

APR 24 2025

IN THE DISTRICT COURT OF WAGONER COUNTY
STATE OF OKLAHOMA

James E. Hight
Court Clerk

At _____ o'clock _____ M

CASE NO. GJ-25-1

WARNING: It is a felony for any person to sign a petition for the convening of a Grand Jury with any name other than his/her own, to knowingly sign his/her name more than once, or to sign such a petition when not a legal voter of the county (22 OS Section 311.1).

PETITION SUMMARY

The Petition set forth herein requests grand jury investigation into alleged criminal acts committed by Wagoner County Sheriff's Deputies relating to the wrongful deaths of Angela Liggins and Jeffrey Krueger. The Petition also requests grand jury investigation into acts amounting to willful neglect of duty, willful maladministration, gross partiality in office and corruption in office committed by the Wagoner County Sheriff and District Attorney concerning the deaths of Angela Liggins and Jeffrey Krueger. The Petition provides that the actions and omissions of the Sheriff and District Attorney provide potential grounds for the removal from office of both the Sheriff and District Attorney.

The Petition further requests grand jury investigation into an Assault and Battery committed by the Sheriff against the person of a female Wagoner County jail inmate along with the failure of the District Attorney to prosecute the Sheriff for Assault and Battery.

The attached Petition also requests grand jury investigation into the attempted concealment of evidence by the Sheriff of a Wagoner County Commission investigation into the director of the Emergency 911 Office.

PETITION FOR EMPANELMENT OF A GRAND JURY

COMES NOW the undersigned Petitioner, Wagoner County Citizens Against Corruption, LLC and for its request for empanelment of a grand jury under *Section 18 of Article II of the Oklahoma Constitution and Title 38 Section 101 of the Oklahoma Statutes* alleges and states as follows:

The subject matter that Petitioners deem necessary for grand jury inquiry, consideration and action involve acts of omission and commission by Wagoner County Sheriff Chris Elliott and Wagoner County District Attorney, N. Jack Thorp that warrant removal from their offices under *Title 22 Section 1181* of the Oklahoma Statutes all as more particularly set forth below. Furthermore, the acts of omission and commission by Wagoner County Sheriff's Deputies warrant the return of a true bill of indictment against them all as more particularly set forth below.

ANGELA LIGGANS DEATH

Chris Elliott is the duly elected Sheriff of Wagoner County, Oklahoma. As Sheriff, he is statutorily charged with maintaining and operating the Wagoner County Detention Facility. Sheriff Elliott is under statutory duty to provide his Detention officers and staff with appropriate training and supervision. Sheriff Elliott is also required to comply with the Oklahoma Jail Standards which were promulgated by the Oklahoma State Department of Health and Substance Abuse Services. Sheriff Elliott has failed to comply with his statutory and administrative duties in the following particulars:

1. Sheriff Elliott has failed to staff the Wagoner County Detention Facility with qualified medical personnel. Sheriff Elliott appointed Haley Longshore as the "Jail Health Administrator" for the Wagoner County Detention Facility. According to Sheriff Elliott's written policy Ms. Longshore was charged with insuring that inmates received proper medical care. Ms. Longshore was also charged with training the other Detention Officers on medical matters and procedures. Ms. Longshore was a medical assistant. As a medical assistant, she could not lawfully diagnose medical conditions nor could she lawfully dispense prescription medications. Furthermore, she lacked the qualifications to provide medical training for the other Detention Officers. Sheriff Elliott's failure to properly staff his Detention Facility with qualified medical personnel resulted in catastrophic medical outcomes as hereinafter set forth.

2. Sheriff Elliott failed to supervise his Detention Officers to ensure that inmates were provided emergency medical care and treatment as hereinafter set forth.

3. Sheriff Elliott failed to supervise his Detention Officers to insure that inmates with serious medical conditions were being properly monitored and timely provided with prescribed medications as hereinafter set forth.

4. Angela Liggans was a forty one year old female who was processed into the Wagoner County Detention Facility on May 18, 2021. She presented as a Type

1 insulin dependent diabetic. Upon admission, it was also noted that she suffered from post-traumatic stress disorder. Upon being processed into the Detention Facility, Ms. Liggans informed the Detention staff that she brought insulin with her and needed to administer it immediately. The Detention staff refused to allow her to administer her insulin dosage and restrained her from injecting herself with the medication. Ms. Liggans was an inmate in the Wagoner County Detention Facility for approximately sixteen days. During the entirety of her incarceration the Detention staff failed to address Ms. Liggans medical needs. They failed to regularly monitor her blood sugar levels and appeared to check her blood sugar levels only when she allegedly requested that they do so. Throughout her time of incarceration, the Detention staff failed to provide Ms. Liggans with regular doses of insulin which were critical to her health and well-being. As a consequence of not receiving her prescribed insulin Ms. Liggans began to experience episodes of psychosis. Psychotic episodes are a known medical consequence that diabetic persons exhibit when they don't receive insulin. The untrained Detention Officers and staff of the Wagoner County Detention Facility did not understand this important medical fact. They instead concluded that she was faking her manifestations of psychosis. As a consequence, they punished Ms. Liggans by placing her in isolation instead of providing her with emergency medical care. Neither the Detention Staff or the offsite physician for the Detention facility sought to have Ms. Liggans hospitalized when

even an untrained lay person would have recognized that she was in dire need of emergency medical treatment. As a consequence of the failings of the Sheriff and his Detention Facility Staff the County of Wagoner was sued under *Title 43 Section 1983 of the United States Code*. This suit resulted in a judgment against Wagoner County in the sum of \$13,500,000.00.

The Detention officers and the off-site physician employed by the county failed to administer insulin to Ms. Liggans from May 29, 2021 through June 2, 2021. On June 2, 2021 Angela Liggans passed away in her isolation cell in the Wagoner County Detention Facility. According to the Oklahoma Medical Examiner's Office, Ms. Liggans died from untreated Diabetic Ketoacidosis.

The acts and omissions of the Detention Officers charged with the care of Angela Liggans were acts of gross negligence that resulted in her death. Therefore, charges of Manslaughter Second Degree under *Title 21 Section 716 of the Oklahoma Statutes* warrant examination and consideration by a duly empaneled grand jury.

On July 19, 2021 Sheriff Elliott told the Wagoner County Commission that he had been operating the jail unlawfully and contrary to jail medical standards for five years.

The acts and omissions of Sheriff Chris Elliott illustrate his Willful Neglect of Duty and Maladministration in the operation of the Wagoner County Sheriff's Office. Therefore, grounds for removal from office under *Title 22 Section 1181 of*

the Oklahoma Statutes warrant examination and consideration by a duly empaneled grand jury.

N. Jack Thorp is the duly elected District Attorney for District 27 for the State of Oklahoma. Wagoner County, Oklahoma is one of the counties within District 27. It is the statutory and constitutional duty of the District Attorney to bring criminal charges against individuals when the facts so warrant. N. Jack Thorp has failed to file criminal actions against any of those individuals responsible for the death of Angela Liggins. Therefore, grounds for removal from office of N. Jack Thorp as District Attorney for District 27 upon the grounds of Willful Neglect of Duty, Willful Maladministration and Gross Partiality in office under *Title 22 Section 1181 of the Oklahoma Statutes* warrant examination and consideration by a duly empaneled grand jury.

JEFFREY KRUEGER DEATH

As the duly elected Sheriff of Wagoner County Chris Elliott pursuant to *Title 22 Section 34.2 of the Oklahoma Statutes* is charged with adopting, creating and implementing policies concerning the use of force by his subordinates. *Title 22 Section 34.1* states in pertinent part, "The use of excessive force shall be presumed when a peace officer continues to apply physical force in excess of the physical force permitted by law to a person who has been rendered incapable of resisting arrest."

1. Sheriff Elliott adopted a use of force policy for the Wagoner County Sheriff's office. Sheriff Elliot's policy required his deputies to only employ force that is objectively reasonable, necessary and proportionate to objectively bring a person or an incident under control, while protecting the Deputy and others from imminent harm. Sheriff Elliott's use of force policy prohibited the use of force to punish or retaliate against an inmate.

2. Four Wagoner County Deputies who participated in the arrests of Jeffrey Krueger violated the Wagoner County Sheriff's use of force policy and the prohibition of excess force as set forth in *Title 22 Section 34.1 and 34.2 of the Oklahoma Statutes*. Sheriff Elliott's subsequent actions concerning the arrest of Jeffrey Krueger also violated his policies concerning use of force along with those statutory provisions referenced in this paragraph.

3. On July 1, 2019 four Wagoner County deputies participated in the arrest and detention of Jeffrey Krueger. This arrest and detention involved the use of force so excessive that it caused the death of Jeffrey Krueger. The four deputies involved in the arrest and subsequent detention of Jeffrey Krueger were Deputy Nicholas Orr, Deputy Kaleb Phillips, Deputy Mathew Lott and Deputy Elizabeth Crockett.

During the evening of July 1, 2019, Deputy Nicholas Orr was fueling his car at a convenience store in Wagoner, Oklahoma when a vehicle pulled in behind him. The person operating this vehicle was Jeffrey Krueger. Upon his arrival, Jeffrey

Krueger began fueling his vehicle. Deputy Orr reported that he believed Jeffrey Krueger was talking to himself. When Jeffrey Krueger finished fueling his vehicle he drove away from the store parking lot and proceeded in a Westerly direction on State Highway 51. Deputy Orr then called Deputy Phillips on his cell phone and requested that he follow Jeffrey Krueger. Deputy Phillips stopped Jeffrey Krueger maintaining that Krueger had been driving in excess of the legal speed limit and had failed to stay in his lane of travel. Deputies Orr and Phillips then forcibly removed Jeffrey Krueger from his vehicle. They then tased Jeffrey Krueger. They also smashed his head into the highway pavement. This caused Jeffrey Krueger to sustain a deep gash to his forehead. During their arrest of Jeffrey Krueger, Deputies Orr and Phillips called for backup help. Deputies Matthew Lott and Elizabeth Crockett arrived and assisted in placing Jeffrey Krueger in restraints. Jeffrey Krueger was placed in both handcuffs and leg restraints which were joined together with a chain. Jeffrey Krueger was placed in a prone position (face down on the highway pavement) while Deputies Lott and Crockett sat on his back and legs. After a period of time it became evident that Jeffrey Krueger had stopped breathing. He was pronounced dead a short time later. It was forensically determined that Jeffrey Krueger died from "positional asphyxia" as a consequence of his restraint. A toxicology report concluded that Jeffrey Krueger did not have alcohol or illicit drugs in his system at the time of his death.

On the same date as Jeffrey Krueger's death Sheriff Chris Elliott made a written nomination to the Oklahoma Sheriff's Association for Deputies Orr and Phillips to be awarded the law enforcement Medal of Valor. Sheriff Elliott erroneously assumed that Jeffrey Krueger was intoxicated and sought the Medal of Valor for Deputies Orr and Phillips for removing an intoxicated person from the roadway.

The actions of Deputies Orr, Phillips, Lott and Crockett in arresting and detaining Jeffrey Krueger amounted to the use of excessive force in violation of *Title 22 Section 34.1 of the Oklahoma Statutes*, along with the offenses of Murder in the Second Degree, Manslaughter First and Second Degrees all in violation of *Title 21 of the Oklahoma Statutes*.

By rewarding the unlawful conduct of his deputies Sheriff Chris Elliott violated his own policies against the use of excessive force. He also violated Oklahoma law. Therefore, grounds for removal from office of Chris Elliott as Sheriff of Wagoner County upon the grounds of Willful Maladministration under *Title 22 Section 1181* warrant examination and consideration by a duly empaneled grand jury.

All the actions of the Wagoner County Sheriff's deputies as set forth above occurred within District Attorney District number 27. As noted above the District Attorney has a statutory and constitutional duty to bring criminal charges against

individuals when the facts so warrant. N. Jack Thorp has failed to file criminal charges against those Deputies responsible for the death of Jeffrey Krueger. Therefore, grounds for the removal from office of N. Jack Thorp as District Attorney for District 27 upon the grounds of Willful Neglect of Duty, Willful Maladministration and Gross Partiality in Office under *Title 22 Section 1181 of the Oklahoma Statutes* warrant examination by a duly empaneled grand jury.

ELIZABETH RODRIGUEZ ASSAULT

As set forth above Sheriff Elliot was in charge of the Wagoner County Detention Facility. As such it was Sheriff Elliott's duty and responsibility to allow only authorized persons to enter the Detention Facility and interact with the inmates housed therein. In 2019 Sheriff Elliott in contravention of this responsibility allowed his spouse, Judy Elliott, to not only enter and work in the Detention facility but also allowed her to interact with inmates therein. Judy Elliott was not an employee of the Wagoner County Sheriff's Office. She was an employee of the Wagoner County Board of County Commissioners and was not authorized to work in the Detention Facility.

In 2019 Lisa Woolley was an inmate in the Wagoner County Detention Facility. Lisa Woolley was detained on charges of Murder First Degree. On a regular basis, Judy Elliott interacted with Lisa Woolley. At times Judy Elliott would

enter Lisa Woolley's cell. At other times, she would interact with Lisa Woolley in the Detention Facility Medical Room.

In 2019 Elizabeth Rodriguez was an inmate in the Wagoner County Detention Facility.

Elizabeth Rodriguez was detained on charges of Murder First Degree. On December 1, 2019 Judy Elliott was visiting with Elizabeth Rodriguez in the common area of the Detention Facility. This visit evolved into a heated argument. During this argument, Sheriff Chris Elliott approached his spouse and Ms. Rodriguez and intervened in the argument. Sheriff Elliott became angry with Elizabeth Rodriguez. Sheriff Elliott violently grabbed Elizabeth Rodriguez by the hair on her head and dragged her across the common area of the jail to a jail cell.

The actions of Sheriff Chris Elliott in allowing his spouse to access the Detention Facility, allowing her to interact with inmates therein and assaulting a female inmate amounted to acts of Corruption in Office, Willful Maladministration and Willful Neglect of Duty. Therefore, grounds for removal from office under *Title 22 Section 1181 of the Oklahoma Statutes* warrant examination and consideration by a duly empaneled grand jury.

Title 21 Section 445 of the Oklahoma Statutes provides that it is a felony offense for an unauthorized person to enter a county Detention Facility. *Title 21*

Section 644 of the Oklahoma Statutes criminalizes as a misdemeanor the unjustified assault by one person against another.

Both the unauthorized entry into the Detention Facility by Judy Elliott and the Assault by Sheriff Elliott occurred in Wagoner County. N. Jack Thorp as District Attorney for District 27 failed to bring criminal actions against Judy Elliott for unlawful entry into the Detention Facility and assault and battery charges against Sheriff Elliott for the assault and battery upon Elizabeth Rodriguez. As set forth above, the District Attorney has a statutory and constitutional duty to bring criminal charges against individuals when the facts so warrant. Criminal actions against Judy Elliott for unauthorized entry into the Wagoner County Detention Facility are now barred under the Oklahoma Statute of Limitations. Therefore, grounds for the removal from office of N. Jack Thorp as District Attorney for District 27 upon the grounds of Willful Neglect of Duty, Willful Maladministration and Gross Partiality in Office under *Title 22 Section 1181 of the Oklahoma Statutes* warrant examination by a duly empaneled grand jury.

EMERGENCY 911

In early 2024, the Wagoner County Commission began an investigation of the Wagoner County Emergency 911 Office and its Coordinator, Judy Elliott. As set forth above, Judy Elliott was an employee of the Wagoner County Commission and as such answered directly to the Board of County of Commissioners. On March 12,

2024, the Board of County Commissioners voted unanimously to place Judy Elliott on paid administrative leave pending the outcome of their investigation. On the same date Sheriff Chris Elliott, Under Sheriff Mark Secrist, Judy Elliott and Kerry Scott all entered the Emergency 911 Office. Kerry Scott was an employee of Wagoner County and served as the county Information Technology specialist. In the presence of Sheriff Elliott all of the files on Judy Elliott's computer were deleted.

The actions of Sheriff Elliott, Under Sheriff Mark Secrist and Judy Elliott were done without the knowledge or consent of the Board of County Commissioners and with the intent to hinder the County Commission investigation of Judy Elliott.

The actions of Sheriff Chris Elliott as set forth in the preceding two paragraphs amount to acts of Willful Maladministration and Corruption in office under *Title 22 Section 1181 of the Oklahoma Statutes* and warrant examination and consideration by a duly empaneled grand jury.

WHEREFORE Petitioners pray that this Court impanel a grand jury to investigate those areas of inquiry outlined above and any other unlawful actions that could result in Removal from Office of County Officials or the return of true bills of Indictment

Respectfully Submitted

Brent Watson

**Member of Wagoner County Citizens
Against Corruption, LLC.
P.O. Box 140241
Broken Arrow, Ok. 74014-0241**

WAGONER COUNTY

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DATE	LEGAL NAME	HOME ADDRESS	WAGONER COUNTY REGISTERED VOTER (CHECK BOX)	SIGNATURE
			Yes <input type="checkbox"/> No <input type="checkbox"/>	
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			Yes <input type="checkbox"/> No <input type="checkbox"/>	
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STATE OF OKLAHOMA
COUNTY OF WAGONER

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I. _____, Being first duly sworn, say: That I am at least eighteen (18) years old and that all signatures on the signature sheet were signed in my presence; I believe that each has stated his or her name, home address, and date of birth associated with his or her Oklahoma voter registration record, and that each signer is a legal voter of the State of Oklahoma.
Subscribed and sworn to before me this day _____ of _____, 2025

Circulator, original signature

Circulator, complete mailing address

Notary Public, signature

Expiration Date

Notary Commission Number

Notary public seal impression here

Notary Public address of record
