

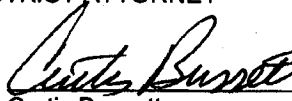
This crime is punishable by imprisonment for not less than 4 years.

OR, in the alternative

COUNT 1: MANSLAUGHTER--FIRST DEGREE ~ a FELONY, on or about the 22nd day of May, 2020, by unlawfully, willfully, intentionally and feloniously, without a premeditated design to effect death, did cause and effect the death of one Enrique Sean Lopez, who was at the time operating a 2010 Chevrolet Camaro bearing Oklahoma tag number BMBLEBEE, while the said defendant was unlawfully engaged in traveling in excess of posted speed when hazards exist by reasons of weather, a misdemeanor, in manner and form as follows, to-wit: that said defendant was then and there driving a 2015 Honda CRV bearing Oklahoma tag number S-37, on the Turner Turnpike near Allied Road in Lincoln County, the same being a public highway, the defendant was exceeding the posted speed limit under hazardous conditions with heavy rain and wind, the said defendant did unlawfully change lanes unsafely, then and there and thereby inflicting death upon the body of said Enrique Sean Lopez, as a direct and proximate result of the unlawful acts of said defendant as aforesaid, inflicted certain mortal wounds, from which mortal wounds the said Enrique Sean Lopez did then and there languish and die.

This crime is punishable by imprisonment for not less than 4 years.

ALLAN GRUBB
DISTRICT ATTORNEY

By: 
Curtis Bussett
Assistant District Attorney

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

Jeremy Baker, Miller EMS, 514 1st Street, Medford, OK 73759
Shayne Ballard, OKLAHOMA HIGHWAY PATROL, OHP Troop A, Oklahoma City, OK 73159
Todd Blish, OKLAHOMA HIGHWAY PATROL, Oklahoma Highway Patrol, ,
James Brigida, 700 NE 13th Street, Oklahoma City, OK 73104
Rusty Kemp, 436608 E. 350 Road, Adair, OK 74330
Joe Kimmons #438, OKLAHOMA HIGHWAY PATROL, Troop YB, 2480 W. I-240, Frontage Road, Oklahoma City, OK
Trp Matthew Ledbetter, OKLAHOMA HIGHWAY PATROL, Troop Z / THU 3600 N Martin Luther King Blvd, Oklahoma City, OK 73136
Shelly Lopez, , ,
Shaun Manes, 6216 S. Lewis #195, Tulsa, OK 74136
Garry Metcalfe, OSBI, Forensic Science Center, 800 E. 2nd Street, Edmond, OK 73034-5309
Travis Rossen, Miller EMS, 514 1st Street, Medford, OK 73759
Stephen Royster, OKLAHOMA HIGHWAY PATROL, Oklahoma Highway Patrol,, ,
Ronnie Sites #698, OKLAHOMA HIGHWAY PATROL, Oklahoma Highway Patrol Troop YB, 2480 W. I-240 Frontage Road, Oklahoma City, OK 73159
Edana Stroberg, Office of Chief Medical Examiner, 921 N.E. 23rd, Oklahoma City, OK 73105
Ben Zembalis, 11063 S. Memorial Drive, Tulsa, OK 74133

IN THE DISTRICT COURT OF LINCOLN COUNTY
STATE OF OKLAHOMA

The State of Oklahoma,
Plaintiff,

vs.

Allison Michelle Ikley-Freeman
[REDACTED]

FILED

NOV 09 2020

BINDY KIRBY, COURT CLERK
LINCOLN COUNTY, OKLAHOMA

CF-20-224

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WARRANT

The undersigned upon oath deposes and states as follows, to wit: That your Affiant is an Oklahoma Highway Patrolman employed by the Oklahoma Highway Patrol and has been so employed since January 2015. Your Affiant is currently serving as an Oklahoma Highway Patrolman for same and is assigned to investigate violations of State laws.

Your affiant is a Traffic Homicide Investigator for the Oklahoma Highway Patrol assigned to the Traffic Homicide Unit.

Your Affiant states:

On May 22nd, 2020, at approximately 07:32 a.m. a fatal collision occurred on The Turner Turnpike, near Allied Road, in Lincoln County.

The Oklahoma Highway Patrol along with other law enforcement and first responders arrived, and the OHP began a criminal investigation into this collision.

During the investigation, it was determined that the collision involved two (2) vehicles, a 2010 Chevrolet Camaro and a 2015 Honda CR-V. The investigation determined the 2010 Chevrolet Camaro was being driven by Enrique Lopez and the 2015 Honda CR-V was being driven by Allison Ikley-Freeman. The investigation determined that the 2010 Chevrolet Camaro was parked, stuck in the grass on the side of the Turner Turnpike. The investigation determined that the 2015 Honda CR-V was traveling westbound on the Turner Turnpike, departed the roadway to the right and struck the Chevrolet Camaro on the driver's side with the front of the Honda CR-V. Following the collision, Enrique Lopez was pronounced dead at the collision scene.

Shelly Lopez, who is the wife of Enrique Lopez, was interviewed at the collision scene. Lopez went into detail of the events of the morning and stated she had received a call from her husband (Enrique Lopez) earlier in the morning. Shelly stated that during that phone conversation, her husband stated he had hydroplaned into the ditch and was stuck. Shelly stated that her husband called her because she drives a four (4) wheel drive vehicle and could pull him out of the ditch. Shelly stated her husband didn't mention anything about the vehicle being damage or being involved in a collision, just that he was stuck in the ditch and needed to be pulled out. SHELLY stated that the time of the phone call from her husband was 7:24 AM.

Three (3) witnesses were identified during the investigation, 1. Ben Zambalis, 2. Rusty Kemp, 3. Shaun Manes. Zambalis was the first individual to call 911.

1. Zambalis called 911 to report the yellow Chevrolet Camaro losing control and coming to rest in the ditch alongside the lanes of travel. Zambalis described the weather as heavy rain and moderate wind gusts. Zambalis stated he was traveling approximately 55mph due to weather and he stated he had difficulty at times staying on the road.
2. Rusty Kemp called 911 to report what he thought was a black SUV about 10 car lengths ahead of him, lose control and roll over off of the roadway. Kemp stated he noticed the yellow vehicle in the ditch after seeing the SUV roll over. Kemp did not stop due to the weather. Kemp stated he was traveling about 55-60mph due to weather. Kemp described the weather has heavy rain and moderate wind gusts.
3. Shaun Manes was traveling westbound on the Turner Turnpike at about 65-70 mph, just below the speed limit. Manes described heavy rain when he noticed lights flash/disappear/reappear about ¼ mile in front of him. Manes did not see the collision, but approached the area and noticed the blue SUV in the ditch. MANES called 911 as he approached the SUV. Manes described the weather as heavy rain and moderate wind gusts.

Following the collision, Allison Ikley-Freeman was interviewed at OU Medical Center by Trooper Joe Kimmons. Ikley-Freeman stated she was traveling westbound on the Turner Turnpike with her cruise control set on approximately 75mph. Ikley-Freeman stated she hydroplaned around Stroud and the next thing she knew she was spinning onto the shoulder. Ikley-Freeman said she saw a car that was stopped perpendicular to the road partially on the outside shoulder and partially in the grass. Ikley-Freeman advised she struck the car. Ikley-Freeman stated the weather was possibly a light rain or possibly a break in the rain. During the interview, Ikley-Freeman consented to a voluntary blood draw, which was conducted by Trooper Kimmons. The blood draw test results stated Ikley-Freeman had Fentanyl (given by medical staff) and Bupropion in her blood stream at the time the blood draw was completed.

During the investigation, search warrants were drafted and obtained to conduct a post collision inspection of the vehicles involved in the collision. During the post collision inspection, crash data was obtained from the Event Data Recorder (Airbag Control Module) from the 2015 Honda CR-V driven by Allison Ikley-Freeman. The recorded vehicle indicated speed prior to the collision was reported started at 91 mph, at 5 seconds before the event was recorded. The vehicle continued traveling at 91mph for an entire second. The next recorded vehicle speed was 90mph for 3.5 seconds and 3.0 seconds prior to the event being record. At 2.5 seconds prior to the event being recorded, the vehicle speed listed is 89mph and the Stability Control is listed as "On Engaged" indicating the stability control function for the vehicle became engaged. At 2.0 seconds prior to the event being recorded, the vehicle speed is listed at 83mph and this is the first timestamp during the event in which the service brake is engaged and listed "On".

During the investigation, search warrants were drafted and obtained to conduct a post collision inspection of the vehicles involved in the collision. During the post collision inspection, crash data was obtained from the Event Data Recorder (Airbag

Control Module) from the 2010 Chevrolet Camaro driven by Enrique Lopez. The recorded vehicle indicated speed recorded prior to the collision was reported around 0 mph, which is consistent with the vehicle being stuck in the ditch.

The Office of the Chief Medical Examiner produced a Report of Investigation for the death of Enrique Lopez. The Probable Cause of Death is listed as Blunt Force Head Trauma from a Motor Vehicle Collision. The Medical Examiner's report noted Enrique Lopez did not have any intoxicants in his blood stream.

The conclusions of this investigation is that on May 22nd, 2020, Enrique Lopez was driving a 2010 Chevrolet Camaro westbound on the Turner Turnpike in Lincoln County. Lopez lost control of his vehicle, departed the roadway to the right and became stuck in the ditch. Moments later, Allison Ikley-Freeman was operating a 2015 Honda CR-V westbound on the Turner Turnpike. Ikley-Freeman departed the roadway right and struck the 2010 Chevrolet Camaro occupied by Lopez.

Alliston Ikley-Freeman was traveling 91mph which is 16mph over the posted speed limit, in weather conditions described as heavy rain and moderate wind gusts by three separate witnesses.

Allison Ikley-Freeman was operating her vehicle in complete disregard to the motoring public and was in the process of committing several misdemeanor crimes, those being: 1. Speeding, 2. Reckless driving, 3. Operating a vehicle at a speed greater than reasonable and proper for the weather conditions and 4. Fail to stay in a single lane of travel, when the collision resulting in the death of Enrique Lopez occurred.

Committing these misdemeanor crimes resulting in the death of Enrique Lopez is violation of 1st Degree Manslaughter.

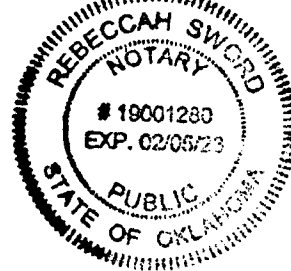
Your Affiant hereby requests a Warrant be issued for the following charges:

Count 1: 1st Degree Manslaughter (Enrique Lopez) 21 O.S. 711

Based on this information, the undersigned prays that this Honorable Court issue a finding of fact that probable cause exists to believe that a crime has been committed and that there is probable cause to believe that the defendant above named committed that crime.

TRP. Sr Bld #249

Affiant



Subscribed and sworn to before me this, 25th day of, August 2020.

My Commission Expires: 02/05/23. Commission No. 19001280

Rebecca Sword

Notary Public

FINDING OF PROBABLE CAUSE

The undersigned Judge of this Court, upon sworn testimony and/or affidavit, hereby determines there to be probable cause to issue a warrant for the defendant(s).

Bond is set at \$30,000⁰⁰

Dated this 5th day of November, 2020.

[Signature]
Judge of the District Court