

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

In Re: Impaneling a Grand )  
Jury To investigate improper and or )  
Illegal Activities by Labor Commissioner )CASE: CJ 2003-8014  
Brenda Reneau Wynn and District Attorney )  
Wes Lane. )

**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 or her name more than once for the convening of the grand jury, or to sign such petition when he is not a legal voter of Oklahoma County.

APPROVED AS TO FORM:

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James E. Dunn, OBA 15222  
James E. Dunn & Associates, P.C.  
116 South Walker  
Oklahoma City OK 73102  
Telephone (405) 239-1000  
Facsimile (405) 239-1003  
Attorney at Law

## AMENDED PETITION FOR CONVENING A GRAND JURY

We the undersigned qualified electors of Oklahoma County, petition this court pursuant to Article II § 18 of the Oklahoma Constitution and 38 O.S. § 101 and Title 22 O.S. § 311 *et. seq.* and the Oklahoma Supreme Court Decision in State Ex Rel. Harris v. Harris, 541 P.2d 171 to immediately call a Grand Jury to convene in Oklahoma County for the purpose of conducting a thorough investigation into all matter set forth herein, said investigation to include but not be limited to:

### SPECIFIC IDENTIFIED SUBJECT MATTERS OF AREAS TO BE INQUIRED WITH RESPECT TO LABOR COMMISSIONER BRENDA RENEAU WYNN

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to the summer of the year 2002, wherein Labor Commissioner Brenda Reneau Wynn was accused of illegal “bid-splitting” (dividing a contract for selling goods or services to a state entity so that a bid that would, in its aggregate require competitive bidding, can be accomplished piecemeal and avoid the competitive bidding process).

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether Commissioner Wynn converted campaign property to personal use as been alleged and/or publicly reported.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may

include, but not be limited to whether Ms. Wynn conducted political campaign business on state time as been alleged and/or publicly reported.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether Ms. Wynn advised an employee and or campaign worker as to methods to circumvent state campaign laws.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to Ms. Wynn hiring Patrick McGuigan after he made a large campaign contribution,.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether Ms. Wynn helped Patrick McGuigan secure a contract for personal services equal to or greater than the amount he donated to Ms. Wynn campaign.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to Ms. Wynn's funding Patrick McGuigan's through service contracts at the same time she was laying off and furloughing employees because of budget cuts.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to Brenda Reneau Wynn and or her affiliates made substantial campaign contributions to District Attorney Lane's campaign after the Oklahoma

Attorney General had referred Ms. Wynn's actions over to District Attorney Wes Lane for inquiry and possible prosecution.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, Brenda Reneau Wynn pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to why more one year has passed since District Attorney Wes Lane has received these allegations against Commissioner Wynn and no investigation has ensued.

STATUTORY TITLE AND SECTION NUMBERS OF  
ALLEGED VIOLATIONS POSSIBLY COMMITTED BY  
COMMISSIONER BRENDA RENEAU WYNN

1. Whether Commissioner Wynn illegally conspired to convert campaign property to personal use contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
2. Whether Commissioner Wynn conspired to illegally conducted political campaign business on state time contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
3. Whether Commissioner Wynn illegally advised an employee, conspired with such employee and/or solicited such employee to circumvent state campaign laws contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
4. Whether Commissioner Wynn illegally advised a campaign worker , conspired with such worker and/or solicited such worker to circumvent state campaign laws contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

5. Whether Commissioner Wynn accepted a bribe from Patrick McGuigan contrary to Okla. Stat. tit., 21 § 266 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
6. In relationship to Patrick McGuigan, whether Commissioner Wynn accepted an emolument, gratuity and/or reward for omitting or deferring the performance of any official duty and/or promised to omit and/or deferred the performance of such contrary to Okla. Stat. tit., 21 § 270 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
7. In relationship to Patrick McGuigan and/or during Commissioner Wynn's campaign efforts, whether Commissioner Wynn willfully failed or refused to perform the duties of her office contrary to Okla. Stat. tit., 21 § 345 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
8. In relationship to Patrick McGuigan, illegal bid splitting and/or the subject matter referred over by the Attorney General to District Attorney Wes Lane, whether Commissioner Wynn willfully made an omission to perform a duty contrary to Okla. Stat. tit., 21 § 581 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
9. Whether Commissioner Wynn gave, offered and/or promised to give a bribe to District Attorney Wes Lane in order to influence such officer's act or judgment on contrary to Okla. Stat. tit., 21 § 381 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
10. Whether Commissioner Wynn in any manner accepted and/or requested a gift or gratuity and/or promise of such from Wes Lane and/or Patrick McGuigan contrary to

Okla. Stat. tit.. 21 § 382 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

11. In relationship to her campaign activities, whether Commissioner Brenda Reneau Wynn conspired to commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit. 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

12. In relationship to her activities with Patrick McGuigan, whether Commissioner Brenda Reneau Wynn conspired to commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit. 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

13. In relationship to her campaign contributions and/or connection with District Attorney Wes Lane, whether Commissioner Brenda Reneau Wynn conspired to commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit. 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

**SPECIFIC IDENTIFIED SUBJECT MATTERS OF AREAS TO  
BE INQUIRED WITH RESPECT TO  
OKLAHOMA COUNTY DISTRICT ATTORNEY WES LANE**

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to Commissioner Brenda Reneau Wynn and or her affiliates made campaign contributions to District Attorney Lane's campaign and District Attorney Wes Lance accepting such funds after the Oklahoma Attorney General had referred Ms. Wynn's actions over to District Attorney Wes Lane for inquiry and possible prosecution.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to why more one year has passed since District Attorney Wes Lane has received these allegations against Commissioner Wynn and no investigation and/or prosecution has ensued.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to the facts surrounding the July 8, 2002 arrest of Donald Pete and subsequent investigation, prosecution and/or tampering with the evidence of such case.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to the videographer of Donald Pete's arrest subsequent claims that public officials attempted to conceal the true nature of events surrounding Donald Pete's arrest.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether there were threats to arrest the videographer if he did not surrender his videotape of the Donald Pete arrest.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether there were attempts to intimidate said videographer into making false statements about the Donald Pete arrest.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to whether there was the filing of false police reports and probable cause affidavits in the Donald Pete matter which were used, accepted, complied and/or relied upon by Wes Lane and his staff.

Inquire whether there is any willful and corrupt misconduct in office of a public officer, District Attorney Wes Lane pursuant to Okla. Stat. tit., 22 § 338 which acts may include, but not be limited to alteration of the audio portion of the Donald Pete videotape to make unintelligible the threat of an official to shoot Mr. Pete at the outset of the arrest and that said alterations occurred after an original copy of the tape was presented to District Attorney Wes Lane.

STATUTORY TITLE AND SECTION NUMBERS OF  
ALLEGED VIOLATIONS POSSIBLY COMMITTED BY  
DISTRICT ATTORNEY WES LANE

1. Whether District Attorney Wes Lane accepted a bribe from Commissioner Wynn and/or her associates contrary to Okla. Stat. tit., 21 § 266 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
2. As it relates to Commissioner Wynn, whether District Attorney Wes Lane accepted an emolument, gratuity and/or reward for omitting or deferring the performance of any official duty and/or promised to omit and/or deferred the performance of such contrary to Okla. Stat. tit., 21 § 270 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.
3. In relationship to Commissioner Wynn, whether District Attorney Wes Lane willfully failed or refused to perform the duties of his office contrary to Okla. Stat. tit., 21 § 345 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

4. In relationship to Commissioner Wynn, whether District Attorney Wes Lane conspired to commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit. 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

5. Whether District Attorney Wes Lane, in any manner, accepted and/or requested a gift or gratuity and/or promise of such from Commissioner Wynn contrary to Okla. Stat. tit. 21 § 382 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

6. In relationship to the Donald Pete investigation and/or prosecution, whether District Attorney Wes Lane willfully failed or refused to perform the duties of his office contrary to Okla. Stat. tit., 21 § 345 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

7. In relationship to Donald Pete, whether District Attorney Wes Lane conspired to commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

8. In relationship to Donald Pete, whether District Attorney Wes Lane conspired to falsely and maliciously indict him for a crime or to procure him to be charged or arrested for any crime contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

9. In relationship to the investigation and/or prosecution of Donald Pete, whether District Attorney Wes Lane willfully made an omission to perform a duty contrary to Okla. Stat. tit., 21 § 581 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

10. In relationship to the subject matter referred over by the Attorney General to District Attorney Wes Lane in connection with Commissioner Wynn, whether District Attorney Wes Lane willfully made an omission to perform a duty contrary to Okla. Stat. tit., 21 § 581 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

11. In relationship to the investigation and/or prosecution of Donald Pete, whether District Attorney Wes Lane abstained from any prosecution of his subordinates and/or police officers or withheld any evidence thereof contrary to Okla. Stat. tit., 21 § 543 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

12. In relationship to the subject matter referred over by the Attorney General to District Attorney Wes Lane in connection with Commissioner Wynn, whether District Attorney Wes Lane abstained from any prosecution of his subordinates and/or police officers or withheld any evidence thereof contrary to Okla. Stat. tit., 21 § 543 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

13. In relationship to Donald Pete, whether District Attorney Wes Lane conspired to tamper with the evidence and/or commit an act injurious to the public health for the perversion or obstruction of justice or the due administration of laws contrary to Okla. Stat. tit., 21 § 421 and/or any other applicable statute, ordinance or rule provided by Oklahoma law.

GRAND JURY PETITION FOR INVESTIGATING BRENDA RENEAU

AND WES LANE: Case No \_\_\_\_\_

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