

IN THE DISTRICT COURT OF THE TWENTY-FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR OKMULGEE COUNTY

THE STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.)
)
 KEEGAN LEAH KELLEY HARROZ,)
)
 Defendant,)

Case No. CF-2021-50 A

FILED
DISTRICT COURT
MAR 28 2022
OKMULGEE COUNTY, OKLAHOMA
CHARLY ORINER, Court Clerk
Deputy

BILL OF PARTICULARS
IN RE PUNISHMENT

I, CAROL ISKI, the undersigned District Attorney for the Twenty-Fifth District, Okmulgee County, State of Oklahoma, do hereby give the Court to know and be informed that the three counts of the offense of Murder in the First Degree, as charged within the original, and/or any amended Complaint and Information, were committed by the defendant, Keegan Leah Kelley Harroz. The undersigned further states that the defendant should be punished by Death due to and as a result of the following aggravating circumstances as set forth by law, to-wit:

1. The defendant knowingly created a great risk of death to more than one person: Jack Randall Chandler, Evelynn Kaye Chandler and Tiffany Shannan Eichor during the course of committing the crimes charged in the Complaint and Information;

2. The murder of Tiffany Shannan Eichor was especially heinous, atrocious or cruel in the following manner, to-wit: Tiffany Shannan Eichor suffered serious physical abuse, torture and pain prior to and during the course of her death at the hands of the defendant and that she suffered mental anguish prior to her death as she heard intruders enter the home she shared with her parents and began firing gunshots striking and killing her parents, Jack Randall Chandler and Evelynn Kaye Chandler;

3. The murder of Evelynn Kaye Chandler was especially heinous, atrocious or cruel in the following manner, to-wit: Evelynn Kaye Chandler suffered mental anguish prior to her death as she heard intruders enter the home she shared with her husband, Jack Randall Chandler and daughter Tiffany Shannan Eichor, as they began firing gunshots striking and killing her husband, Jack Randall Chandler as she attempted to hide from the intruders seeking refuge in her closet.

4. The murders were committed for the purpose of avoiding arrest and prosecution for the following crimes, to-wit: That Jack Randall Chandler and Evelynn Kaye Chandler were murdered by the defendant in order for her to avoid prosecution for the crime of Murder, First Degree of Tiffany Shannan Eichor;

5. There exists a probability that the defendant would commit criminal acts of violence that would constitute a continuing threat to society in the following manner, to-wit: That prior to the murders of Jack Randall Chandler, Evelynn Kaye Chandler and Tiffany Shannan Eichor, the defendant has demonstrated acts of violence. Further, the totality of the circumstances surrounding the crimes charged in the Complaint and

Information demonstrate a blatant disregard for the sanctity of human life, and that at all times subsequent to the crimes charged in the Complaint and Information, the defendant's actions and statements evidence absolutely no regret or remorse for his crimes.

Wherefore, the State of Oklahoma prays it be allowed to submit evidence of the foregoing aggravating circumstances to the Court, upon either a plea or verdict of guilty to the charges of Murder in the First Degree, so as to allow the Court to consider sentencing the defendant to Death as prescribed by law, and for such other and further relief to which the State of Oklahoma may be entitled.

RESPECTFULLY SUBMITTED,



CAROL ISKI, OBA #11471
District Attorney
314 West 7th Street
Okmulgee, OK 74447
918-756-0794

CERTIFICATE OF MAILING

I hereby certify that on this 28th day of March, 2022, a true and correct copy was electronically mailed to: Creekmore Wallace at creeklaw@yahoo.com, and Carla Stinnett at carla@stinnettlaw.com, attorneys for the Defendant, and a copy deposited in the U.S. Mail addressed to: Creekmore Wallace at P.O. Box 90, Sapulpa, OK 74066, and to Carla Stinnett at 404 E. Dewey Avenue, Suite 100, Sapulpa, OK 74066, with postage fully prepaid.



Carol Iski

THIN THE DISTRICT COURT OF THE TWENTY-FOURTH JUDICIAL DISTRICT OF THE STATE OF OKLAHOMA SITTING IN AND FOR OKMULGEE COUNTY

THE STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.)
)
 BARRY ROLAND TITUS, II.,)
)
 Defendant.)

Case No. CF-2021-50 **B**

FILED
IN DISTRICT COURT
MAR 28 2022
OKMULGEE COUNTY, OKLAHOMA
CHARLY CRINER, Court Clerk
Deputy

BILL OF PARTICULARS
IN RE PUNISHMENT

I, CAROL ISKI, the undersigned District Attorney for the Twenty-Fifth District, Okmulgee County, State of Oklahoma, do hereby give the Court to know and be informed that the three counts of the offense of Murder in the First Degree, as charged within the original, and/or any amended Complaint and Information, were committed by the defendant, Barry Roland Titus, II. The undersigned further states that the defendant should be punished by Death due to and as a result of the following aggravating circumstances as set forth by law, to-wit:

1. The defendant knowingly created a great risk of death to more than one person: Jack Randall Chandler, Evelynn Kaye Chandler and Tiffany Shannan Eichor during the course of committing the crimes charged in the Complaint and Information;
2. The murder of Tiffany Shannan Eichor was especially heinous, atrocious or cruel in the following manner, to-wit: Tiffany Shannan Eichor suffered serious physical abuse, torture and pain prior to and during the course of her death at the hands of the defendant and that she suffered mental anguish prior to her death as she heard intruders enter the home she shared with her parents and began firing gunshots striking and killing her parents, Jack Randall Chandler and Evelynn Kaye Chandler;
3. The murder of Evelynn Kaye Chandler was especially heinous, atrocious or cruel in the following manner, to-wit: Evelynn Kay Chandler suffered mental anguish prior to her death as she heard intruders enter the home she shared with her husband, Jack Randall Chandler and daughter Tiffany Shannan Eichor, as they began firing gunshots striking and killing her husband, Jack Randall Chandler as she attempted to hide from the intruders seeking refuge in her closet.
4. The murders were committed for the purpose of avoiding arrest and prosecution for the following crimes, to-wit: That Tiffany Shannan Eichor was murdered by the defendant in order for the defendant to avoid prosecution for the crimes of: Domestic Abuse, Assault and Battery Resulting in Great Bodily Injury, Domestic Abuse by Strangulation and Kidnapping, filed in Oklahoma County District Court in CF-2018-4664. Further, that Jack Randall Chandler and Evelynn Kaye Chandler were murdered by the defendant in order for him to avoid prosecution for the crime of Murder, First Degree of Tiffany Shannan Eichor;

5. There exists a probability that the defendant would commit criminal acts of violence that would constitute a continuing threat to society in the following manner, to-wit: That prior to the murders of Jack Randall Chandler, Evelyn Kaye Chandler and Tiffany Shannan Eichor, the defendant has demonstrated numerous acts of violence. Further, the totality of the circumstances surrounding the crimes charged in the Complaint and Information demonstrate a blatant disregard for the sanctity of human life, and that at all times subsequent to the crimes charged in the Complaint and Information, the defendant's actions and statements evidence absolutely no regret or remorse for his crimes.

Wherefore, the State of Oklahoma prays it be allowed to submit evidence of the foregoing aggravating circumstances to the Court, upon either a plea or verdict of guilty to the charges of Murder in the First Degree, so as to allow the Court to consider sentencing the defendant to Death as prescribed by law, and for such other and further relief to which the State of Oklahoma may be entitled.

RESPECTFULLY SUBMITTED,



CAROL ISKI, OBA #11471
District Attorney
314 West 7th Street
Okmulgee, OK 74447
918-756-0794

CERTIFICATE OF MAILING

I hereby certify that on this 28th day of March, 2022, a true and correct copy was electronically mailed to: Peter Astor at Peter.astor@oids.ok.gov; Gregg Graves at Gregg.graves@oids.ok.gov and Gretchen Mosely at Gretchen.mosely@oids.ok.gov, attorneys for the Defendant, and a copy deposited in the U.S. Mail addressed to Capital Trial Counsel, 610 S. Hiawatha, Sapulpa, OK 74066, with postage fully prepaid.



Carol Iski