

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. CR-22-209-JD
)	
BLAINE DYER,)	
)	
)	
Defendant.)	

MOTION TO AMEND CONDITIONS OF RELEASE

The United States has recently obtained evidence indicating that Defendant Blaine Dyer, a convicted felon, possessed and acquired firearms subsequent to his felony indictment and conviction. This development constitutes a change in circumstances under 18 U.S.C. § 3142 that warrants modification of the terms of Mr. Blaine Dyer’s supervised release. For the reasons set forth below, the Court should amend those supervised release conditions to: (1) require Mr. Blaine Dyer to submit to supervision by the United States Probation Office; (2) require Mr. Blaine Dyer to receive a mental health evaluation/psychiatric treatment; (3) expressly prohibit Mr. Blaine Dyer from possessing a firearm, destructive device, or other weapon; (4) require Mr. Blaine Dyer to abstain from the use of alcohol; and (5) require Mr. Blaine Dyer to submit to testing for a prohibited substance as determined by a pretrial services officer or supervising probation officer.

RELEVANT BACKGROUND

A federal grand jury in the Western District of Oklahoma returned an Indictment

against Defendant Blaine Dyer and his co-conspirators on May 17, 2022. (Doc. 1.) On June 9, 2022, following an initial appearance at which he arraigned the Defendant on the charges set forth in that Indictment, Magistrate Judge Gary Purcell entered an order setting Mr. Blaine Dyer's conditions of release. In addition to the standard conditions set forth in 18 U.S.C. § 3142(c)(A), Judge Purcell adopted three special conditions suggested by the assigned United States Probation Officer, which required Mr. Blaine Dyer to: (1) surrender his U.S. passport; (2) not obtain a passport or other international travel document; and (3) restrict his travel to the Western District of Oklahoma, unless pre-approved by the United States Probation Office. (Doc. 16 at 2); 18 U.S.C. § 3142(c)(1)(B). Though Mr. Blaine Dyer's conditions of release included the standard condition that he not violate federal, state, or local law while on release, they did not expressly prohibit him from possessing a firearm, destructive device, or other weapon. (Doc. 16 at 1, 2.) Moreover, those conditions did not require that Mr. Blaine Dyer submit to supervision by the United States Probation Office, or abstain from excessively using alcohol. (*See id.* at 2.)

As this Court is aware, Mr. Blaine Dyer pleaded guilty to one count of Conspiracy to Commit Honest Services Wire Fraud, in violation of Title 18 U.S.C. § 371, on February 17, 2023. (Docs. 197-205.) He has remained out of custody on bond since that time and, despite a July 11, 2023, motion seeking the return of his passport, (Doc. 210), to which the United States responded in opposition, (Doc. 211), Defendant Blaine Dyer's conditions of release have remained unaltered. (*See* Doc. 212).

Possession of Firearms

On or about August 12, 2023, Oklahoma City Crime Stoppers received an

anonymous tip alleging a firearms violation. The narrative of the tip stated:

Blaine Dyer is pending sentencing in federal court in Oklahoma City (Western District of Oklahoma) and after he pled guilty, he had his wife Ashley Dyer purchase a rifle. Most likely it was purchased from Cabela's in Oklahoma City where Blaine Dyer's father works. He is a high-profile defendant after defrauding Continental Resources and the case was worked by FBI. He drinks heavily every day and is very erratic due to his personality and pending prison sentence.

In addition, the tipster alleged that he/she had last seen the weapon—a rifle or a shotgun—at Mr. Dyer's office building in Edmond, and that he/she expected that the weapon was either there or at Mr. Dyer's home. FBI agents obtained firearm transaction records that corroborated these allegations and, based upon this and additional evidence, obtained a search warrant for Mr. Dyer's office, home, and vehicles. *See Gov't Ex. 1 (Search Warrant Application, Affidavit, and Warrant, Aug. 30, 2023).*

On the morning of September 7, 2023, federal agents and task force officers executed the warrant simultaneously at Mr. Blaine Dyer's home and office where they found, and seized, a total of seventeen firearms, along with ammunition. *See Gov't Ex. 2 (Search Warrant Return, certified Sept. 11, 2023).* Mr. Blaine Dyer readily admitted to possessing firearms, and insisted that his attorneys had informed him that—until he was sentenced—he was free to possess and use these guns. That afternoon, the undersigned received a phone call from Mr. Blaine Dyer's attorney, Michael Johnson, who told her that indeed, he and his co-counsel, Justin Lowe, had unequivocally informed their client that he had not been formally “convicted” until he was sentenced, and therefore need not relinquish his firearms until after his sentencing hearing.

ARGUMENT

I. Mr. Blaine Dyer’s Continued Possession of Firearms Constitutes a Violation of Federal Law and a Flagrant Disregard of this Court’s Admonishment.

The United States has no reason to doubt the word of Mr. Blaine Dyer’s attorneys that they did in fact advise their client—albeit erroneously—that he could maintain possession of his extensive firearm collection. But this advice flagrantly disregarded this Court’s clear directive at their client’s change of plea hearing, which they both attended:

The Court: Do you understand that the crime to which you’re pleading guilty is a felony offense[,] *and if your plea is accepted, you will be officially adjudicated guilty of that felony offense* and that this judgment may deprive you of valuable civil rights, including . . . the right to possess any kind of firearm, ammunition, or destructive device . . . [?]

The Defendant: Yes. I understand, Your Honor.

The Court: *I really want to make sure you understand a felony conviction bears collateral consequences[] meaning, among other things, that you cannot possess a firearm, ammunition, or other destructive device, among other things.* Do you understand all of that?

The Defendant: Yes, Your Honor.

Gov’t Ex. 3 at 46-47 (Tr. Change of Plea Hr’g, Feb. 16, 2023) (emphasis added). In sum, this Court explicitly told Mr. Blaine Dyer that he could not keep his firearms not once, but twice.

Mr. Blaine Dyer broke the law when he took counsel’s advice over this Court’s correct recitation of the law, and the United States is contemplating charges accordingly. In the interim, however, and in light of Mr. Blaine Dyer’s blatant disregard for this Court’s

admonitions at his change of plea hearing, immediate action amending his conditions of release is warranted.

II. Mr. Blaine Dyer’s Conditions of Release Should be Amended to Address his Flagrant Disregard for the Law, “Erratic” Behavior, and Substance Abuse Problem.

In initially assessing whether Mr. Blaine Dyer should be released or detained pending trial, Magistrate Judge Purcell evaluated what conditions or combination of conditions—if any—could ensure that Mr. Blaine Dyer would appear for court proceedings as required, as well as ensure the safety of the community. *See* 18 U.S.C. § 3142; *United States v. Cisernos*, 328 F. 3d 610, 617 (10th Cir. 2003). At the time of Mr. Blaine Dyer’s arraignment, however, neither the United States Probation Office nor the Court knew of his substance abuse issues, “erratic” behavior, or continued possession of numerous firearms. The contents of the Crime Stoppers tip, search warrant that followed, and seizure of seventeen firearms and ammunition constitutes new information that calls for amended terms of supervised release.

Under 18 U.S.C. § 3142(c)(3), “[t]he judicial officer may at any time amend [an] order to impose additional or different conditions of release.” Such an amendment is warranted here. The Federal Bureau of Investigation’s seizure of seventeen firearms, coupled with reports of Mr. Blaine Dyer’ “erratic” behavior and excessive drinking,¹ make clear that he is a danger to himself and possibly others. In a high-profile case such as this,

¹ As the undersigned previously represented in her Response in Opposition to Mr. Blaine Dyer’s own Motion to Modify his Conditions of Supervised Release, (Doc. 211), she personally witnessed Defendant’s abuse of alcohol when Mr. Blaine Dyer appeared at a proffer—that he requested—noticeably intoxicated. (*See* Doc. 211 at 3.)

the Court should not take chances. The United States has therefore consulted with Deputy Chief U.S. Probation Officer Sean Bernhard and Supervisory U.S. Probation Jonathan Sheth, head of the Pretrial Services Unit, who concur in recommending the following additional conditions of release requiring Mr. Blaine Dyer to:

7(a): submit to supervision by the United States Probation Office and report for supervision;

7(h): receive psychiatric treatment as recommended by the United States Probation Office;

7(k): not possess a firearm, destructive device, or other weapon;

7(l): abstain from the use of alcohol; and

7(n): submit to testing for a prohibited substance if required by the pretrial services office or supervising officer.

See Doc. 16 at 2.

CONCLUSION

Mr. Blaine's post-conviction possession and acquisition of firearms, particularly when coupled with reportedly "erratic" behavior and substance abuse issues, cannot be ignored. For the reasons set forth above, his conditions of supervised release should be amended to include special conditions 7(a), 7(h), 7(k), 7(l), and 7(n).

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/ Julia E. Barry

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CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Justin Lowe and Michael Johnson, counsel for Blaine Dyer.

s/ Julia E. Barry

Assistant United States Attorney

AO 106 (Rev. 04/10) Application for a Search Warrant

AUTHORIZED AND APPROVED/DATE:

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

In the Matter of the Search of
19845 N. COUNCIL ROAD, EDMOND, OK with access and control
of all outbuildings, structures, curtilage; office building located at 16328
MUIRFIELD PLACE, EDMOND, OK; 2021 LAND ROVER RANGE ROVER
bearing OK license plate number EMN 611; 2015 BENTLEY
CONTINENTAL bearing OK license plate number ALG 781; 2023
CADILLAC ESCALADE bearing OK license plate number MDG 502; and
2014 FERRARI 458 SPIDER bearing OK license plate number ITZ 709

Case No. M-23- 765 AMG

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment "A"

located in the Western District of Oklahoma, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment "B" which is incorporated by reference herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)	Unlawful possession of a firearm

The application is based on these facts:

See attached Affidavit of, which is incorporated by reference herein.

- Continued on the attached sheet.
- Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Andrew Sullivan, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/30/23

City and state: Oklahoma City, Oklahoma

Judge's signature

AMANDA MAXFIELD GREEN, U.S. MAGISTRATE JUDGE

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Andrew Sullivan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for a residence located at 19845 N Council Road, Edmond, Oklahoma, including all outbuildings, structures, and curtilage of the property; and an office building located at 16328 Muirfield Place, Edmond, Oklahoma, as further described in Attachment A, hereinafter the "SUBJECT PREMISES." I also write this affidavit in support of an application for a search warrant for a 2021 Land Rover Range Rover bearing Oklahoma license plate number EMN 611, a 2015 Bentley Continental bearing Oklahoma license plate number ALG 781, a 2023 Cadillac Escalade bearing Oklahoma license plate number MDG 502, and a 2014 Ferrari 458 Spider bearing Oklahoma license plate number ITZ 709, all of which are registered to Blaine Michael Dyer or Cash Holdings LLC, for which Blaine Michael Dyer is the sole member, hereinafter the "SUBJECT VEHICLES."

2. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since January 2019, and I am currently assigned to the Oklahoma City Division. My responsibilities include the investigation of possible violations of federal law, including investigation of white-collar crimes such as wire fraud, bank fraud, and money laundering. Throughout my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.

3. The statements in this affidavit are based on my personal observations, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation.

4. This affidavit is being submitted in support of a warrant to search the SUBJECT PREMISES and SUBJECT VEHICLES, which are believed to contain evidence of violation of Title 18 U.S.C. § 922(g). Based on the investigation to date, I submit that there is probable cause to believe that a search of the SUBJECT PREMISES and SUBJECT VEHICLES will uncover evidence, more particularly described in Attachment B (which is incorporated herein), related to the offense. I further submit that the items set forth in Attachment B, which constitute evidence of, the instrumentalities used, and contraband from the unlawful possession of a firearm in violation of 18 U.S.C. §922(g) may be found inside the SUBJECT PREMISES and SUBJECT VEHICLES for which I seek a search warrant. I further submit the items listed in Attachment B, including firearms and ammunition, are portable and may easily be transferred between the SUBJECT PREMISES and SUBJECT VEHICLES. I therefore request permission to search the SUBJECT VEHICLES, if the vehicles are located at the SUBJECT PREMISES.

5. The subject of this investigation, Blaine Dyer (“Dyer”), is a former attorney who surrendered his law license in 2022. Any authorized search will therefore be conducted by a filter team according to established practices and procedures to ensure that protected materials—including attorney-client privileged communications and attorney work product information—are not disclosed to members of the prosecution team.

FACTS ESTABLISHING PROBABLE CAUSE

Case Background

6. On or about May 17, 2022, Dyer and a co-conspirator were indicted in the Western District of Oklahoma on one count of Conspiracy to Commit Honest Services Wire Fraud, in violation of Title 18 U.S.C. § 1349, seven counts of Honest Services Wire Fraud, in violation of Title 18 U.S.C. §§1346 and 1343, one count of Providing a False Statement on Loan Application, in violation of Title 18 U.S.C. §1014, and one count of Providing a False Statement on a Promissory Note, in violation of Title 18 U.S.C. §1014. Dyer's indictment was filed under court case number 5:22-cr-00209-JD.

7. On or about December 19, 2022, a federal grand jury in the Western District of Oklahoma returned a superseding indictment that charged Dyer with an additional count of Providing a False Statement on a Promissory Note and Commercial Guaranty, in violation of Title 18 U.S.C. §1014.

8. On or about February 16, 2023, Dyer completed a Petition to Enter Plea of Guilty.

Page 4, question #15 of the Petition stated the following:

Do you understand if you plead GUILTY to a felony offense this may deprive you of valuable civil rights including the right to vote, the right to hold public office, the right to serve on a jury, the right to possess any kind of firearm, destructive device[,] or ammunition, and may make you ineligible for certain government benefits?

Following the above question, Dyer checked the box for "Yes." He also signed page 12 of the Petition.¹

¹ The Petition to Enter Plea of Guilty is Document 201 under case number 5:22-cr-00209-JD.

9. On or about February 17, 2023, Blaine Dyer pleaded guilty in United States District Court for the Western District of Oklahoma to one count of Conspiracy to Commit Honest Services Wire Fraud, in violation of Title 18 U.S.C. § 371, before District Court Judge Jodi W. Dishman.

10. Pursuant to the plea agreement, which Dyer signed, the maximum penalty that could be imposed at sentencing was five years of imprisonment or a fine of \$250,000.00, or both such a fine and imprisonment, as well as a mandatory special assessment of \$100.00 and a term of supervised release of three years.² Dyer is not currently detained, and he is awaiting sentencing.

Crime Stoppers Tip

11. On or about August 12, 2023, Oklahoma City Crime Stoppers received a tip alleging a firearms violation. The narrative of the tip consisted of the following:

Blaine Dyer is pending sentencing in federal court in Oklahoma City (Western District of Oklahoma) and after he pled guilty, he had his wife Ashley Dyer purchase a rifle. Most likely it was purchased from Cabela's in Oklahoma City where Blaine Dyer's father works. He is a high-profile defendant after defrauding Continental Resources and the case was worked by FBI. He drinks heavily every day and is very erratic due to his personality and pending prison sentence.

12. The tip provided 16328 Muirfield Place, Oklahoma City, Oklahoma as the address of the incident, late spring/summer as the date and time of offense, and the weapon as a rifle and shotgun. The anonymous tipster stated that the last time he/she saw the weapon was at "Office in Edmond at (16328 Muirfield Place, Edmond, OK)." The tip provided "Home or Office. (16328 Muirfield Place, Edmond, OK)" as the specific location where the weapon is located. Additionally, the tip alleged that the firearm is registered under Dyer's wife's name, Ashley Dyer.

13. Agents previously interviewed Dyer on or about July 31, 2023, at his office building located at 16328 Muirfield Place, Edmond, Oklahoma. During the interview, Dyer acknowledged

² The plea agreement is Document 202 under case number 5:22-cr-00209-JD.

that he owns the entire building. Large sections of the building—including office space, closets, and conference rooms—are currently unoccupied. However, Dyer does lease to a few tenants.

14. On or about August 18, 2023, following receipt of the Crime Stoppers Tip, FBI Special Agents went to the Cabela's located at 1200 W Memorial Road, Oklahoma City, Oklahoma to review ATF Form 4473 Firearm Transaction Records. During a review of the Form 4473s, Agents identified a Form 4473 submitted by Blaine Michael Dyer on November 18, 2022. The Form demonstrates that Dyer attempted to purchase a Christensen Arms Model 14 bearing serial number CV63151 rifle and an Istanbul Silah/Baco Inc. Model SXP bearing serial number TR140020YZSP shotgun.

15. Dyer provided his social security account number, date of birth, address of 19845 North Council Road, Edmond, Oklahoma, and other personal identifiers while completing the Form. Question #21b asks:

Are you under indictment or information in any court for a felony, or any other crime for which the judge could imprison you for more than one year, or are you a current member of the military who has been charged with violation(s) of the Uniform Code of Military Justice and whose charge(s) have been referred to a general court-martial?

16. Dyer checked the "Yes" box for this question, and Cabela's voided the firearms sale, as Dyer was legally barred from purchasing a firearm.

17. Agents also located a Form 4473 for Ashley Rose Tucker-Dyer, Dyer's wife. On the Form, Tucker-Dyer provided her social security account number, date of birth, address of 19845 N Council Road, Edmond, Oklahoma, and other personal identifiers. Tucker-Dyer ultimately purchased a Christensen Arms Model 14 bearing serial number CV63151 rifle on March 27, 2023—the very same rifle that Dyer tried to purchase in November 2022.

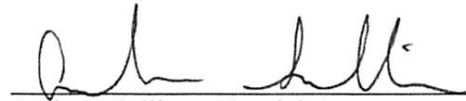
18. Agents conducted open-source research of Christensen Arms and learned that Christensen Arms are produced at a factory in Utah. Therefore, Christensen Arms firearms are shipped or travel via interstate commerce into the State of Oklahoma.

CONCLUSION

19. Based upon Ms. Tucker-Dyer's purchase of the Christensen Arms Model 14 rifle in March 2023, and Dyer's prior attempt to purchase the same rifle, I submit that there is probable cause to believe that Tucker-Dyer served as a straw purchaser for her husband, and that Dyer may be in possession of a firearm despite his felony conviction.

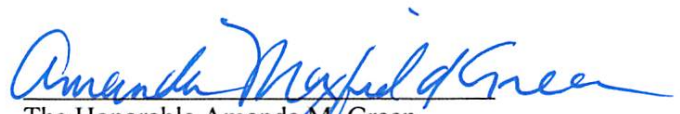
20. I therefore submit that there is probable cause to believe that the SUBJECT PREMISES and SUBJECT VEHICLES contain evidence of a crime, fruits of a crime, contraband and instrumentalities of unlawful possession of a firearm in violation of 18 U.S.C. § 922(g).

Respectfully submitted,



Andrew Sullivan, Special Agent
Federal Bureau of Investigation
Department of Justice

Subscribed and sworn to me on this 30th day of August, 2023.



The Honorable Amanda M. Green
United States Magistrate Judge

Attachment A

Residence

The residence to be searched is the entire property located at 19845 North Council Road, Edmond, Oklahoma. The property is identified by a brick mailbox next to the street with the numeric "19845." The front of the property is marked by a white, wooden, ranch-style fence. The aerial view of the property depicts several outbuildings near the residence.



(Street view of residence depicting address on mailbox)



(Aerial view of residence depicting outbuildings)

Office

The office building to be searched includes those portions of the building located at 16328 Muirfield Place, Edmond, Oklahoma that: (1) are occupied by Blaine Dyer or his companies, including Maverick Capital Partners, LLC, which is located on the southeast corner of the second floor and occupies a corner office and conference room; (2) are vacant/unoccupied; and (3) are hallways or common areas. It does not include any rooms, sections, or areas, that are exclusively occupied by any entities other than those pertaining to Blaine Dyer—*viz.* Suite 101 (Garage Door Solutions/Miner Family Insurance) or Suite 22 (Design Thumbprint). The building is clearly marked with the numeric “16328” near the main entrance door. The office building is located near the corner of NW 162nd Street and Muirfield Place in Edmond, Oklahoma, and consists of approximately 4,000 square feet of office space.



(Office building observed from Muirfield Place)

Attachment B

List of items to be seized from the SUBJECT PREMISES and SUBJECT VEHICLE:

1. Firearms, including but not limited to handguns, rifles, and shotguns;
2. firearm ammunition, including but not limited to shotgun shells, center fire and rim fire ammunition;
3. documentation regarding the purchase of firearms, firearms ammunition, or other firearms-related accessories; and
4. videos, photographs, and digital storage devices capable of storing video surveillance footage of the SUBJECT PREMISES.

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

19845 N. COUNCIL ROAD, EDMOND, OK with access and control
of all outbuildings, structures, curtilage, office building located at 16328 MUIRFIELD PLACE, EDMOND, OK;
2021 LAND ROVER RANGE ROVER bearing OK license plate number EMN 811; 2015 BENTLEY
CONTINENTAL bearing OK license plate number ALG 731; 2023 CADILLAC ESCALADE bearing OK license
plate number MDG 502; and 2014 FERRARI 458 SPIDER bearing OK license plate number ITZ 709

Case No. M-23-765 -AMG

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Western District of Oklahoma
(identify the person or describe the property to be searched and give its location):

See Attachment A, which is incorporated by reference herein.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B, which is incorporated by reference herein.

YOU ARE COMMANDED to execute this warrant on or before Sept. 13, 2023 (not to exceed 14 days)
in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to Amanda Maxfield Green
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

for days (not to exceed 30) until, the facts justifying, the later specific date of

Date and time issued: 8/30/23 @ 2:20 pm Amanda Maxfield Green
Judge's signature

City and state: Oklahoma City, Oklahoma AMANDA MAXFIELD GREEN, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.: M-23- -AMG	Date and time warrant executed:	Copy of warrant and inventory left with:
------------------------------------	---------------------------------	--

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

Attachment A

Residence

The residence to be searched is the entire property located at 19845 North Council Road, Edmond, Oklahoma. The property is identified by a brick mailbox next to the street with the numeric "19845." The front of the property is marked by a white, wooden, ranch-style fence. The aerial view of the property depicts several outbuildings near the residence.



(Street view of residence depicting address on mailbox)



(Aerial view of residence depicting outbuildings)

Office

The office building to be searched includes those portions of the building located at 16328 Muirfield Place, Edmond, Oklahoma that: (1) are occupied by Blaine Dyer or his companies, including Maverick Capital Partners, LLC, which is located on the southeast corner of the second floor and occupies a corner office and conference room; (2) are vacant/unoccupied; and (3) are hallways or common areas. It does not include any rooms, sections, or areas, that are exclusively occupied by any entities other than those pertaining to Blaine Dyer—*viz.* Suite 101 (Garage Door Solutions/Miner Family Insurance) or Suite 22 (Design Thumbprint). The building is clearly marked with the numeric “16328” near the main entrance door. The office building is located near the corner of NW 162nd Street and Muirfield Place in Edmond, Oklahoma, and consists of approximately 4,000 square feet of office space.



(Office building observed from Muirfield Place)

Attachment B

List of items to be seized from the SUBJECT PREMISES and SUBJECT VEHICLE:

1. Firearms, including but not limited to handguns, rifles, and shotguns;
2. firearm ammunition, including but not limited to shotgun shells, center fire and rim fire ammunition;
3. documentation regarding the purchase of firearms, firearms ammunition, or other firearms-related accessories; and
4. videos, photographs, and digital storage devices capable of storing video surveillance footage of the SUBJECT PREMISES.

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

19845 N COUNCIL ROAD, EDMOND, OK with access and control
of all outbuildings, structures, cutlidge, office building located at 16328 MUIRFIELD PLACE, EDMOND, OK;
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plate number MDG 502; and 2014 FERRARI 458 SPIDER bearing OK license plate number ITZ 709

Case No. M-23-765 -AMG

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Western District of Oklahoma
(identify the person or describe the property to be searched and give its location):

See Attachment A, which is incorporated by reference herein.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B, which is incorporated by reference herein.

YOU ARE COMMANDED to execute this warrant on or before Sept. 13, 2023 (not to exceed 14 days)
in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to Amanda Maxfield Green
(United States Magistrate Judge)


Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

for days (not to exceed 30) until, the facts justifying, the later specific date of

Date and time issued: 8/30/23 @ 2:20 pm Amanda Maxfield Green
Judge's signature

City and state: Oklahoma City, Oklahoma AMANDA MAXFIELD GREEN, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return		
Case No.: M-23-765-AMG	Date and time warrant executed: 09/07/2023 10:00 AM	Copy of warrant and inventory left with: Ashley Dyer and left at office
Inventory made in the presence of: Ashley and Blake Dyer		
Inventory of the property taken and name of any person(s) seized:		
<ul style="list-style-type: none"> -Christensen Arms garrison USA model 14 sin C063151 -Sig Sauer SIGM400 sin 20K035649 ·Ammunition -Diamondback multi sin DB1726221 -Remington 1100 sin R156518V -ASD Browning shotgun sin 71519N12504 -Browning A5 sin B6916 ·Bennelli 20 gauge sin X045336415 -Maiberg Rifle sin E05139970 -Stoeger M3500 sin 1658688 -Silver Hunter sin 113MV18403 -Henry Turkey Federation sin J03-001099 -Mossberg 930 sin A50017950 -Springfield XDS sin 63623327 -S&W .38 special sin CWD1718 -Taurus revolver sin TB792726452 -S&W mmo Shield sin LER5273 <li style="text-align: right;">-Basek PX4 Storm sin P241576 		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p>		
Date: <u>09/11/2023</u>	 Executing officer's signature	
Andrew Sullivan FBI Special Agent Printed name and title		