

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

v.

JENNIFER ROBERTS,

KALEB ROBERTS,

MYRA HARGROVE,

CHELSEA FOWLER,

TYLER MANESS,

LAUREN LANGLEY,

AVERY PARKER,

CHRISTOPHER ROBERTS,

NOEL CROW,

Defendants.

K. NIKKI KIRKPATRICK
INFORMATION

CF - 2026-4161

Case No. CF-2026-

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

JUL 28 2026

**RICK WARREN
COURT CLERK**

20

Gentner Drummond, Oklahoma Attorney General, informs the District Court, that:

COUNT I: On, about, or between October 27, 2018 and February 1, 2026, in Oklahoma County, Oklahoma, JENNIFER ROBERTS, did commit the crime of Racketeering, a Felony, by unlawfully, feloniously and knowingly, and within the jurisdiction of this Court, while associated with the OK Crisis Nursery Foundation, did conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of racketeering activity, as defined by 22 O.S. Section 1402 and as set forth in Counts Two, Three, Four, Five, Six, and/or Seven, which are incorporated herein, contrary to the provisions of 22 O.S. 1403(A) of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

COUNT II: On or about October 27, 2018 and February 1, 2026, in Oklahoma County, Oklahoma, JENNIFER ROBERTS, KALEB ROBERTS, MYRA HARGROVE, and CHELSEA FOWLER did commit the crime of Embezzlement a Felony, who willfully and fraudulently did while acting in concert with each other, embezzle money at a value in excess of \$15,000.00, said money being the property of OK Crisis Nursery Foundation and which money was to be used for a benevolent purpose with the willful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate the money to their own use and not for a use and/or purpose so authorized, contrary to the provisions of 21 O.S. 1451 of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

COUNT III: On, about, or between October 27, 2018 and February 1, 2026, JENNIFER ROBERTS, in Oklahoma County, Oklahoma, did feloniously violate the Oklahoma Solicitation of Charitable Contributions Act, by soliciting and/or collecting contributions for a charitable organization, to wit: OK Crisis Nursery Foundation, through a fraudulent scheme, pretense, representation or promise that said donations would be used for charitable purposes and/or said donations would be tax exempt under 26 U.S.C. Section 501(c)(3) in violation of Section 552.14a(A)(5) of Title 18 of Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT IV: On or about September 23, 2025, JENNIFER ROBERTS and TYLER MANESS, did commit the crimes of False Preparation of Exhibits as Evidence in Oklahoma County, Oklahoma, by falsifying records of community service and presenting such as evidence in Oklahoma County Case numbered CM-2025-1526, in violation of Section 453 of Title 21 of the Oklahoma Statutes and against the peace and dignity of Oklahoma.

COUNT V: On, about, or between, October 27, 2018 and February 1, 2026, in Oklahoma County, Oklahoma, JENNIFER ROBERTS and LAUREN LANGLEY, who knowingly or intentionally did while acting in concert with each other, commit the crime of Receipt of Unlawful Proceeds in excess of ten thousand hundred dollars (\$10,000), a Felony, did receive or acquire proceeds and conceal such proceeds known to be derived from unlawful activity; specifically, Embezzlement, contrary to the provisions of 21 O.S. 2001 of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

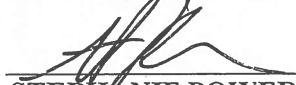
COUNT VI: On, about, or between, October 27, 2018 and February 1, 2026, in Oklahoma County, Oklahoma, JENNIFER ROBERTS and AVERY PARKER, did commit the crime of Receipt of Unlawful Proceeds in excess of two thousand five hundred dollars (\$2,500), a Felony, who knowingly or intentionally did while acting in concert with each other, receive or acquire proceeds and conceal such proceeds, and known to be derived from unlawful activity; specifically, embezzlement, contrary to the provisions of 21 O.S. 2001 of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

COUNT VII: On or about July 16, 2024, in Oklahoma County, Oklahoma, JENNIFER ROBERTS and CHRISTOPHER ROBERTS, in Oklahoma County, Oklahoma, did commit the crime of Endeavoring to Distribute a Controlled Substance, a Felony, by unlawfully, willfully, knowingly, and intentionally while acting in concert with each other, did endeavor to commit the crime of unlawful delivery or distribution of controlled dangerous substance, to-wit: Hydrocodone - Norco, the same being classified as a controlled dangerous substance in Schedule II of the Uniform Controlled Dangerous Substances Act of this State, contrary to the provisions of 63 O.S. 2-408 of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

COUNT VIII: On or about January 7, 2023, in Oklahoma County, Oklahoma, AVERY PARKER, and NOEL CROW did commit the crime of Receipt of Unlawful Proceeds in excess of two thousand five hundred dollars (\$2,500), a Felony, who knowingly or intentionally did while acting in concert with each other, receive or acquire proceeds and conceal such proceeds, and known to be derived from unlawful activity; specifically, embezzlement, when Jennifer Roberts purchased a vehicle, a 2016 Nissan Sentra, for said AVERY PARKER and NOEL CROW, using funds from OK Crisis Nursery, intended for a benevolent purpose, for the personal use of AVERY PARKER, contrary to the provisions of 21 O.S. 2001 of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

COUNT IX: On or about July 16, 2024, in Oklahoma County, Oklahoma, CHELSEA FOWLER, did commit the crime of Accessory to a Felony, a Felony, by unlawfully and willfully and knowingly, aid one, Jennifer Roberts a person who on, about, or between October 22, 2018 and February 1, 2026 had committed a felony, to-wit: the crimes of Embezzlement and Violation of the Oklahoma Solicitation of Charitable Contributions Act. The said defendant well knowing that the said Jennifer Roberts had committed said felony, did thereafter the commission of said crime, aid the said Jennifer Roberts, by manufacturing a fake board of directors for OK Crisis Nursery Foundation, with the unlawful, willful and felonious intent on the part of said defendant that the said Jennifer Roberts may avoid and escape from arrests, trial, conviction and punishment for the aforesaid crimes, contrary to the provisions of 21 O.S. 175(1) of the Oklahoma statutes, and against the peace and dignity of the State of Oklahoma.

Respectfully Submitted,
GENTNER DRUMMOND



STEPHANIE POWERS, OBA #22892
Deputy Attorney General

WITNESSES

1. ADAM GOOD
Oklahoma Attorney General
313 NE 23rd Street
Oklahoma City, OK 73105
2. DANIEL MOBLEY
Oklahoma Attorney General
313 NE 23rd Street
Oklahoma City, OK 73105
3. MAGGI WILLIAMS
Oklahoma Attorney General
313 NE 23rd Street
Oklahoma City, OK 73105
4. RICHARD LASHAR
Oklahoma Attorney General
313 NE 23rd Street
Oklahoma City, OK 73105
5. RANDA ORQUIZ
Oklahoma Attorney General
313 NE 23rd Street
Oklahoma City, OK 73105
6. PAYPAL HOLDINGS, INC.
2211 N. 1st St.
San Jose, CA 95131
7. BLOCK INC.
1955 Broadway, Suite 600
Oakland, CA 94612
8. OKDHS
1124 NE 36th Street
Oklahoma City, Oklahoma 73111
9. OKLAHOMA SECRETARY OF STATE
421 NW 13th St, Suite 210
Oklahoma City, OK 73103

10. CITY NATIONAL BANK & TRUST
PO Box 2009
Lawton, OK 73502
11. AIRBNB, INC.
888 Brannan Street, 4th Floor
San Francisco, CA 94103
12. BLISS MEDICAL SPA
2123 N. Classen Blvd.
Oklahoma City, OK 73106
13. RICHEY WELLNESS AND AESTHEITCS
910 NW 139th St. Parkway
Edmond, OK 73013
14. LIFETIME FITNESS
2902 Corporate Place
Chanhassen, MN 55317
15. GLO TANNING
12231 S. May Ave
Oklahoma City, OK 73170
16. LULULEMON
5854a N Classen Blvd Suite #P11
Oklahoma City, OK 73118
17. TELMATE
PO Box 1137
Fruitland, ID 83619
18. OKC PSYCHIATRIC
2316 NW 23rd Street
Oklahoma City, OK 73107
19. THE FITZ AESTHETICS AND WELLNESS/ TRILLIUM MEDICAL SPA
14201 N. Santa Fe Avenue Ste 107
Edmond, OK 73013
20. HIDDEN HILLS CABINS
15 Deadwood Trail
Broken Bow, OK 74728

21. SECURUS TECHNOLOGIES, LLC./ JPAY
3450 Lakeside Drive, Suite 100
Miramar, FL 33027
22. BRIDGECREST ACCEPTANCE CORPORATION
PO Box 52020
Phoenix, AZ 85072
23. KALIDY KIA
14205 Broadway Extension,
Oklahoma City, OK 73013
24. META
1 Meta Way
Menlo Park, CA 94025
25. OKLAHOMA TAX COMMISSION
300 N. Broadway Avenue,
Oklahoma City, Oklahoma 73102
26. BEACHWALK VACATIONS
202 Beachwalk Lane,
Michigan City, IN 46360
27. SOUTHWEST AIRLINES
PO Box 3661
Dallas, Texas 75235
28. DOOR DASH
303 2nd Street
San Francisco, California 94107
29. AM NAILS
5020 N. may Avenue
Oklahoma City, Oklahoma 73112
30. DELTA AIRLINES
PO Boxx 20574
Atlanta, Georgia 30320
31. GOOGLE, INC
1600 Amphitheatre Parkway,
Mountain View, CA 9404
32. ROXEANNE PATTERSON

In the Care of the Attorney General's Office

33. LINDSAY LAIRD

In the Care of the Attorney General's Office

34. GARY MCNETT

In the Care of the Attorney General's Office

35. DANNY MEYER

In the Care of the Attorney General's Office

36. KENDRA ALLEN

In the Care of the Attorney General's Office

37. ASHLEY HILDERBRAND

In the Care of the Attorney General's Office

38. KYLER JENNINGS

In the Care of the Attorney General's Office

39. JAMES WOODS

In the Care of the Attorney General's Office

40. MARIA RYAN

In the Care of the Attorney General's Office

41. LINETTE ROBERTS

Pippin Properties

7701 N. Broadway Extension,

Oklahoma City, Oklahoma 73116

42. ANGELA SLAYTON

In the Care of the Attorney General's Office

43. FARRAH CHRISTIAN

In the Care of the Attorney General's Office

44. HEATHER SALA THOMPSON

In the Care of the Attorney General's Office

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

PAGE 2

INFORMATION

CF-2026-

I, THE UNDERSIGNED DEPUTY 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 VII: ENDEAVORING TO DISTRIBUTE A CONTROLLED SUBSTANCE

AS CHARGED IN THE FILED INFORMATION IN THIS CASE WERE COMMITTED BY THE DEFENDANT, CHRISTOPHER ROBERTS, NAMED THEREIN, AFTER HAVING BEEN CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT.

GRAND LARCENY ON THE 6TH DAY OF NOVEMBER, 2024, IN THE DISTRICT COURT OF OKLAHOMA COUNTY, STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2023-2666.

COUNT 1: LARCENY OF MERCHANDISE FROM A RETAILER, COUNT 2: LARCENY OF MERCAHNDISE FROM A RETAILER, AND COUNT 3: LARCENY OF MERCHANDISE FROM A RETAILER ON THE 6TH DAY OF NOVEMBER, 2024, IN THE DISTRICT COURT OF OKLAHOMA COUNTY, STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2023-2665.

UNAUTHORIZED USE OF A MOTOR VEHICLE ON THE 30TH DAY OF DECEMBER, 2025, IN THE DISTRICT COURT OF MCCLAIN COUNTY, STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-20220-98.

FALSE DECLARATION TO PAWNBROKER ON THE 3RD DAY OF NOVEMBER, 2022, IN THE DISTRICT COURT OF OKLAHOMA COUNTY, STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2018-5492.

GENTNER DRUMMOND
ATTORNEY GENERAL OF OKLAHOMA



Stephanie Powers
Deputy Attorney General

**IN THE DISTRICT COURT SITTING IN AND FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA**

STATE OF OKLAHOMA)
Plaintiff)

VS.)

JENNIFER LYNN ROBERTS)
Defendant)

Case No. CPC-26-6236

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

**AFFIDAVIT OF PROBABLE CAUSE FOR ISSUANCE OF JUL 24 2026
ARREST WARRANT**

**RICK WARREN
COURT CLERK**

It is herein alleged that the defendant;

80 _____

Name: Jennifer Lynn ROBERTS	Date of Birth: 03/xx/1983	SSN: xxx-xx-1397
Address: 9105 NW 123 rd Street, Yukon, OK 73099	Race: White	Sex: Female

Did commit the offenses of;

- Count 1:** Embezzlement of Property to be Used for a Benevolent or Public Purpose in Excess of \$15,000, a Class C1 Felony - 21 O.S. § 1451(A)(1)
- Count 2:** Solicit or Collect Charitable Contributions by Use or Involving a False Promise or Scheme, a Felony - 14 O.S. § 522.14a(A)(5)
- Count 3:** False Preparation of Exhibits as Evidence – a Class D1 Felony - 21 O.S. § 452
- Count 4:** Conspiracy to Commit a Felony; to-wit – False Preparation of Exhibits as Evidence – a Class C2 Felony – 21 O.S. § 421(A)(1)
- Count 5:** Violation of the Oklahoma Computer Crimes Act – a Class D1 Felony - 21 O.S. § 1958
- Count 6:** Endeavoring to Violate the UCDSA; to-wit – Distribution of a Schedule II Controlled Dangerous Substance – a Class C2 Felony - 63 O.S. § 2-408 referencing 63 O.S. § 2-401(C)(2)
- Count 7:** Unlawful Use of a Telecommunication Facility to Violate the UCDSA – a Class D1 Felony - 13 O.S. § 176.3
- Count 8:** Engaging in Transactions Involving Proceeds to Be Used in Furtherance of Violating the UCDSA – a Class C2 Felony – 63 O.S. § 2-503.1(B)
- Count 9:** Violation of the Oklahoma Racketeer-Influenced Corrupt Organization Act – a Class B1 Felony - 22 O.S. § 1403(A)

Of which occurred within Oklahoma County and within the State of Oklahoma.

Your Affiant, Adam M. Good, is a duly and regularly appointed Supervisory Agent commissioned by the Oklahoma Attorney General's Office and sets forth the particular facts supporting probable cause as follows:

Background

1. The Oklahoma City Crisis Nursery, a/k/a OKCity Crisis Nursery, a/k/a OK Crisis Nursery Foundation (“the nursery” or “nursery”) was incorporated under the laws of the State of Oklahoma as a not-for-profit entity on 10/29/2018 and remained incorporated as such for all times relevant to this Affidavit. The nursery registered with the Internal Revenue Service (“IRS”) as a 501(c)(3) tax exempt entity as well with Jennifer Lynn ROBERTS, the above-named Defendant, (“J. ROBERTS”) as the principal officer at 1843 Westminster Place, Nichols Hills, Oklahoma county, Oklahoma for tax period 01/01/2019 to 12/31/2019. The nursery operated initially at 2728 NW 14th Street in Oklahoma City around 2018 and 2019. It transitioned to 2524 NW 52nd Street in Oklahoma City in 2020 where it remained at least until adverse legal action began in March 2026.

2. J. ROBERTS acted as the one of the initial incorporators, executive director and primary point of contact for the nursery throughout the times enumerated throughout the Affidavit. This was supported by social media posting, communications on Facebook, media appearances on KWTN News 9 in Oklahoma City, and through interviews of individuals involved with the nursery from the inception up and through when adverse action was filed.

Ct 1: Embezzlement of Property to be Used for a Benevolent or Public Purpose in Excess of \$15,000

Bank, Cash App and Venmo Records for the Nursery

3. J. ROBERTS opened bank account ending in XX2551 through City National Bank and Trust for OK Crisis Nursery Foundation d/b/a OKCity Crisis Center. She listed her phone number as (405) 979-0706 and e-mail address as jroberts@crisisnurseryokc.com. The stated business was “non-profit / charity”. The bank account was used prior but requested and analyzed records span bank to 09/01/2020. She was the sole signer and authorized user for the account during the referenced times.

4. Deposits into the account showed to be donations with remarks on various checks reading “power of 100”, “October 2021 donation”, “donation”, and similar expressions. The primary source of funding for this account appeared to be donations. The account would also be funded by Venmo and Cash App

transfers. The responsive records from both companies indicated that a large portion of contributions to these methods were also donations.

5. Agents noticed charges that did not appear to be for charitable purposes on the bank statements that included:

- a. 75 transactions to AM Nails, Butterflies Nails, Signature Nail, Dragon Nails, Mint Nails, Swan Spa & Nails and Vivi Nails, between 09/04/2020 and 09/08/2025 totaling \$10,502.50;
- b. 31 transactions to AirBNB between 07/11/2022 and 03/31/2025 totaling \$15,316.59;
- c. 13 transactions to Trillium Medical, a medical aesthetics provider, between 05/14/2024 and 09/02/2025 totaling \$7,318.10;
- d. 1 transaction to Bliss Medical, another medical aesthetics provider, on 02/07/2024 for \$1,380.00;
- e. 8 transactions to Richey Wellness and Aesthetics between 02/12/2021 and 12/06/2023 totaling \$4,446.00;
- f. 5 transactions to Life Time Fitness between 01/06/2025 and 09/08/2025 totaling \$1,482.17;
- g. 50 transactions to Glo Tanning between 03/02/2022 and 08/05/2025 totaling \$3,613.93;
- h. 25 transactions to LuluLemon between 09/23/2020 and 04/11/2025 totaling \$10,335.00;
- i. 91 transactions to various inmate providers such as Access Secure, Telmate Inmate, GTL Collect; Securus and JPay between 09/08/2020 and 11/27/2023 totaling \$2,271.08;
- j. Check number 103 written on 01/07/2023 to Kalidy Kia and signed by J. ROBERTS for \$13,500.00 with a remark that read "Averys Sentra";
- k. Check number 104 written on 01/07/2023 to Noel CROW ("CROW") and signed by J. ROBERTS for \$2,000.00;
- l. 20 transactions between 07/14/2022 and 07/18/2022 at various attractions, restaurants and other entities near Branson, Missouri totaling at least \$2,015.92.

m. 23 transactions to OKC Psychiatric Services between 09/11/2020 and 04/25/2025 totaling \$3,742.99;

6. The amount noted from the checking account in paragraphs 5a to 5m is not comprehensive to the amount of questionable expenditures but totaled \$77,924.28.

7. Agents requested records from Block, Inc., the parent company of Cash App. The records spanned from 01/01/2021 to 01/31/2026. The primary account utilized was C_s42yx8m60 which had J. ROBERTS' date of birth and social security number listed as the verified person. The account went through display name iterations of Jennifer Roberts, OkCity Crisis Nursery; kyler jennings; OkCity Crisis Nursery; CrisisNurseryOkc; CRISISNURSERYOKC and finally Crisis Nursery Okc. The CashTag was \$CRISISNURSERYOKC. A person conducting a transaction with the account through Cash App would likely believe they were doing so with the nursery. The account was linked to cards ending in XX6883, XX7106 and XX7921 which were all affiliated with the aforementioned nursery foundation checking account ending in XX2551. This meant that funds not available immediately in Cash App balance, but requested from the Cash App account, would be pulled from the nursery foundation account.

8. J. ROBERTS' ex-husband, James WOOD, conducted 54 deposits that contributed \$104,500.00 to the account between 01/01/2021 and 12/31/2025 which all were earmarked in someway indicating they were likely child support. He contributed roughly 38% of all deposits. Removing his contributions left a net of \$168,296.18.

9. Several of the deposits were earmarked with various memos such as "donation for beds!", "sorry it's not a lot. hope it can help", "thank you for all you do!", "donation" and more. Some of the deposits did not have any of memo lines. There is a presumption based upon the business and memo lines that a significant portion of remaining deposits were charitable contributions.

10. Agent Good reviewed the account for transactions benefitting people he knew were affiliated with J. ROBERTS. This included Avery PARKER ("PARKER") who was the longtime girlfriend of J. ROBERTS' son, Kyler JENNINGS ("JENNINGS"), Noel CROW ("CROW") who was PARKER's

mother, JENNINGS, Kaleb ROBERTS ("K. ROBERTS") who was J. ROBERTS' son, Christopher ROBERTS ("C. ROBERTS") who was J. ROBERTS' brother, Chelsea FOWLER ("FOWLER") who was J. ROBERTS' sister and Myra HARGROVE ("HARGROVE") who was J. ROBERTS' mother. He found the following amounts within the record times:

- a. PARKER - \$26,777.00
- b. CROW - \$14,610.00
- c. JENNINGS - \$9,246.00
- d. K. ROBERTS - \$26,146.00
- e. C. ROBERTS - \$12,941.00
- f. FOWLER - \$4,025.00
- g. HARGROVE - \$39,114.00

11. Some of the records to PARKER showed \$600.00 for a "dress", \$150.00 for "meds", \$900.00 for "Von Maur", \$2,940.00 with a heart emoji, \$300.00 for "school uniforms", \$100.00 for "depositing check"; \$200.00 for an "oil change"; \$350.00 for "gas" over 6 days and \$5,120.00 for various labor.

12. Records for CROW showed \$350.00 for "Avery contacts", \$1,450.00 for "house", \$1,000.00 for "Josiah", \$700.00 for "tow and tires", \$350.00 for "phone" and \$200.00 for "camp".

13. Records for JENNINGS included \$100.00 for "Bryce's shoes", \$500.00 with a heart emoji, \$100.00 for "tire", \$4,635.00 for "food" and \$700.00 for "Christmas".

14. Records for K. ROBERTS included \$400.00 for "insurance and food", \$300.00 with a remark of "stay strong", "\$300.00 for "health ins & storage", \$500.00 for "car payment", \$30.00 for "abbys dog food" and \$350.00 with a heart emoji.

15. Records for C. ROBERTS showed \$100.00 for "Help w move – thank you", \$300.00 for "gifts cards" and \$2,085.00 for hauling off trash.

16. Records for FOWLER showed \$200.00 for "Gin", \$300.00 for "food" and \$200.00 for "Gas – Jasiah".

17. Records for HARGROVE included \$150.00 for "laundromat", \$240.00 for "kaleb car insurance",

\$600.00 for “Kaleb’s car insurance 2 months”, \$50.00 for “Bryce chick fila a”, \$200.00 for “hair”, \$100.00 for “Kaleb’s food”, \$350.00 for “Kaleb car ins, my rent ins,, laundry soap”, \$620.00 for “house bills and food”, \$220.00 for “mounjaro – month of July” and \$100.00 for “Joel”.

18. Agents obtained records from PayPal and Venmo. The primarily utilized Venmo account was 6732819. The account was an individual account in the name of "CRISIS NURSERY OKC", 18001 Chisholm Creek Farm Lane, Edmond, Oklahoma and it was created on 10/04/2015. It was linked to ROBERTS' date of birth and social security number along with telephone number (405) 979-0706 and e-mail address jroberts@crisisnurseryokc.com. Prior listed e-mail addresses include godsminiscdo@gmail.com and jnnro@aol.com. An address was also listed as 2524 NW 52nd Street, Oklahoma City which was added on 08/20/2022.

19. The dataset for this account indicated transactions between 12/31/2020 and 01/29/2026. It was linked to the nursery foundation checking account through cards XX3232 and XX1171. The credits to the account reflected as follows:

Credits			
Year	Count	Amount	Average
2020	7	\$7,265.00	\$1,037.86
2021	1604	\$131,177	\$81.78
2022	2291	\$190,203.66	\$83.02
2023	1649	\$142,740.62	\$86.56
2024	1682	\$167,519.52	\$99.59
2025	1591	\$160,077.09	\$100.61
2026	27	\$6,929.50	\$256.65
Total	\$638,392.87		

20. The majority in this time frame appeared earmarked as donations except one transfer into a

Venmo card from Wix.com which appeared to be a refund. A spot review of 2024 confirmed charitable intentions.

21. Some of the credits noted were:

- a. 1 credit from Avery PARKER on 08/26/2025 in the amount of \$13.00 with the remark of "Kyler lunch."
- b. 19 credits from Myra HARGROVE between 03/31/2022 and 10/12/2025 totaling \$3,064.00. Some of the remarks read as follows, "Food for bus trip for mom and daughter", "N", "Hair", "Snacks", "Diapers", "Baby Bed - Harris family", "Donation", "Bryce bday party", "Formula", "Food" and "Gas".
- c. 9 posted credits from Chelsea FOWLER between 11/14/2021 and 07/17/2024 totaling \$3,604.00. Some of the remarks read as follows, "Donation", "Need", "Bryan clothes", "Refund", "Teefs", "Needs", and "Get you a few coffees 🍷 (kissing emoji)".
- d. 10 credits from Kaleb ROBERTS between 02/06/2021 and 11/12/2025 totaling \$615.00. Some of the remarks read, "🍕 (pizza emoji)", "🎁 (gift emoji)", and "🏠 🏠 🏠 (three house emojis)".

22. The debits from the account showed to begin on 12/31/2020 and reflected as follows:

Debits			
Year	Count	Amount	Average
2020	4	\$2083.00	\$520.75
2021	854	\$177,091.63	\$207.37
2022	2338	\$234,116.06	\$100.14
2023	2805	\$234,913.90	\$83.75
2024	2919	\$255,129.54	\$77.13

2025	3587	\$247,295.80	\$68.94
2026	146	\$13,429.00	\$91.98
Total	\$1,164,058.93		

23. Some of the debits located for merchant-related transactions were as follow:

- a. 9 debits to Torchy's Tacos between 11/25/2021 and 12/22/2022 totaling \$358.12.
- b. 1 debit to Scottsdale Fashion on 03/16/2023 for \$95.08.
- c. 7 debits to AM Nails between 09/12/2024 and 12/23/2025 totaling \$1,132.68.
- d. 1 debit to AirBNB on 11/04/2025 for \$638.09.
- e. 4 debits to Athleta between 03/29/2025 and 11/21/2025 totaling \$1,327.34.
- f. 8 debits to BarkBox between 02/14/2022 and 09/02/2022 totaling \$241.14.
- g. 4 debits to Boot Barn between 01/10/2023 and 01/09/2024 totaling \$530.01.
- h. 3 debits to Capital Dank Dispensary between 02/11/2023 and 07/13/2023 totaling \$210.25.
- i. 790 debits to DoorDash between 03/08/2022 and 01/24/2026 totaling \$32,994.40 and averaging \$41.77. All of the DoorDash transactions appeared to be related to restaurants.
- j. 1 debit to Josef A. Bank on 05/02/2023 for \$43.40.
- k. 5 debits to Ulta between 01/25/2023 and 09/21/2025 for \$646.55.
- l. 53 debits for Microsoft Xbox between 02/10/2022 and 01/22/2026 for \$970.36.

24. Some of the debits to individuals known through the investigation were:

- a. 15 debits directed to Avery PARKER between 07/27/2025 and 12/24/2025 totaling \$6,020.00. The remarks read, "Christmas presents"; "Christmas Gifts"; "Nursery Help"; "Shampoo"; "Formula"; "Deliveries & Formula"; "Deliveries"; "Walmart order"; "Nursery" "Walmart Run - Diapers"; Diapers"; "Diapers and formula"; "❤️ (heart

emoji); "Nursery help and moving/storage"; "fees/store reimbursement"; "Nursery help" and "❤️ (heart emoji)".

- b. 1 debit directed to Noel CROW on 12/18/2021 for \$1,000.00 with a remark that read "❤️ (heart emoji)".
- c. 174 debits directed to Chelsea FOWLER between 01/01/2021 and 01/27/2026 totaling \$19,490.00. Some of the remarks read, "Diapers", "Christmas", "Similac pro total comfort - marketplace lady", "Bryan", "Have a Starbucks on me...bc I can't get one now bc of your mother & bc J.C. Penney's is closing 🤔 (laughing emoji)", "Food", "Gas", "Nancy's Attorney fees", "Groceries & diapers - family in Wichita", "Braxton", "Diapers - single mom of 3", "Diapers", "Rest of the stuff. Pillows, bedding, organization, etc ❤️ (heart emoji)" and more.
- d. 67 debits directed to Myra HARGROVE between 01/01/2021 and 01/19/2026 totaling \$16,085.00. Some of the remarks read, "Bills", "Diapers", "Food", "Bears stuff", "Car Insurance", "Reimbursement", "Deliveries", "Tahoe Tag & Penalties" and more.
- e. 3 debits directed to Christopher ROBERTS between 12/10/2025 and 12/17/2025 totaling \$390.00 with remarks that read, "Nursery moving", "Gas" and "Nursery help - moving Christmas stuff".
- f. 218 debits directed to Kaleb ROBERTS between 01/12/2021 and 12/25/2025 totaling \$42,368.00. Some of the remarks read, "Bills", "Food", "Gas", "Diapers", "1st bills", "Medicine", "Bday", "Insurance", "❤️ (heart emoji)", "Dinner", "Warehouse", "Deliveries", "Hardware for 7,486 cribs", "Tv - Playroom" and more.
- g. 102 debits directed to Lauren LANGLEY between 12/31/2020 and 01/28/2026 totaling \$54,230.00. Some of the remarks read, "Food", "Diapers", "Christmas Help", "Helping Apaullo", "Gas and foods", "Gas - Jade", "Pizza for kids", "CPR", "P Dub 👑 (crown emoji)", "Baby Yodas", "Gods got it", "Tiki torches offspring" and many more.

25. Some of the notable debit remarks included:

- a. 1 debit on 12/07/2022 for \$100.00 with a remark that read, "2nd Grade Teacher Gifts - Bryce Wood (Jennifer Roberts)"
- b. 1 debit on 12/25/2023 for \$250.00 with a remark that read, "Bryce's jersey"
- c. 1 debit on 04/10/2025 to Lauren WHEELER for \$150.00 with a remark that read, "Brows".
- d. 37 debits between 02/20/2021 and 01/09/2026 for \$5,645.00 that had remarks that read, "hair"; "Hair - Jen" or "Hair - Jen Roberts".
- e. 3 debits between 01/25/2024 and 01/15/2025 for \$1,100.00 with remarks that read, "Jen - Eyebrows"; "Jen - t shirts", "Jen Roberts - 2 hair appts ❤️".
- f. 1 debit on 06/07/2024 to Chelsea FOWLER for \$50.00 with a remark that read, "Have a Starbucks on me...bc I can't get one now bc of your mother & bc J.C. Penney's is closing. 🤔 (laughing emoji)"
- g. 1 debit on 07/01/2025 to Lori AQUINO for \$45.00 with a remark that read, "Robbie Shirt & 2 Koozies (Jen Roberts)"
- h. 1 debit on 05/06/2025 to Myra HARGROVE for \$410.00 with a remark that read, "Water Bill".

Interview with Jennifer ROBERTS

26. On 02/19/2026, J. ROBERTS was interviewed by Agent Daniel Mobley at the Oklahoma Attorney General's Office, 313 NE 21st Street, in Oklahoma City.

27. J. ROBERTS confirmed she founded the nursery in 2019, and the nursery was conceived to provide safe care for children in crisis situations. The nursery received financial donations through PayPal, Venmo and Cash App. She acknowledged that she allowed the tax-exempt status to lapse through the IRS. She was the only authorized representative on the bank account and had no personal

bank accounts. She explained that DoorDash purchases were to provide food and formula for those requesting services; Glo Tanning was a person expense and her ex-husband would send her money through Cash App for this expenditure; payments to HARGROVE, LANGLEY and PARKER were reimbursements for purchases they made for the nursery; LuLuLemon and Alo purchases were purchases made for teenagers who came into nursery care; Bliss Medical and Trillium Medical were purchases of candles and skin care products for “mom gift bags” and the nail salon purchases were for moms who were seeking services. The purchase of the vehicle for PARKER was so that she could use it for deliveries, but confirmed the vehicle was not titled to the nursery.

28. J. ROBERTS identified nursery board members as her sister, Chelsea NAVA a/k/a FOWLER, and Maria RYAN. She explained they were aware of the purchases.

Review of Records from The Fitz Aesthetics and Wellness

29. Agents obtained records from The Fitz Aesthetics and Wellness located at 14201 N. Sante Fe Avenue, Suite 107, Edmond, Oklahoma for J. ROBERTS. She had provided all her known pertinent information to the business included the e-mail address of jroberts@crsisnurseryokc.com.

30. The records indicated that J. ROBERTS had utilized this facility between 03/12/2024 and 08/22/2025 for various personal cosmetic procedures including lip filler, dissolver, laser treatment and dermal filler. The total amount charged directly to the nursery foundation account for the cosmetic procedures was \$8,330.59. There was a total of four (4) candles purchased over 16 documented visits to the clinic.

Review of Records from Bliss Medical Spa

31. Agents obtained records from Bliss Medical Spa, 7312 N. Classen Boulevard, in Oklahoma City for J. ROBERTS. Records showed that on 02/07/2024, J. ROBERTS purchased a filler known as Volbella valued at \$750.00 and a neurotoxin valued at \$530.00 for a personal cosmetic procedure. A total of \$1,380.00 was charged to the nursery foundation account for this.

Review of Records from Richey Wellness and Aesthetics

32. Agents obtained records from Richey Wellness and Aesthetics, 910 NW 139th Street Parkway,

Edmond, Oklahoma for J. ROBERTS. The records indicated that J. ROBERTS purchased various botox and filler treatments from the company for person treatments between 02/11/2021 and 12/5/2023. The total amount billed to the nursery foundation account was \$4,446.00.

33. The total amount charges to the nursery foundation account for personal aesthetic procedures for J. ROBERTS between 02/11/2021 and 08/22/2025 was \$14,156.59.

Review of Records from Life Time Fitness

34. Agents obtained records from Life Time Fitness related to J. ROBERTS. Records indicated that the account was opened 01/28/2025 in J. ROBERTS' name with Ryan SCHLABS being a partner along with DJ HILLMON and PARKER being secondary members. The account was paid for with a card ending in XX1171 which was assigned to the nursery foundation account. The total amount paid to Life Time Fitness was \$4,650.22.

Review of Records from Glo Tanning

35. Agents obtained records from Glo Tanning related to J. ROBERTS. The company switched management software in November 2024 and could not provide detailed records prior to that. Records indicated that J. ROBERTS executed a waiver on 11/22/2024 and an agreement on 11/7/2025 which proved she had an account. The total amount charged to the nursery account for Glo Tanning between 09/02/2020 and 08/05/2025 was \$3,613.93.

Review of Records from Hidden Hills Cabins

36. Agents obtained records for J. ROBERTS from Hidden Hills Cabins, which was a resort cabin rental company out of Hochatown, Oklahoma. The company provided records including a reservation made on 01/11/2023 for the Evergreen Dreams cabin under J. ROBERT's name, e-mail and phone number for two (2) adults with an anniversary charge. The total amount charged to the nursery foundation account for the cabins between 12/28/2022 and 01/11/2023 was \$800.77.

Review of Oklahoma Department of Corrections Expenditures

37. Agents found charges to the nursery foundation account for Securus and JPay which are systems

that serve incarcerated individuals through phone services, commissary orders and similar programs.

Agent Good received documentation from the Oklahoma Department of Corrections related to J.

ROBERTS profile which consisted of ninety-six (96) pages. There were the following transfers to inmate accounts:

Date	ID	Inmate Name	Amount
11/18/2020	859675	Christopher Roberts	\$50.00
05/05/2022	876450	Ashley Hilderbrand	\$150.00
07/09/2022	876450	Ashley Hilderbrand	\$200.00
12/04/2022	876450	Ashley Hilderbrand	\$100.00
11/25/2023	876450	Ashley Hilderbrand	\$100.00

38. Agent Good knew from the investigation that J. ROBERTS had a brother named Christopher ROBERTS. The total amount charged to the nursery foundation account for Securus and JPay charges for \$550.54.

Review of Records from OKC Psychiatric Services

39. Agents obtained records from OKC Psychiatric Services, 2316 NW 23rd Street, Oklahoma City, related to J. ROBERTS. The records showed thirty-two (32) payments occurring between 09/11/2020 and 03/19/2026. Twenty-three (23) of the payments were made via debit card and nine (9) made via Cash App tied to the nursery. The majority of the transactions were in J. ROBERTS name with one being paid for Christopher ROBERTS. Some of the memo lines in Cash App showed "Jen Roberts copay" or something similar. The total amount paid to this business was \$5,092.99 with most of the transactions linked to the nursery Cash App or foundation account.

Review of Records from Bridgecrest Acceptance Corporation

40. Agent Good learned that Bridgecrest Acceptance Corporation was the primary financing

company for car dealer Carvana. He requested and received records related to J. ROBERTS.

41. The records indicated that J. ROBERTS entered into a loan agreement on 02/27/2021 to purchase a silver 2020 Chevrolet Malibu for \$20,990.00. Agent Good later learned that Kyler JENNINGS had a Chevrolet Malibu that his mother paid for. The registration for this vehicle showed to be in J. ROBERT's name. Agent Good found that \$12,130.00 had been paid for this car from the nursery foundation account.

Review of Documents Related to Avery PARKER's Nissan Sentra

42. Agents obtained records from Service Oklahoma related to check 103 written to Kalidy Kia on 01/07/2023 for \$13,500.00. Records showed that Avery PARKER and her mother, Noel CROW, were co-buyers on a used, silver 2016 Nissan Sentra on that date. The vehicle was titled in both CROW and PARKER's name. None of the official paperwork showed that the vehicle had any relation to the nursery other than the check used to make the purchase.

Interviews with Avery PARKER, Noel CROW and Kyler JENNINGS

43. On 04/06/2026, Noel CROW and Avery PARKER were interviewed at the Oklahoma Attorney General's Office.

44. CROW confirmed PARKER was the long-term girlfriend of J. ROBERTS' son, Kyler JENNINGS. PARKER volunteered at the nursery since she was 15 years old. CROW was a single parent and she and PARKER shared a Lexus SUV when PARKER turned 16 and it placed a strain on commuting for them. J. ROBERTS approached CROW and PARKER around Christmas 2022 explaining that she wanted to buy PARKER a car. It was stated that it would be to repay PARKER for time she had previously committed to the nursery as well as allowing her to make deliveries in the future. J. ROBERTS gave CROW a potential price range of around \$12,000.00 to \$15,000.00. CROW told J. ROBERTS they found a vehicle at Kalidy Kia. CROW met J. ROBERTS and retrieved the check from her used to buy the car. CROW also explained the second check of \$2,000.00 paid directly to her by J. ROBERTS was to cover insurance and wheels on the vehicle. CROW did not know where the vehicle Sentra was currently located. PARKER had since purchased another car in Texas and returned the Sentra to J. ROBERTS.

45. PARKER confirmed that J. ROBERTS would send her and JENNINGS DoorDash with her "personal money." PARKER confirmed that J. ROBERTS took her shopping at various stores and purchased PARKER items. J. ROBERTS purchased PARKER items at Alo. She said she was not with J. ROBERTS when she made purchases at LuluLemon. PARKER did not recall J. ROBERTS making personal purchases at TJMaxx or Target. She recalled "baby bag" items being purchased at these stores. PARKER knew that J. ROBERTS tanned at Glo Tanning. She did not know if J. ROBERTS paid for anyone else to tan. Agent Good reviewed PARKER's received CashApp payments from the nursery. She recalled some of the payments to pick up food, gas, diapers, etc. and J. ROBERTS would pay her back. J. ROBERTS never made PARKER turn in a receipt for reimbursement. There was no established protocol or agreement for repayment. She never asked J. ROBERTS for this money and it would just arrive. PARKER knew that J. ROBERTS had purchased JENNINGS' Chevrolet Malibu through Carvana.

46. Kyler JENNINGS ("JENNINGS") was interviewed on the same date at the same location as PARKER and CROW.

47. He recalled receiving Cash App transactions from his mother for food and subsistence. He did not know that the money was coming from the charity account. He helped move heavy items for the nursery. JENNINGS had his Chevrolet Malibu, which was his primary car, for three or four years. It was Agent Good's understanding that his mother helped pay for this vehicle. His mother would DoorDash food to him from time to time.

Search Warrants Executed in Furtherance of the Investigation

48. Agent Good obtained and executed a search warrant directed to Meta Platforms, Inc. for Facebook accounts affiliated with URLs www.facebook.com/crisisnurseryokc, www.facebook.com/jen.roberts.2929 and www.facebook.com/jnnro. He obtained further warrants that authorized the seizure and search J. ROBERTS' Apple iPhone 15 Pro Max with serial number JX5V77P069 and telephone number (405) 979-0706 and Apple iPhone 15 Pro Max with serial number C20JV2DVTD. It was assigned telephone number (405) 979-0706 with the previously assigned phone number of (405) 551-7636.

Cell Phone Evidence and Record Corroboration for AirBNB Expenditures

49. Agent Good found the following message threads in the Apple iPhone with serial number C20JV2DVTD and cross referenced the records received from AirBNB and the bank account records:

- a. On 10/16/2025, a contact saved as Gary McNETT ("McNETT") told J. ROBERTS she was due to be in Oklahoma City in an hour and asked if she wanted to see him. She responded, "Ugh I so wish I could. I just got to the house and I have Bryce tonight." followed by, "Want me to get you an air bnb?" She sent also sent him, "Let me know if you do. I can book those easily and do usually a few times a month anyways like I told you before. I usually do 2-3 nights though. I just couldn't book that one last night bc it was already booked up till next Tues." along with, "2701 Northwest 63rd Street, Oklahoma City, OK 73116, United States". Agent Good found a charge to the Crisis Nursery foundation bank account on 10/17/2025 for \$217.78, but the records provided by AirBNB did not include this date range. J. ROBERTS followed up with, "The owner messaged me with some info. Will send you that. The one I usually book didn't respond. I haven't booked with this one before but it looks decent and is in a pretty good area. Will be kinda eh more than likely, not a country club neighborhood but definitely safe. And it's only 15 from my house and like 5 mins from Bryce's school in the am."
- b. Agent Good found a conversation between J. ROBERTS and a contact labeled as Zach MARTSON ("MARSTON").
 - i. On 09/12/2022, J. ROBERTS asked, "Do you like broken bow" followed by "Wanna go", "I wanna get out of here" and "This weekend?" J. ROBERTS also sent, "There are a few places I saw earlier. Checking on them now. I'll bring weed. Lol we can just go there and chill tf out."
 - ii. MARSTON asked how much it would cost and she replied "None ya" followed by, "It will be my treat and you won't argue. I just want to get away. May just do one night...I think check in is at 3. You could drive to okc Saturday and we

could ride together and take the hoe. Come back Sunday..." This indicated that J. ROBERTS intended to use the Tahoe which was supposed to be used for the nursery. MARSTON seemed shocked at the price and J. ROBERTS bragged, "I spent \$700 at target today". He agreed to go and she replied, "Booked".

- iii. Agent Good found a charge to AirBNB on 09/13/2022 under J. ROBERTS' AirBNB account at 67 Green Persimmon Trail, Broken Bow, Oklahoma for \$623.00. The charge was made on a card ending in XX6883 which was tied to the crisis nursery foundation account.

50. The conversations with McNETT and MARSTON appeared that both were love interests for J. ROBERTS.

Summary of Personal Financial Expenditures Billed to the Nursery

51. Agent Good summarized some of the personal financial expenditures billed to the nursery bank and other accounts.

Charge	Amount
Various Nail Salons	\$10,502.50
Medical Aesthetic Spas	\$14,156.59
Life Time Fitness	\$4,650.22
Glo Tanning	\$3,613.93
Various Inmate Services	\$2,271.08
OKC Psychiatric Services	\$5,092.99
Hidden Hills Cabins	\$800.77
Personal Chevrolet Malibu	\$12,130.00
Avery PARKER's Nissan Sentra	\$15,500.00
Personal AirBNB Bookings	\$840.78
Total	\$69,558.86

52. This is not comprehensive accounting, but merely an itemized list necessary to establish probable cause that the crime was committed and J. ROBERTS committed the crime.

Ct 2: Solicit or Collect Charitable Contributions by Use or Involving a False Promise or Scheme

53. Public facing Facebook posts showed that J. ROBERTS was in control of and utilized the account affiliated with URL www.facebook.com/crisisnurseryokc to solicit donations to the charity. Some of the conversation excerpts from the search warrant included the following:

- a. A conversation between the account and a user named Farrah CHRISTIAN at account number 1662992170 between 02/14/2025 and 02/16/2025. The user was asking for a receipt for tax deduction purposes.
- b. Agent Good located another conversation between the account and a user named Angela SLAYTON at account number 1521370420 between 01/17/2025 and 12/17/2025.

Excerpts of the conversation are as follows:

- i. SLAYTON - "Hi! I did a donation in December for \$500. I don't have the tax receipt yet. Is it possible to get it? It was on 12/22 for \$500." - 01/17/2025
- ii. Crisis Nursery - "Hello! Can you please send an email to info@crisisnurseryokc.com and they will send one right back to you! Thank you for your support." - 01/17/2025
- iii. SLAYTON - "Is it still an option for a tax receipt for donations?" - 12/17/2025
- iv. Crisis Nursery - "Yes" - 12/17/2025

54. Agent Good reviewed the Internal Revenue Service 501(c)(3) status for the nursery and found that it was posted revoked on 08/12/2024 and dated revoked on 05/15/2024. As previously established, J. ROBERTS was the registered person for the 501(c)(3) status and would have been aware of the loss of status when promising individuals the donations were tax exempt.

55. Agent Good found conversations with J. ROBERTS and her brother, Christopher ROBERTS in the Apple iPhone 15 Pro Max with serial number JX5V77P069. J. ROBERTS was attempting to obtain pills, namely Hydrocodone Acetaminophen and Adderall, from C. ROBERTS. In part, J. ROBERTS wrote the following:

- a. On 08/14/2025, J. ROBERTS sent, "I haven't gotten any new donations today and don't have any to give you for the others but I will as soon as I can."
- b. On 08/15/2025, J. ROBERTS sent, "There aren't any donations coming in at all today and I can't post on social media for another week because they will blow me up about not being able to volunteer. So I'm broke broke unless something comes through this

weekend. But I'll pay you eventually for helping me. If you have anymore whites I'll take them. It will just be a day or so before I can."

56. It appeared from the content of the messages that J. ROBERTS was misleading donors into believing donations were tax deductible as well as soliciting and collecting donations for, among multiple other reasons, purchasing drugs from her brother.

Ct 3: False Preparation of Exhibits as Evidence

Ct 4: Conspiracy to Commit a Felony; to-wit – False Preparation of Exhibits as Evidence

Ct.5: Violation of the Oklahoma Computer Crimes Act

57. Agent Good reviewed data seized through a search warrant in the Facebook account affiliated with the URL www.facebook.com/jnnro. The user provided ROBERTS' known date of birth and that she was from Wichita Falls, Texas. The records also indicated that she was the founder and executive director of OKCity Crisis Nursery. Her family showed Kyler JENNINGS and Kaleb ROBERTS as her sons, her sister as Chelsea FOWLER and mother as Myra HARGROVE.

58. Agent Good located a conversation between ROBERTS and a user named Tyler MANESS at account number 502645720 that happened between 09/23/2025 and 09/24/2025. Excerpts of the conversation are as follows:

- a. MANESS - "Hey Jennifer, hope you're doing well. I'm in a bit of a tough spot and was wondering if Crisis Nursery might be open to helping. I've been offered a deal from the DA to dismiss a trespassing charge (total misunderstanding tied to a drone job where the producer lied to me about permissions, after this is clear, my legal team is Suing), and part of that deal includes completing 40 hours of community service before October 9. That's proving nearly impossible between running multiple businesses, homeschooling my daughter, moving our home, closing our salons, our recent miscarriage and life in general. Would your organization be open to allowing a donation in exchange for some or all of those hours? Totally understand if that's not something you offer, just figured I'd ask. Appreciate you either way and thank you for everything you do."
- b. J. ROBERTS - "I've got you"

- c. J. ROBERTS - "Just send me the dates you need to have on there and I'll have them make it for you today"
- d. MANESS - "You'd be helping me out tremendously. Let me know what you guys need and we can donate or venmo/donate however"
- e. ROBERTS - "You don't need to do that!"
- f. MANESS - "tylermaness22@gmail.com"
- g. ROBERTS - "Just need the dates you want on there and total number of hours, etc"
- h. MANESS - "perfect, send it here?"
- i. ROBERTS - "Have a friend that helps me with those."
- j. ROBERTS - "If anyone asks you helped move furniture, donation overflow to storages, deliveries of beds to families, etc."
- k. MANESS - "even my legal said "they never actually verify" lmfap"

59. Agent Good noted that MANESS was charged in Oklahoma County District Court case CM-2025-1526 for one count of trespassing. His case was dismissed on 10/09/2025 based upon "proof of completion." Agent Good spoke with the Assistant District Attorney and confirmed this was due to MANESS presenting proof of community service completion with OKCity Crisis Nursery.

Ct. 6: Endeavoring to Distribute a Schedule II Controlled Dangerous Substance
Ct. 7: Unlawful Use of a Telecommunication Facility to Violate the UCDSA

60. Agent Good found a conversation between J. ROBERTS and Kaleb ROBERTS in the Apple iPhone 15 Pro Max with serial number C20JV2DVTD.

61. J. ROBERTS sent a message to K. ROBERTS that read, "On 02/24/2025, J. ROBERTS sent, "Can you put 6 of those adderall out for Angela please" and "There are 10 in the bottle but just take 4 out and put the bottle in the mailbox".

62. On 03/15/2025, J. ROBERTS said she needed to run by and get an Adderall. She asked if K. ROBERTS still had some and he confirmed he did. It appeared she was going to get the drug from him.

63. Agent Good knew that Adderall was the brand name for a drug that contained amphetamines

dextroamphetamine saccharate, amphetamine aspartate, dextroamphetamine sulfate, and amphetamine sulfate and is a Schedule II controlled dangerous substance. J. ROBERTS utilized her cell phone to facilitate the distribution.

64. He also made observations of J. ROBERTS purchasing Adderall and other controlled substances utilizing the phones on multiple occasions.

Ct. 8: Engaging in Transactions Involving Proceeds to Be Used in Furtherance of Violating the UCDSA

65. Agent Good found and built a conversation with "mom" at telephone number (405) 905-1314 in the Apple iPhone 15 Pro Max with serial number JX5V77P069. Agent Good found that J. ROBERTS had listed this telephone number as belonging to her mother, Myra HARGROVE, in records from City National Bank.

66. On 12/26/2020, J. ROBERTS and mom discuss likely getting pain pills from a person named "Sherry". J. ROBERTS requested mom contact "Sherry" and find out how many she had. Mom replied, "She will have 280 on the 1st. Friday. We must pay for them ASAP because it's first come. I told her you would be sending her money today. I have 15 extra Percs you can use til Friday." J. ROBERTS agreed to get 100 for \$6 a piece. "Percs" was shortened for Percocet which the brand name for oxycodone and acetaminophen, a Schedule II controlled dangerous substance.

67. On 01/05/2025, Mom sent, "I'm heading to OKC in the morning for my appt. Do you need anything from Shari or Hannah?" to which J. ROBERTS replied, "I hate having to spend \$15 a piece but may have to get some adderall. Just see if she can do 20 please" followed by "Lauren took so many of mine this time. Damn it." Mom sent, "Yes she had some. (300 of them). Send me the money" followed by "I'm about to go to bed so if you want those send the money so I can send it to Shari on Zelle." Mom directed J. ROBERTS to send the money on Venmo. Mom sent back, "Got it. Just sent it to Shari. I'm meeting Mel around 10:45 so if I have time before my appt I will bring them to you. If not it will be after my doctor appt." Mom followed it up with, "I just picked them up from Shari. These are round pink not oval. Shari was not there, but Mel said that's the only kind she has so I'm bringing those." Mom also

received coaching from J. ROBERTS on how to approach her doctor for Adderall. Agent Good found a \$320.00 transfer to Myra HARGROVE, who was known to be J. ROBERTS' biological mother, on 01/06/2025. The remark read "diapers".

68. On 03/19/2025, J. ROBERTS asked mom if the doctor would call in her Adderall or if she had to do an office visit for that. Mom replied, "Yes the first time you have to be seen. I have 30 from Chris. He has 15 more. I'm physically getting them now." J. ROBERTS explained she paid for 30. Mom replied, "I know. Paying his doctor so you get them." Mom then asked, "Chris is asking if you want to buy the other 15? He needs rent money lol" later followed by, "Any norco? He just got those also" J. ROBERTS said she thought she would be able to make that purchase. There was a \$300.00 Cash App to Christopher ROBERTS from the Crisis Nursery account on 03/04/2025 without a remark followed by a transfer of \$40.00 on 03/21/2025.

69. On 08/18/2025, Mom sent, "Kenny will have some Norco in a week also. I told him I will buy his. They are 6 each. He sold the shots for \$200 per box. I got 2 boxes. Should be good for a while. I can get 7.5 next time from Nancy and we can rotate them all."

70. On 10/23/2025, Mom sent, "I'm heading to Kenny's. I need some money". J. ROBERTS offered to send it either PayPal or Venmo. He located a Venmo transfer to Myra HARGROVE on 10/23/2025 for \$200.00 with a remark that read "formula". J. ROBERTS told mom same date, "I'm making a post tonight and Sunday."

Count 9: Violation of the Oklahoma Racketeer-Influenced Corrupt Organization Act

71. Paragraphs 1 through 70 are incorporated by reference.

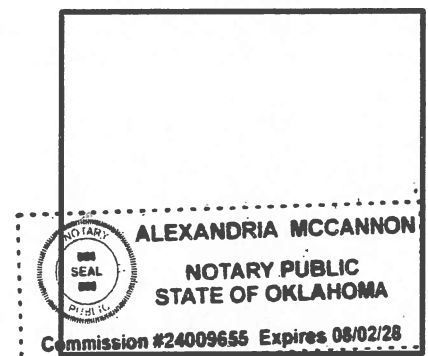
72. It is consistent with Agent Good's law enforcement training and experience coupled with the evidence that J. ROBERTS exercised control of the nursery, lawfully incorporated charitable entity, from its inception and through the investigation. Through that control, J. ROBERTS committed multiple distinct violations of law including counts 1 through 8 over a period of years which are all predicate offenses to violating the Oklahoma Racketeer-Influenced Corrupt Organization Act.

All of which is sworn to upon my oath. Your Affiant prays the Honorable Court, upon the finding of probable cause, issue an arrest warrant for the defendant.


Adam M. Good
Supervisory Agent
Oklahoma Attorney General's Office

State of Oklahoma)
)
County of Oklahoma)

Subscribed and Sworn to before this me this 07/23/26.
My Commission Number is 24009655.
My Commission expires 08/02/28.
Notary Public Alexandra McCannon.



IN THE DISTRICT COURT SITTING IN AND FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
OKLAHOMA COUNTY

STATE OF OKLAHOMA

Plaintiff

VS.

JENNIFER LYNN ROBERTS

Defendant

)
)
)
)
)
)
)

JUL 24 2026

RICK WARREN
COURT CLERK

Case No. 80

CPC-26-6234

FINDING OF PROBABLE CAUSE

I, the undersigned Judge having jurisdiction in Oklahoma County, Oklahoma, have reviewed the attached Affidavit and have found probable cause to issue an arrest warrant in counts 1 2 3 4 5 6 7 8 9 as alleged in the Affidavit for the defendant. I further set bail for the offense(s) in the amount of

\$ 50,000

Done this 24 day of July, 2024 at 11:01a M at Oklahoma City, Oklahoma.

JUDGE OF THE OKLAHOMA COUNTY DISTRICT COURT

CERTIFIED COPY
AS FILED OF RECORD
IN DISTRICT COURT

JUL 24 2026

RICK WARREN COURT CLERK
Oklahoma County