

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

CALEB IBRAHAM MOHAMED ALI,
DOB: 02/21/1981
SSN: XXX-XX-6557

ERIKA JEANNINE WATSON,
DOB: 04/15/1983
SSN: XXX-XX-2705

DOMINIQUE TESHAWN PRICE,
DOB: 10/09/1992
SSN: XXX-XX-9182

AMBER MICHELLE SMITH,
DOB: 01/28/1990
SSN: XXX-XX-6157

AARON WAYNE HENSLEY,
DOB: 06/10/1984
SSN: XXX-XX-4936

JESUS EARL MARTINEZ, JR.,
DOB: 07/20/1978
SSN: XXX-XX-4739

Defendants.

Case No. CF-²⁰²⁶~~2025~~-236

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

MAY 14 2026

RICK WARREN
COURT CLERK

80 _____

SUPERCEDING INDICTMENT

FOR:

- COUNT 1: CONSPIRACY TO COMMIT FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 421, a FELONY
- COUNT 2: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED
INSTRUMENT ~ 21 O.S. § 1577, a FELONY
- COUNT 3: FALSE PERSONATION OF ANOTHER ~ 21 O.S. § 1531(3), a FELONY
- COUNT 4: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED
INSTRUMENT ~ 21 O.S. § 1577, a FELONY

- COUNT 5: ILLEGAL ACTS RELATING TO IDENTIFICATION CARDS ~ 21 O.S. § 1550.41, a FELONY**
- COUNT 6: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY**
- COUNT 7: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY**
- COUNT 8: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY**
- COUNT 9: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY**
- COUNT 10: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. § 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 Twenty-First Multi-County Grand Jury of Oklahoma was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from December 16, 2024, for eighteen (18) months, or until the designated presiding judge determines the Twenty-First 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 FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 421, a FELONY**

On or about or between December 8, 2023, and August 3, 2025, the crime of **CONSPIRACY TO COMMIT A FELONY, TO WIT: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was committed by **CALEB ALI, ERIKA WATSON, DOMINIQUE PRICE, AMBER SMITH, AARON HENSLEY, JESUS MARTINEZ, JR.**, and Jennifer Wilkins in Oklahoma County and other counties, who conspired with one another, by agreeing to intentionally exchange fraudulent checks to various Walmart Supercenter retail stores, located in Oklahoma City, Midwest City, Norman, Chandler, Glenpool, Edmond, Mustang, Yukon, Broken Arrow, Moore, Pryor, Claremore, Sand Springs, Stillwater, Warr Acres, Newcastle, Weatherford, Elk City, Shawnee, Purcell, and Lawton, for money. More particularly, this scheme included a common design by which one or more members of the conspiracy would create a fraudulent check and fraudulent temporary driver's license, present the check and license to Walmart, and receive money in exchange for the check, acts which were in violation of Sections 1577 of Title 21, in a conspiracy that was contrary to the provisions of Section 421 of Title 21 and against the peace and dignity of the State of Oklahoma.

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

- a. On or about December 8, 2023, and August 3, 2025, **ERIKA WATSON** created and provided fraudulent temporary driver's licenses and fraudulent checks to **CALEB ALI, DOMINIQUE PRICE, AMBER SMITH, AARON HENSLEY, JESUS MARTINEZ, JR.**, and Jennifer Wilkins, to be presented at various Walmart Supercenters in exchange for money.
- b. On or about November 6, 2024, and June 14, 2025, **CALEB ALI** received fraudulent temporary driver's licenses and fraudulent checks from **ERIKA WATSON** and intentionally exchanged over thirty (30) fraudulent checks to

various Walmart Supercenters, for money with an aggregate value of \$15,000.00 or more, known by **CALEB ALI**, to be false.

- c. On or about November 10, 2024, and February 9, 2025, **DOMINIQUE PRICE** received fraudulent temporary driver's licenses and fraudulent checks from **ERIKA WATSON** and **CALEB ALI** and intentionally exchanged over ten (10) fraudulent checks to various Walmart Supercenters, for money with an aggregate value of \$10,000.00 or more, known by **DOMINIQUE PRICE**, to be false.
- d. On or about November 11, 2024, and February 13, 2025, **AMBER SMITH** received fraudulent temporary driver's licenses and fraudulent checks from **ERIKA WATSON**, **CALEB ALI**, and **AARON HENSLEY** and intentionally exchanged over seven (7) fraudulent checks to various Walmart Supercenters, for money with an aggregate value of \$7,000.00 or more, known by **AMBER SMITH**, to be false.
- e. On or about December 8, 2023, and January 26, 2025, **AARON HENSLEY** produced and/or received fraudulent temporary driver's licenses and fraudulent checks from **ERIKA WATSON** and intentionally exchanged over eleven (11) fraudulent checks to various Walmart Supercenters, for money with an aggregate value of \$11,000.00 or more, known by **AARON HENSLEY**, to be false.
- f. On or about December 13, 2024, and August 3, 2025, **JESUS MARTINEZ, JR.** received fraudulent temporary driver's licenses and fraudulent checks from **AMBER SMITH**, who was working in concert and together with **ERIKA WATSON**, **AARON HENSLEY**, and Jennifer Wilkins, and intentionally exchanged over nine (9) fraudulent checks to various Walmart Supercenters, for money with an aggregate value of \$9,000.00 or more, known by **JESUS MARTINEZ, JR.**, to be false.

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 2: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

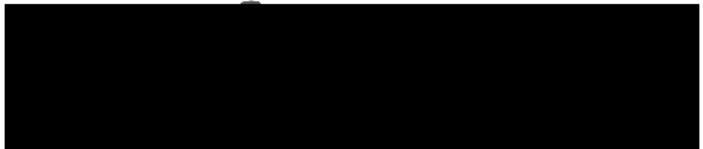
On or about or between November 6, 2024, and April 5, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **CALEB ALI** in Oklahoma County and other counties, by exchanging over thirty (30) fraudulent checks to various Walmart Supercenters, located in Oklahoma City, Midwest City, Norman, Chandler, Glenpool, Edmond, Mustang, Yukon, Kingfisher, Broken Arrow, Moore, Claremore, Pryor, Sand Springs, and Stillwater, for money with an aggregate value of \$15,000.00 or more, known by **CALEB ALI**, to be false, and which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 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 3: FALSE PERSONATION OF ANOTHER ~ 21 O.S. § 1531(3), a FELONY

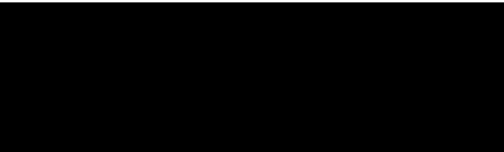
On or about March 5, 2025, in Cleveland County, Oklahoma, the crime of **FALSE PERSONATION OF ANOTHER** was feloniously committed by **CALEB ALI**, who falsely assumed the identity of Clint Charles Johnson by presenting a fraudulent temporary Driver's License to an employee at Walmart Supercenter located at 640 SE 4th Street, Moore, Oklahoma 73160, knowing that said temporary driver's license was fraudulent, thereby intentionally impersonating Clint Charles Johnson's identity, and that under such false identity, **CALEB ALI** presented a written instrument, to wit: a fraudulent check that contained Clint Charles Johnson's information, with the intent that the check be received and processed as true, contrary to the provisions of Section 1531(3) of Title 21 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: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

On or about or between November 6, 2024, and August 3, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **ERIKA WATSON** in Oklahoma County and other counties, in concert and together with **CALEB ALI, ERIKA WATSON, DOMINIQUE PRICE, AMBER SMITH, AARON HENSLEY, JESUS MARTINEZ, JR.**, and Jennifer Wilkins, by aiding and abetting in the exchange of over one hundred (100) fraudulent checks, created and known by **ERIKA WATSON** to be false, that were presented to various Walmart Supercenters, located in Oklahoma City, Midwest City, Norman, Chandler, Glenpool, Edmond, Mustang, Yukon, Broken Arrow, Moore, Pryor, Claremore, Sand Springs, Stillwater, Warr Acres, Newcastle, Weatherford, Elk City, Shawnee, Purcell, and Lawton, for money with an aggregate value of \$100,000.00 or more which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 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: ILLEGAL ACTS RELATING TO IDENTIFICATION CARDS ~ 21 O.S. § 1550.41, a FELONY

On or about or between December 8, 2023, and August 3, 2025, the crime of **ILLEGAL ACTS RELATING TO IDENTIFICATION CARDS**, was willfully and feloniously committed by **ERIKA WATSON** and **CALEB ALI** in Oklahoma County, who created, published, or otherwise manufactured identification documents, which purported to identify the bearer of such documents, that being temporary driver licenses, in order to utter fraudulent checks at various Walmart Supercenters, located in Oklahoma City, Midwest City, Norman, Chandler, Glenpool, Edmond, Mustang, Yukon, Broken Arrow, Moore, Pryor, Claremore, Sand Springs, Stillwater, Warr Acres, Newcastle, Weatherford, Elk City, Shawnee, Purcell, and Lawton, in order to receive money by fraud from the various stores, contrary to the provisions of Section 1550.41 of Title 21 and against the peace and dignity of the State of Oklahoma.

TRUE BILL

(X)

NO BILL

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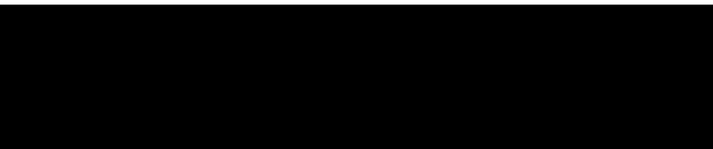
OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 6: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

On or about or between October 11, 2024, and February 9, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **DOMINIQUE PRICE** in Oklahoma County and other counties, by exchanging over ten (10) fraudulent checks to various Walmart Supercenters, located in Oklahoma City, Mustang, Yukon, and Warr Acres, for money with an aggregate value of \$10,000.00 or more, known by **DOMINIQUE PRICE** to be false, and which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 and against the peace and dignity of the State of Oklahoma.

TRUE BILL ()

NO BILL ()



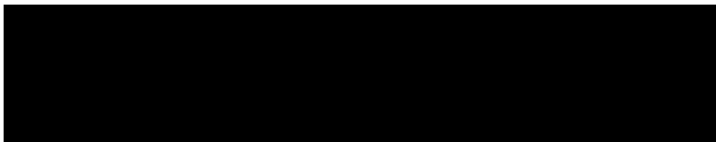
OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 7: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

On or about or between November 11, 2024, and February 13, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **AMBER SMITH** in Oklahoma County and other counties, by exchanging over seven (7) fraudulent checks to various Walmart Supercenters, located in Oklahoma City, Norman, Glenpool, and Edmond, for money with an aggregate value of \$7,000.00 or more, known by **AMBER SMITH**, to be false, and which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 and against the peace and dignity of the State of Oklahoma.

TRUE BILL (X)

NO BILL ()



OKLAHOMA MULTICOUNTY GRAND JURY

COUNT 8: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

On or about or between December 8, 2023, and January 26, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **AARON HENSLEY** in Oklahoma County and other counties, by exchanging over eleven (11) fraudulent checks to various Walmart Supercenters, located in Newcastle, Oklahoma City, Midwest City, Norman, Edmond, Mustang, and Moore, for money with an aggregate value of \$11,000.00 or more, known by **AARON HENSLEY**, to be false, and which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 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 9: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT ~ 21 O.S. § 1577, a FELONY

On or about or between December 13, 2024, and August 3, 2025, the crime of **FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT**, was intentionally and feloniously committed by **JESUS MARTINEZ, JR.** in Oklahoma County and other counties, by exchanging over nine (9) fraudulent checks to various Walmart Supercenters, located in Oklahoma City, Edmond, Moore, Pryor, Elk City, and Weatherford, for money with an aggregate value of \$9,000.00 or more, known by **JESUS MARTINEZ, JR.**, to be false, and which was the direct result of a formulation of a plan or scheme to take or divert money on a recurring basis, contrary to the provisions of Section 1577 of Title 21 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: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. § 425, a FELONY

On or about or between December 8, 2023, and August 3, 2025, the crime of **ENGAGING IN A PATTERN OF CRIMINAL OFFENSES** was feloniously committed by **CALEB ALI, ERIKA WATSON, DOMINIQUE PRICE, AMBER SMITH, AARON HENSLEY,** and **JESUS MARTINEZ, JR.,** by perpetrating criminal offenses – including the crimes of Conspiracy to Commit Forgery in the Second Degree, Forgery in the Second Degree and/or False Personation of Another – in two or more counties in the State of Oklahoma, with said offenses occurring in Oklahoma County, Cleveland County, Lincoln County, Tulsa County, Canadian County, Kingfisher County, Mayes County, McClain County, Custer County, Beckham County, Comanche County, Pottawatomie County, and Payne County, with such offenses being committed as part of the same plan, scheme, or adventure, and/or with such offenses each proceeding from or having antecedent a single prior incident or pattern of fraud, theft, false pretenses, and forgery. These acts constituted a pattern of criminal offenses 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

PAGE 2 SUPERSEDING INDICTMENT

BE IT FURTHER STATED THAT THE OFFENSES OF:

*COUNT 1: CONSPIRACY TO COMMIT FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT;*

*COUNT 2: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED
INSTRUMENT;*

COUNT 3: FALSE PERSONATION OF ANOTHER

COUNT 5: ILLEGAL ACTS RELATING TO IDENTIFICATION CARDS;

COUNT 10: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

AS CHARGED IN THE INDICTMENT IN THIS CASE WERE COMMITTED BY THE
DEFENDANT **CALEB IBRAHAM MOHAMMED ALI** NAMED THEREIN, AFTER HAVING
BEEN CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT:

*OBTAINING PROPERTY BY USE OF FALSE RETAIL LABEL (COUNT 1); ON THE 5TH DAY
OF SEPTEMBER 2014, IN THE DISTRICT COURT OF LOGAN COUNTY STATE OF
OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2013-303.*

*BAIL JUMPING (COUNT 1); ON THE 5TH DAY OF SEPTEMBER 2014, IN THE DISTRICT
COURT OF LOGAN COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT
CASE NUMBER CF-2014-260.*

*USE OF UNIVERSAL PRICE CODE LABEL TO COMMIT THEFT (COUNT 1); OBTAINING
SIGNATURE UNDER FALSE PRETENSES (COUNT 2); ON THE 29TH DAY OF APRIL 2015, IN
THE DISTRICT COURT OF TULSA COUNTY STATE OF OKLAHOMA, THE SAME BEING
DISTRICT COURT CASE NUMBER CF-2015-1107.*

*UTTERING TWO OR MORE BOGUS CHECKS IN THE AMOUNT OF \$500.00 OR MORE
(COUNT 1); ON THE 23RD DAY OF NOVEMBER 2015, IN THE DISTRICT COURT OF*

OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2008-5106.

TRANSFERRING A UNIVERSAL PRICE CODE LABEL WITH THE INTENT TO DEFRAUD (COUNT 1); ON THE 23RD DAY OF NOVEMBER 2015, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2015-265.

GRAND LARCENY (COUNT 1); LARCENY OF MERCHANDISE FROM A RETAILER (COUNT 2); ON THE 24TH OF APRIL 2025, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2024-2657.

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

SUPERSEDING INDICTMENT

BE IT FURTHER STATED THAT THE OFFENSES OF:

*COUNT 1: CONSPIRACY TO COMMIT FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT;*

*COUNT 6: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED
INSTRUMENT;*

COUNT 10: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

AS CHARGED IN THE INDICTMENT IN THIS CASE WERE COMMITTED BY THE
DEFENDANT **DOMINIQUE TESHAWN PRICE** NAMED THEREIN, AFTER HAVING
BEEN CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT:

*DOMESTIC ABUSE BY STRANGULATION (COUNT 1); ON THE 30TH DAY OF MARCH 2020,
IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME
BEING DISTRICT COURT CASE NUMBER CF-2018-4293.*

*DOMESTIC ABUSE AFC (COUNT 1); ON THE 30TH DAY OF MARCH 2020, IN THE DISTRICT
COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT
COURT CASE NUMBER CF-2019-4781.*

*DOMESTIC ABUSE AFC (COUNT 1); ON THE 30TH DAY OF MARCH 2020, IN THE DISTRICT
COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT
COURT CASE NUMBER CF-2020-775.*

*DOMESTIC ASSAULT AND BATTERY BY STRANGULATION (COUNT 1); DOMESTIC ABUSE
(COUNT 2); ON THE 26TH DAY OF AUGUST 2020, IN THE DISTRICT COURT OF
OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE
NUMBER CF-2020-2891.*

THROW OR DROP OBJECT ON MOTOR VEHICLE (COUNT 1); ON THE 24TH DAY OF NOVEMBER 2025, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2025-5007.

TRUE BILL (K)
NO BILL ()



OKLAHOMA MULTICOUNTY GRAND JURY

IN THE SUPREME COURT OF THE
STATE OF OKLAHOMA

PAGE 2

SUPERSEDING INDICTMENT

BE IT FURTHER STATED THAT THE OFFENSES OF:

*COUNT 1: CONSPIRACY TO COMMIT FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT;*

*COUNT 7: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED
INSTRUMENT;*

COUNT 10: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

AS CHARGED IN THE INDICTMENT IN THIS CASE WERE COMMITTED BY THE
DEFENDANT **AMBER MICHELLE SMITH** NAMED THEREIN, AFTER HAVING BEEN
CONVICTED OF THE FOLLOWING CRIMES PUNISHABLE BY IMPRISONMENT:

*POSSESSION OF A FIREARM WHILE ON PROBATION FOR A FELONY (COUNT 1); ON THE
31ST DAY OF AUGUST 2016, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF
OKLAHOMA, THE SAME BEING DISTRICT COURT CASE NUMBER CF-2016-427.*

TRUE BILL

(X)

NO BILL

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OKLAHOMA MULTICOUNTY GRAND JURY

IN THE SUPREME COURT OF THE
STATE OF OKLAHOMA

PAGE 2

SUPERSEDING INDICTMENT

BE IT FURTHER STATED THAT THE OFFENSES OF:

*COUNT 1: CONSPIRACY TO COMMIT FORGERY IN THE SECOND DEGREE –
UTTERING A FORGED INSTRUMENT;*

COUNT 4: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT

COUNT 9: FORGERY IN THE SECOND DEGREE – UTTERING A FORGED INSTRUMENT

COUNT 10: ENGAGING IN A PATTERN OF CRIMINAL OFFENSES;

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

*VIOLATION OF PROTECTIVE ORDER – SUBSEQUENT OFFENSE (COUNT 1); ASSAULT
AND BATTERY – DOMESTIC – 2ND OFFENSE (COUNT 3); ON THE 14TH DAY OF FEBRUARY
2020, IN THE DISTRICT COURT OF TULSA COUNTY STATE OF OKLAHOMA, THE SAME
BEING DISTRICT COURT CASE NUMBER CF-2017-4913.*

*UNAUTHORIZED USE OF A MOTOR VEHICLE (COUNT 1); ON THE 4TH DAY OF MARCH
2025, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE
SAME BEING DISTRICT COURT CASE NUMBER CF-2024-3249.*

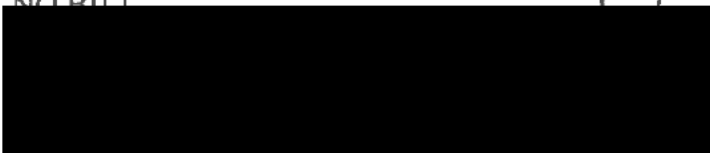
*FELON IN POSSESSION OF A FIREARM AFCF (COUNT 1); ON THE 4TH DAY OF MARCH
2025, IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA, THE
SAME BEING DISTRICT COURT CASE NUMBER CF-2025-1765.*

TRUE BILL

(X)

NO BILL

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FOREMAN
Witnesses Appeared Before the Grand Jury

Agent Douglas Frost – Office of the Oklahoma Attorney General

Jennifer Wilkins – c/o Office of the Oklahoma Attorney General

CERTIFIED COPY
AS FILED OF RECORD
IN DISTRICT COURT

MAY 14 2026

RICK WARREN COURT CLERK
Oklahoma County

Rick Warren