

**IN THE DISTRICT COURT OF TEXAS COUNTY
STATE OF OKLAHOMA**

THE STATE OF OKLAHOMA,
Plaintiff,

vs.

TAD BERT CULLUM,
Defendant.

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Case No. CF-2024-71

**TEXAS COUNTY
FILED**

OCT 23 2025

BILL OF PARTICULARS
IN RE PUNISHMENT

M. RENEE ELLIS
COURT CLERK
By 871 Deputy

I, George H. Leach III, the undersigned District Attorney for the First District, Texas County, State of Oklahoma, do hereby give the Court to know and be informed that the two counts of the offense of Murder in the First Degree, as charged within the original, and/or any amended Information, were committed by the defendant, Tad Bert Cullum. The undersigned further states that the defendant should be punished by Death due to and as a result of the following aggravating circumstances as set forth by law, to-wit:

1. The defendant knowingly created a great risk of death to more than one person (21 O.S.2021, § 701.12(2)): Veronica Butler and Jilian Kelley during the course of committing the crimes charged in the Information; Veronica Butler and Jilian Kelley were traveling together in a vehicle to pick up children for visitation when they were both ambushed and killed at the correction line on State Highway 94 in an intentionally planned attack to take both of their lives. Jilian Kelley was killed a few minutes after Veronica Butler, but within a few feet of Veronica Butler's dead body. This aggravator applies to both counts of Murder in the First Degree;

2. The murder of Veronica Butler was especially heinous, atrocious or cruel (21 O.S.2021, § 701.12(4)) in the following manner, to-wit: Veronica Butler suffered serious physical abuse, torture, physical and mental suffering and pain prior to and during the course of her death with the aid and support of the defendant as she was struck in the head multiple times with a hammer and chased down, tackled, shocked with a stun gun, and suffered thirty (30) sharp wounds to her head, neck, torso and extremities, including defensive wounds as she attempted to resist her murderer;

3. The murder of Jilian Kelley was especially heinous, atrocious or cruel (21 O.S.2021, § 701.12(4)) in the following manner, to-wit: Jilian Kelley suffered serious physical abuse, torture, physical and mental suffering and pain prior to and during the course of her death with the aid and support of the defendant as an attempt was made to break her neck and as she heard and/or saw the attack on Veronica Butler, as she was being attacked and killed, and she was shocked with a stun gun, and suffered sixteen (16) sharp wounds to her head, neck, left shoulder and extremities including defensive type wounds as she resisted her murderers;

4. The murder of Jilian Kelley was committed for the purpose of avoiding arrest and prosecution for the following crime (21 O.S.2021, § 701.12(5)), to-wit: Jilian Kelley was murdered with the aid and support of the defendant in order for the defendant to avoid prosecution for the crime of Murder in the First Degree of Veronica Butler. This circumstance is further supported by the first attempt upon Veronica Butler's life in which it was believed that Ms. Butler might be accompanied by her fiancé, Tracy Peitz, during said murder and thus he would also need to be killed. As a direct witness to the murder of Veronica Butler, Jilian Kelley was murdered to avoid arrest or prosecution for Ms. Butler's murder; and

5. There exists a probability that the defendant would commit criminal acts of violence that would constitute a continuing threat to society (21 O.S.2021, § 701.12(7)) in the following manner, to wit: The murder of Veronica Butler was planned for eight weeks, and the murder of Jilian Kelley was planned for four weeks. The defendant participated in the conspiracy and took deliberate measures to conceal and destroy the evidence of his acts of violence by carrying away the bodies in a freezer and burying them in a remote location. The defendant carefully planned for the disposition and concealment of key evidence in this murder. Further, in the first attempt upon Veronica Butler's life, the defendant planned on killing her fiancé, Tracy Peitz, if he were present. Lastly, the totality of the circumstances surrounding the crimes charged in the Information with the calloused nature of the murders demonstrates a blatant disregard for the sanctity of human life, and that at all times subsequent to the crimes charged in the Information, the defendant's actions and statements evidence absolutely no regret or remorse for his crimes. This aggravator applies to both counts of Murder in the First Degree.

WHEREFORE, the State of Oklahoma prays it be allowed to submit evidence of the foregoing aggravating circumstances to the Court, upon either a plea or verdict of guilty to the charges of Murder in the First Degree, so as to allow the Court to consider sentencing the defendant to Death as prescribed by law, and for such other and further relief to which the State of Oklahoma may be entitled.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that on or about the date of filing, a true and correct copy of the foregoing document was delivered to the following:

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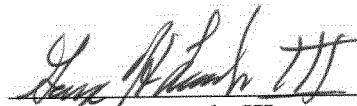
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