



of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

**COUNT 2:**

That Wayne Royce Junghanns, on or about January 16, 2012, in Oklahoma County, State of Oklahoma, did unlawfully, willfully, fraudulently and feloniously commit the crime of **UNLAWFUL USE OF A COMPUTER** in violation of **21 O.S. § 1953A.2** to wit:

That on or about January 16, 2012, in Oklahoma County, State of Oklahoma, the Defendant did unlawfully, willfully, knowingly, intentionally, and fraudulently, use a computer for the purpose of devising and executing a scheme or artifice with the intent to defraud, deceive, and for the purpose of obtaining money by means of false pretense or representation in violation of 21 O.S. §1953A.2 and did obtain money from Rainbow Fleet, Inc. by submitting a computer generated document purporting to reflect that said Defendant had purchased items valued at \$933.55 from The National Association for Family Child Care, when in truth and in fact the said Defendant had not purchased the items from The National Association for Family Child Care.

Said actions by Defendant are contrary to the provisions of Section §1953A.2 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

**E. SCOTT PRUITT  
ATTORNEY GENERAL**

By: \_\_\_\_\_

Phillip L. Stambeck, OBA #8544  
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**STATE OF OKLAHOMA )  
OKLAHOMA COUNTY )**

I do solemnly swear that the statements and allegations set forth in the within information are true and correct to the best of my information and belief.

\_\_\_\_\_  
Phillip L. Stambeck

Signed and sworn to before me by Phillip L. Stambeck on the \_\_\_\_\_ day of June, 2013.

\_\_\_\_\_  
Notary Public

(Seal)

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

**Violation & Penalty**

**21 O.S. § 1451**

Not more than 10 years and/or  
Fine of not more than \$10,000

**21 O.S. §1953A.2.**

Not more than 10 years and/or  
Fine of not less than \$5,000 nor more than \$100,000

**Witnesses Endorsed for the State of Oklahoma**

Mike Gibson, President  
Rainbow Fleet, Inc.  
531 Couch Drive, Ste 200  
Oklahoma City, OK 73102

Representative of Saunders and Associates, PLLC, CPAs  
630 East 17<sup>th</sup> St.  
PO Box 1406  
Ada, OK 74820

Investigator Paul Boyd  
Public Protection Unit  
Oklahoma Attorney General's Office  
313 N.E. 21<sup>st</sup> Street  
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