

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF OKLAHOMA SITTING IN AND FOR GARFIELD COUNTY

THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.)
ERNST LEROY CURRIER)
ADDR: 2721 S. Leona Mitchell)
Enid, OK 73701)
SSN: ***-**-)
DOB: October, 1953)
Defendant(s).)

FILED
GARFIELD COUNTY, OKLA
Case No. CF-2017-*Lette* NOV 14 2017
JANELLE M. SHARP
COURT CLERK
BY
DEPUTY COURT CLERK

INFORMATION

- COUNT 1: UNLAWFUL PROCEEDS - 21 O.S. § 2001(B), a FELONY
- COUNT 2: MISAPPLICATION OF FUNDS - 21 O.S. § 1834.2, a FELONY
- COUNT 3: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - 21 O.S. § 1531, a FELONY
- COUNT 4: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
- COUNT 5: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
- COUNT 6: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - 21 O.S. § 1531, a FELONY
- COUNT 7: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
- COUNT 8: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
- COUNT 9: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - 21 O.S. § 1531, a FELONY
- COUNT 10: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
- COUNT 11: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
- COUNT 12: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
- COUNT 13: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
- COUNT 14: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - 21 O.S. § 1531, a FELONY
- COUNT 15: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
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- COUNT 17: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
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- COUNT 23: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
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- COUNT 30: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY
- COUNT 31: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - 21 O.S. § 1531, a FELONY
- COUNT 32: FORGERY IN THE SECOND DEGREE - 21 O.S. § 1577, a FELONY
- COUNT 33: OBTAINING MONEY BY FALSE PRETENSES - 21 O.S. § 1541.1, a FELONY

STATE OF OKLAHOMA, COUNTY OF GARFIELD:

I, **Michael J. Fields**, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Garfield and in the State of Oklahoma, **ERNST LEROY CURRIER** did then and there unlawfully, willfully, knowingly and wrongfully commit the crime(s) of:

COUNT 1: UNLAWFUL PROCEEDS - a FELONY, on or about the 10th day of August, 2014, to on or about 10th day of August, 2017, in Garfield County, Oklahoma, Ernst Currier committed the crime of unlawful proceeds, a felony in violation of 21 O.S. § 2001, by knowingly and intentionally receiving or acquiring proceeds which Ernst Currier knew were derived from, second degree forgery, misapplication of funds, false personation, and obtaining money by false pretenses, to-wit: Ernst Currier submitted forged documents to fraudulently obtain loans from Security National Bank, Enid, Garfield County, Oklahoma, and did receive and conceal the proceeds from said loans while he was an employee of Security National Bank.

This crime is punishable by imprisonment for 5 – 20 years and/or a civil penalty of up to 3 times the value of the property involved in the transactions.

COUNT 2: MISAPPROPRIATION OF FUNDS (EMBEZZLEMENT) - a FELONY, on or about the 10th day of August, 2014, to on or about the 10th day of August, 2017, in Garfield County, Oklahoma, Ernst Leroy Currier, while he was an employee of Security National Bank, Enid, Garfield County, Oklahoma, committed the crime of misapplication of funds, a felony in violation of 6 O.S. § 1412, by misapplying and/or causing to be misapplied funds under the control of Security National Bank, Enid, Garfield County, Oklahoma, with the intent to deceive, cheat, or defraud Security National Bank.

This crime is punishable by imprisonment for up to 5 years and/or by a fine of up to \$100,000.

COUNT 3: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or about the 3rd day of April, 2014 to on or about the 10th day of August, 2017, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED], by submitting fraudulent bank loan documents to Security National Bank, Enid, Garfield County, Oklahoma. If said acts had been done by [REDACTED] [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$370,000.

This crime is punishable by imprisonment for up to 10 years.

COUNT 4: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 10th day of August, 2017, in Garfield County, Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 5: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 10th day of August, 2017, in Garfield County, Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$145,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank, Enid, Garfield County, Oklahoma.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 6: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or about the 15th day of November, 2016 and the 13th day of July, 2017, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED], by submitting fraudulent bank loan documents to Security National Bank, Enid, Garfield County, Oklahoma. If said acts had been done by [REDACTED], [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$265,000.

This crime is punishable by imprisonment for up to 10 years.

COUNT 7: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 15th day of November, 2016, the 1st day of December, 2016, and the 13th day of July, 2017, in Garfield County, Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain loans and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 8: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 15th day of November, 2016, 1st day of December, 2016, and the 13th day of July, 2017, in Garfield County, Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation 21 O.S. § 1541.1, by obtaining cash money in the sum of \$265,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 9: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or about the 15th day of February, 2011 to on or about the 12th day of November, 2015, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED] by submitting fraudulent bank loan documents to Security National Bank, Enid, Garfield County, Oklahoma. If said acts had been done by [REDACTED], [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$375,020.

This crime is punishable by imprisonment for up to 10 years.

COUNT 10: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 12th day of November, 2015, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 11: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 11th day of November, 2015, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$125,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 12: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 23rd day of December, 2015, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED], with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 13: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 23rd day of December, 2015, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$100,000 from Security National Bank, Enid, Garfield County, Oklahoma by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 14: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or about the 15th day of August, 2008 to on or about the 8th day of December, 2014, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531 by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED] by submitting fraudulent bank loan documents to Security National Bank, Enid, Oklahoma. If said acts had been done by [REDACTED], [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$493,923.31.

This crime is punishable by imprisonment for up to 10 years.

COUNT 15: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 8th day of December, 2014, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Oklahoma fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 16: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 8th day of December, 2014, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$100,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 17: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 14th day of May, 2015, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Oklahoma fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 18: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 14th day of May, 2015, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1 by obtaining cash money in the sum of \$125,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 19: FORGERY IN THE SECOND DEGREE ~ a FELONY, on or about the 17th day of May, 2016, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 20: OBTAINING MONEY BY FALSE PRETENSES ~ a FELONY, on or about the 17th day of May, 2016, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$135,000, from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 21: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or about the 26th day of February, 2009 to on or about the 29th day of January, 2015, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED] by submitting fraudulent bank loan documents to Security National Bank, Enid, Oklahoma. If said acts had been done by [REDACTED], [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$403,208.84.

This crime is punishable by imprisonment for up to 10 years.

COUNT 22: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 29th day of January, 2015, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 23: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 29th day of January, 2015, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$160,000, from Security National Bank, Enid, Garfield County, Oklahoma by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 24: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY ~ a FELONY, on or about the 14th day of November, 2012 to on or about the 15th day of August, 2016, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED], by submitting fraudulent bank loan documents to Security National Bank, Enid, Garfield County, Oklahoma. If said acts had been done by [REDACTED] [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$310,000.

This crime is punishable by imprisonment for up to 10 years.

COUNT 25: FORGERY IN THE SECOND DEGREE ~ a FELONY, on or about the 15th day of August, 2016, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED], with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 26: OBTAINING MONEY BY FALSE PRETENSES ~ a FELONY, on or about the 15th day of August, 2016, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$110,000 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 27: FORGERY IN THE SECOND DEGREE ~ a FELONY, on or about the 2nd day of April, 2015, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma fraudulent loan documents purported to have been completed and signed by [REDACTED] [REDACTED], with the intent to obtain a loan and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 28: OBTAINING MONEY BY FALSE PRETENSES ~ a FELONY, on or about the 2nd day of April, 2015, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$98,500 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 29: FORGERY IN THE SECOND DEGREE ~ a FELONY, on or about the 9th day of September, 2015 and or about the 10th day of June, 2016, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Oklahoma fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain loans and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 30: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 9th day of September, 2015 and on or about the 10th day of June, 2016, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$225,000, from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

COUNT 31: FALSELY PERSONATE ANOTHER TO CREATE LIABILITY - a FELONY, on or between the 11th day of January, 2012, to on or about the 11th day of May, 2012, in Garfield County, Oklahoma, Ernst Currier committed the crime of false personation, a felony in violation of 21 O.S. § 1531, by knowingly, willfully, intentionally, and falsely assuming the identity and impersonating [REDACTED] by submitting fraudulent bank loan documents to Security National Bank, Enid, Garfield County, Oklahoma. If said acts had been done by [REDACTED] [REDACTED] would have thereby incurred debt and liability. Said Ernst Currier did in fact, accrue and receive a benefit as a result of said false personation in the total amount of \$200,000.

This crime is punishable by imprisonment for up to 10 years.

COUNT 32: FORGERY IN THE SECOND DEGREE - a FELONY, on or about the 10th day of February, 2017 and on or about the 13th day of April, 2017, in Garfield County Oklahoma, Ernst Currier, committed the crime of uttering a forged instrument, a felony in violation of 21 O.S. § 1592, by uttering and publishing as true to Security National Bank, Enid, Garfield County, Oklahoma, fraudulent loan documents purported to have been completed and signed by [REDACTED] with the intent to obtain loans and defraud Security National Bank, all the while knowing that said instruments were forged.

This crime is punishable by imprisonment for up to 7 years.

COUNT 33: OBTAINING MONEY BY FALSE PRETENSES - a FELONY, on or about the 10th day of February, 2017 and on or about the 13th day of April, 2017, in Garfield County Oklahoma, Ernst Currier committed the crime of obtaining money by false pretenses, a felony in violation of 21 O.S. § 1541.1, by obtaining cash money in the sum of \$251,020 from Security National Bank, Enid, Garfield County, Oklahoma, by means or use of deception or false or fraudulent representation or pretense, to-wit: by forging loan documents under the name of [REDACTED] and submitting said forged loan documents and uttering them as true with the intent to cheat and defraud Security National Bank.

This crime is punishable by imprisonment for up to 10 years and/or by a fine of up to \$5,000.

MICHAEL J. FIELDS
DISTRICT ATTORNEY

By: Michael J. Fields
Michael J. Fields
District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

By: Michael J. Fields
Michael J. Fields
District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA



Det. Sgt. Nick John, Enid Police Department, 301 W. Garriott, Enid, OK 73701
Det. James McFadden, Enid Police Department, 301 W. Garriott, Enid, OK 73701
Security National Bank Records Custodian, 201 W. Broadway, Enid, OK 73701



Officer Steve Varney, 301 W. Owen K. Garriott, Enid, OK
Detective James McFadden, 301 W. Owen K. Garriott, Enid, OK
Detective Brad Pritchett, 301 W. Owen K. Garriott, Enid, OK



IN THE DISTRICT COURT OF GARFIELD COUNTY
STATE OF OKLAHOMA

FILED
GARFIELD COUNTY, OKLA

NOV 14 2017

THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

Case No. CF-17-614

JANELLE M. SHARP
COURT CLERK
BY _____
DEPUTY COURT CLERK

Ernst Currier)

2721 S. Leona Mitchell)

Enid, Oklahoma 73701)

DOB 10-53 SSN ***-**-██████████)

Defendant

AFFIDAVIT

The undersigned upon oath deposes and states as follows: to-wit: that the affiant, Sergeant Nick John, has been employed with the Enid Police Department in Enid, Oklahoma in Garfield County since May 9th, 2005. That the affiant is currently assigned as a Sergeant to the Investigative Services Division, and is assigned to investigate criminal violations of State and Municipal laws.

On September 5th, 2017 at approximately 12:14 P.M. ██████████ came to the Enid Police Department to report that his identity had been stolen. ██████████ reported to Officer Steven Varney that on August 31st, 2017 he received a call from Security National Bank asking about his farm equipment loan. ██████████ advised the bank employee that he did not have any loans with Security National Bank. ██████████ stated that the bank employee confirmed all of his personal information, except for his address. ██████████ stated that the bank had 610 S. Cleveland PMB 367. ██████████ stated that he had never used that address.

██████████ added that he then called his close family friend, Ernst Currier, Senior Vice President of Commercial Lending for Security National Bank, 201 W. Broadway, City of Enid, County of Garfield, State of Oklahoma. ██████████ told Ernst about the call he received from Security National Bank. Ernst told ██████████ that he was on vacation, however the call was a mistake and his identity had not been stolen.

██████████ told Detective James McFadden that on September 4th, 2017 he called Ernst again about the loans. ██████████ stated that Ernst did not answer, but then called him back. ██████████ stated that Ernst told him that he had taken the loans out in ██████████ name. ██████████ stated that Ernst told him that he fully expected to be prosecuted for this. Ernst also told ██████████ that there were other names that he had also used to create fraudulent loans. ██████████ added that he had started a recording of the conversation, on September 4th, 2017, when Ernst called back. ██████████ provided the recording to Detective McFadden. Detective McFadden listened to the recording and was able to confirm the information that ██████████ had provided.

During the investigation it was discovered that ██████████ actually had 3 loans at Security National Bank in Enid opened in his name. The first loan 162289 was opened on April 3rd, 2014 for \$100,000. The second loan 164225 was opened on June 11th, 2014 for \$125,000 and the third loan 191494 was opened on August 10th, 2017 in the amount of \$145,000. The total amount of fraudulent loans opened in the name of ██████████ is \$370,020. Records indicate that Ernst Currier generated and signed the documents used to open the fraudulent loans in ██████████ name.

On September 7th, 2017 ██████████ came to the Enid Police Department and spoke with Detective McFadden. ██████████ stated that he had found out that he had 3 fraudulent loans opened in his name at Security National Bank in the total amount of \$265,000. The first loan 186082 was opened on November 15th, 2016 in the amount of \$100,000. The second loan 186379 was opened on December 1st, 2016 in the amount of \$75,000 and the third loan 190746 was opened on July 13rd, 2017 in the amount of \$90,000.

██████████ stated that he attended the First Baptist Church with Ernst Currier and that Ernst had asked him to come by the bank in October or November of 2016. ██████████ added that Ernst told him that he needed to conduct a background check on him so that he could help at the

church. [REDACTED] stated that he provided his personal information to Ernst at that time. [REDACTED] stated that he checked his credit report recently and noticed a credit inquiry from Security National Bank on November 14th, 2016. [REDACTED] added that he had never done business at Security National Bank and never signed any documents at Security National Bank to authorize a loan. Records indicate that Ernst Currier generated and signed the documents used to open the fraudulent loans in [REDACTED] name.

[REDACTED] also provided an email that had been sent to him by Ernst on September 6th, 2017. A portion of the email stated, "I have created a mess that I am dealing with in my life, and I am in some deep trouble".

On September 7th, 2017 Detective McFadden was contacted by [REDACTED]. [REDACTED] stated that he was notified about a fraudulent loan in his name from Security National Bank. [REDACTED] stated that he had a legitimate loan at Security National Bank that has since been paid off and Ernst Currier was the loan officer he worked with to complete that transaction. [REDACTED] stated that he had no other involvement with the bank and that was the only loan that he had ever authorized at Security National Bank. [REDACTED] added that he had met Ernst at church and Ernst directed him to Security National Bank for the loan. [REDACTED] stated that Security National Bank had notified him of the discovery of 4 fraudulent loans. The first loan 132600 was opened on February 15th, 2011 in the amount of \$100,000. The second loan 133062 was opened on March 2nd, 2011 in the amount of \$100,000. The third loan 135570 was opened on June 6th, 2011 in the amount of \$50,020 and the fourth loan 177326 was opened on November 12th, 2015 in the amount of \$125,000. [REDACTED] stated that he never authorized or signed any documents at Security National Bank authorizing the fraudulent loans. Records indicate that Ernst Currier generated and signed the documents used to open the fraudulent loans in [REDACTED] name.

During the investigation the following list of additional fraudulent loans were discovered to have been opened by Ernst Currier at Security National Bank in Enid during his employment as Senior Vice President:

Daniel Hale had 8 fraudulent loans opened in his name; loan 36065 opened on February 23rd, 2000 in the amount of \$95,000, loan 41548 opened on December 9th, 2002 in the amount of \$75,542.39, loan 65198 opened on October 14th, 2004 in the amount of \$99,898.68, loan 80895 opened on February 17th, 2006 in the amount of \$150,000, loan 85119 was opened on July 7th, 2006 in the amount of \$50,000, loan 137715 was opened on September 16th, 2011 in the amount of \$96,000, loan 157053 opened on August 26th, 2013 in the amount of \$90,000, loan 178349 opened on December 23rd, 2015 in the amount of \$100,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

Timothy Bagley had 4 fraudulent loans opened in his name; loan 59016 opened on April 9th, 2004 in the amount of \$87,500, loan 65649 opened on October 29th, 2004 in the amount of \$89,454.93, loan 99144 opened on October 11th, 2007 in the amount of \$100,000, loan 122425 opened on January 15th, 2010 in the amount of \$100,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

[REDACTED] had 5 fraudulent loans opened in his name; loan 108153 opened on August 15th, 2008 in the amount of \$100,000, loan 110639 opened on November 17th, 2008 in the amount of \$68,923.31, loan 155370 opened on July 2nd, 2013 in the amount of 75,000, loan 166568 opened on September 12th, 2014 in the amount of \$150,000, loan 168581 opened on December 8th, 2014 in the amount of \$100,000.

Terry L. Barton had 5 fraudulent loans opened in his name; loan 44177 opened on March 19th, 2003 in the amount of \$50,000, loan 61678 opened on June 16th, 2004 in the amount of \$53,869.27, loan 102554 opened on February 11th, 2008 in the amount of \$79,817.47, loan 125494 opened on May 11th, 2010 in the amount of \$143,868.05, loan 172596 opened on May 14th, 2015 in the amount of \$125,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

[REDACTED] had 3 fraudulent loans opened in his name; loan 146966 opened August 28th, 2012 in the amount of \$100,020, loan 153775 opened May 8th, 2013 in the amount of \$100,000, loan 180208 opened on May 17th, 2016 in the amount of \$135,000.

██████████ had 3 fraudulent loans opened in his name; loan 112850 opened on February 26th, 2009 in the amount of \$116,208.84, loan 137594 opened on September 13th, 2011 in the amount of \$127,000, loan 169813 opened on January 29th, 2015 in the amount of \$160,000.

██████████ had 3 fraudulent loans opened in his name; loan 149243 opened on November 14th, 2012 in the amount of \$100,000, loan 151366 opened on February 6th, 2013 in the amount of \$100,000, loan 184124 opened August 15th, 2016 in the amount of \$110,000.

Clifford Melton had 4 fraudulent loans opened in his name; loan 118839 opened on August 21st, 2009 in the amount of \$109,890.28, loan 131137 opened on December 3rd, 2010 in the amount of \$50,000, loan 137759 opened on September 19th, 2011 in the amount of \$128,418.51, loan 171408 opened on April 2nd, 2015 in the amount of \$98,500. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

Jack Porter had 2 fraudulent loans opened in his name; loan 78497 opened on November 8th, 2005 in the amount of \$98,901.63, loan 120401 opened on October 20th, 2009 in the amount of \$100,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

Kevin Ross had 2 fraudulent loans opened in his name; loan 37354 opened on May 2nd, 2001 in the amount of \$87,422, loan 91114 opened on January 24th, 2007 in the amount of \$94,682.78. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

Gary Watts had 6 fraudulent loans opened in his name; loan 36947 opened on December 8th, 2000 in the amount of \$69,500, loan 69400 opened on February 14th, 2005 in the amount of \$100,000, loan 105172 opened on May 6th, 2008 in the amount of \$95,751.74, loan 129410 opened on September 17th, 2010 in the amount of \$130,000, loan 175676 opened on September 9th, 2015 in the amount of \$100,000, loan 182430 opened on June 10th, 2016 in the amount of \$125,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

██████████ had 2 fraudulent loans opened in his name; loan 140806 opened on January 11th, 2012 in the amount of \$100,000, loan 143919 opened on May 11th, 2012 in the amount of \$100,000.

██████████ had 2 fraudulent loans opened in his name; loan 187787 opened on February 10th, 2017 in the amount of \$141,020, loan 188975 opened on April 13th, 2017 in the amount of \$110,000.

Carl Massey had 2 fraudulent loans opened in his name; loan 157471 opened on September 11th, 2013 in the amount of \$100,020, loan 159957 opened on December 30th, 2013 in the amount of \$130,000. Through the investigation it was determined that this was not a real person and was an identity likely created by Ernst Currier.

During a 17-year period, 2000-2017, Ernst Currier opened a total of 61 fraudulent loans using his position as a loan officer and Senior Vice President at Security National Bank in Enid. He did so by stealing and using the personal identities of at least 9 confirmed individuals. He gained access to those identities by using his position of trust at the Security National Bank, the First Baptist Church in Enid, and by his status as a leader in the community. He also used 8 other identities, which were not real people and were identities likely created by Ernst Currier, for a total of 17 individual names and identifiers used to open the 61 fraudulent loans.

The total combined original amount of all 61 fraudulent loan accounts opened unlawfully by Ernst Currier is \$6,207,229.88. The combined outstanding and remaining balance on all the fraudulent loan accounts is \$1,811,588.01.

Banking records indicate that Ernst Currier routinely dispersed the proceeds derived from the fraudulent loans to a variety of accounts held at other financial institutions. The

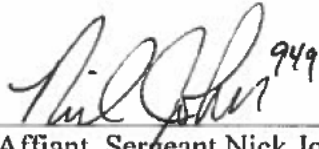
disbursements were made by conducting numerous unlawful wire transfers. Records also clearly indicate that Ernst Carrier used a portion of those unlawfully obtained proceeds for his own personal gain.

The investigation revealed that Ernst Carrier had manufactured numerous false computer documents and records over the years in an attempt to conceal and to further assist his continuing criminal enterprise. Those documents included fraudulent tax returns, forged loan applications, financial statements, identification documents, and profit and loss statements. Those fraudulent documents were stored on Ernst Carrier's computer system and network files located at the Security National Bank. Your affiant believes those documents were likely created by Ernst Carrier using the same computer system and data from the Security National Bank. Ernst also set up several Post Office boxes to direct mail and to give the appearance of real mailing addresses.

Additionally, Ernst Carrier's actions during this 17-year period constitute numerous violations of Oklahoma State Statutes, including and not limited to: Misapplication of Funds, Unlawful Proceeds, False Personation, Second Degree Forgery and Obtaining Money by False Pretenses.

Based on this information the undersigned prays that this Honorable Court issued a finding of fact that probable cause exists to believe that a crime has been committed and that there is probable cause to believe that the defendant above named committed that crime.




Affiant, Sergeant Nick John 949

Subscribed and sworn to before me this 14 day of November, 2017.

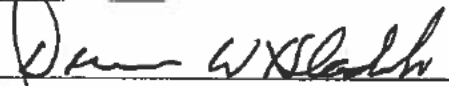
Notary Public 

My commission expires: 9-24-20

FINDING OF PROBABLE CAUSE

The undersigned Judge of this Court, upon sworn testimony and/or affidavit, hereby determines there to be probable cause to detain the defendant.

Dated this 14 day of NOVEMBER, 2017.


JUDGE OF THE DISTRICT COURT