

- a. Continuing Threat To Society: The evidence shows that the defendant and co-conspirators engaged in a plot to kidnap and murder the deceased, Veronica Butler and Jilian Kelley, in order to prevent the lawful granting of custody and/or unsupervised visitation by the Court. The defendant and conspirators attempted said crime previously by both traveling to Hugoton in an attempt to lure Veronica out of her home and additionally planning to organize her death by throwing an anvil through her windshield while she drove down the road. *See Scott v. State*, 1995 OK CR 14, ¶ 36, 891 P.2d 1283, 1296 ("[The aggravating circumstance of continuing threat to society] can be established through introduction of evidence detailing the defendant's participation in unrelated crimes as well as the sheer callousness with which a defendant commits a particular murder." (footnotes omitted)); *Hooks v. State*, 1993 OK CR 41, ¶ 33, 862 P.2d 1273, 1282 ("[T]he nature and circumstances of the killing itself are sufficient to show a propensity towards future acts of violence."); *Workman v. State*, 1991 OK CR 125, ¶ 25, 824 P.2d 378, 383-84 ("[T]he calloused manner in which a crime is committed may support a finding of a continuous threat.").
2. Both First Degree Murder and Kidnapping are violent offenses under the definition at 57 O.S. 571.
3. "D. There shall be a rebuttable presumption that no condition of release would assure the safety of the community if the state shows by clear and convincing evidence that the person was arrested for a violation of Section 741 of Title 21 of the Oklahoma Statutes." 22 O.S. 1101. Section 741 is the provision regarding the crime of kidnapping which is shown to be one of the crimes of which the defendant and conspirators have been arrested for.
4. The maximum sentence for murder is death, life, or life without parole. The maximum sentence for kidnapping is up to 20 years.

PROOF OF GUILT IS EVIDENT

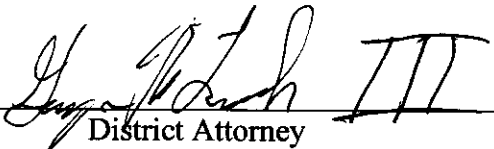
See attached sworn affidavit detailing the relevant facts at this time. State would point out that after arrest this defendant, Tiffany Adams, did provide a recorded statement to law enforcement indicating her responsibility for the death of the deceased.

NO CONDITION OF RELEASE WOULD PROTECT THE COMMUNITY

Taking into consideration the rebuttable presumption of 22 O.S. 1101 and as detailed in the attached affidavit no condition would assure the safety of the community, which includes the witnesses and Court personnel involved in this case. The facts are that in order to prevent Veronica Butler from regaining custody and/or unsupervised supervision with her children, the defendant and conspirators were willing to commit murder. Said murder was complex and involved extensive preparation. There are statements of the co-conspirators that their problem would be taken care of because in addition to removing Veronica they knew the path the Judge walked to work. Now faced with the consequence of a sentence of death or life in prison the defendant and conspirators would be willing to do anything since they have shown to be willing to commit capital murder in order to limit Veronica's visitation.

WHEREFORE the State requests that the Court hold the defendant without bail as allowed under the Oklahoma Constitution.

GEORGE H. LEACH III, DISTRICT ATTORNEY

By:  District Attorney

Neither phone was found at the scene or within the vehicle and they are currently missing. Adams was the last known person to communicate with Butler and was scheduled to meet Butler and Kelley for visitation at 1000 hours on March 30, 2024.

Through the child custody case, recordings were obtained where Rickman discussed death threats by Adams and Adams' boyfriend, Tad Cullum. The custody battle began in February of 2019 with many hearings and court appearances. On March 18, 2024 and March 20, 2024, motions were filed requesting extended visitation for Butler. A hearing was scheduled to occur on April 17, 2024. Butler's attorney informed OSBI that Butler was likely to receive unsupervised visitation with her children at that hearing. At times Adams refused to let Rickman have his children, even though Rickman had legal custody of them. Law enforcement previously responded to a call for service where Adams refused to give Rickman his children. Reportedly the officer told Rickman he believed the children were better off in Adams' care.

Rickman's grandmother, Debi Knox-Davis, reported that in mid to late February 2024, Rickman told her they didn't have to worry about the custody battle much longer because Adams had it under control, that Adams knew the path the judge walked to work, and "we will take out Veronica at drop off." Rickman was confirmed to be in a rehabilitation facility in Oklahoma City, OK at the time of the disappearance. The children remain in the custody of Adams. Rickman denied having told Knox that information.

On April 1, 2024, OSBI agents obtained a search warrant for Adams cellular phone, OSBI agents performed an extraction on the device. Information gained from the device included web searches for taser pain level, gun shops, prepaid cellular phones and how to get someone out of their house.

On April 3, 2024, OSBI interviewed CW (age 16 years). CW is the daughter of Cora Twombly and Coby White. Cora is married to Cole Twombly. CW stated that she had overheard group conversations related to Butler not protecting her children from her brother, all in reference to a sexual abuse allegation. CW advised that she was told by Cora that Adams, Cullum, Cora, Cole, and Paul Grice were involved in the deaths of Butler and Kelley. She stated that Adams provided "burner" phones to use so they could communicate without using their personal devices. CW saw two "burner" phones charging on Cora's nightstand in her bedroom.

CW described Cora, Cole, Adams, Cullum, Paul Grice as being part of an anti-government group that had a religious affiliation. Through the OSBI investigation it was learned that they call their group, God's Misfits. Regular meetings were held weekly at Twombly's and the home of Barrett and Lacy Cook.

CW was told on March 29, 2024, that Cora and Cole would not be home in the morning when she woke and were going to be on a "mission". When CW awoke at approximately 1000 hours, Cora and Cole were not home, but returned home later. CW knew that Cole and Cora took a blue and gray Chevrolet pickup owned by them and a blue flatbed pickup, owned by Clint Twombly, when they left and returned in the same vehicles. CW was told to clean the interior of the Chevrolet pickup. CW asked Cora what had happened and was told that things did not go as planned, but that they would not have to worry about her (Butler) again. CW asked about Kelley and why she had to die and was told by Cora that she wasn't innocent either, as she had supported Butler. CW asked Cora if their bodies were put in a well, and Cora replied, "something like that". CW also

disclosed that other attempts to kill Butler occurred during February of 2024, near Hugoton, Ks, in which Adams, Cullum, Cole, Cora and Grice went to Hugoton, but Butler did not leave her residence, this is consistent with the web search discovered on Adams' phone about how to get someone out of their house. CW stated that Cora told her that the plan to kill Butler in Kansas was to get in front of her while she was driving and to throw an anvil through her vehicle windshield. The plan was designed to look like an accident as anvil's fall off of work trucks regularly in the area.

The OSBI investigation showed that Adams purchased three pre-paid cellular phones from Wal-Mart in Guymon on February 13, 2024. The phones were identified by phone numbers (620) 417-5752, (806) 390-9141 and (806) 390-9085. Search warrants for information related to location services and phone usage were completed for each device. It was learned that all three phones were at the area where Butler's car was located and the last known location of Butler and Kelley at the time of their disappearance. After their disappearance, between 1016 and 1035 hours, it was determined that phone numbers (620) 417-5752 and (806) 390-9085 were at a property owned by Jamie Beasley, below a dam, in the pasture, near an area of freshly disturbed dirt. Concrete was moved from a location near Beasley's residence, approximately 150-200 yards to below the dam, where it was discovered that a hole had been dug and filled back in.

The location where Butler and Kelley disappeared from and where Butler's vehicle was located is approximately 8.5 miles away from the location below the dam on Beasley's property, giving drive time from the location of where Butler's vehicle was located to Beasley's property, well within the 34 minutes between the time of Butler and Kelley's phones stopping transmission and pre-paid phone numbers (620) 417-5752 and (806) 390-9085 arriving at the dam on Beasley's property. All pre-paid phones stopped transmitting on the morning of March 30, 2024 at locations near Twombly's residence and Beasley's property.

Beasley advised that the dirt work was done with a skid steer, by Cullum on March 29, 2024 and was possibly finished on March 30, 2024 in the morning hours. Beasley knew that Cullum left his skid steer on his property the night of March 29, 2024, and when he awoke on March 30, 2024, at approximately 1200 hours, the skid steer was gone. Cullum rents the pasture property owned by Beasley for cattle grazing and has access to it at any time. On March 28 or 29, 2024, Cullum asked Beasley if he could cut a tree down, remove a stump, bury some concrete, do dirt work where the concrete pile was and below the dam. Adams was with Cullum, at Beasley's property, when that conversation was had. In a contact with Cullum, your affiant learned from Cullum that Adams is his "significant other". Beasley agreed to allow Cullum to do the work. Cullum brought up the idea of doing the work to Beasley.

On Sunday, March 31, 2024, in the morning hours, Cullum was at Beasley's house and told Beasley that people were looking at him for the disappearance of Butler and Kelley. Cullum told Beasley that he didn't want the police or people to cause problems for Beasley and said that all the skid steer tracks on his property without a skid steer looked bad. Beasley said that if anyone asked, he would tell them that Cullum had done tree and dirt work for him.

OSBI investigation showed that Adams had searched for gun shops on her cellular phone. A search of local gun shops showed Adams buying five stun guns at the Big R store in Guymon. The purchase was made on March 23, 2024.

The property near Beasley's residence where the disturbed dirt was located was leased by Cullum. Cullum grazed his cattle and accessed the property regularly to feed the animals. On or about March 29, 2024, Cullum used a skid steer to dig a hole and bury concrete at the site near the dam. On April 13, 2024, law enforcement agents executed a search warrant on Beasley's property. The area of disturbed dirt was excavated and the bodies of two individuals were discovered. The state of the bodies indicated they died as a result of foul play. Further, a stun gun was also located at the excavation site. After her arrest on April 13, 2024, during a custodial interview, Adams made statements to law enforcement indicating she was responsible for the deaths of Butler and Kelley.

At a hearing scheduled for April 17, 2024, Butler would potentially have been granted unsupervised visitation with her children. Adams vehemently opposed this and went to great lengths to plan and purchase items used in Butler and Kelley's murders. The crimes and the bodies were concealed, and attempts were made to obscure Adams, Cullum, Cora, and Cole's whereabouts at the time of the murder. Adams, Cullum, Cole, and Cora were willing to kidnap and murder two victims to limit visitation for Butler. They are therefore willing to take ANY extreme, violent measure to protect themselves and thwart the criminal justice process.

Adams and Cullum have a history of violent interactions, including death threats and intimidation against individuals who disagree with their ideas. Members of the conspiracy participated in multiple attempts to murder Butler in the States of Oklahoma and Kansas. They abide by their own philosophy and have no regard for the sanctity of human life.

Adams, Cullum, Cora, and Cole have resources sufficient to organize and execute a complex murder. Therefore, they also have the resources to flee if given the opportunity. At the time of his arrest Cullum had a rifle, ammunition, body armor, and a go-bag prepared at his residence. Adams and Cullum own numerous guns and other weapons. Adams and Cullum pose grave danger to witnesses and community members. No conditions exist which would effectively assure the safety of the community or any person involved in this case including court officials should Adams and Cullum be released.

Further, the Affiant sayeth not.

Amie Gates
Lt. Amie Gates, OSBI

Subscribed and sworn to before me this 16th day of April, 2024.

Misty Dawn Fawcett
Notary Public

My commission expires:

8/11/27