EXHIBIT A

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

IN RE: PETITION FOR THE CONVENING OF A CITIZENS' GRAND JURY

Case No. ______________________
Hon. ____________________, District Judge

PETITION FOR THE CONVENING OF A CITIZENS' GRAND JURY

(CIRCULATION COPY FOR SIGNATURE BY QUALIFIED ELECTORS OF TULSA COUNTY)

WARNING: It is a felony for anyone to sign a petition for the convening of a grand jury with any name other than his own, or knowingly to sign his name more than once for the convening of the grand jury, or to sign such petition when he is not a legal voter of the county. 22 O.S. § 311.1.

TO THE QUALIFIED ELECTORS OF TULSA COUNTY, OKLAHOMA: The undersigned qualified electors and registered voters of Tulsa County, Oklahoma, join in this Petition and request that a district judge order the convening of a citizens' grand jury, pursuant to Article II, Section 18 of the Oklahoma Constitution and 38 O.S. §§ 101-107, to investigate the matters set forth below. This Petition reproduces the complete text of the allegations approved by the Court for circulation. A copy of this Petition was filed with the Court Clerk of Tulsa County before any signatures were obtained, as required by 38 O.S. § 101. By signing, each signer states that he or she is a qualified elector of Tulsa County and has read, or has had read to him or her, the allegations below.

I. NATURE OF THE PETITION AND STATUTORY AUTHORITY

1. This is a citizens' petition to convene a grand jury pursuant to Article II, Section 18 of the Oklahoma Constitution and the grand jury petition statutes, 38 O.S. §§ 101, 102, 103, 105, 106, and 107, together with the warning required by 22 O.S. § 311.1.

> 2. Article II, Section 18 of the Oklahoma Constitution reserves to the people the right to require the convening of a grand jury. It provides that a grand jury "shall be ordered by a district judge upon the filing of a petition therefor signed by qualified electors of the county equal to the number of signatures required to propose legislation by a county by initiative petition as provided in Section 5 of Article V of the Oklahoma Constitution, with the minimum number of required signatures being five hundred (500) and the maximum being five thousand (5,000)." In any calendar year in which a grand jury has already been convened by petition, any subsequent petition requires double the minimum number of signatures.

3. The Oklahoma Court of Civil Appeals has held that the word "shall" in Article II, Section 18 is mandatory and leaves the district judge no discretion, once the petition is facially sufficient and the required signatures are certified, other than to order the grand jury convened. Key v. Owens, 1996 OK CIV APP 150, ¶ 16, 935 P.2d 1189, 1193.

4. Pursuant to 38 O.S. § 101, before any signatures are obtained a copy of this Petition is filed with the Court Clerk of Tulsa County, and this Petition states on its face:

   a. The subject matter or matters of the prospective grand jury;

   b. A reasonably specific identification of the areas to be inquired into; and

c. Sufficient general allegations to warrant a finding that the inquiry may lead to information which, if true, would warrant a true bill of indictment or an action for removal of a public official.

5. These are the only facial requirements. A grand jury petition "is sufficient" when it states those three things and "requires nothing more." Key v. Owens, 1996 OK CIV APP 150, ¶¶ 8-9, 935 P.2d 1189, 1191. Neither the Constitution nor the statutes require the petition to contain specific allegations of crime, and its sufficiency is to be "liberally construed." State ex rel. Harris v. Harris, 1975 OK 131, ¶ 12, 541 P.2d 171, 173.

6. The statutory scheme is expedited and sequential: within four (4) days (excluding weekends and holidays) of filing, the presiding district judge must enter an order determining facial sufficiency, and any order finding the petition deficient must "set forth clearly in writing each and every deficiency found," with two (2) days to amend and a further two (2) days for the judge to rule, 38 O.S. § 102; upon a sufficiency determination the circulators have forty-five (45) days to gather signatures, 38 O.S. § 103; the completed petition is filed with the Court Clerk and delivered to the Election Board, which has seven (7) business days to certify the number of qualified elector signatories, 38 O.S. § 106; and upon certification of a sufficient number the presiding judge "shall order the impaneling of a grand jury to convene within thirty (30) days," 38 O.S. § 107.

7. The conduct described herein occurred in, affected, or concerns Tulsa County, Oklahoma.

8. The allegations below are based upon public court records, government records, published reporting, records produced or withheld under the Oklahoma Open Records Act, and information supplied by persons claiming personal knowledge. Consistent with Article II, Section 18 and the liberal construction standard, Petitioner does not attach evidentiary exhibits; the records,

communications, and witnesses to be examined are identified with particularity in Section IX so that the grand jury may compel their production. See Harris, 1975 OK 131, ¶ 15 (signers need not possess concrete evidence of wrongdoing; development of evidence is "the function of the grand jury").

9. Petitioner does not allege that any named person has been adjudicated guilty of a criminal offense or of removable misconduct. Petitioner alleges that the facts and circumstances described below warrant compulsory investigation by a grand jury vested with authority to obtain testimony under oath, electronic communications, personnel records, public records, campaign records, and other evidence unavailable to private citizens.

10. The reviewing court's role at this stage is limited. Under Article II, Section 18 and 38 O.S. § 102, the Court passes only on the facial sufficiency of the Petition. Oklahoma courts have held that the presiding judge has no discretion to quash a facially sufficient petition based on the petitioners' perceived motive, on public policy concerns, or on the asserted adequacy of other investigations; "motive is not to be considered in ruling on sufficiency," and such concerns "are issues appropriately contemplated by the grand jury," not the reviewing court. Key v. Owens, 1996 OK CIV APP 150, ¶¶ 12, 16, 935 P.2d 1189, 1193; Harris, 1975 OK 131, ¶ 14. Because the subject of the requested investigation is the District Attorney and his office, Petitioner respectfully submits that the appropriate advisor to the Court and to any grand jury is independent counsel, as set forth in Sections VII and X.

II. PETITIONER

11. Petitioner is an organization made up of qualified electors and registered voters of Tulsa County, Oklahoma, located at P.O. Box 1139, Broken Arrow, Oklahoma 74013. Members of Petitioner state under penalty of perjury as set forth below.

12. Petitioner is prepared to appear before the grand jury, authenticate records in Petitioner's possession, identify witnesses, and provide testimony concerning the factual basis for this Petition.

III. PUBLIC OFFICIAL AND SUBJECT MATTER TO BE INVESTIGATED

13. Stephen A. Kunzweiler is the elected District Attorney for Oklahoma Prosecutorial District No. 14, consisting of Tulsa County.

14. Petitioner requests that the grand jury investigate whether District Attorney Kunzweiler, persons acting under his direction, employees of the Tulsa County District Attorney's Office, or persons acting in concert with them engaged in:

a. Habitual or willful neglect of official duty;

b. Gross partiality in office;

c. Oppression in office;

d. Corruption in office, including the use of public office or authority to procure or attempt to procure a personal benefit, profit, or perquisite;

e. Willful maladministration;

f. Obstruction or concealment of public records;

g. Misuse of public employees, public time, public equipment, or public resources for political purposes;

h. Knowing toleration, concealment, or rewarding of employee misconduct;

i. Improper interference with criminal, civil, post-conviction, or public record proceedings; and

j. Such criminal offenses, ethical misconduct, conflicts of interest, or additional grounds for removal as the grand jury's investigation may reveal.

15. A district attorney is an officer "not subject to impeachment" and is therefore removable through the statutory ouster process. Russell v. Henderson, 1979 OK 164, ¶¶ 3-4, 603 P.2d 1132, 1134 (impeachment under Article VIII, § 1 is reserved for officials elected statewide; 19 O.S. § 215.16 makes the district attorney subject to removal in the same manner as the former county attorney, incorporating 22 O.S. §§ 1181-1197).

16. The statutory causes for removal are set out in 22 O.S. § 1181 and include habitual or willful neglect of duty; gross partiality in office; oppression in office; corruption in office (defined to include "the use of public office or authority to procure or attempt to procure a personal benefit, profit, or perquisite"); extortion or willful overcharge of fees; and willful maladministration. These grounds are cumulative and "in addition to any other methods and causes provided by law." 22 O.S. § 1181; 51 O.S. § 91.

17. A grand jury is expressly authorized to present a written accusation charging any Section 1181 cause of removal to the district court of the county the officer serves. 22 O.S. § 1182; State ex rel. Grand Jury of McCurtain County v. Pate, 1977 OK 232, ¶ 23, 572 P.2d 226, 227-28 (the grand jury retains the power to initiate, investigate, and indict for removal). Removal proceedings are tried to a jury in the manner of a misdemeanor but "are not to be judged as strictly as a criminal indictment" and have attributes of both criminal and civil actions. State v. Price, 2012 OK 51, ¶ 10, 280 P.3d 943, 947.

18. Removal requires more than a mere mistake or difference in judgment. Conduct is "willful" when done either with a bad or evil intent or purpose, or contrary to a known duty, that is, in

deliberate or inexcusably reckless disregard of statutory duties the officer knew or should have known; "something more than a reckless error of judgment is required." State v. Price, 2012 OK 51, ¶¶ 28-29, 280 P.3d 943, 952; Rowe v. Grand Jury of Johnston County, 1985 OK 79, ¶ 11, 708 P.2d 1082, 1084. The areas of inquiry below are framed to determine whether that standard is met.

IV. AREAS TO BE INQUIRED INTO

A. Legal Advice and Institutional Failures at the Tulsa County Juvenile Detention Center

19. During 2022 through 2024, the Tulsa County Juvenile Detention Center was the subject of reported assaults, sexual misconduct allegations, staffing failures, and state inspection findings, while the District Attorney's Office, through its Civil Division, advised the Tulsa County Board of County Commissioners on the County's exposure and responsibilities. The grand jury should inquire into:

a. Whether District Attorney Kunzweiler, Civil Division Chief Doug Wilson, or any other employee advised the Board that Tulsa County bore no legal responsibility for conditions, abuse, supervision, staffing, contracting, or constitutional violations at the facility;

b. What facts were known to the Office concerning reported assaults, sexual misconduct, staff misconduct, deficient supervision, state inspection findings, staffing failures, improper use of isolation, or other dangerous conditions, and when;

c. When the Office first received complaints, reports, notices, claims, litigation demands, or inspection findings indicating that children were being abused or exposed to unconstitutional conditions;

d. Whether the Office advised county officials to investigate, preserve evidence, suspend or remove employees, notify law enforcement, alter contractual relationships, assume operational control, or take other steps to prevent continuing harm;

e. Whether advice concerning the County's purported lack of responsibility delayed intervention, permitted additional harm, impaired evidence preservation, or increased Tulsa County's civil liability;

f. Whether the Office had conflicting duties arising from its representation of county officials, its prosecutorial authority, and its knowledge of potential criminal conduct inside the facility; and

g. Whether any employee or official concealed complaints, discouraged reporting, withheld records, minimized known dangers, or made inaccurate representations regarding responsibility for the facility.

B. State v. Hankins and the Management of Employee Credibility

20. In State v. Timothy Francis Hankins, Jr., Tulsa County Case No. CF-2020-5224, Assistant District Attorney Ashley Nix (now Ashley Thompson) testified concerning her communications with Tulsa Police Detective Darren Ehrenrich; Hankins was acquitted, and related civil litigation followed in Hankins v. Ehrenrich, N.D. Okla. Case No. 22-CV-515-SEH-CDL. The public record establishes the acquittal, the federal litigation, and the communications at issue; it does not itself establish perjury or entrapment, which are proper subjects for examination of the underlying evidence. The grand jury should inquire into:

a. Whether Ashley Nix/Thompson made materially inaccurate or knowingly false statements under oath in the Hankins matter concerning her communications with Detective Ehrenrich or any other material matter;

b. Whether telephone records, electronic messages, law enforcement records, or trial or deposition testimony materially contradicted her sworn testimony;

c. Whether the Office conducted a credibility, ethical, employment, Brady, or Giglio review after the acquittal;

d. Whether Mr. Kunzweiler reviewed the trial transcript, communications records, internal investigative records, or the discovery produced in Hankins v. Ehrenrich;

e. Whether Mr. Kunzweiler was informed of workplace relationships, conflicts of interest, or other matters bearing on Ms. Thompson's credibility;

f. Whether Ms. Thompson was promoted to leadership positions after Mr. Kunzweiler knew of unresolved credibility or ethical concerns, and, if so, why;

g. Whether Ms. Thompson's credibility history was disclosed, as constitutionally and ethically required, in cases in which she acted as a prosecutor or material witness;

h. Whether the Office maintained and followed policies concerning prosecutors accused of dishonesty, material misstatements, conflicts, or abuse of official authority; and

i. Whether other employees were discouraged from reporting concerns about Ms. Thompson or were subjected to retaliation or disparate treatment for doing so.

C. The April Wilkens Proceedings and Conflicts of Interest

21. Post-conviction and resentencing proceedings concerning April Wilkens, Tulsa County Case No. CF-1998-2173, have been litigated by the District Attorney's Office. Public reporting describes a residential property formerly owned by Ms. Wilkens being purchased by personnel associated with the Office, allegations of disqualifying conflicts, communications attributed to District Attorney Kunzweiler, and a communication involving a sitting judge. The grand jury should obtain the complete messages, deeds, pleadings, disclosures, calendars, invitations, photographs, and testimony before determining whether misconduct occurred, and should inquire into:

a. Whether Assistant District Attorneys Ashley Thompson and Luke Thompson purchased a residence formerly owned by April Wilkens while proceedings concerning Ms. Wilkens were being litigated by their Office;

b. Whether either prosecutor possessed confidential, privileged, nonpublic, evidentiary, victim related, or strategic information concerning the property or Ms. Wilkens;

c. Whether the purchase created an actual conflict, an appearance of partiality, a financial interest, or circumstances requiring disclosure, screening, recusal, or appointment of independent counsel;

d. Whether the purchase was disclosed promptly to Ms. Wilkens, her counsel, the court, Mr. Kunzweiler, or the Attorney General;

e. Whether Mr. Kunzweiler approved, minimized, concealed, or failed to address the conflict or appearance of impropriety;

f. Whether Mr. Kunzweiler, Assistant District Attorneys, judges, or other public officials participated in a wedding or social event at the property while the Wilkens litigation remained pending, and whether participation reflected or produced undisclosed relationships relevant to the proceeding;

g. Whether office personnel made statements about the prior ownership of the property by an active defendant, and whether Mr. Kunzweiler was informed of them;

h. Whether Mr. Kunzweiler sent a text message to the Governor's staff stating that he was "busy keeping April Wilkens in prison," the context and recipients of that communication, and whether it reflected prejudgment, retaliatory intent, or a purpose inconsistent with the fair administration of justice;

i. Whether any judge or judicial officer communicated with Mr. Kunzweiler or members of his Office outside the presence of Ms. Wilkens and her counsel concerning a pending or impending issue in the Wilkens proceedings, whether any such communication was substantive, whether it was disclosed to all parties, and whether any lawful exception applied; and

j. Whether Mr. Kunzweiler failed to screen employees, disclose material relationships, or request independent review despite facts creating an actual or apparent conflict.

D. The Rosario Chico Prosecution

22. The prosecution of Maria del Rosario Chico Vietti for child stealing or a related offense, and related family and protective order matters (Tulsa County Case Nos. CF-2022-121, CM-2018-5483, CM-2020-4176, PO-2018-4106, PO-2020-3718, FD-2018-1255, and PG-2021-736), raise questions concerning the source of the charging decision and the handling of potentially exculpatory material, including a handwritten note from guardian ad litem Catherine Welsh. The grand jury should inquire into:

a. Whether Mr. Kunzweiler personally initiated, directed, or assumed the prosecution of Ms. Chico after receiving a request, note, communication, or referral from Catherine Welsh;

b. Whether Ms. Welsh was Mr. Kunzweiler's political supporter, donor, friend, or associate, and whether that relationship influenced charging, case assignment, litigation decisions, or Mr. Kunzweiler's personal participation;

c. Whether the handwritten note or other communication from Ms. Welsh contained information favorable to Ms. Chico, information bearing on Ms. Welsh's bias or credibility, impeachment evidence, or evidence relevant to selective prosecution;

d. Whether the note was created and transmitted to Mr. Kunzweiler to gain advantage in a related child custody case;

e. When the Office obtained the note, when prosecutors first reviewed it, when Ms. Chico requested it, and when it was produced, and whether its withholding violated Chico's due process rights under Brady v. Maryland, 373 U.S. 83 (1963);

f. Whether the note or related communications were withheld intentionally, negligently, pursuant to office policy, or contrary to a court order or constitutional disclosure obligation;

g. Whether the Office adequately evaluated Ms. Chico's allegations of domestic violence, coercive control, necessity, duress, or efforts to protect her children;

h. Whether the decision to drop charges against Christopher Vietti, the father of Ms. Chico's children and her alleged abuser, was motivated by a desire to improve the posture of the prosecution against Ms. Chico;

i. Whether the charging decision was influenced by a private participant in the related domestic case rather than by an independent assessment of admissible evidence and public safety; and

j. Whether Mr. Kunzweiler's personal involvement created an actual or apparent conflict requiring disclosure or recusal.

E. Henry Jamerson, Wrongful Conviction Evidence, and Post-Conviction Duties

23. The Henry Jamerson matter (Tulsa County Case Nos. CF-1990-2836 and CF-1991-3429; Appellate Case No. PC-2024-733) involves representations concerning the availability of biological evidence, a complaining-witness recantation, and DNA results. The grand jury should inquire into:

a. Whether the Office represented to a court, opposing counsel, or the public that biological evidence in Jamerson's case had been destroyed, lost, or was unavailable;

b. What inquiry the Office made of the Tulsa Police Department, evidence custodians, laboratories, property rooms, or archives before making any such representation;

c. Whether evidence was later located that could have been located earlier through reasonable diligence;

d. When Mr. Kunzweiler learned that the complaining witness had recanted and that DNA testing excluded Jamerson;

e. Whether Mr. Kunzweiler or his Office fairly and independently reassessed the conviction after the recantation and DNA results;

f. Why the Office continued to oppose relief or pursue appellate review, and whether those decisions rested on a good faith evidentiary assessment or on institutional defensiveness or protection of another agency;

g. Whether the Office's conduct unnecessarily prolonged the proceedings, delayed redress, or materially increased taxpayer exposure; and

h. Whether the Office maintained adequate policies requiring prosecutors to investigate credible innocence claims, locate biological evidence, correct inaccurate representations, and disclose misconduct by law enforcement agencies.

F. Open Records, Record Retention, and Use of Private Communications

24. The Office's compliance with the Oklahoma Open Records Act, 51 O.S. §§ 24A.1 et seq., is at issue, including in a pending 2026 Tulsa County lawsuit, McDugle and Humphrey v. Kunzweiler, Case No. CV-2026-1016. The grand jury should inquire into:

a. Whether the Office maintains policies reasonably calculated to comply with the Open Records Act;

b. Whether the Office has repeatedly delayed, denied, narrowed, or inadequately searched for responsive records without lawful justification;

c. Whether Mr. Kunzweiler or employees conducted public business through personal telephones, private email accounts, encrypted applications, or social media messaging not searched in response to requests;

d. Whether records were deleted, withheld, mislabeled, incompletely produced, or improperly treated as personal communications despite concerning public business;

e. Whether the Office asserted inconsistent explanations regarding the existence, custody, privilege, or location of responsive records;

f. Whether nonexempt recipients, senders, dates, or metadata were improperly redacted;

g. Whether the Office obstructed requests relating to the Richard Glossip matter, the juvenile detention center, the Wilkens proceedings, employee conduct, or other matters of public concern;

h. Whether the Office failed to preserve communications after receiving a request, litigation notice, subpoena, or other preservation obligation;

i. Whether the Office allows employees to identify their own responsive records without supervision or without limiting access to devices during searches; and

j. Whether records retention failures were accidental, systemic, or deliberately designed to frustrate access or conceal unlawful conduct.

G. Oklahoma Survivors' Act Waiver Language in Plea Documents

25. The Office is reported to have used plea document language requiring or requesting defendants to waive present or future relief under the Oklahoma Survivors' Act, 22 O.S. § 1090.1 through § 1090.5. The grand jury should inquire into:

a. Whether Mr. Kunzweiler authorized plea documents requiring or requesting waiver of Oklahoma Survivors' Act claims;

b. Who drafted and approved the language, when it was implemented, and in how many cases it was presented;

c. Whether defendants were told that a plea offer was conditioned upon surrendering relief later authorized by the Legislature;

d. Whether the waiver was applied to persons whose criminal conduct may have resulted from domestic violence, trafficking, coercion, or abuse;

e. Whether the Office evaluated the legality, public policy implications, and legislative purpose of the waiver;

f. Whether judges and defense counsel were informed that the language was standardized office policy;

g. Whether the Office sought external legal advice before implementing the form; and

h. Whether the language was withdrawn or modified, and whether affected defendants were notified.

H. Use of Public Employees and Resources for the 2026 Re-Election Campaign

26. Oklahoma law regulates the use of public employees and public resources in political activity. See 21 O.S. § 360; Okla. Ethics Comm'n R. 2.3-2.4; 19 O.S. §§ 138.11-138.19. Section 360 prohibits public employees and officials from coercing, commanding, advising, or directing state employees to contribute salary, compensation, time, effort, or anything else of value for political purposes, while Ethics Commission rules restrict specified uses of public funds, property, and time for political fundraising and election activity. For purposes of this inquiry, voluntary political activity undertaken by employees on their own time should be distinguished from activity that was compelled, directed, or performed using public time or resources. The grand jury should inquire into:

a. Whether employees performed campaign work for Mr. Kunzweiler during compensated county working hours;

b. Whether employees used county owned computers, telephones, email accounts, databases, vehicles, office space, printing, supplies, social media accounts, contact lists, photographs, or video for campaign purposes;

c. Whether employees were directed, pressured, or induced to attend campaign events, display signs, share campaign content, recruit supporters, make contributions, or campaign on Election Day (June 16, 2026);

d. Whether evaluations, assignments, promotions, favorable treatment, or retaliation were connected to an employee's support or nonsupport for the campaign;

e. Whether employees recorded leave or compensatory time for campaign activities conducted during ordinary work hours, such as sign waving on Election Day;

f. Whether Communications and Community Outreach Director Adam Jones performed campaign management, political communications, fundraising, scheduling, event, opposition research, voter contact, or speaking work using public time or resources, including at engagements before the Tulsa Republican Women's Club on March 10, 2026, and the Tulsa Area Republican Assembly on April 21, 2026;

g. Whether government created photographs, video, mailing lists, media relationships, or official social media content were transferred to or used by the campaign;

h. Whether campaign activity was coordinated through official staff meetings, county email, text message groups, or supervisors acting within their governmental authority; and

i. Whether Office employees, including Ashley Thompson, Courtney Wilson, Leyna Churchill, and Anna Maner, conducted campaign activities during regular business hours or on state issued devices, and whether they were instructed to do so by Mr. Kunzweiler or others associated with the campaign.

I. Administration, Attendance, Delegation, and Supervision of the Office

27. Petitioner is informed that former employees have reported working at the Office for extended periods without meeting or seeing the elected District Attorney, and that on March 28, 2026, during a public campaign appearance, Mr. Kunzweiler stated in substance that he "will not lead from a desk," that he is not an administrator, and that he prioritizes trying cases and low level case work over the leadership and administrative duties of his elected position. The grand jury should inquire into:

a. Whether Mr. Kunzweiler regularly performs the administrative, supervisory, prosecutorial, and public duties of his elected office;

b. The number of days and hours during which he was physically present, conducting official business elsewhere, on leave, at church, in prayer groups, or unavailable during each year of the relevant period;

c. Whether calendars, security access records, parking records, telephone records, email activity, meeting records, travel records, and witness testimony corroborate or refute reports of prolonged absence;

d. Whether significant charging, personnel, budgeting, civil advice, policy, or litigation decisions were delegated without adequate supervision;

e. Whether employees were unable to obtain decisions, guidance, discipline, or review from the elected District Attorney; and

f. Whether absence or inadequate supervision contributed to the employee misconduct, records failures, conflicts, disclosure problems, or maladministration described in this Petition.

J. Tulsa Little League Litigation

28. The District Attorney's Civil Division advises the Board of County Commissioners regarding litigation involving Tulsa Little League and LaFortune Park. The grand jury should inquire into:

a. Whether Mr. Kunzweiler, Doug Wilson, or another member of the Civil Division advised the Board to file, delay, stay, dismiss, or otherwise alter the Tulsa Little League litigation;

b. Whether the timing of any recommendation was influenced by Mr. Kunzweiler's 2026 campaign rather than the County's litigation interests;

c. Whether Mr. Kunzweiler or his employees communicated to the Board, in executive session, about the political consequences of the case as a reason for delaying the litigation;

d. Whether the Board discussed the litigation or its political consequences in executive session, and whether the minutes, agendas, and legal justification for any executive session complied with the Oklahoma Open Meeting Act; and

e. Whether public legal advice was manipulated or delayed for Mr. Kunzweiler's personal electoral benefit.

K. Campaign Relationships and Prosecutorial Decision Making

29. Petitioner identifies specific matters in which campaign contributions, endorsements, or other political support by defense counsel occurred while matters involving those attorneys' clients were pending and were followed by dispositions favorable to those clients. These circumstances do not themselves establish that campaign support influenced prosecutorial decision making, but they warrant inquiry into whether political or personal relationships affected the exercise of prosecutorial discretion. The grand jury should inquire into:

a. Whether campaign contributions, endorsements, fundraising assistance, or personal relationships provided by criminal defense attorneys to Mr. Kunzweiler or his campaign influenced, or created the appearance of influencing, plea offers, sentencing recommendations, charge reductions, dismissals, expungement positions, or other favorable treatment for those attorneys' clients;

b. Whether attorney Allen Smallwood contributed to Mr. Kunzweiler's campaign while representing Elliott Binney in State v. Elliott Binney, Tulsa County Case No. CF-2024-557; the date of any contribution; the status of the case on that date; and whether Mr. Kunzweiler, campaign personnel, assigned prosecutors, or Mr. Smallwood communicated about the contribution or the disposition of the case;

c. Whether the resolution of the Binney case, including the plea to first degree manslaughter, leaving the scene of a fatal collision, and child neglect counts; the dismissal of other counts; and the State's sentencing recommendation departed from ordinary office practice or outcomes in materially comparable cases;

d. Whether Mr. Kunzweiler personally approved, directed, modified, or communicated about the Binney plea or sentencing recommendation; what written analysis supported the disposition; and whether the contribution or Mr. Smallwood's close relationship with Mr. Kunzweiler was disclosed to the victims' family, or the court;

e. Whether Mr. Swab, while representing Wesley Cole in State v. Wesley Adam Cole, Tulsa County Case No. CF-2024-3158, publicly endorsed Mr. Kunzweiler's re-election while Mr. Cole's prosecution, plea negotiations, sentencing, or expungement remained pending;

f. Whether the court records in the Cole case reflect multiple rape by instrumentation and sexual battery allegations involving multiple women; whether those charges were dismissed or amended; whether the case was resolved through a plea to a non-sex offense, probation, no sex offender registration requirement, and an unusually expedited expungement; and whether each component complied with Oklahoma law, office policy, and the victims' rights guaranteed by Article II, Section 34 of the Oklahoma Constitution;

g. Whether the victims in the Cole matter received timely notice of all plea negotiations, hearings, proposed sentencing terms, and contemplated expungement; whether their views were accurately communicated to the court; and whether any victim was excluded or mischaracterized;

h. Whether Mr. Swab's endorsement or other political support was requested, offered, accepted, publicized, or coordinated before, during, or after the material plea negotiations, and whether any communication linked, expressly or implicitly, political support to official action;

i. Whether the Binney and Cole matters received unusual access, supervisory review, reassignment, expedited consideration, charge concessions, sentencing recommendations, or expungement concessions because of defense counsel's relationship with Mr. Kunzweiler; and

j. Whether a broader review of felony cases handled by attorneys who contributed to, endorsed, or publicly supported Mr. Kunzweiler reveals a significant pattern of more favorable treatment than comparable cases handled by attorneys who provided no such support.

V. GENERAL ALLEGATIONS SUPPORTING GRAND JURY INQUIRY

30. The foregoing matters do not consist merely of disagreement with individual charging decisions or the lawful exercise of prosecutorial discretion. Taken together, they raise questions concerning whether known employee credibility and conflict concerns were ignored or rewarded; whether the Office's civil advice failed to protect children and taxpayers from foreseeable harm; whether personal or political relationships affected charging and litigation decisions; whether innocence claims and exculpatory evidence were approached with the neutrality required of a prosecutor; whether public records are routinely concealed, destroyed, or inadequately maintained; whether public employees and property were used to advance the District Attorney's political interests; and whether Mr. Kunzweiler knowingly failed to supervise, investigate, discipline, disclose, recuse, or correct misconduct within his Office.

31. Many facts material to these inquiries are exclusively within the possession of the District Attorney's Office, Tulsa County, law enforcement agencies, courts, private communication providers, or employees who may fear retaliation, and cannot be compelled without the grand jury process. A grand jury is therefore necessary to obtain testimony under oath, issue subpoenas, examine electronic communications and metadata, inspect personnel and discipline records, assess credibility, and determine whether criminal charges or removal proceedings are warranted.

32. Consistent with Harris, this Petition is not required to allege specific crimes or to attach evidence; the development of evidence is the function of the grand jury. Harris, 1975 OK 131, ¶¶ 12-15. Should the grand jury elect to present a written accusation for removal under 22 O.S. § 1182, that accusation must plead ultimate facts and specific instances supporting each statutory ground, as required of a removal accusation. Russell v. Henderson, 1979 OK 164, ¶¶ 12-14, 603 P.2d 1132, 1136.

VI. LEGAL SUFFICIENCY AND GROUNDS FOR REMOVAL

33. At the initial judicial review stage, 38 O.S. § 101 does not require Petitioner to prove every allegation or establish guilt. It requires only a reasonably specific identification of the subject matter and areas of inquiry, together with sufficient general allegations that the investigation may lead to information warranting indictment or removal. Key v. Owens, 1996 OK CIV APP 150, ¶¶ 8-9, 935 P.2d 1189; Harris, 1975 OK 131, ¶ 12.

34. This Petition identifies the official and offices involved, the specific cases and policies at issue, relevant time periods, particular communications and records to be examined, and the potential grounds for removal enumerated in 22 O.S. § 1181.

35. The allegations, if substantiated, could establish more than isolated error. They could establish a continuing pattern of knowing neglect, favoritism, concealment, improper political activity, failure to supervise, misuse of authority, or reckless disregard of known legal duties, conduct that, if proven, would satisfy the "willful" standard governing removal. State v. Price, 2012 OK 51, ¶¶ 28-29, 280 P.3d 943.

36. Petitioner therefore requests that the Court determine this Petition facially sufficient for circulation. That determination is not a finding that Mr. Kunzweiler or any other person committed

misconduct; that determination belongs to the grand jury after investigation. Key v. Owens, 1996 OK CIV APP 150, ¶ 16, 935 P.2d 1189.

VII. INDEPENDENT COUNSEL AND JUDICIAL ASSIGNMENT

37. Many of the matters identified in this Petition arise from proceedings in the Tulsa County District Court, and the requested grand jury investigation may require examination of records, communications, rulings, or testimony relating to those proceedings. For example, District Judge David Guten has presided over proceedings in the Wilkens, Chico, Hankins, and Jamerson matters. To avoid placing a judge who has previously presided over one or more of the identified matters in the position of supervising a grand jury investigation that may examine those same proceedings, Petitioner respectfully requests that the grand jury proceeding be assigned to a district judge who has not presided over or otherwise participated in any matter identified in this Petition, including, if necessary, a judge from outside Tulsa County.

38. Because the elected District Attorney and members of the Tulsa County District Attorney's Office are subjects, potential witnesses, and custodians of evidence relevant to the requested investigation, 22 O.S. § 340(C) prohibits the District Attorney and assistant district attorneys from participating in an official capacity in a grand jury investigation of the Office or persons officially associated with it.

39. The conflict is institutional rather than limited to a single assistant. Accordingly, upon convening of the grand jury, Petitioner requests that the Tulsa County District Attorney's Office be disqualified from advising or otherwise participating in the grand jury's investigation of these matters and that the Attorney General appoint an assistant attorney general or a district attorney or

assistant district attorney from another district to advise the grand jury as provided by 19 O.S. §§ 215.9 and 215.13 and 22 O.S. § 340(A).

VIII. REQUEST TO SEAL SIGNATORIES' PRIVATE IDENTIFYING INFORMATION

40. Given the sensitive nature of these proceedings and concerns about the intimidation of grand jury signatories, Petitioner requests that, should this Petition be approved for circulation, the Court order that the residential addresses and other private identifying information of signatories and electors be maintained under seal or redacted from the public record to the extent permitted by law. Petitioner acknowledges that the Tulsa County Election Board must retain access to the signatures and voter information necessary to certify the number of qualified electors under 38 O.S. § 106, and this request is not intended to impair that statutory function.

IX. RECORDS, COMMUNICATIONS, AND WITNESSES TO BE OBTAINED BY THE GRAND JURY

41. Consistent with Article II, Section 18 and Harris, no exhibits are attached to this Petition. The following records, communications, and witnesses are identified with particularity so that, upon convening, the grand jury may compel their production and appearance:

a. Juvenile Detention Center: state inspection reports and findings (2022-2024); complaints, incident reports, lawsuits, and claims concerning the facility; Civil Division advice and correspondence to the Board of County Commissioners; and related litigation records.

b. State v. Hankins: the trial transcript in CF-2020-5224; the telephone and electronic message records between Ashley Nix/Thompson and Detective Darren Ehrenrich; and the complaint, material exhibits, dispositive order, and final judgment in Hankins v. Ehrenrich, N.D. Okla. No. 22-CV-515-SEH-CDL.

c. April Wilkens: the disqualification motion and all exhibits filed in CF-1998-2173; the property deed and closing records; complete text and email chains involving Mr. Kunzweiler, Ashley Thompson, Luke Thompson, and the Governor's staff (including the "busy keeping April Wilkens in prison" message); calendars and event invitations; and any communications involving any judge or judicial officer concerning the Wilkens proceedings.

d. Maria del Rosario Chico Vietti: the charging documents and case files in CF-2022-121, CM-2018-5483, CM-2020-4176, PO-2018-4106, PO-2020-3718, FD-2018-1255, and PG-2021-736; the handwritten note and related communications from guardian ad litem Catherine Welsh; discovery requests and production correspondence; and campaign finance records reflecting any relationship between Ms. Welsh and Mr. Kunzweiler. Witnesses: Catherine Welsh; the assigned prosecutors; and records custodians.

e. Henry Jamerson: DNA reports and recantation evidence; evidence custody records of the Tulsa Police Department; and the orders and filings in CF-1990-2836, CF-1991-3429, and PC-2024-733. Witnesses: attorney Dan Smolen; Henry Jamerson; and Assistant Attorney General Randall Young (former post-conviction counsel for the Tulsa County District Attorney's Office), officers at Tulsa Police Department.

f. Open Records: the complete Open Records Act requests and responses, search descriptions, and withheld record logs; and the pleadings in McDugle and Humphrey v. Kunzweiler, CV-2026-1016. Witness: Assistant District Attorney Andrew Higginbotham (Civil Division).

g. Oklahoma Survivors' Act: the standardized plea waiver form and examples showing its actual use. Witnesses: Tulsa County District judges, personnel of the District Attorney's Office, and the Tulsa County Public Defender's Office.

h. Campaign Resources: staff time and leave records; campaign communications; social media metadata; photographs; county device records; and witness accounts. Witnesses: Adam Jones; Ashley Thompson; Courtney Wilson; Leyna Churchill; Anna Maner; Brenda Tiemann (Tulsa Republican Women's Club); and Donnie Tiemann (Tulsa Area Republican Assembly).

i. Administration and Attendance: building security access, parking, calendar, travel, and email activity records; and testimony of current and former employees concerning the elected District Attorney's presence and supervision, and the March 28, 2026 recorded public statement.

j. Tulsa Little League: the pleadings and any stay order; executive session agendas, minutes, and legal justifications of the Board of County Commissioners; and related communications.

k. Campaign Relationships and Prosecutorial Decision Making: the complete files in CF-2024-557 (Binney) and CF-2024-3158 (Cole); plea and sentencing memoranda; internal approvals; victim contact records; emails, texts, and call logs; calendars; campaign finance reports; endorsement communications; and statistically analyzed comparable case data.

SIGNATURES OF QUALIFIED ELECTORS OF TULSA COUNTY

READ BEFORE SIGNING. By signing below, I state, under the penalties provided by law, that: (1) I am a qualified elector and registered voter of Tulsa County, State of Oklahoma; (2) I have personally signed this Petition with my own name and have not knowingly signed it more than once; and (3) I have read the foregoing allegations, or have had them read to me. I understand the WARNING set forth on the first page of this Petition. Any signer may have his or her name removed from this Petition, at any time before the Election Board certifies the number of signatures, by filing a written request with the Court Clerk of Tulsa County, as provided in 38 O.S. § 105.

Signature Sheet No. ______ of ______ County of signature: Tulsa County, Oklahoma

Each signer must legibly print his or her legal first and last name, sign, and provide the signer's residence address (house number and street), city and ZIP code, and month and day of birth associated with the signer's Oklahoma voter registration record.

1. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
2. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
3. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
4. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
5. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
6. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
7. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________

8. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
9. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________
10. Printed Name: ________________________________
   Signature: ________________________________
   Residence Address: ________________________________
   City/ZIP: _______________ Date of Birth (Mo/Day): __________
   Date Signed: __________

CIRCULATOR'S VERIFICATION OF SIGNATURES

State of Oklahoma)

) ss.

County of ____________)

I, ____________________________, being first duly sworn, say: That I am at least eighteen (18) years old, a registered voter of this state, and that all signatures on the foregoing signature sheet were signed in my presence; I believe that each signer has stated his or her name, mailing address, county of residence, 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 and of Tulsa County.

____

Signature of Circulator

____

Printed Name and Complete Address of Circulator

Subscribed and sworn to before me this ______ day of ____________________, A.D. 20____.

____

Signature and title of the Oklahoma notarial officer before whom oath is made, and his or her complete address, commission number and expiration date, and official Oklahoma notary public seal.