

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF OKLAHOMA SITTING IN AND FOR GARFIELD COUNTY

FILED
GARFIELD COUNTY, OKLA
NOV 16 2022

THE STATE OF OKLAHOMA,
Plaintiff,



JANELLE M. SHARP
COURT CLERK
BY *[Signature]*
DEPUTY COURT CLERK

vs.

Case No. CF-2022-490-
138

MICHAEL SCOTT GEIGER
Defendant.

SPECIAL BILL OF PARTICULARS

Comes now the State of Oklahoma, by and through Michael J. Fields, District Attorney for Garfield County, and pursuant to Title 21, section 701.10 of the Oklahoma Statutes, gives the Court to know and be informed that the offense of Murder in the First Degree, as charged in Count 1 in the Amended Information was committed by the Defendant, Michael Scott Geiger, and he should be punished by death, due to and as a result of the following statutory aggravating circumstances, to wit:

I.
**THE DEFENDANT WAS PREVIOUSLY CONVICTED OF A FELONY INVOLVING
THE USE OR THREAT OF VIOLENCE TO A PERSON
21 O.S. § 701.12(1)**

The evidence relied upon by the State of Oklahoma to support this aggravating circumstance includes the following:

On the 13th day of January, 1995, the Defendant was convicted of the felony crime of Robbery with a Firearm in case number CF-1994-4788 in the District Court of Oklahoma County, State of Oklahoma. The Defendant was represented by counsel and this is a final conviction.

II.
THE MURDER WAS ESPECIALLY HEINOUS, ATROCIOUS, OR CRUEL.
21 O.S. § 701.12(4)

The evidence relied upon by the State of Oklahoma to support this aggravating circumstance includes the following:

The victim of this murder, Caliyah Guyton, was just over two years of age when she was murdered. The evidence discovered in room 247 of the Grand Prairie Hotel showed that the injuries she sustained there produced copious bleeding and trauma. Physical examination of her body revealed extensive damage to her vagina, including abrasions and serious tears to both the exterior and interior areas of her vagina. Her DNA was later collected from a swab of the Defendant's penis, showing that Caliyah was violently raped by the Defendant while she was still alive, and immediately prior to her murder.

Examination by the Office of the Chief Medical Examiner revealed additional injuries, further showing that she was physically brutalized in the process of being murdered. Caliyah had markings on her neck, with underlying muscle and soft tissue damage, as well as burst blood vessels throughout her face, head, chest, and vital organs, indicating that she was forcibly strangled to the point that she was unable to breathe and her brain became swollen. She also suffered attacks resulting in numerous bruises about her face, mouth, chest, and other areas.

After the violent rape and physical abuse, the Defendant threw Caliyah into the swimming pool inside the Grand Prairie Hotel from a second-floor balcony, where she was still alive and, while struggling to breathe after being strangled, drowned in the water, causing her lungs to swell and develop a white frothy fluid that was found throughout her airway. She then died due to lack of oxygen caused by both strangulation and drowning.

III.

**THERE EXISTS A PROBABILITY THAT THE DEFENDANT WOULD COMMIT CRIMINAL ACTS OF VIOLENCE THAT WOULD CONSTITUTE A CONTINUING THREAT TO SOCIETY.
21 O.S. § 701.12(7)**

The evidence relied upon by the State of Oklahoma to support this aggravating circumstance includes the following:

Between August of 1992 and March of 1993, the Defendant engaged in several distinct acts of sexual assault upon K.L.H, who was then approximately thirteen years of age, which constituted the crimes of Rape in the First Degree, Forcible Oral Sodomy, and Rape in the First Degree by Instrumentation.

On or about the 16th day of June, 1994, the Defendant and another person entered the home of Blake Edward Morris in the early morning hours, held him at gunpoint, robbed him of numerous items of personal property, then forced him into his own vehicle and took him away from his home, which acts constituted the crimes of Robbery with a Firearm, Kidnapping, and Unauthorized Use of a Vehicle.

On or about the 27th day of October, 2006, the Defendant was found to possess both a homemade knife approximately eleven inches in length and a segment of pipe approximately sixteen inches in length, both illegally possessed while the Defendant was incarcerated in the Oklahoma Department of Corrections.

On or about the 22nd day of September, 2009, the Defendant committed the crime of Assault and Battery upon Oklahoma Department of Corrections medical director Kathy Miller.

On or about the 18th day of June, 2010, the Defendant threatened correctional officers of the Oklahoma Department of Corrections, stating, "One of these days you're going to get what's coming to you."

On or about the 25th day of January, 2012, the Defendant committed the crime of Assault and Battery upon a fellow inmate of the Oklahoma Department of Corrections by striking him with

batteries inside a sock, used as a makeshift weapon, causing the victim's head to bleed from the resulting injury.

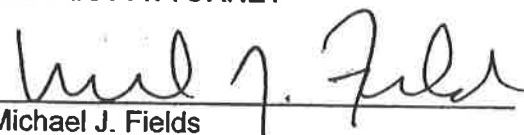
On or about the 5th day of October, 2014, the Defendant injured a correctional officer in the Oklahoma Department of Corrections by pulling the correctional officer's arm through the cell food port and injuring his fingers in the attempt to forcibly resist being placed in restraints.

The Defendant is a member of the United Aryan Brotherhood, a criminal organization whose members are known to regularly carry out crimes of violence on behalf of the organization.

While the Defendant was in the custody of the Oklahoma Department of Corrections, administration personnel determined that a discretionary override should be used to keep the Defendant in a higher security facility than he would otherwise be, due to his history of committing violent misconducts during his incarceration.

The Defendant was released from the Oklahoma Department of Corrections custody on or about the 29th day of March, 2022. He was at liberty for a mere thirty days before he committed the violent rape and murder of Caliyah Guyton. Furthermore, he arrived in the City of Enid only a few hours before committing these crimes, showing that he was willing to perpetrate these atrocious acts almost immediately upon taking notice of the victim.

MICHAEL J. FIELDS
DISTRICT ATTORNEY

By: 
Michael J. Fields
District Attorney

WITNESSES ENDORSED BY THE STATE OF OKLAHOMA

All previously-endorsed witnesses for the State of Oklahoma
K.L.H c/o Garfield County District Attorney's Office, 114 W. Broadway, Enid, OK 73701
Numerous Oklahoma Department of Corrections personnel and former inmates
Blake Edward Morris, 2300 NW 109th St., Oklahoma City, OK 73120
Records Custodian, Oklahoma Department of Corrections, 3400 North Martin Luther King
Avenue Oklahoma City, OK 73111