IN THE DISTRICT COURT OF OSAGE COUNTY

STATE OF OKLAHOMA

TERRY YORK,

Plaintiff,

v.

OSAGE COUNTY, OKLAHOMA;

BART PERRIER, individually and in his official capacity to the extent permitted by law;

BILLY WAKEFIELD, individually;

JOHN CUMMINGS, individually;

JOHN DOES 1–10,

Defendants.

Court Clerk Osage County, OK
OCT - 9 2026

Case No. CJ-26-231

PETITION

Plaintiff Terry York, appearing pro se, alleges as follows:

I. PARTIES

1. Plaintiff Terry York is a resident of Osage County, Oklahoma.

2. Defendant Osage County, Oklahoma, is a political subdivision of the State of Oklahoma.

3. Defendant Bart Perrier was the Sheriff of Osage County during the relevant events.

4. Defendant Billy Wakefield served as Undersheriff of the Osage County Sheriff's Office during the relevant events.

5. Defendant John Cummings served as Chief Deputy of the Osage County Sheriff's Office during the relevant events.

6. Plaintiff names Perrier, Wakefield, and Cummings individually for their own alleged conduct, subject to applicable Oklahoma law, immunities, and defenses. Official-capacity allegations are asserted only to the extent permitted by law.

7. Defendants John Does 1–10 are individuals whose identities and respective roles are not yet fully known to Plaintiff. Plaintiff seeks leave to identify and name these individuals as permitted by the Oklahoma Pleading Code and applicable court rules.

8. Plaintiff alleges that Defendants and the Doe Defendants participated in, directed, or had relevant knowledge of the events described below. The scope of employment, individual participation, immunity, and liability of each Defendant are subject to applicable law and evidence.

II. JURISDICTION AND VENUE

9. This action arises under Oklahoma law. Plaintiff seeks relief only on claims and theories for which a legal basis exists under applicable law.

10. Plaintiff alleges that venue is proper in Osage County because the events at issue occurred, in whole or in part, in Osage County and involved the operation and personnel of the Osage County Sheriff's Office.

III. GOVERNMENTAL TORT CLAIMS ACT NOTICE

11. Plaintiff submitted a governmental tort claim notice under the Oklahoma Governmental Tort Claims Act, 51 O.S. §§ 151 et seq., concerning injuries and losses arising from the events described in this Petition.

12. The notice concerned the conduct and circumstances underlying Plaintiff's allegations, to the extent described in the notice actually submitted.

13. Plaintiff alleges that his governmental tort claim was denied on or about April 22, 2026.

14. Plaintiff asserts claims against Osage County only to the extent that the claims satisfy the notice, presentment, timing, waiver, and other requirements of the Oklahoma Governmental Tort Claims Act.

15. Plaintiff does not seek to impose liability on the County for conduct or damages barred by the Act or other applicable law.

IV. FACTUAL ALLEGATIONS

A. Plaintiff's Employment and Good-Faith Reports

16. Plaintiff was employed by the Osage County Sheriff's Office during the relevant period.

17. During his employment, Plaintiff became aware of matters that he believed involved misconduct, policy violations, investigative irregularities, deficient work practices, or other concerns affecting the Sheriff's Office.

18. Plaintiff raised concerns with supervisory personnel, including Chief Deputy John Cummings and Sheriff Bart Perrier.

19. Plaintiff made the reports in good faith based on his understanding of the events and his responsibilities as a law-enforcement employee.

20. Plaintiff's concerns included investigative practices, personnel conduct and performance, the handling of reports and cases, and the accuracy and integrity of information used in law-enforcement decisions.

21. Plaintiff believed that addressing these concerns was important to the proper operation of the Sheriff's Office, public trust, and the integrity of law enforcement.

B. Investigation, Suspension, and Termination

22. After Plaintiff raised his concerns, he became the subject of an investigation and was suspended and ultimately terminated from employment.

23. Chief Deputy John Cummings conducted or directed aspects of the investigation, according to Plaintiff's understanding.

24. Before Plaintiff was suspended, Sheriff Bart Perrier allegedly offered Plaintiff's position to Shane Rhames.

25. Plaintiff alleges that Perrier's offer to Rhames occurred before Plaintiff's suspension and before the investigation had concluded. Plaintiff contends that the timing is relevant to whether the outcome of the investigation and Plaintiff's continued employment had already been contemplated or decided in advance.

26. Plaintiff alleges that the offer raises questions about the impartiality of the investigation, whether decision-makers fairly considered evidence favorable to Plaintiff, and whether the investigation was conducted to objectively determine the facts or to support an outcome that had already been contemplated.

27. Plaintiff offers this allegation as evidence relevant to the sequence of events, the decision-makers' intentions, and the reasons for his subsequent suspension and termination.

28. Plaintiff alleges that the investigation appeared to reach or favor a predetermined outcome rather than fairly evaluate all material evidence and competing accounts.

29. Plaintiff alleges that relevant information was ignored or inadequately considered, including the chronology and prior dissemination of information later attributed to Plaintiff.

30. Plaintiff alleges that the investigation relied on hearsay or secondhand accounts without adequate verification, examination of original sources, or consideration of contrary evidence.

31. Plaintiff alleges that relevant witnesses were not adequately interviewed or considered.

32. Plaintiff alleges that material evidence and circumstances were omitted, overlooked, or inadequately evaluated.

33. Plaintiff alleges that he did not receive written notice before an investigative interview, contrary to his understanding of applicable policies or established practices.

34. Plaintiff alleges that investigative policies and procedures were not adequately followed and that conclusions were reached without a fair assessment of the available facts.

35. Plaintiff alleges that these deficiencies contributed to adverse employment actions and resulted in an incomplete or inaccurate account of the circumstances relied upon against him.

C. Prior Disclosure and Discussion of Information Before Justin Caffey Contacted Plaintiff

36. Information later attributed to Plaintiff had allegedly been disclosed or discussed by other individuals before Justin Caffey contacted Plaintiff.

37. Plaintiff alleges that he was not the original source of all information later attributed to him.

38. Andrew Minson disclosed relevant information during a training class before Caffey contacted Plaintiff.

39. This disclosure allegedly occurred before Plaintiff had any contact with Caffey concerning the information at issue.

40. Andrew Minson and Brady Reed also discussed an internal investigation involving Deputy Bradley before Caffey contacted Plaintiff.

41. Plaintiff alleges that Deputy Bradley was informed by maintenance personnel that inquiries had been made concerning the GPS device or tracking system associated with Bradley's patrol vehicle. Plaintiff contends that this information is relevant to identifying who was making inquiries, when those inquiries occurred, and how information concerning Deputy Bradley and the internal investigation was obtained or disseminated.

42. Plaintiff alleges that this information should have been considered as part of a complete investigation into the sources and chronology of information later attributed to Plaintiff. Plaintiff contends that identifying the maintenance personnel and determining who made the inquiries concerning the patrol vehicle's GPS could have provided relevant leads that were not adequately explored.

43. Plaintiff alleges that the discussion concerned Deputy Bradley and the investigation involving Bradley, rather than being a discussion originating with Plaintiff.

44. Misty Perryman, an Osage Nation Police Officer, was present during the discussion and was in a position to hear what was said.

45. Before Caffey contacted Plaintiff, Perryman allegedly relayed information to officers with the Skiatook Police Department.

46. Accordingly, before Caffey contacted Plaintiff, information had allegedly been disclosed in a training setting, discussed in other Osage County Sheriff's Office personnel, and in the presence of personnel from another agency

47. Caffey subsequently contacted Plaintiff.

48. Plaintiff alleges that the chronology is material to determining the original source of the information and how it was disseminated.

49. Plaintiff alleges that the information had already been disclosed or discussed among other individuals before Caffey contacted him.

50. Plaintiff alleges that the chronology is inconsistent with an assumption that Plaintiff was necessarily the original source merely because Caffey later contacted him.

51. Plaintiff contends that a fair investigation required examining the chronology and the roles of the individuals who possessed, discussed, or transmitted the information.

52. Plaintiff alleges that Defendants attributed responsibility for the information to Plaintiff and relied on that attribution in the investigation or resulting disciplinary decisions.

53. Plaintiff alleges that the investigation did not adequately establish the source and sequence of the disclosures before attributing responsibility to him.

54. Plaintiff alleges that the investigation did not adequately interview or consider the information available from Minson, Reed, and Perryman concerning the chronology and dissemination of the information.

55. Plaintiff was informed directly by Andrew Minson that personnel within the Sheriff's Office administration had told Minson to avoid Plaintiff and had represented to Minson that Plaintiff was blaming him.

56. Plaintiff alleges that Minson's account is relevant to the circumstances of the investigation and the handling of information attributed to Plaintiff.

57. Plaintiff alleges that the communication may have affected Minson's willingness to communicate with Plaintiff or provide information concerning the events under investigation.

58. Plaintiff contends that these circumstances are relevant to whether the investigation fairly considered witnesses, evidence, chronology, and competing accounts.

59. Plaintiff alleges that the investigative failures materially contributed to the adverse employment actions taken against him.

D. Undersheriff Wakefield's Pole-Camera Write-Up Discovered After Termination

60. Before Plaintiff's termination, Undersheriff Billy Wakefield prepared a written entry concerning an email about pole cameras, stating that Plaintiff had not responded to the email.

61. Plaintiff disputes the completeness and accuracy of that characterization because he had previously discussed the pole-camera issue with Wakefield in person in the breakroom of the Osage County Sheriff's Office.

62. During that conversation, Plaintiff explained that grant funding would need to be identified to purchase the pole cameras.

63. Plaintiff alleges that the written entry did not reflect or account for this in-person discussion or the substance of the conversation.

64. Plaintiff discovered the written entry in his personnel file after his termination. Plaintiff alleges that, although he did not discover the entry in his personnel file until afterward, the write-up was used in the decision to terminate his employment.

65. Plaintiff contends that the use of the write-up without adequately accounting for the prior in-person discussion resulted in an incomplete or misleading characterization of his response to the pole-camera issue.

66. Plaintiff alleges that the write-up is relevant to the accuracy and completeness of the information used to evaluate his work-related conduct and to the reasons given for his termination.

67. Plaintiff further alleges that the use of the write-up is relevant to whether his conduct was fairly evaluated and whether the stated reasons for his termination accurately reflected the circumstances.

68. Plaintiff relies on these facts as part of the overall circumstances surrounding the investigation, the documentation of his conduct, and the decision to terminate his employment.

E. Remarks Concerning Minority Groups and Juneteenth

69. Plaintiff alleges that Undersheriff Billy Wakefield made numerous derogatory remarks about minority groups, including Native Americans and African Americans.

70. Plaintiff is a citizen of the Citizen Potawatomi Nation.

71. Plaintiff recalls that Wakefield went on a rant concerning Juneteenth and made a remark to the effect of, "How many holidays do we have to give them?" Plaintiff understood the remark to concern the County's observance of Juneteenth as a paid holiday.

72. Plaintiff alleges that Sheriff Perrier was present on some occasions when Wakefield made derogatory remarks. This allegation concerns Perrier's knowledge only to the extent that he personally heard the remarks or otherwise knew of them.

73. Plaintiff alleges that the remarks were inconsistent with the professionalism, impartiality, and respect expected of law-enforcement leadership.

74. Plaintiff contends that the remarks and the manner in which management addressed or failed to address the conduct are relevant background to the workplace environment, supervisory standards, and treatment of employees.

75. Plaintiff further contends that the handling of Wakefield's conduct, when compared with the investigation, suspension, and termination of Plaintiff, may be relevant to whether disciplinary standards were applied consistently and whether the stated reasons for Plaintiff's termination accurately reflected the circumstances.

76. Plaintiff does not contend that the remarks alone establish discriminatory intent or unlawful retaliation. Plaintiff offers the circumstances as potential background or comparative evidence to the extent relevant and admissible.

F. Plaintiff's Concerns Regarding Patrol Captain Jay Long

77. Plaintiff raised concerns about the job performance and conduct of Patrol Captain Jay Long.

78. Plaintiff's concerns included allegedly incomplete reports and conduct in high-stress situations.

79. Plaintiff raised these concerns in good faith because he believed they affected the operation and safety of the Sheriff's Office.

80. Plaintiff alleges that Perrier told third parties that Plaintiff was "being mean" to Long.

81. Plaintiff alleges that this characterization misrepresented or minimized the good-faith work-related concerns Plaintiff had raised.

82. Plaintiff contends that the characterization contributed to a misleading narrative concerning his conduct and the nature of his reports.

G. Reports Concerning a Former Deputy

83. Plaintiff reported concerns regarding a former deputy's alleged improper searches and handling of cases, which Plaintiff believed affected the integrity of investigations and the administration of justice.

84. Plaintiff made these reports in good faith and based on his concerns regarding law-enforcement practices and accountability.

85. Perrier allegedly stated that the former deputy "did a lot of campaigning for me down south."

86. Plaintiff alleges that this statement was unrelated to the substance of his concerns about the former deputy's conduct and is relevant to the circumstances surrounding Plaintiff's reports and the reasons later given for actions taken against him.

H. Captain Matt Clark and Comparative Disciplinary Treatment

87. After Plaintiff's termination, Captain Matt Clark was reportedly found to have engaged in sexual relations with an employee who was under Clark's direct supervision.

88. Plaintiff alleges that Sheriff Perrier initially stated that the subordinate employee would have to resign, but subsequently told Captain Clark that Clark would have to resign.

89. Captain Clark was permitted to resign following the reported serious policy violations.

90. Plaintiff alleges that the handling of Captain Clark's matter is relevant to the Sheriff's Office's treatment of alleged misconduct, the exercise of supervisory discretion, and the consistency of disciplinary standards.

91. Plaintiff offers these circumstances as potential comparative evidence concerning the handling of workplace conduct and discipline, to the extent the circumstances are sufficiently similar and the evidence is admissible. Plaintiff does not allege that this matter, standing alone, establishes unlawful retaliation or discrimination.

92. Plaintiff alleges that these circumstances provide relevant background concerning how misconduct reports and disciplinary decisions were handled within the Sheriff's Office.

I. Causation and Adverse Employment Actions

93. Plaintiff alleges that his reports and concerns preceded the investigation, suspension, and termination.

94. Plaintiff alleges that the relevant decision-makers knew of his reports before the adverse employment actions occurred.

95. Plaintiff contends that the offer of his position to Shane Rhames before his suspension, the pole-camera write-up used in the termination decision, the investigative deficiencies, the chronology of information dissemination, the handling of witnesses, and the other circumstances described above support his allegation that the reasons given for the adverse employment actions were incomplete, inaccurate, or inadequately investigated.

96. Plaintiff alleges that his good-faith reports and the circumstances surrounding them were a substantial factor in the actions taken against him.

97. Plaintiff further alleges that, absent any retaliatory motive or other improper consideration, the same adverse employment actions would not have occurred under the circumstances alleged.

98. Plaintiff contends that the stated reasons for his suspension and termination do not fully and accurately reflect the circumstances surrounding the investigation and his prior reports.

J. Perrier's Post-Termination Statements

99. After Plaintiff's termination, Perrier allegedly made statements to third parties concerning comments attributed to individuals about investigators at the Sheriff's Office.

100. Plaintiff alleges that Perrier denied making certain comments and attributed those comments to Plaintiff.

101. Plaintiff contends that the denial and attribution were false because Perrier had made the comments and other individuals had witnessed or heard them.

102. Plaintiff alleges that the denial and attribution shifted responsibility to Plaintiff and misled others about who had made the comments.

103. Plaintiff contends that the circumstances are relevant to whether Perrier sought to undermine Plaintiff's credibility or discredit him after his termination.

104. Plaintiff alleges that the statements were communicated to third parties and were capable of harming his professional reputation, particularly in the law-enforcement community.

105. Plaintiff asserts a defamation claim concerning these statements only to the extent the statements meet the requirements of Oklahoma law, including falsity, defamatory meaning, publication, applicable fault requirements, lack of a controlling privilege, and timely filing.

V. COUNT I — NEGLIGENCE AGAINST OSAGE COUNTY, TO THE EXTENT PERMITTED BY THE OKLAHOMA GOVERNMENTAL TORT CLAIMS ACT

106. Plaintiff incorporates paragraphs 1 through 105 as though fully set forth herein.

107. To the extent recognized by Oklahoma law and not barred by immunity, Plaintiff alleges that the County owed applicable duties in the reasonable administration, supervision, and operation of the Sheriff's Office.

108. Plaintiff alleges that the County failed to exercise reasonable care in the handling of relevant information, investigation, supervision, or disciplinary processes, to the extent those acts or omissions give rise to a cognizable claim.

109. Plaintiff alleges that the investigative process failed reasonably to consider material information concerning the chronology and sources of information attributed to him.

110. Plaintiff alleges that the foregoing acts or omissions caused or contributed to legally recoverable injury and loss.

111. Plaintiff asserts this Count against the County only to the extent the alleged conduct falls within the County's liability under the Governmental Tort Claims Act and is not otherwise exempt from liability.

VI. COUNT II — WRONGFUL DISCHARGE IN VIOLATION OF OKLAHOMA PUBLIC POLICY, IF THE REQUIRED ELEMENTS ARE SATISFIED

112. Plaintiff incorporates paragraphs 1 through 111 as though fully set forth herein.

113. Plaintiff was employed by the Osage County Sheriff's Office and raised concerns about alleged law-enforcement misconduct, investigative irregularities, and agency practices.

114. Plaintiff alleges that his reports were made in good faith and concerned matters affecting public trust and the integrity of law enforcement.

115. Plaintiff alleges that the relevant decision-makers knew of his reports before his suspension and termination.

116. Plaintiff alleges that the reports and circumstances surrounding them were a significant factor in the adverse employment actions.

117. Plaintiff contends that the termination violated a clear and compelling Oklahoma public policy, if a recognized public-policy tort applies to the facts alleged.

118. Plaintiff asserts this Count only if the applicable requirements for a wrongful-discharge claim are satisfied, including any requirements concerning at-will employment, the particular public policy implicated, causation, and the absence of an adequate alternative statutory remedy.

VII. COUNT III — RETALIATION FOR GOOD-FAITH REPORTING, TO THE EXTENT A COGNIZABLE CAUSE OF ACTION EXISTS

119. Plaintiff incorporates paragraphs 1 through 118 as though fully set forth herein.

120. Plaintiff reported alleged misconduct, investigative irregularities, and workplace practices that he believed affected the integrity and proper operation of the Sheriff's Office.

121. Plaintiff alleges that he made these reports in good faith.

122. Plaintiff alleges that the relevant Defendants knew of the reports.

123. Plaintiff alleges that he was investigated, suspended, and terminated after making the reports.

124. Plaintiff contends that the chronology of events, including the alleged offer of his position to Shane Rhames before his suspension, the pole-camera write-up used in the termination decision, investigative deficiencies, handling of witness information, and circumstances surrounding disciplinary decisions support his allegation that the reports were a substantial motivating factor in the adverse employment actions.

125. Plaintiff seeks relief under this Count only to the extent Oklahoma law or another applicable law recognizes a cause of action on these facts and Plaintiff can establish all required elements. Plaintiff does not rely on the word "retaliation" alone as an independent source of a legal right to relief.

VIII. COUNT IV — DEFAMATION, TO THE EXTENT ACTIONABLE UNDER OKLAHOMA LAW

126. Plaintiff incorporates paragraphs 1 through 125 as though fully set forth herein.

127. Plaintiff alleges that Perrier made statements to third parties concerning Plaintiff's conduct and responsibility for comments about investigators at the Sheriff's Office.

128. Plaintiff alleges that Perrier also characterized Plaintiff as "being mean" to Patrol Captain Jay Long.

129. Plaintiff contends that the characterization of his conduct misrepresented his good-faith work-related concerns. Plaintiff acknowledges that a statement expressing opinion or a subjective characterization may not be actionable unless the applicable legal requirements are met.

130. Plaintiff alleges that Perrier denied making comments about investigators and attributed those comments to Plaintiff, notwithstanding Plaintiff's allegation that Perrier made the comments and that other individuals witnessed or heard them.

131. Plaintiff alleges that the attribution was false or misleading and was communicated to third parties.

132. Plaintiff alleges that the statements, to the extent they constituted false and defamatory assertions of fact, were capable of harming his professional reputation and employment prospects.

133. Plaintiff alleges that the responsible Defendant knew or, where legally sufficient, negligently failed to ascertain the truth or falsity of the statements.

134. Plaintiff alleges that he suffered reputational, professional, economic, or other legally recoverable damages as a result of actionable statements.

135. Plaintiff asserts this Count only to the extent the particular statements, their context, the identity of the speaker and recipients, applicable privileges, fault requirements, and limitation periods satisfy Oklahoma law.

IX. DAMAGES

136. As a result of the conduct alleged, Plaintiff claims damages to the extent recoverable under the causes of action and applicable law, including lost wages, lost compensation and benefits, loss of future earning capacity, economic losses, reputational harm, and other actual damages.

137. Plaintiff seeks emotional-distress damages only to the extent authorized by the applicable cause of action and supported by the evidence.

138. Plaintiff seeks allowable costs, interest, and other relief only to the extent authorized by law.

139. Plaintiff reserves the right to seek leave to amend this Petition as permitted by the Oklahoma Pleading Code and applicable court rules if discovery establishes additional facts or identifies additional responsible parties.

X. PUNITIVE DAMAGES

140. Plaintiff seeks punitive damages against an individual Defendant only if such damages are legally available on a particular claim and the evidence satisfies the applicable statutory and evidentiary requirements.

141. Plaintiff does not seek punitive damages against Osage County to the extent prohibited by the Oklahoma Governmental Tort Claims Act or other applicable law.

XI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Terry York respectfully requests that the Court, to the extent authorized by law and supported by the evidence:

A. Award compensatory damages for proven, legally recoverable losses;

B. Award lost wages, compensation, benefits, and other economic damages to the extent recoverable;

C. Award damages for reputational injury and emotional distress only to the extent authorized by applicable law and supported by the evidence;

D. Award punitive damages against individual Defendants only where legally permitted and supported by the required proof;

E. Award allowable costs, interest, and other relief authorized by law; and

F. Grant such other relief as the Court determines to be just and proper under the claims and evidence properly before it.

XII. JURY DEMAND

Plaintiff demands a jury trial on all issues for which a jury trial is available as a matter of law.

Respectfully submitted,

TERRY YORK, Plaintiff Pro Se

147 w 7th St.

Shidler OK 74652

Date: 10-9-26

Signature: Terry York