return to shore. Alias had stated to [REDACTED] that once the rig returned to shore Morris and [REDACTED] would move in together.

10. When MidFirst Bank held the funds on suspicion of fraud, alias contacted her and instructed her to go to her bank and lie to them. [REDACTED] was instructed to tell them the funds were for the purchase of property, and not for fuel for his alleged oil tanker. [REDACTED] did so and also lied to Muller at MidFirst bank as well, stating the funds were for the purchase of property.

11. Unbeknownst to [REDACTED], during this time frame, Echohawk submitted the above-described false invoice for property through her company, as well as multiple emails and phone calls to MidFirst Bank in an attempt to persuade MidFirst Bank to release the funds [REDACTED] had sent.

12. On March 25, 2025, your affiant contacted [REDACTED] via telephone and spoke about funds she sent to Echohawk. [REDACTED] stated in April 2023 she began an online romantic relationship with an individual she knew as "Edward Lotts" (alias). Between date of first contact and date of interview, [REDACTED] sent alias over \$600,000.00. [REDACTED] advised the funds were purported to be for alias to pay off a debt which would allow \$2,000,000.00 to be released to him. Once the debt was paid off, alias was to move in with [REDACTED]. [REDACTED] stated she sold her paid-off residence to afford to do this.

13. Funds sent included a \$10,000.00 payment which [REDACTED] was told by alias to mail to Echohawk's address in Pawnee, OK. [REDACTED] obtained a cashier's check made out to Christine Echohawk for \$10,000.00 on September 30, 2024, from her financial institution, Chase Bank and mailed said check to Echohawk. The check was deposited to Echohawk's MidFirst Bank account on or about October 1, 2024.

14. On March 25, 2025, your affiant contacted [REDACTED] via telephone and spoke about funds sent to Echohawk by her. [REDACTED] stated she had been involved in an online romantic relationship with an individual who identified himself as Jason Morris (alias) since October 2024. From date of first contact to date of interview, Morris had convinced [REDACTED] to send him over \$100,000.00. Payments were made by various methods including Apple gift cards, mailing cash via FedEx, and money wire(s). One such money wire was sent from [REDACTED] on or about December 12, 2024, to Echohawk's MidFirst bank account. [REDACTED] believed the funds were going to be used to buy supplies and fuel for Morris' oil tanker he had in Turkey.

15. On March 31, 2025, your affiant was contacted by [REDACTED] via telephone and spoke about funds sent to Echohawk by her. [REDACTED] stated in July 2024 she was contacted by an individual identified as Glenn Goadard (alias) who told her she knew him since college. [REDACTED] was convinced to pay \$250,000.00 to alias for expenses related to a financial portfolio he was sending her from Syria. [REDACTED] paid these funds by various methods including mailing gift cards, mailing cash, and mailing a \$90,000.00 cashier's check to Echohawk's residence. The check was obtained by [REDACTED] from Chase Bank on October 29, 2024, and deposited into Echohawk's MidFirst account on October 30, 2024. The check shows to have been endorsed by Echohawk.

16. On March 26, 2025, your affiant, along with OAG Agent Richard Lashar conducted a voluntary interview of Echohawk at the Pawnee Police Department, located in Pawnee, OK. During the interview Echohawk advised she is a high school graduate, holds an associate's degree in business, and also holds various nursing certifications. Echohawk opened the interview by asking if she paid back individuals who sent her money would it "all go away." Echohawk admitted that she has been receiving cash, checks,

electronic fund transfers, and other such items of monetary value since 2023, for an individual she believed herself to be in a romantic relationship with, identified as Maurice Dinero (alias). Echohawk stated the funds came from countless individuals whom she did not know.

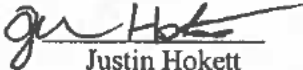
17. Echohawk had been informed by Chief Clymer in January 2024 during an investigation he was assisting with that the funds she received were from individuals being scammed by alias. Echohawk was informed that alias used her to do so because her actions were able to be traced. Chief Clymer informed Echohawk she was in fact, laundering the funds she received. Echohawk advised she had moved \$500,000.00 in funds from an account which alias stated belonged to him to various other LLC accounts he designated. Echohawk admitted the LLC accounts she moved funds to did not seem related to oil drilling. Echohawk claimed she had stopped assisting alias with depositing and moving funds to her various accounts after Chief Clymer's interview with her. Echohawk advised that in October 2024, when she opened accounts at MidFirst Bank she decided to start depositing and moving funds for alias again. Echohawk was specifically asked about the false invoice submitted to MidFirst Bank. Echohawk stated alias had created the invoice, and she knew it to be fake, but submitted it to MidFirst Bank via her email address. Echohawk also advised there were multiple "red flags" about the situation, and she had frequent concerns about being arrested.

18. Echohawk stated she opened numerous accounts at various financial institutions to deposit the funds or allow funds to be deposited into. Echohawk would then transfer the funds to other accounts in her name, and ultimately convert almost all funds to crypto currency, to be held in a crypto wallet in her name. Those funds would then be transferred to a separate wallet in the name of alias. Echohawk stated some of the funds which were not converted to crypto were used by Echohawk for personal gain. Echohawk advised the financial institutions would typically close her accounts within a few months of her opening them, with some citing money laundering concerns. Echohawk also admitted to lying to numerous financial institutions who would frequently ask her about the source of funds going into her accounts. Echohawk advised she would lie and say they were individuals who had owed her deceased husband, George Echohawk, money.

19. Echohawk provided your affiant with consent to search her purse wherein your affiant found \$500.00 in cash, several apple gift cards with their barcodes revealed, numerous bank cards which were all associated with accounts Echohawk had laundered funds through, and a MidFirst Bank deposit slip for \$110,000.00. Echohawk stated the \$500.00 cash was received from individuals sending money to alias which she had not yet deposited. The funds were intermingled with other funds which Echohawk advised were hers. Echohawk stated she previously managed the various accounts from a laptop and an older cellphone but currently uses her current cellphone to do manage the financial accounts.

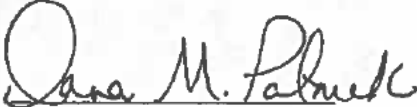
I request upon probable cause, the court issue a warrant for the arrest of on **four (4) Felony charges of Unlawful Proceeds, Title 21 § 2001(D)**, and **one (1) felony charge of Using Access to Computers to Violate Oklahoma Statutes, Title 21 § 1983(A)(2)**.

Further, your Affiant sayeth not.


Justin Hokett

Subscribed and affirmed before me this 7th day of April, 2025.

My commission expires: May 15, 2025



Notary Public



FINDING OF PROBABLE CAUSE

On this 7th day of April, 2020, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court, and upon the Affidavit of Justin Hokett, requesting that a warrant of arrest be issued for the within named Defendant, that she might be arrested and held to answer for **four (4) Felony charges of Unlawful Proceeds, Title 21 § 2001(D), and one (1) felony charge of Using Access to Computers to Violate Oklahoma Statutes, Title 21 § 1983(A)(2).**

The Court finds that the **four (4) Felony charges of Unlawful Proceeds, Title 21 § 2001(D), and one (1) felony charge of Using Access to Computers to Violate Oklahoma Statutes, Title 21 § 1983(A)(2)** has been committed and there is probable cause to believe that the within Defendant has committed said offenses and that a warrant of arrest should be issued.

Dated this 7th day of April, 2020.



JUDGE OF THE DISTRICT COURT