IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

JAMES REA,

Plaintiff,

v.

OKLAHOMANS FOR POSITIVE CHANGE PAC, a fictitious entity; LIBERTY ACTION FUNDS, INC., a nonprofit corp.; A. FLOWERS; G. HARJO; JOHN DOE1; JOHN DOE2; JOHN DOE3; JOHN DOE4; JANE DOE1; JANE DOE2; JANE DOE3; and JANE DOE4

Defendants.

CJ-2025-02467

JURY TRIAL DEMANDED

KELLY M. GREENOUGH
DISTRICT COURT
FILED
JUN 05 2025
DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

PETITION

COMES NOW Plaintiff; by and through his attorney, Laurie Phillips, and in support of his Petition alleges and states as follows:

I.
JURISDICTION

1. This Court has jurisdiction over the parties and the subject matter of this action.

2. Plaintiff James Rea ("Plaintiff" or "Rea") is a resident of Tulsa County and has been for a period in excess of thirty (30) days; and the State of Oklahoma and has been for a period in excess of six (6) months.

3. The facts which give rise to this cause of action occurred in Tulsa County, State of Oklahoma.

4. Plaintiff reserves the right to amend his Petition to include allegations against unknown individuals and entities Defendants John Doe1, John Doe2, John

[illegible]

Doe3, John Doe4, Jane Doe1, Jane Doe2, Jane Doe3, and Jane Doe4 whose identities are currently unknown.

II.
FACTS

1. Plaintiff filed for election for the position of County Commissioner for Tulsa County, District 2 ("CC", "CC D2") as a Democrat.

2. Two other Democratic candidates filed for the same CC position.

   A. Maria Barnes (candidate)

   B. Sarah Gray (candidate)

3. A primary election was held on June 18, 2024. Plaintiff was not the winning candidate in the Democratic primary for CC D2.

4. Just days before the primary election inflammatory written materials discrediting Plaintiff were mailed to voters. Exhibits A, B, and C[1].

   A. The inflammatory written materials stated it was authorized and paid for by Defendant Oklahomans for Positive Change PAC ("OKFAPCPAC").

   B. Defendant OKFAPCPAC is not a registered entity with the Oklahoma Ethics Commission.

   C. Defendant OKFAPCPAC is not a registered entity with the Tulsa County Election Board.

   D. Defendant OKFAPCPAC is a fictitious PAC.

   E. The mailing address for Defendant OKFAPCPAC printed on the inflammatory written materials is a mail suite located in Ardmore, Oklahoma.

   F. The telephone number printed on the inflammatory written materials for the Defendant OKFAPCPAC is fictitious.

[1] Exhibit C is included only to demonstrate that Defendant OKFAPCPAC used the identification in three (3) mailings prior to the primary election. Plaintiff does not allege that Exhibit C contains any derogatory statements about Plaintiff directly.

5. Defendant A. Flowers filed a Contributions and Expenditures Report for Independent Expenditures and Electioneering Communications on June 14, 2024, and June 17, 2024, with the Tulsa County Election Board on behalf of Defendant OKFAPCPA. Exhibits D and E.

A. Defendant Flowers is listed as "Chairman/Treasurer" of the OKFAPCPAC.

B. Defendant Flower's address is listed on the report at a mail suite in Dallas, Texas[2].

C. Defendant Flowers telephone number listed on the report is the same fictitious number listed on the inflammatory written materials described above.

D. Defendant Flowers listed expenditures to 37 Stars for direct mail on June 14, 2024.

E. Defendant Flowers listed an expenditure to 37 Stars for Direct Mail on June 17, 2024.

6. Defendant OKFAPCPAC filed Committee Schedule D – In Kind Contributions report with the Tulsa County Election Board on July 1, 2024, and identified Defendant Liberty Action Fund, Inc. and Defendant G. Harjo of Stillwater, Oklahoma as making in kind contributions for direct mailers. Exhibit F

A. There is no identification of the person responsible for filing the report.

B. Defendant Liberty Action Fund, Inc. is a 501 (C)(4) nonprofit organization incorporated in the State of Delaware and registered as a foreign corporation in the State of Oklahoma.

i The Oklahoma Secretary of State is the registered agent in Oklahoma.

ii Its stated purpose on its website is:

"Liberty Action Fund, Inc. is a nonprofit organization dedicated to promoting civic engagement by encouraging people to organize, get involved, and run for office to

[2] Oklahoma Ethics Rule 2.81. "...The Treasurer or Deputy Treasurer shall be residents of Oklahoma."

advance the common sense conservative principles that Oklahomans cherish."[3]

C. Defendant G. Harjo's address in Stillwater, Oklahoma is a mail suite.

D. There is no voter registration records for G. Harjo in Stillwater, Oklahoma.

7. On January 2, 2025, Plaintiff's employment with Tulsa County was effectively terminated.

8. Since the general election of November 5, 2024, Plaintiff has been quietly disqualified from government employment because of the actions of the Defendants, individually and collectively.

9. Defendants, individually and collectively, acted with intentional disregard for the truth by publishing inflammatory written materials:

A. "Something is off about Jim Rea" because "his boss pays a political consulting company" Exhibit A

B. Stating that Plaintiff was somehow responsible for the atrocious abuse that occurred at the Tulsa County Juvenile Justice Center because the abuse occurred on county property. Exhibit A

C. Associating Plaintiff with the MAGA Shaman and stating that Plaintiff had "TIES TO MAGA TRUMP CONSULTANTS" Exhibit A

D. Messaging that Plaintiff was in some way responsible for the alleged sexual assault that occurred at the Tulsa County Juvenile Justice Center because he was an employee of Tulsa County and tied to a lawsuit filed against Tulsa County on behalf of the child victims. Exhibit B

E. Incorrectly states that Plaintiff is a "bankruptcy and contract lawyer". Plaintiff was employed by the Tulsa County District Attorney's office from approximately March 2019 until he began working for the Board of County Commissioners. Plaintiff's employment at the time of publication was Chief Deputy County Commissioner. Exhibit B

10. Defendants, individually and collectively, acted with intent to harm the reputation of Plaintiff.

[3] https://www.libertyactionfundinc.com/

11. Defendants, individually and collectively, acted with intent to discredit Plaintiff in any role that he may seek related to governmental employment.

III.
COUNT I – FRAUD

1. Plaintiff adopts and realleges all facts, statements, and allegations set out herein (Jurisdiction, Facts) and incorporates them herein in all respects.

2. Defendants, individually and collectively, have committed fraud by intentionally deceiving others to discredit Plaintiff as follows:

A. Defendant OKFAPCPAC identified itself as a Political Action Committee ("PAC") so that Plaintiff and others would believe that the inflammatory written materials described above were credible and the messenger could be identified.

B. Defendant OKFAPCPAC withheld its identity.

C. Defendant A. Flowers used a fictitious address and telephone number to defraud Plaintiff so that Plaintiff and others would be unable to identify him/her/they.

D. Defendant Liberty Action Fund, Inc. used its non-profit status (dark money) to fraudulently hide the identity of Defendant OKFAPCPAC actors.

E. Defendant G. Flowers used a fictitious address to defraud Plaintiff, and others would be unable to identify him/her/they.

F. Defendants John Doe1, John Doe2, John Doe3, John Doe4, Jane Doe1, Jane Doe2, Jane Doe3, and Jane Doe4 are unknown persons who perpetrated fraud against Plaintiff and others. Plaintiff reserves the right to amend his Petition to make allegations of fraud against unknown persons.

3. Plaintiff is entitled to damages for the fraud perpetrated by Defendants individually and collectively.

4. Defendants John Doe1, John Doe2, John Doe3, John Doe4, Jane Doe1, Jane Doe2, Jane Doe3, and Jane Doe4 are unknown persons who perpetrated slander against Plaintiff and others. Plaintiff reserves the right to amend his Petition to make allegations of fraud against unknown persons.

WHEREFORE, premises considered, Plaintiff prays that this Court grant him a sum in excess of $75,000.00 against the Defendants, individually and collectively, and all other relief that is equitable and proper including attorney fees and costs of this action.

IV.
COUNT II – LIBEL

1. Plaintiff adopts and realleges all facts, statements, and allegations set out herein (Jurisdiction, Facts, Count I), and incorporates them herein in all respects.

2. Defendants, individually and collectively, published inflammatory written materials that were untruthful on their face. Exhibits A, B

3. Defendants, individually and collectively, disseminated inflammatory written materials that were untruthful on their face.

4. Defendants, individually and collectively, published and disseminated the inflammatory written materials maliciously.

5. Defendants, individually and collectively, published and disseminated the inflammatory written materials to deprive Plaintiff of the public's confidence.

6. Defendants, individually and collectively, published and disseminated inflammatory written materials to deprive Plaintiff of a governmental occupation..

7. Defendants, individually and collectively, published and disseminated the inflammatory written materials to injure Plaintiff's ability to obtain gainful employment.

8. Defendants, individually and collectively, published and disseminated the inflammatory written materials to injure Plaintiff's reputation.

9. Defendants John Doe1, John Doe2, John Doe3, John Doe4, Jane Doe1, Jane Doe2, Jane Doe3, and Jane Doe4 are unknown persons who perpetrated slander against Plaintiff and others. Plaintiff reserves the right to amend his Petition to make allegations of slander against unknown persons.

WHEREFORE, premises considered; Plaintiff prays that this Court grant him a sum in excess of $75,000.00 against the Defendants, individually and collectively, and all other relief that is equitable and proper including attorney fees and costs of this action.

V.
COUNT III - CONSPIRACY

1. Plaintiff adopts and realleges all facts, statements, and allegations set out herein (Jurisdiction, Facts, Count I, Count II), and incorporates them herein in all respects.

2. Defendants conspired to publish and disseminate the inflammatory written materials for the acts set out above.

3. Defendants published and disseminated the inflammatory written materials unlawfully.

A. A political action committee is required to register under the laws of the State of Oklahoma.

B. Defendants intentionally and knowingly acted in concert to cause ridicule to Plaintiff.

C. Defendants intentionally and knowingly acted in concert to cause malicious lies to be published and disseminated to the households in Tulsa County, Oklahoma.

4. The documents attached as Exhibits, incorporated herein, are evidence that a conspiracy existed to maliciously defame Plaintiff by unlawful means.

WHEREFORE, premises considered; Plaintiff prays that this Court find that Defendants acted to conspire against Plaintiff to perpetrate fraud and slander, and all other relief that is equitable and proper including attorney fees and costs of this action.

Respectfully submitted,

By: _____

LAURIE PHILLIPS, OBA #19910
1408 S. Denver Ave.
Tulsa, OK 74119
918.587.8800 ofc
LPhillips@918Lawyer.com
Attorney for Plaintiff

VERIFICATION

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

JAMES REA, states that he is the Plaintiff in the above styled and numbered cause, that he has read the above and foregoing document and the facts contained therein are true and correct, to the best of his knowledge, information and belief.

I state under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct to the best of his knowledge, information and belief. (12 OS § 426)

DATE SIGNED: 5/14/2025

_____
JAMES REA
Petitioner

EXHIBIT A

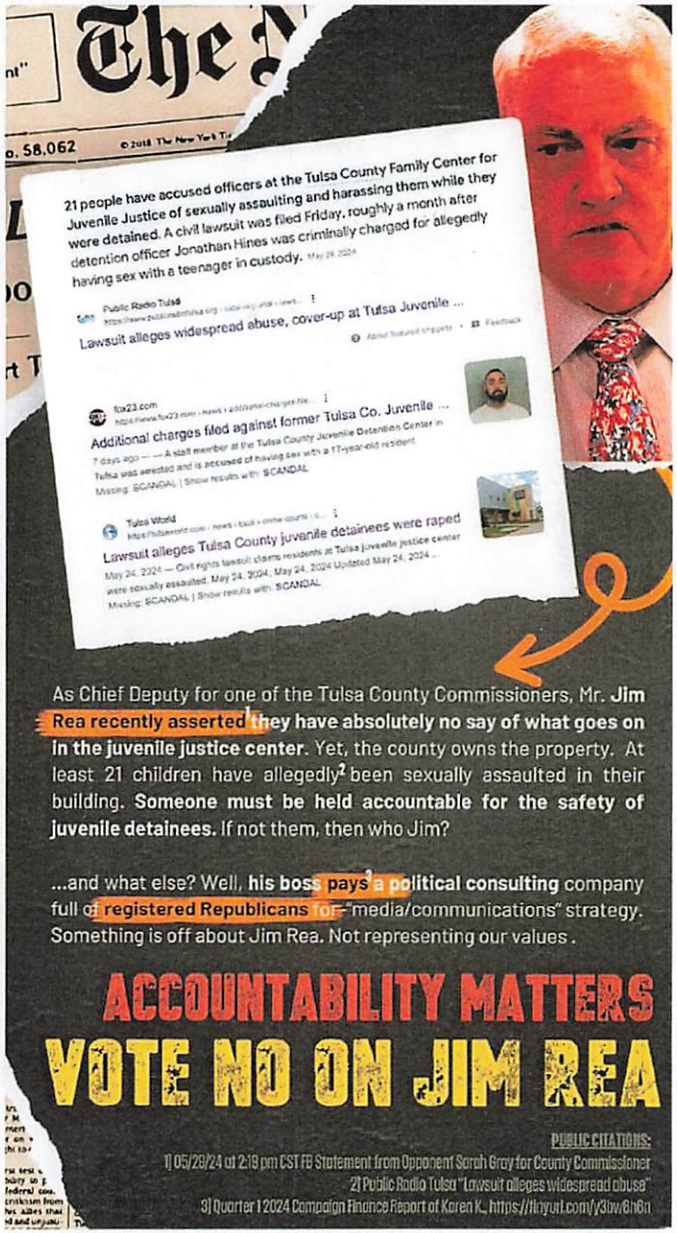
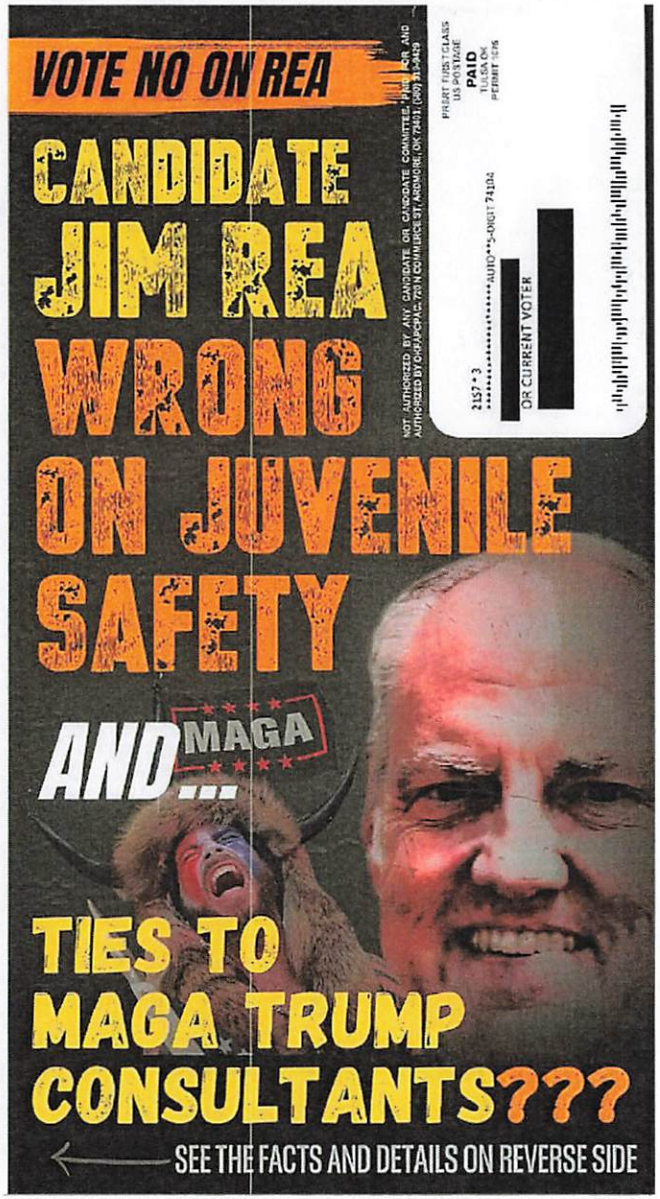


EXHIBIT A



WE INFORM, YOU DECIDE • VOTE JUNE 18TH

COMPARE THE CANDIDATES FOR TULSA COUNTY COMMISSIONER DISTRICT 2

	Sarah Gray	Jim Rea	Maria Barnes
	31, Public Relations Consultant & Activist[1]	53, Bankruptcy & Contract Lawyer[2]	63, Former Tulsa City Councilor & Board Member for Life Senior Services[3]
AGE & BACKGROUND	✓	✗	✓
DEMANDS ACCOUNTABILITY	✓	✗	✓
TRANSPARENCY	✓	?	✓
JUVENILE DETENTION SAFETY	Yes	8 MONTHS?[4]	40+ YEARS[5]
LIVING IN DISTRICT 2			

PUBLIC SOURCE(S): 1, 2, and 3 are from candidate websites last seen 06-9-24; source 4 is referencing the hearing featured on Channel 6 News "...TULSA COUNTY ELECTION BOARD HEARS ELIGIBILITY..."; 5) campaign website

EXHIBIT B

EXHIBIT B

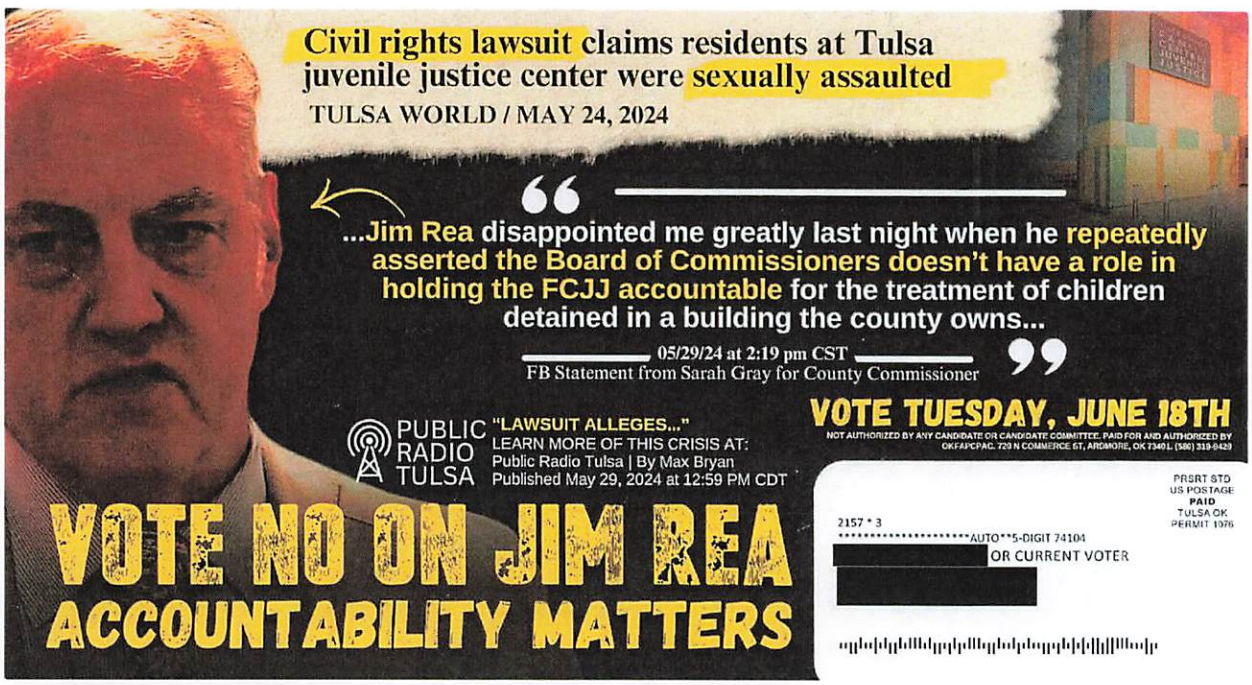


EXHIBIT C

EXHIBIT C

STATE OF OKLAHOMA COUNTY OF TULSA (Name of County)

CONTRIBUTIONS AND EXPENDITURES REPORT FOR INDEPENDENT EXPENDITURES AND ELECTIONEERING COMMUNICATIONS

AMENDED: ☐

Full Name of Committee or Person Making Expenditure	Acronym
Oklahomans for a Positive Change PAC	OKFAPCPAC
Address of Person Making Expenditure	
720 N Commerce St Unit #951 Ardmore, OK 73401	
Full Name of Person Filing Report	**Office or Title of Person Filing Report** / **Phone Number**
Flowers, A.	Chairman/Treasurer / 580319[redacted]429
Address of Person Filing Report	
Attn: DDG 2807 Allen St Dallas, TX 75204	
Type of Report	**Reporting Period:** / **Ethics Activity**
Next Business Day	JUNE 14, 2024 24 HOUR REPORTING

Contributors to a committee filing this report will be disclosed on Schedule A.

☑ **Non-committee filers only. Funds were received from others for the purpose of making independent expenditures or electioneering communications and those contributors are disclosed on Schedule K.**

TOTAL EXPENDITURES	$12688.86

Date	Amount	Type of Expense [IE or EC]	Description	Entity Receiving Expenditure [Name and Address]	Name and Office of Candidate
06-14-24	$6,344.43	IE	Direct Mail	37 Stars 1218 E. Kenosha, BA, OK 74012	Maria Barnes (Support)
06-14-24	$6,344.43	IE	Direct Mail	37 Stars 1218 E. Kenosha BA, OK 74012	Maria Barnes (Support), Sarah Gray (Support), and Jim Rea (Oppose)

EXHIBIT E

STATE OF OKLAHOMA COUNTY OF TULSA (Name of County)

CONTRIBUTIONS AND EXPENDITURES REPORT FOR INDEPENDENT EXPENDITURES AND ELECTIONEERING COMMUNICATIONS

AMENDED: ☐

Full Name of Committee or Person Making Expenditure	Acronym
Oklahomans for a Positive Change PAC	OKFAPCPAC
Address of Person Making Expenditure	
720 N Commerce St Unit #951 Ardmore, OK 73401	
Full Name of Person Filing Report	**Office or Title of Person Filing Report** / **Phone Number:**
Flowers, A.	Chairman/Treasurer / 5803[illegible]429
Address of Person Filing Report	
Attn: DDG 2807 Allen St Dallas, TX 75204	
Type of Report	**Reporting Period:** / **Ethics Number:**
Next Business Day	JUNE 14, 2024 24 HOUR REPORTING

Contributors to a committee filing this report will be disclosed on Schedule A.

☑ **Non-committee filers only. Funds were received from others for the purpose of making independent expenditures or electioneering communications and those contributors are disclosed on Schedule K.**

TOTAL EXPENDITURES:	$5,647.81

Date	Amount	Type of Expense [IE or EC]	Description	Entity Receiving Expenditure [Name and Address]	Name and Office of Candidate
06-17-24	$5,647.81	IE	Direct Mail	37 Stars 1218 E. Kenosha, BA, OK 74012	Jim Rea (Oppose)

FILED 06/17/2024

EXHIBIT E

EXHIBIT F

COMMITTEE SCHEDULE D—IN KIND CONTRIBUTIONS

Amended: ☐

Full Legal Name of Candidate (if applicable)	Full Name of Committee	
	Oklahomans for a Positive Change PAC	
Type of Report: Quarterly	Reporting Period: Q2 2024	Number (if assigned)

In Kind Contributions of $50 or less	Number	Reporting Period Total	Aggregate Total
	2	$18,336.67	$18,336.67

IN KIND CONTRIBUTIONS EXCEEDING $50

Date	Contributor Information [Name/Address/Occupation/Employer] [Name of Committee, Committee #]	Type of Contributor	Description of Goods or Services	Amount	Reporting Period Total	Aggregate Total
06-30-2024	Liberty Action Fund, Inc. 1520 Belle View Blvd Alexandria, VA 22307	Nonprofit Corp.	Direct Mailers 1 and 2 of 3 in Tulsa CC D2 Primary	$14,900	14900.00	14900.00
06-30-24	G. Harjo, Retired Retired, 601 S WASHINGTON ST, Stillwater, OK 74074	Individual	Direct Mailers 3 of 3 in Tulsa CC D2 Primary	3436.67	3436.67	3436.67

FILED 07012024