



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

DISTRICT COURT  
**FILED**

MAY 27 2021

DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

CARL EDWARDS ADAMS, SR. )  
as the next of kin of CARL EDWARD )  
ADAMS, JR., deceased, )

Plaintiff, )

v. )

TOWN OF SPERRY, OKLAHOMA )  
and the SPERRY POLICE )  
POLICE DEPARTMENT; )  
TULSA COUNTY, a political )  
subdivision, and THE BOARD OF )  
COUNTY COMMISSIONERS OF )  
TULSA COUNTY; VIC REGALADO, )  
in his Official Capacity as Tulsa County )  
Sheriff; ST. JOHN HEALTH SYSTEM, )  
INC., a domestic Not for Profit )  
Corporation, d/b/a ASCENSION ST )  
JOHN; and, COUNTRY CORNER )  
FIRE DISTRICT, INC. a not for )  
profit Oklahoma corporation d/b/a )  
COUNTRY )  
CORNER FIRE DEPARTMENT )  
Defendants. )

**CJ-2021-01552**  
Case No. Judge

**DOUG DRUMMOND**

ATTORNEY LIEN CLAIMED

JURY TRIAL DEMANDED

PETITION

COMES NOW the Plaintiff, Carl Edward Adams, St. ("Carl Adams"), as the surviving father and next of kin of Carl Edward Adams, Jr. ("Bo Adams"), deceased, and for his Petition against the Defendants, above named, states as follows:

**I. PARTIES, JURISDICTION AND VENUE**

1.1 Plaintiff, Carl Adams is a resident of Tulsa County, Oklahoma, and the father and next of kin of his deceased son, Bo Adams.

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1.2 The Defendant Town of Sperry, Oklahoma is a town located in Tulsa County, Oklahoma, and operates a police department known as the Sperry Police Department.

1.3 The Defendant, Board of County Commissioners of Tulsa County (“BOCC”) is the governing body of Tulsa County.

1.4 The Defendant, Vic Regalado (“Regalado”), is the Sheriff of Tulsa County and is responsible for Sheriff’s deputies on duty and acting within the course and scope of their employment with the Tulsa County Sheriff’s Department.

1.5 The Defendant, St. John’s Health System, Inc. is a domestic not for profit corporation doing business under the name of Ascension St. John (“St. John”).

1.6 The Defendant, Country Corner Fire District, Inc. is a not for profit Oklahoma corporation located in Tulsa County, Oklahoma who does business under the name of Country Corner Fire Department (“CCFD”).

1.7 The acts and/or omissions to act giving rise to this wrongful death action by Carl Adams for the death of his son, Bo Adams, occurred in Tulsa County, Oklahoma.

1.8 This Court has jurisdiction over the parties and subject matter and venue is proper.

## **II. GENERAL FACTS**

2.1 On or about May 27, 2019, Sperry Police Department officers responded to a call from Carl Adams regarding his son, Bo Adams, who was ill from ingesting a substance believed to be some sort of methamphetamine. Failing to render any aid or assistance, the Sperry Police officers notified the Tulsa County Sheriff’s department who dispatched deputies in response to the call. Upon arrival, three, unidentified Sheriff’s deputies discussed administering to Bo Adams

some unknown compound they brought with them, referred to by them as a “cocktail”, to counteract the ill effects of the methamphetamine substance Bo Adams had ingested.

2.2 Upon information and belief, neither of the Sheriff’s deputies had any experience administering the “cocktail”. Rather than wait a few minutes for an ambulance and medical technicians from CCFD to arrive, one of the Sheriff’s deputies negligently injected Bo Adams with the “cocktail”, which caused him to go into immediate cardiac arrest.

2.3 Following the arrival of the CCFD ambulance, Bo Adams’ lifeless body was loaded into the ambulance for transport to St. John. Upon information and belief, the medical technicians of CCFD revived Bo Adams while in route to St. John but were otherwise negligent in failing to render to him appropriate, emergency treatment to counteract the ill effects of the “cocktail” he had been injected with by one of the Sheriff’s deputies.

2.4 Upon information and belief, Bo Adams received negligent care and treatment by St. John personnel, which contributed to cause his death, including the failure of St. John’s health care personnel to administer the appropriate and necessary treatment to counteract the ill effects of the “cocktail” Bo Adams had been injected with by one of the Sheriff’s deputies.

2.5 As a result of the negligent acts and/or negligent omissions to act of the Defendants, and each of them, Bo Adams was pronounced dead while at St. John.

2.6 On or about May 28, 2019, a Tort Claim Notice was served on the BOCC and Tulsa County Sheriff’s Office concerning the Tulsa County Sheriff’s deputies negligently administering substances [the “cocktail”], which contributed to the wrongful death of Bo Adams. The tort claim was later deemed denied by the BOCC and Tulsa County Sheriff’s Office failing to respond. Also on May 28, 2019, a Tort Claim Notice was served on the Town of Sperry who failed to accept the claim, which was thereafter deemed denied.

2.7 Bo Adams was born January 10, 1975, and was 44 years old at the time of his death.

**III. CLAIM FOR RELIEF  
(Negligence and Wrongful Death)**

3.1 The Defendants, and each of them, owed Bo Adams the duty to provide care and treatment in a non-negligent manner.

3.2 The Defendants, and each of them, breached that duty which caused or contributed to cause the wrongful death of Bo Adams.

3.3 As a result of Bo Adams wrongful death, the Plaintiff is entitled to money damages allowed pursuant to 12 O.S. §1053 et seq., including but not limited to damages for his grief for the death of his son and his son's medical and funeral expenses incurred, which are in excess of \$75,000.00 (an amount that would support diversity jurisdiction in federal court).

WHEREFORE, Plaintiff prays judgment in his favor and against the Defendants, and each of them, for wrongful death damages in excess of \$75,000.00, all costs of this action, including a reasonable attorney's fee, interest as provided by law, and for such other and further relief as the Court deems just.

Respectfully submitted,



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