



**ORIGINAL**

**FILED  
SUPREME COURT  
STATE OF OKLAHOMA**

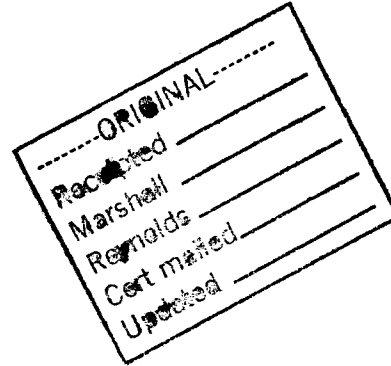
**IN THE SUPREME COURT OF THE STATE OF OKLAHOMA SEP 8 2021**

**JOHN D. HADDEN  
CLERK**

THE STATE OF OKLAHOMA, )  
 )  
 Petitioner, )  
 )  
 v. )  
 )  
 ADAM LUCK, INDIVIDUALLY AS )  
 A MEMBER OF THE PARDON AND )  
 PAROLE BOARD, )  
 )  
 & )  
 )  
 KELLY DOYLE, INDIVIDUALLY )  
 AS A MEMBER OF THE PARDON )  
 AND PAROLE BOARD, )  
 )  
 Respondents. )

**#11983 9**

Case No. \_\_\_\_\_



**PETITIONER'S REQUEST FOR AN ORDER DIRECTING ADAM LUCK AND KELLY DOYLE, AS INDIVIDUAL MEMBERS OF THE OKLAHOMA PARDON AND PAROLE BOARD, TO REFRAIN FROM PARTICIPATING IN ANY ACTIONS WITH REGARD TO THE COMMUTATION PROCEEDINGS RELATED TO INMATE JULIUS DARIUS JONES UNTIL THIS COURT HAS RULED ON THE ISSUE OF DISQUALIFICATION AS TO EACH OF THEM**

COMES NOW, the Petitioner, and respectfully requests this Honorable Court to issue an order directing Adam Luck and Kelly Doyle, as individual members of the Oklahoma Pardon and Parole Board (Board), to refrain from acting in any manner with regard to the commutation proceedings related to inmate Julius Darius Jones, until further order of this court.

In support hereof, the State would inform the Board that:

1. Inmate Julius Darius Jones was convicted of inter alia, Murder in the First Degree, out of Oklahoma County in case number CF-1999-4373, and was sentenced to death as a result thereof;
2. Inmate Julius Darius Jones has filed an application for commutation of his sentence of death in CF-1999-4373, and the commutation hearing is set for 9:00 am on September 13, 2021;
3. Adam Luck and Kelly Doyle are individual members of the Board, which consists of five (5) total members;
4. The State has filed a motion seeking to disqualify Adam Luck as an individual member as it relates to the commutation of inmate Julius Darius Jones' sentence of death;
5. The State has filed a motion seeking to disqualify Kelly Doyle as an individual member as it relates to the commutation of inmate Julius Darius Jones' sentence of death;
6. The State sought to have individual members Adam Luck and Kelly Doyle make a public ruling as it relates to the commutation request of Julius Darius Jones by Wednesday, September, 8, 2021, by noon, in order to allow the State

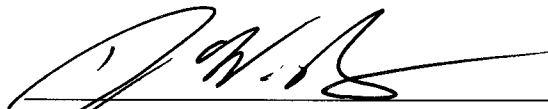
time to seek relief in the Supreme Court if either or both of them refused to disqualify themselves;

7. Adam Luck and Kelly Doyle have declined to disqualify themselves in this matter;
8. The Oklahoma Pardon and Parole Board has no internal appeal mechanism when an individual member refuses to disqualify him or herself;
9. If the State is required to proceed with a commutation hearing before a court has reviewed the State's motions to disqualify Adam Luck and / or Kelly Doyle, the State will suffer irreparable harm, and there is not further remedy.

For premises considered, the State respectfully requests this Honorable Court to issue an order directing Adam Luck and Kelly Doyle to refrain from acting in any manner, directly or indirectly, in the commutation hearing of Julius Darius Jones until further order of this Court.

Respectfully submitted,

DAVID PRATER  
DISTRICT ATTORNEY



---

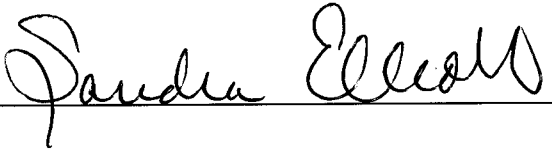
320 Robert S. Kerr, Room 505  
Oklahoma City, Oklahoma 73102  
(405) 713-1600 FAX: 713-1749

**CERTIFICATE OF MAILING**

I certify that on the 8 day of September, 2021, that a true and correct copy of the above and foregoing instrument was hand delivered to the following:

Tom Bates, Executive Director on behalf of Adam Luck and Kelly Doyle  
c/o Pardon and Parole Board  
2915 N Classen Blvd #405  
Oklahoma City, OK 73106

Mark Barrett, Local Counsel for Julius Jones  
P.O. Box 896  
Norman, Ok 73070

  
\_\_\_\_\_