

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FERNANDO ESPINOZA, )  
 )  
 Defendant. )

Case No. CF - 2013 - 2116

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

APR 05 2013

TIM RHODES  
COURT CLERK

12 \_\_\_\_\_

*Elliot H*

INFORMATION

In the name and by the authority of the State of Oklahoma;

**E. SCOTT PRUITT, Attorney General of Oklahoma**, in and for the State and County

aforesaid, gives the court to know and be informed as follows:

**Count 1:** On or about December 18, 2010, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Martin Saenz, DBA MS Eagles Roofing, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that MS Eagles Roofing was a business that performed painting and paper hanging when **FERNANDO ESPINOZA** knew and had reason to believe that Martin Saenz, DBA MS Eagles Roofing was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02172048 to Martin Saenz and MS Eagles Roofing and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 2:** On or about March 1, 2011, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Manual Ochoa, DBA Ochoa Andrade Construction, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that Ochoa Andrade Construction was a business that performed painting and paper hanging when **FERNANDO ESPINOZA** knew and had reason to believe that Manual Ochoa, DBA Ochoa Andrade Construction was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02172296 to Manual Ochoa and Ochoa Andrade Construction and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 3:** On or about March 16, 2011, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Fredy Gonzalez, DBA Fredy Gonzalez, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that Fredy Gonzalez was a business that performed painting and paper hanging when **FERNANDO ESPINOZA** knew and had reason to believe that Fredy Gonzalez, DBA Fredy Gonzalez was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02172359 to Fredy Gonzalez DBA Fredy Gonzales and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 4:** On or about February 29, 2012, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers'

compensation insurance on behalf of Fidel Vera, DBA Vera Roofing, Inc., Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that Vera Roofing, Inc. was a business that performed general contracting and carpentry when **FERNANDO ESPINOZA** knew and had reason to believe that Fidel Vera, DBA Vera Roofing, Inc. was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02172371 to Fidel Vera and Vera Roofing, Inc. and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 5:** On or about February 11, 2011, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Alberto Pineda, DBA F.W.S. Corporation, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that F.W.S. Corporation was a business that performed miscellaneous installation and fence erection contracting when **FERNANDO ESPINOZA** knew and had reason to believe that Alberto Pineda, DBA F.W.S. Corporation was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02170190 to Alberto Pineda and F.W.S. Corporation and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 6:** On or about February 22, 2012, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Alberto Pineda, DBA F.W.S. Corporation, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that F.W.S. Corporation was a business that performed miscellaneous installation and fence erection contracting when **FERNANDO ESPINOZA** knew and had reason to believe that Alberto Pineda, DBA F.W.S. Corporation was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation

insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02173145 to Alberto Pineda and F.W.S. Corporation and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 7:** On or about December 10, 2010, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, a felony, in violation of **Title 21, § 1663**, to wit: by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for workers' compensation insurance on behalf of Juan Santana-Garcia, DBA Juan Santana-Garcia, Oklahoma City, OK, said information concerning facts or things material to the aforesaid application for workers' compensation insurance, to wit: by misrepresenting to Farmers Insurance that Juan Santana-Garcia was a business that performed painting and paper hanging when **FERNANDO ESPINOZA** knew and had reason to believe that Juan Santana-Garcia, DBA Juan Santana-Garcia was principally engaged in the business of roofing and with the knowledge that Farmers Insurance does not insure businesses that perform roofing for purposes of workers' compensation insurance; said false, fraudulent, incomplete, or misleading information being presented or caused to be presented with an intent to defraud Farmers Insurance and to induce Farmers Insurance into issuing a workers' compensation policy, Policy # A02172021 to Juan Santana-Garcia and providing fraudulent certificates of workers' compensation insurance, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**Count 8:** On or about December 10, 2010, in Oklahoma County, Oklahoma, **FERNANDO ESPINOZA**, operating as a Farmers Insurance agent at the Fernando Espinoza Insurance Agency, 4316 S. Walker Avenue, Oklahoma City, OK, did knowingly, willfully, intentionally and feloniously commit the crime of **OBTAINING MONEY OR PROPERTY BY FALSE PRETENSES**, a felony, in violation of **Title 21, §§ 1541.1 AND 1541.2**, to wit: obtained insurance premiums from Carlos Lopez, DBA Carlos Construction, Oklahoma City, OK in an amount greater than five-hundred dollars (\$500.00) and less than one thousand dollars (\$1,000.00) by presenting, and/or causing to be presented to Farmers Insurance false, fraudulent, incomplete, or misleading information in an application for the issuance of a contract for general liability insurance on behalf of Carlos Lopez, said information concerning facts or things material to the aforesaid application for general liability insurance, to wit: by misrepresenting to Farmers Insurance that Carlos, DBA Carlos Construction was a business that performed painting and paper hanging when **FERNANDO ESPINOZA** knew and had reason to believe that Carlos Lopez, DBA Carlos Construction was principally engaged in the business of roofing and as a result caused Policy # 605000409 to issue, a policy that was invalid because of the false, fraudulent, incomplete, or misleading information presented, all of which was done with an intent to defraud Carlos Lopez, DBA Carlos Construction and Farmers Insurance and to induce Farmers Insurance into issuing a general liability insurance policy to Carlos Lopez, DBA Carlos Construction contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

**E. SCOTT PRUITT**  
**ATTORNEY GENERAL OF OKLAHOMA**

By: Vincent Antonioli  
**VINCENT ANTONIOLI, OBA #15670**  
**Assistant Attorney General**  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
(405) 522-3405

I have examined the facts in this case and recommend that a warrant do issue.

**E. SCOTT PRUITT**  
**ATTORNEY GENERAL OF OKLAHOMA**

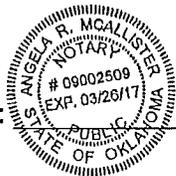
By: Vincent Antonioli  
**VINCENT ANTONIOLI**  
**ASSISTANT ATTORNEY GENERAL**

20 13 Signed and sworn to before me by Vincent Antonioli on the 5<sup>th</sup> day of April

Angela R. McAllister  
Notary Public

(SEAL)

My Commission Expires: \_\_\_\_\_



**Penalties:**

21 O.S. § 1663 - not more than 7 years and/or \$10,000

21 O.S. § 1541.2 - (felony) up to 1 year imprisonment and/or \$5,000

WITNESSES

Debbie Ross  
Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

April De La Garza  
Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

Terry Adkins  
Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

Morgan Carpenter  
Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

Doug Brower  
c/o Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

Martin Saenz  
MS Eagles Roofing  
3821 South Drexel Avenue  
Oklahoma City, OK

Sherry King  
CompSource Oklahoma  
1901 N. Walnut Avenue  
Oklahoma City, OK 73152

Victor Chevez  
Farmers Insurance  
215 North Trade Center Terrace  
Mustang, OK 73064

Don Holman  
CompSource Oklahoma

1901 N. Walnut Ave.  
Oklahoma City, OK 73152

Custodian of Records, Underwriting  
CompSource Oklahoma  
1901 N. Walnut Ave.  
Oklahoma City, OK 73152

Custodian of Records, Audit  
CompSource Oklahoma  
1901 N. Walnut Ave.  
Oklahoma City, OK 73152

Manual Ochoa  
Ochoa Andrade Construction  
2507 South Central Avenue  
Oklahoma City, OK 73129

Fredy Gonzalez  
2661 S.W. 39<sup>th</sup> Street  
Oklahoma City, OK 73119

Fidel Vera  
Vera Roofing, Inc.  
729 S.W. 30<sup>th</sup> Street  
Oklahoma City, OK 73109

Juan Davila  
5427 Lynn Avenue  
Oklahoma City, OK 73119

Alberto Pineda  
F.W.S. Corporation  
3816 S. Olie  
Oklahoma City, Oklahoma 73109

Juan Santana-Garcia  
810 N.W. 109<sup>th</sup> Street  
Oklahoma City, OK 73114

Murray Cutbirth  
Target Roofing and Construction  
717 Mockingbird  
Mustang, OK 73064

Alan Talkington  
AT Roofing and Construction  
14400 Coyote Trail  
Oklahoma City, OK 73185

Carlos Lopez  
Carlos Construction  
4307 N. Georgia  
Oklahoma City, OK 73118

Custodian of Records  
Crestwood Roofing

Custodian of Records  
Oklahoma Employment Security Commission  
Will Rogers Memorial Office Building  
2401 N. Lincoln Boulevard  
Oklahoma City, OK 73105

Custodian of Records  
Electrical Licensing Committee  
Oklahoma Construction Industries Board  
2401 N.W. 23<sup>rd</sup> Street, Suite 2F  
Oklahoma City, OK 73107

Custodian of Records  
Oklahoma Secretary of State  
2300 N. Lincoln Boulevard, Room 101  
Oklahoma City, OK 73105



Auditor, regarding Fernando Espinoza. King located numerous fraudulent Commercial Certificates of Insurance that were issued by Espinoza. King contacted Espinoza on December 1, 2011. King talked to Espinoza about a fraudulent certificate he issued to Martin Peralta. Espinoza issued Peralta a Commercial Certificate of insurance with the quote numbers on it. Espinoza explained the underwriters would not write Peralta a policy therefore the certificate was not any good. Peralta insisted his policy was good because he was still paying on it.

In February of 2012, King spoke with Espinoza again, this time he told her the fraudulent certificates she located were issued in error, while he was out of town. Espinoza accepted full responsibility for the certificates and told King, he would stop issuing false Commercial Certificates of Insurance. King continued to locate fraudulent certificates after this conversation with Espinoza.

On December 14, 2011, I interviewed Juan Santana-Garcia, 810 NW 109<sup>th</sup>, Oklahoma City, Oklahoma 73114. Garcia is a roofer by trade, who subcontracts his company out to roofing contractors. Garcia went to Fernando Espinoza's office to obtain workers' compensation insurance for his crew. Garcia said he told Espinoza he needed workers' compensation for his roofing company. Garcia told your Affiant Espinoza made a deal with him to pay him five hundred dollars that day and he would pay a percentage of what he made off of roofing jobs in the future. A few weeks later Garcia received a bill in the mail for a large amount. Garcia said he called Espinoza's office and explained he could not afford to pay that amount. They lowered the amount to five hundred dollars and he could pay a hundred and ninety-four dollars a month. Garcia thought he was paying for workers' compensation to cover roofing, but the policy was actually for wall paper hanging and painting. Fernando Espinoza issued workers' compensation policy # A02172021 on November 22, 2010 to Juan Santana-Garcia.

On January 19, 2012, I interviewed Martin Saenz owner and operator of MS Eagle Roofing, 3821 Drexel Avenue, Oklahoma City, Oklahoma 73119. Mr. Saenz went to Fernando Espinoza to obtain insurance for his company due to insurance being so expensive through CompSource Oklahoma. At the time of this interview Saenz had his company insured through Espinoza. Saenz said Espinoza knew his company was fifty percent roofing and fifty percent tyvek wrapping of homes and businesses. Saenz was paying Espinoza 13.4% of his monthly wages that he paid out to his three employees monthly for workers' compensation and one thousand three hundred dollars for general liability. Saenz's workers' compensation insurance policy #A02172048 was issued on December 18, 2010, signed by Fernando Espinoza, was coded for wall paper hanging and painting. Saenz said Espinoza knew his company did roofing and was upset that his policy would not cover roofing.

On February 29, 2012, I interviewed Murray Cutbirth the owner/operator of Target Roofing & Construction. Cutbirth said he was audited by CompSource Oklahoma on February 20, 2012, and during the audit he was told one of the subcontractor's commercial certificate of insurance wasn't valid. The certificate in question was issued to Alberto Pineda, DBA: F.W.S. Corp, 3816 S. Olie, Oklahoma City, Ok 73109, issued on August 29, 2011 and signed by Fernando Espinoza, policy #A02173145 was coded for carpentry. Cutbirth was instructed to

use the OWCC website to validate all of his subcontractor's workers' compensation insurance. Cutbirth checked the website and located where F.W.S. Corp had workers' compensation. Cutbirth called CompSource to see if he could use F.W.S. Corp and was told they would get back with him. Cutbirth said he decided to call his Insurance Agent Victor Chevez ( who is also a Farmers Insurance Agent) and ask him if he would find out if F.W.S. Corp had workers' compensation. Cutbirth said Chevez checked on F.W.S. Corp and their policy was coded for carpentry. Cutbirth said after he told F.W.S. Corp he could not use them any longer, he received a call from Espinoza. Cutbirth said Espinoza told him F.W.S. Corp did other work besides roofing. Cutbirth said he told Espinoza he needed something in writing stating they had workers' compensation for roofing because that was the only type of work he subcontracted. Cutbirth said he did not hear from Espinoza after that conversation. Cutbirth provided copies of checks where he paid F.W.S. Corp more than thirty-eight thousand dollars for roofing jobs. The first policy Cutbirth received from F.W.S. Corp was issued and signed by Fernando Espinoza on August 8, 2010 with policy numbers #604755440 for General Liability and #A02170190 for Workers' Compensation

On April 16, 2012, I interviewed Manuel Ochoa the Owner/Operator of Ochoa Andrade Construction, 2507 S. Central Avenue, Oklahoma City, Oklahoma 73129. I asked Ochoa what type of construction his company was involved in and he said roofing only. When Ochoa was asked about his insurance, he said his company has had workers' compensation through Farmers Insurance for three years and his Agent has been Fernando Espinoza until recently he was told Miguel Baez was taking over his account. Ochoa produced a Commercial Certificate of Insurance, Workers' Compensation policy #A02172296 issued by Fernando Espinoza on March 3, 2011, that had recently been faxed to Elliot Roofing, 3900 N. Harvard Avenue, Oklahoma City, Oklahoma 73122. The certificate showed Ochoa to have workers' compensation through Truck Insurance Exchange which is owned by Farmers Insurance Exchange which does not insure any part of the roofing industry. I viewed a subpoenaed copy of Ochoa's insurance policy that is coded for wall paper hanging and painting. Ochoa's company only does roofing and the Commercial Certificate of Insurance was sent to a roofing company.

On April 16, 2012, I interviewed Fidel Vera the Owner/Operator of Vera Roofing, Inc., 729 SW 30<sup>th</sup> Street, Oklahoma City, Oklahoma 73109. Vera said his workers' compensation policy #A02172371 issued by Fernando Espinoza on March 17, 2011, covered roofing and restaurant businesses. I asked Vera why he had both businesses on the same policy and he said his agent changed so he was going today to separate his business workers' compensation. Vera was asked how long he had been in the roofing business and he said all his life. Vera told your Affiant he was a roofing subcontractor and he has not had anyone hurt on the job yet. Vera has a workers' compensation policy coded for Carpentry. Vera provided receipts showing he had been playing premiums on his policy.

On November 8, 2012, I interviewed Carlos Lopez. Lopez and his son Kevin Lopez, own and operate Carlos Construction, 4307 N. Georgia Avenue, Oklahoma City, Oklahoma 73118. Lopez's company is a roofing only business. Lopez said he still has his General Liability Insurance policy # 605000409 issued by Fernando Espinoza on April 12, 2011.

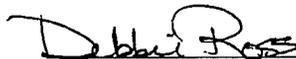
Lopez told your Affiant when he went to Espinoza for insurance he told him he was a roofing business. Lopez did not know his business was coded for painting. Lopez said he remembered Espinoza saying he was going to make the premium a little easier on him. Your Affiant spoke with Farmers Insurance and was advised General Liability Premiums for Roofing is much more expensive than General Liability for painting.

On March 20, 2013, Investigator April De La Garza and I interviewed Fredy Gonzalez, 2661 SW 39<sup>th</sup> Street, Oklahoma City, Oklahoma 73119. Gonzalez said he saw Fernando Espinoza's Farmers Insurance Agency sign while driving. Gonzalez stopped in because Espinoza's sign said he spoke Spanish. Gonzalez said he told Espinoza he needed workers' compensation for his company that does construction type work, but they were primarily a roofing company. Espinoza issued him a Commercial Certificate of Insurance for General Liability Policy #604892479 and Workers' Compensation Policy #A02172359 effective on March 16, 2011 coded for painting and wall paper hanging. Gonzalez took the certificate to Murray Cutbirth at Target Roofing, who had his insurance agent check on the certificate. Cutbirth refused to hire Gonzalez when he found out his certificate was not for roofing. Gonzalez said he cancelled his policy when he found out his certificate was not good for roofing.

On March 26, 2013, Fernando Espinoza was interviewed. During the interview Espinoza explained how he bent the rules to issue Commercial Certificates of Insurance by using quote numbers so the insured could work, while waiting on underwriters to make a decision. Espinoza admitted that he would code policies for work other than roofing due to the fact Farmers Insurance Exchange does not insure any type of roofing work.

Based on the above information, I believe that probable cause exists to show that **FERNANDO ESPINOZA** committed the crime of **OBTAINING UNDER FALSE PRETENSE** in violation of **TITLE 21 O.S. 1541.2**, a felony, and therefore request that a warrant be issued for his arrest.

**FURTHER AFFIANT SAYETH NOT.**

  
\_\_\_\_\_  
Debbie Ross, AFFIANT

STATE OF OKLAHOMA        )  
                                      )  
COUNTY OF OKLAHOMA    ) SS

Subscribed and sworn to before me this 5<sup>th</sup> day of April, 2013, by Debbie Ross.

Angela R. McAllister

Notary Public

(SEAL)



My Commission Expires: \_\_\_\_\_

FINDING OF PROBABLE CAUSE

On this \_\_\_\_\_ day of \_\_\_\_\_, 2013, the above-styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Oklahoma County, Oklahoma, upon the Affidavit of Debbie Ross, Investigator with the State Attorney General's Office, requesting that a warrant of arrest be issued for the within named defendant, Fernando Espinoza, that he might be arrested and held to answer for the offense of Obtaining Under False Pretense. Based upon said Affidavit, I am satisfied and do hereby find that the offense of Obtaining Under False Pretense, 21 os 15411.2 has been committed, and that there is probable cause to believe the within named defendant has committed said offense, and that a warrant of arrest should issue.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2013 .

\_\_\_\_\_  
Judge of the District Court