



IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 CRAIG S. KEY, )  
 DOB: 06-19-1965, SSN: [REDACTED] )  
 )  
 JOSHUA E. ANDERSON, )  
 DOB: 09-13-1976, SSN: [REDACTED] )  
 )  
 LESLIE L. BOTTGER, )  
 DOB: 09-29-1965, SSN: [REDACTED] )  
 Defendants. )

Case No. \_\_\_\_\_

INDICTMENT

**FOR: CONSPIRACY TO COMMIT LARCENY OF DOMESTIC ANIMALS AND IMPLEMENTS OF HUSBANDRY, 21 O.S. §421 [1 Count being Count 1]**

**LARCENY OF DOMESTIC ANIMALS OR IMPLEMENTS OF HUSBANDRY, 21 O.S. § 1761 [1 Count being Count 2]**

*IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OKLAHOMA:*

By the order of the Supreme Court of Oklahoma, the Fourteenth Multicounty Grand Jury was convened with its principal site to be in Oklahoma City, Oklahoma County, Oklahoma, to serve from February 25, 2013 until August 25, 2014, or until the designated presiding judge determines the Fourteenth Multicounty Grand Jury has reached reasonable completion of its investigations, but, in any event, no more than twenty-four (24) months from the commencement of its term. That the said Multicounty Grand Jury of the State of Oklahoma, being composed of good and lawful men and woman, legally drawn and summoned according to law, and then and there examined, impaneled, sworn, and charged according to law to diligently inquire into and

true presentment make of all public offenses against the State of Oklahoma committed and triable within the State of Oklahoma, upon their oath and in the name and by the authority of the State of Oklahoma, do present and find that:

**COUNT 1: CONSPIRACY TO COMMIT LARCENY OF DOMESTIC ANIMALS AND IMPLEMENTS OF HUSBANDRY**

Commencing on or about the 27<sup>th</sup> of September, 2012 through the 9<sup>th</sup> day of October, 2012, the crime of **CONSPIRACY TO COMMIT LARCENY OF DOMESTIC ANIMALS AND IMPLEMENTS OF HUSBANDRY** was feloniously committed in several counties in the State of Oklahoma including, but not limited to, Lincoln County and Jefferson County and throughout the State of Oklahoma by Defendants **CRAIG S. KEY, JOSHUA E. ANDERSON and LESLIE L. BOTTGER** and other co-conspirators both named and un-named.

During all times set forth herein, and within said Counties and State, **CRAIG S. KEY, JOSHUA E. ANDERSON, LESLIE L. BOTTGER** and other co-conspirators both named and un-named who, acting jointly, knowingly agreed and conspired to commit the felony of **LARCENY OF DOMESTIC ANIMALS AND IMPLEMENTS OF HUSBANDRY**, to wit:

On or about September 27, 2012, Defendants **CRAIG S. KEY, JOSHUA E. ANDERSON, LESLIE L. BOTTGER**, and other co-conspirators both named and un-named, formed an agreement to take, steal, and carry away multiple head of live cattle and a stock trailer owned by Harold Lowe without Mr. Lowe's consent, and with the intent to permanently deprive Harold Lowe of said cattle and trailer. In furtherance of said agreement and conspiracy and to

attain the goals thereof, the above-named Defendants committed the following **OVERT ACTS**,

to wit:

1. On or about September 27, 2012, Defendants **CRAIG S. KEY, JOSHUA E. ANDERSON, LESLIE L. BOTTGER** and other co-conspirators both named and unnamed formed an agreement to take, steal and carry away multiple head of live cattle and a stock trailer owned by Harold Lowe without Mr. Lowe's consent and with the intent to permanently deprive Harold Lowe of said cattle and trailer.
2. On or about September 28, 2012, Defendant **CRAIG S. KEY** provided Defendant **JOSHUA E. ANDERSON** with approximately two hundred dollars (\$200) in cash with the intent said monies were to be used by Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** for any and all incidental expenses incurred by them in taking, stealing and carrying away the live cattle and stock trailer of **HAROLD LOWE**.
3. On or about the evening of September 28, 2012, Defendant **CRAIG S. KEY** sent a text message to Brandon Dawson, an individual residing on Lilliebridge Farms Property, a property owned by Defendant **CRAIG S. KEY**, instructing Brandon Dawson to leave the gate to said property unlocked.
4. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** drove Defendant **LESLIE L. BOTTGER'S** Dodge Pickup to the property of Harold Lowe, located in Lincoln County, for the purposes of taking, stealing and carrying away Harold Lowe's cattle.
5. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE BOTTGER** stole a stock trailer owned by Harold Lowe, located on Harold Lowe's property in Lincoln County.
6. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** hooked up the stock trailer stolen from Harold Lowe to the Dodge Pickup owned by Defendant **LESLIE L. BOTTGER**.
7. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** loaded six head of cattle into the aforementioned stock trailer attached to Defendant **LESLIE L. BOTTGER'S** Dodge Pickup truck.
8. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** drove to Lilliebridge Farm property, located in Lincoln County and owned by Defendant **CRAIG S. KEY**, and unloaded the aforementioned six head of cattle.

9. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER**, after unloading the aforementioned six head of cattle, returned to the property of Harold Lowe located in Lincoln County.

10. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** loaded seven additional head of cattle owned by Harold Lowe into the stock trailer owned by Harold Lowe attached to the Dodge Pickup owned by Defendant **LESLIE L. BOTTGER**.

11. On or about the morning of September 29, 2012, Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** unloaded the aforementioned head of cattle at Lilliebridge Farm property located in Lincoln County and owned by Defendant **CRAIG S. KEY**.

12. On or about the morning of September 29, 2012, Defendant **JOSHUA E. ANDERSON** sent a text message to Defendant **CRAIG S. KEY** asking what he wanted Defendants **JOSHUA E. ANDERSON** and **LESLIE L. BOTTGER** to do with the stock trailer stolen from the property of Harold Lowe.

13. On or about the morning of September 29, 2012, Defendant **CRAIG S. KEY** sent a text message to Defendant **JOSHUA E. ANDERSON** instructing him to leave the stock trailer stolen from the property of Harold Lowe at the Lilliebridge Farm property owned by Defendant **CRAIG S. KEY**.

14. Between the dates of September 29, 2012 and October 9, 2012, **BRANDON DAWSON** began to paint the stock trailer stolen from the property of Harold Lowe in preparation for selling the stock trailer at the behest of Defendant **CRAIG S. KEY**.

15. Between the dates of September 29, 2012 and October 9, 2012, the Defendant **CRAIG S. KEY** instructed **BRANDON DAWSON** to take the cattle stolen from the property of Harold Lowe and sell them at the livestock sales barn Waurika Livestock Commission Company in Jefferson County, Oklahoma, instructing **BRANDON RAY DAWSON** to tell the Waurika Livestock Commission Company that he was selling the cattle in Jefferson County because he was there to pick up a bull from the property of Glen Majors in Jefferson County, Oklahoma and promising **BRANDON RAY DAWSON** approximately Two Hundred Dollars (\$200.00) from the proceeds of the sale.

16. Between the dates of September 29, 2012 and October 9, 2012, the Defendant **CRAIG S. KEY** gave **BRANDON RAY DAWSON** his debit card on his personal account at Stroud National Bank for use to pay for gasoline and incidental expenses during the transportation of the cattle stolen from the property of Harold Lowe from Lilliebridge Farm in Lincoln County to Waurika, Jefferson County, Oklahoma.

16. On or about the morning of October 9, 2012, BRANDON RAY DAWSON, JAMES PAUL REAVES, AND REBECCA ALLEY loaded the aforementioned cattle stolen from the property of Harold Lowe onto a stock trailer belonging to the Defendant **CRAIG S. KEY** and drove them from Lilliebridge Farms in Lincoln County to the Waurika Livestock Commission Company in Jefferson County, Oklahoma.

17. On October 9, 2012, BRANDON RAY DAWSON placed the cattle stolen from the property of Harold Lowe for sale at the Waurika Livestock Commission Company in Jefferson County, Oklahoma and unsuccessfully attempted to sell them.

18. On October 9, 2012, BRANDON RAY DAWSON was approached by enforcement officers of the Oklahoma Department of Agriculture at the Waurika Livestock Commission Company on inquiry regarding the attempted sale of cattle stolen from the property of Harold Lowe and BRANDON RAY DAWSON sent a text message to the cell phone of the Defendant **CRAIG S. KEY**, stating "Cops Just Came In," to which the Defendant **CRAIG S. KEY** responded with a return text to BRANDON RAY DAWSON which read "Leave," prompting BRANDON RAY DAWSON to leave without consummating the sale of the cattle stolen from the property of Harold Lowe.

Said agreement, conspiracy, and overt acts in furtherance thereof being contrary to the provisions of Sections 421, 423, and 424 of Title 21 of the Oklahoma Statutes and against the peace and Dignity of the State of Oklahoma.

## **COUNT 2: LARCENY OF DOMESTIC ANIMALS AND IMPLEMENTS OF HUSBANDRY**

On or about September 29, 2012, Defendants **LESLIE L. BOTTGER** and **JOSHUA E. ANDERSON**, acting in concert with, and at the behest of, and with the aid, assistance and encouragement of Defendant **CRAIG S. KEY**, did, in Lincoln County, Oklahoma unlawfully, wilfully, stealthily and feloniously take, steal and carry away thirteen (13) head of live cattle and a W.W. Stock Trailer, the personal property of Harold Lowe, without the consent of the owner thereof, with the unlawful and felonious intent on the part of said Defendants to deprive said owner thereof permanently, and to convert the same to their use and benefit. All of said

acts being contrary to the provisions of Sections 1716 of Title 21 of the Oklahoma Statutes and against the Peace and Dignity of the State of Oklahoma.

TRUE BILL

NO BILL

FOREMAN   
OKLAHOMA MULTICOUNTY GRAND JURY

*Penalties:*

**Conspiracy to Commit a Felony.** By imprisonment in the State Penitentiary for a period not exceeding ten (10) years and a fine up to Five Thousand Dollars (\$5,000.00.)

**Larceny of Domestic Animals and Implements of Husbandry.** By imprisonment in the State Penitentiary for a period from three (3) years and not exceeding ten (10) years and a fine of up to three (3) times the value of the domestic animals and/or implements of husbandry stolen, up to Five Hundred Thousand Dollars (\$500,000.00).

**WITNESSES** (Before the Grand Jury):

Agent Kent Dowell c/o Oklahoma Department of Agriculture

Investigator David Driscoll c/o Oklahoma Attorney General Office, 313 N.E. 21<sup>st</sup> Street, Oklahoma City, Oklahoma 73105

Harold Lowe, 818 South Dungan Road, Cushing, Oklahoma 74023

Deputy Larry Stover c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue, Chandler, Oklahoma 74834

James Reaves, 870333 South 3300 Road, Wellston, Oklahoma 74881

Rebecca Alley, 870333 South 3300 Road, Wellston, Oklahoma 74881

Judy Morningstar c/o James Hodgens, Esq., 301 West Main Street, Stroud, Oklahoma 74079

James Morningstar c/o James Hodgens, Esq., 301 West Main Street, Stroud, Oklahoma 74079

Anita Martin, Waurika Livestock Commission Co., S. Hwy 81, Waurika, Oklahoma 73573

Brandon Dawson c/o Lincoln Co. Sheriff's Department, 14 Courthouse, 811 Manvel Avenue, Chandler, Oklahoma 74834

Shanda Chastain. 1731 N. Louisa Avenue, Shawnee, Oklahoma 74804

Evelyn Beaman, 910 E. 1<sup>st</sup> Street, Chandler, Oklahoma 74834

Sena Pribble, 341215 880 Road E, Chandler, Oklahoma 74834

Leslie Bottger, 345944 E. 760 Road, Agra, Oklahoma 74824

Josh Anderson, 344180 E. 930 Road, Agra, Oklahoma 74824

Pam Hammers, Lincoln Co. District Attorney's Office, 811 Manvel Ave., Suite B, Chandler, Oklahoma 74834

Pete Newsom, 333675 Timber Trail, Wellston, Oklahoma 74881

Edna Melson, 910030 S. 3470 Road, Chandler, Oklahoma 74834

Brian Sullivan, 2420 N.W. 161<sup>st</sup> Terrace, Edmond, Oklahoma 73013

Shawna Cruz 4131 N.W. 122<sup>nd</sup> Street, Oklahoma City, OK

John Eyman, OU Medical Center, 1200 Everett Drive, Oklahoma City, OK 73104

Joyce Hopkins, 210 S.W. 89<sup>th</sup> Street, Oklahoma City, OK 73139

Shirley Kritz, OCOM Imaging (SW MRI), 401 SW 80<sup>th</sup> Street, Building D, Oklahoma City, OK

Dorinda Eaton, OU Physicians, University of Oklahoma, 660 Parrington Oval Room 119, Norman Oklahoma 73019