

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

FILED

DEC 19 2019

F. CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY: ac DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

No. CR-19 404 D

LAURA R. JOHNSON,

a/k/a Laura Ashley Johnson,

a/k/a Laura Johnson,

a/k/a Laura Johnston,

a/k/a Lorelei Johnston,

a/k/a Nia Forte,

THOMAS JOHNSON, SR.,

a/k/a Thomas Clark Johnson,

a/k/a Thomas C. Johnson,

a/k/a Tom Johnson,

a/k/a King Redneck, and

CHERYL M. ASHLEY,

a/k/a Cheryl Ashley,

a/k/a Carol Mary Ashton,

a/k/a Cheryl Ashton,

a/k/a Jan Kendel,

Defendants.

Violations: 18 U.S.C. § 1349

18 U.S.C. § 1014

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1344(2)

18 U.S.C. § 2

18 U.S.C. § 1343

18 U.S.C. § 1028(a)(7) & (c)(3)(A)

18 U.S.C. § 1028(f)

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 982(a)(2)

28 U.S.C. § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

At all times relevant to the Indictment:

Introduction

1. A warranty deed is commonly used in Oklahoma as a method to transfer ownership of real estate. A warranty deed offers a guarantee to the buyer that the seller rightfully owns the property. The warranty deed will identify the buyer and seller, provide a legal description of the property, and be signed by the person transferring the property. The seller's signature must be acknowledged by a notary before it can be filed in a county clerk's office.

2. In Oklahoma, a county clerk's office is responsible for filing documents related to the sale of property in each individual county. This includes filing warranty deeds, quit claim deeds, mortgages, and confidential documentary stamp tax affidavits. Each county clerk's office charges a fee related to the filing of documents.

3. In Oklahoma, a county treasurer's office is responsible for collecting assessed taxes on real property located within the county. The treasurer's office also prepares delinquent tax affidavits, delinquent tax bills, and receipts for the payment of taxes. Should property taxes become delinquent for at least four years, the county treasurer is responsible for conducting an auction to sell the property in order to collect the delinquent taxes. If a property sells at auction for more than the amount of taxes owed, the balance of the sale price is returned to the record owner of the property. If a property owner pays at least one year of delinquent taxes before the auction, the property is pulled off the auction list.

4. In Oklahoma, a county sheriff's office is responsible for conducting foreclosure sales on property where a homeowner has defaulted on his mortgage. If a

district court judge determines a homeowner has defaulted on a mortgage, the property is auctioned to recover the amount remaining on the mortgage. In a foreclosure sale, the minimum bid to purchase property must be at least two-thirds of the appraised value of the property.

5. MidFirst Bank was a financial institution located in the Western District of Oklahoma whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

6. International Bank of Commerce (“IBC”) was a financial institution with branches located in the Western District of Oklahoma whose deposits were insured by the FDIC.

7. Bank of Oklahoma was a financial institution located in the Western District of Oklahoma whose deposits were insured by the FDIC.

8. JP Morgan Chase Bank (“Chase”) was a financial institution with branches located in the Western District of Oklahoma whose deposits were insured by the FDIC.

9. Duende Management LLC, Enginuity LLC, Family Heritage Trust LLC, Help & Hope LLC, Hope & Help LLC, The Helping Hand LLC, Horsing Around Family Farms LLC, Innovative Transformations Inc. (“Innovative Transformations”), Jets LLC, Latt Living Revocable Trust, MDOK Family Trust, OT LLC, Rejuvenations LLC, Showtech Distributors LLC are among the entities created and controlled by the defendants.

COUNT 1
(Conspiracy to Commit Mail and Wire Fraud)

10. The Grand Jury realleges and incorporates paragraphs one through nine of the Indictment as though fully set forth herein.

11. Beginning in or about 2014 and continuing into 2019, in the Western District of Oklahoma, and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,

THOMAS JOHNSON, SR.,
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck, and

CHERYL M. ASHLEY,
a/k/a Cheryl Ashley,
a/k/a Carol Mary Ashton,
a/k/a Cheryl Ashton,
a/k/a Jan Kendel, -----

knowingly, unlawfully and with interdependence conspired together and with others, both known and unknown to the Grand Jury, to commit offenses against the United States, that is mail fraud and wire fraud by obtaining and attempting to obtain money and property through means of materially false and fraudulent pretenses, representations and promises in the Western District of Oklahoma in violation of Title 18, United States Code, Section 1341 and Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

12. The purpose of the conspiracy was to fraudulently obtain title to homes and other properties located in the Western District of Oklahoma through the use of fraudulent documents, many of which contained forged signatures. Such documents included warranty deeds, confidential documentary stamp tax affidavits, eviction notices, mortgages, as well as district court pleadings and exhibits.

Manner and Means

13. During the course of the conspiracy, the defendants used “front companies” to conceal their identity. The defendants also opened postal boxes to establish addresses for the front companies.

14. During the course of the conspiracy, the defendants communicated in person, by phone, and through emails and texts.

15. During the course of the conspiracy, the defendants routinely targeted for takeover single-family homes on which the homeowners owed delinquent county property taxes or properties in foreclosure proceedings.

16. During the course of the conspiracy, the defendants claimed to have purchased the fraudulently obtained homes at tax auctions; however, the homes had not been auctioned by county officials. In fact, the defendants often paid a portion of the back taxes owed on the targeted homes to prevent them from being sold at auction.

17. During the course of the conspiracy, the defendants caused fraudulent warranty deeds to be filed transferring homes from the actual owners, but without the

knowledge or consent of the homeowners, to the control of the defendants. At times, the defendants caused multiple fraudulent warranty deeds to be filed on the same home.

18. During the course of the conspiracy, the names and signatures of homeowners and notaries were forged on warranty deeds and other documents before being filed in the County Clerk's Offices in Marshall County and Oklahoma County.

19. During the course of the conspiracy, the defendants paid filing fees to record fraudulent documents such as warranty deeds, mortgages, and confidential documentary stamp tax affidavits.

20. During the course of the conspiracy, the defendants caused the Oklahoma County Clerk's Office to electronically upload fraudulent warranty deeds and other documents to the county's internet website. Similarly, the defendants caused the Marshall County Clerk's Office to mail fraudulent warranty deeds and other documents to an Oklahoma City postal box controlled by the defendants.

21. During the course of the conspiracy, the defendants took actions to physically take over the targeted homes by placing fictitious eviction notices on the homes and changing the locks to the homes.

22. During the course of the conspiracy, the defendants transferred fraudulent titles of targeted homes to front companies they controlled and to acquaintances. Defendants also allowed family members to live in a home and rented a home for their financial benefit.

23. During the course of the conspiracy, the defendants kept personal property found in some of the fraudulently obtained homes such as mail, business records, financial

records, an H2 corporate seal, driver licenses, social security cards, birth records, a family Bible, pictures, mineral records, and Last Wills and Testaments.

24. During the course of the conspiracy, the defendants obtained and attempted to obtain money from MidFirst Bank, Bank of Oklahoma and International Bank of Commerce in connection with the targeted properties. Such activity included withdrawal of funds from a homeowner's account and use of targeted properties to support a loan application.

25. During the course of the conspiracy, the defendants changed utility services from the actual homeowners to the names of front companies.

26. During the course of the conspiracy, the defendants attempted to thwart the efforts of homeowners who filed lawsuits to stop the takeovers of their homes. The defendants caused pleadings to be filed in Marshall and Oklahoma County District Courts using the names of fictitious lawyers. The defendants also caused fraudulent documents and exhibits that contained forged signatures to be filed in court proceedings.

Overt Acts

27. To effect the object of the conspiracy, the defendants committed and caused the commission of the following overt acts, among others, in the Western District of Oklahoma in their effort to takeover 15 targeted properties.

28. On May 14, 2015, Cheryl Ashley opened a postal box in the name of Innovative Transformations at a UPS store located at 12101 N. MacArthur, Ste. A#271, Oklahoma City, OK.

29. On June 27, 2017, Cheryl Ashley opened a postal box in the name of Helping Hand LLC at a UPS store located at 5830 NW Expressway, #178, Oklahoma City, OK.

**The Shorter home
8825 Parkridge Terrace
Oklahoma City, Oklahoma**

30. In January 2014 a foreclosure lawsuit was filed in Oklahoma County District Court against J.L. Shorter and J.M. Shorter for breach of their mortgage agreement with the Mortgage Clearing Corporation ("Mortgage Clearing"). In April 2014, an Oklahoma County District Court Judge found the Shorters had breached their mortgage agreement due to non-payment of \$12,704.82.

31. The Oklahoma County Sheriff's Office was directed to obtain an appraisal of the Shorters' home and then conduct a sale of the property to satisfy the judgment. In July 2014, the Shorters' home was appraised at a value of \$110,000.

32. Defendants' efforts to take over the Shorters' home began when Cheryl Ashley and Laura Johnson attempted to locate and contact members of the Shorter family in an effort to purchase the home. In particular, Laura Johnson contacted the Shorters' daughter, K. Wiedmer, and offered to pay the approximate \$12,000 due on the mortgage in return for the title to the home being placed in the name of Showtech Distributors.

33. At the September 11, 2014 sheriff's sale, Cheryl Ashley placed the highest bid to purchase the Shorters' home in the amount of \$77,000. Confirmation of the sale was scheduled for October 3, 2014, at which time the entire \$77,000 had to be paid into the Oklahoma County Court Clerk's Office.

34. On September 12, 2014, Cheryl Ashley paid \$7,700 to the Oklahoma County Clerk's Office in the form of a \$4,700 cashier's check and a \$3,000 cashier check. Cheryl Ashley failed to submit any further money toward the balance of her \$77,000 bid for the Shorters' home.

35. On October 3, 2014, Mortgage Clearing received emails from Tom Johnson at tom@showtechdistro.com, signed "Laura" with phone number 405-641-4016, that offered to pay the balance of the Shorters' mortgage in return for Mortgage Clearing providing a deed to the Shorters' home in the name of Showtech Distributors LLC.

36. On the same day, "Laura", with the phone number 641-4016, filed a warranty deed with the Oklahoma County Clerk's Office transferring the Shorters' home to Tom Johnson's company Showtech Distributors LLC. Cheryl Ashley notarized the warranty deed which contained the forged signatures of the Shorters.

37. On October 7, 2014, Mortgage Clearing received another email from Tom Johnson at tom@showtechdistro.com, signed "Laura" with phone number 405-641-4016, which claimed Showtech Distributors LLC legally held the warranty deed to the Shorters' home. The email offered to pay Mortgage Clearing \$12,704.82 in exchange for a release of the Shorters mortgage and a warranty deed in the name of Showtech Distributors LLC.

38. A Mortgage Clearing representative responded to Laura at tom@showtechdistro.com stating the company could not work with Showtech because the company's note and mortgage were with Mr. and Mrs. Shorter.

39. Subsequently, Laura Johnson and Cheryl Ashley asked a family acquaintance, C. Taylor, to sign a warranty deed as a representative of Showtech

Distributors LLC. This fraudulent warranty deed, filed with the Oklahoma County Clerk's Office on October 16, 2014, transferred the Shorters' home from Showtech Distributors LLC to Help and Hope LLC.

40. On November 7, 2014, Help and Hope LLC paid \$13,000 in cash into the Oklahoma County Court Clerk's account established in the foreclosure lawsuit against the Shorters. Less than a week later on November 12, 2014, Laura Johnson filed a false "Certificate of Release" that represented Oklahoma County District Court Judge Bryan C. Dixon released the judgment previously awarded to Mortgage Clearing against the Shorters. In reality, the judge had not released the mortgage.

41. On January 23, 2015, Mortgage Clearing filed a motion to set aside the Certificate of Release which was approved by the district court judge.

42. The Shorters' home was sold at a second sheriff's sale on February 12, 2015 for \$75,100.

43. Cheryl Ashley picked up Oklahoma County Court Clerk check #403301 payable to herself in the amount of \$6,528.03 on August 31, 2015. This check refunded a portion of the \$7,700 submitted by Ashley on September 12, 2014.

44. Laura Johnson picked up Oklahoma County Court Clerk Check #412908 payable to Help & Hope in the amount of \$12,684.30 on June 13, 2016. This check refunded a portion of \$13,000 Help & Hope paid in cash on November 7, 2014. This check was deposited into Tom Johnson's Showtech Distributors LLC account x-3701 at the Bank of Oklahoma.

**The Bartrug home
5636 NW 58th Terrace
Warr Acres, Oklahoma**

45. Mr. J. Bartrug and Mrs. J.M. Bartrug owned their home at 5636 NW 58th Terrace in Warr Acres, Oklahoma. After the death of her husband, Mrs. J.M. Bartrug (“Bartrug”) lived alone in the home until her death in 2012. On June 24, 2012, a neighbor checking on Bartrug’s welfare discovered the elderly woman had died in her home. The neighbor contacted the police department to report the death. The neighbor, who had regularly assisted Bartrug for a number of years, was unaware of any family or other friends of the elderly woman. Bartrug’s body was taken to the Demuth Funeral Home, where ultimately she was cremated on August 22, 2012 because no one claimed her body.

46. After her death, the property taxes on Bartrug’s home remained unpaid for tax years 2011, 2012, 2013, and 2014, and the Oklahoma County Treasurer’s Office placed the home on the list of properties to be auctioned on June 8, 2015.

47. Defendants’ efforts to take over Bartrug’s home began on June 2, 2015, when Cheryl Ashley sent an email to Laura Johnson identifying four properties scheduled to be auctioned by the Oklahoma County Treasurer’s Office on June 8, 2015. One of the properties identified by Cheryl Ashley was Bartrug’s home at 5636 NW 58th Terrace in Warr Acres, Oklahoma.

48. On June 3, 2015, Cheryl Ashley sent another email entitled “House” to Laura Johnson in which she provided additional information on the Bartrug property including the following description: “Bartrug has a phone number of 728-0236 no email 89 year old lady 5636 NW 58th Terr #188591095.”

49. On June 5, 2015, Cheryl Ashley signed a Delinquent Tax Affidavit to pay the 2011 property taxes of \$1131.35 in cash on Bartrug's home. Payment of the 2011 property taxes removed Bartrug's home from the list of homes to be auctioned. On the Delinquent Tax Affidavit, Ashley signed as the property owner/agent for Innovative Transformations, located at 12101 N. MacArthur Suite A, OKC, OK 73162. This address was for a postal box Cheryl Ashley opened on May 14, 2015.

50. Beginning in June 2015, defendants and other family members gained entry into Bartrug's home and began searching through her possessions and those of her deceased husband. Thereafter, they removed numerous personal items from Bartrug's home.

51. On June 10, 2015, Tom Johnson sent a text message to Laura Johnson about the discovery of financial documents in Bartrug's house. More specifically, Tom Johnson stated, "There is over \$100k in her MidFirst account!!! We found stocks & bonds too!!!" Laura Johnson responded, "Don't repeat that to anyone dork."

52. On June 17, 2015, three MoneyGrams totaling \$2,761.10 and made payable to the Oklahoma County Treasurer with the notation Bartrug, 5636 NW 58th Terr., acct #188591095 were purchased at a Walmart store located at 11101 N. Rockwell, Oklahoma City, Oklahoma. Two days later, the MoneyGrams were used to pay the 2012, 2013 and 2014 property taxes on Bartrug's home.

53. Beginning in July 2016, Laura Johnson and Tom Johnson began efforts to obtain money from Bartrug's MidFirst bank accounts. These efforts included submitting a fraudulent 2012 Power of Attorney and a Power of Attorney Checklist that represented Bartrug was still alive, forging Bartrug's name on checks written on her MidFirst Bank

accounts and causing funds to be electronically transferred from Bartrug's accounts for their personal benefit.

54. On October 25, 2016, a Receipt for Services prepared by the Oklahoma County Clerk's Office listed Laura Johnson with phone number 641-4016 as having paid cash to file an Affidavit for Surviving Joint Tenant and a warranty deed on the Bartrug home. Both documents contained forged signatures.

55. Although filed on October 25, 2016, the fraudulent Affidavit for Surviving Joint Tenant and the fraudulent warranty deed claimed to have been signed and notarized four years earlier in 2012. In particular, the fraudulent Affidavit for Surviving Joint Tenant claimed the document was signed and notarized on January 4, 2012. Similarly, the fraudulent warranty deed claimed to have been signed and notarized on May 11, 2012. The signatures and seals of the notaries had been forged on both documents.

56. On November 1, 2016, Laura Johnson caused a fraudulent Last Will and Testament of Jewel Marvine Bartrug to be filed in a probate case brought by Bartrug's nephew. During the course of the probate proceedings, Laura Johnson falsely claimed to have known Bartrug for decades.

57. On November 8, 2017, the Oklahoma County Clerk's Office received through the mail a fraudulent warranty deed, a fraudulent confidential documentary stamp tax affidavit and a Convenience Express Money Order to cover filing fees. The warranty deed transferred Bartrug's home from Innovative Transformations to Family Heritage Trust. The confidential documentary stamp tax affidavit listed a purchase price of \$88,000. The signatures and seals of the notaries had been forged on both documents.

58. On June 3, 2019, an envelope containing five \$300 Convenience Express Money Orders and a \$220 Convenience Express Money Order was mailed to the Oklahoma County Treasurer's Office to pay the 2015 property taxes on the Bartrug home. The money orders were purchased at a 7-11 convenience store located at 11231 N. Rockwell, Oklahoma City, Oklahoma.

**The Weems home
5952 NW 60th
Oklahoma City, Oklahoma**

59. In 2017, J. Weems owned his home at 5952 NW 60th Street, in Oklahoma City, Oklahoma.

60. In January 2017, Laura Johnson searched the Oklahoma County Treasurer's Office website for taxes owed on J. Weems' home under the property identification number R188503055.

61. Defendants' efforts to take over Weems' home began on January 25, 2017, with the filing of two fraudulent warranty deeds. The Oklahoma County Clerk's Office prepared a Receipt for Services that listed "Laura" with phone number 204-5482 as having paid cash to file two warranty deeds on Weems' home. The first warranty deed transferred the home from Weems to Jets LLC, followed by a second warranty deed that transferred the home from Jets LLC to Hope and Help LLC. Both warranty deeds contained the forged signature of J. Weems, as well as the forged seals and signatures of notaries.

62. In March 2017, Cheryl Ashley electronically paid the 2013 and 2014 property taxes on Weems' home.

63. Defendants and others gained entry into Weems' home and removed Weems' personal property. Cheryl Ashley later rented the property.

64. On June 16, 2017, Weems filed a lawsuit to set aside the forged warranty deeds and reclaim his home.

65. On June 27, 2017, the Oklahoma County Clerk's Office prepared a Receipt for Services that listed C.S., who was Laura and Tom Johnsons' teenage niece and Cheryl Ashley's granddaughter ("Johnsons' Teenage Niece") with phone number 234-6151 as having paid cash to file a third warranty deed, a confidential documentary stamp tax affidavit and a mortgage on Weems' home. This fraudulent warranty deed transferred Weems' home from Hope and Help LLC to Helping Hand LLC. The fraudulent confidential documentary stamp tax affidavit listed a purchase price of \$69,000. The signatures and seals of the notaries had been forged on both documents.

66. The fraudulent mortgage, filed against Weems' home, was between Helping Hand LLC and The Texas Bank. This mortgage, which contained a forged signature, appeared to attach a \$92,000 loan against the Weems' home. The return address listed on the mortgage for The Texas Bank was a postal box opened on the same day, June 27, 2017, by Cheryl Ashley at 5830 NW Expressway, #178, Oklahoma City, OK. The Oklahoma County Treasurer's Office prepared a Mortgage Tax Receipt that listed the Johnsons' Teenage Niece as having paid cash for the \$92 fee on the mortgage.

67. In response to the lawsuit Weems filed to reclaim his home, a Special Entry of Appearance and Motion to Dismiss was filed on July 6, 2017, using the name of a fictitious lawyer, George Crossanall #21895, at 208 Fountainview Dr., Euless, TX 76039.

A second Special Entry of Appearance and Motion to Dismiss was filed on July 31, 2017, using the name of another fictitious lawyer, Dru Barrett #017, at 5800 Gulf Blvd., South Padre Island, TX 78597.

68. Weems' lawsuit is still pending.

**The Hayhurst home
2728 Cambridge Court
Oklahoma City, Oklahoma**

69. In 2017, D. Hayhurst owned his home at 2728 Cambridge Court in Oklahoma City, Oklahoma.

70. On February 22, 2017, D. Hayhurst electronically accessed the Oklahoma County Treasurer's Office and used a credit card to pay all of the property taxes he owed on his home for the tax years 2013, 2014, 2015, and 2016.

71. Defendants' efforts to take over Hayhurst's home began on February 23, 2017, with the filing of two fraudulent warranty deeds. The Oklahoma County Clerk's Office prepared a Receipt for Services that listed Johnsons' Teenage Niece with phone number 641-4016 as having paid cash to file two warranty deeds. The first warranty deed transferred the home from Hayhurst to OT LLC. The second warranty deed transferred Hayhurst's home from OT LLC to C. Herrera Trust. Both warranty deeds contained forged signatures.

72. On February 27, 2017, Laura Johnson told C. Herrera that Tom Johnson had gone by Hayhurst's home on Cambridge and placed an eviction notice informing the owner that he had to be out in 48 hours and that the locks would be changed.

73. Although Hayhurst had paid the past due taxes on his home, he moved out because the eviction notice caused him to believe he had paid the taxes too late to prevent his home from being auctioned. Thereafter, the defendants gained entry into Hayhurst's home.

74. On July 6, 2017, C. Herrera, at the direction of Laura Johnson, created four false invoices for construction work purportedly done on properties taken over by the defendants. One of the false invoices was for Hayhurst's home.

75. Herrera subsequently filed a warranty deed that transferred the home from the C. Herrera Trust to C. Herrera on January 3, 2018. Herrera later corrected the legal description of the property with a warranty deed filed on October 2, 2018.

**The Riggs home
7476 Basket Court
Kingston, Oklahoma**

76. In 2017, J. Riggs owned a lakefront home at 7476 Basket Court in Kingston, Oklahoma. At the time, Riggs lived in Blanchard, Oklahoma.

77. Laura Johnson began searching records on Riggs' home in March 2017, including electronically accessing the Marshall County tax records to view taxes owed on Riggs' home. Laura Johnson also sent pictures of Riggs' home to Tom Johnson on May 29, 2017.

78. Defendants' efforts to take over Riggs' home began on June 1, 2017, when Laura Johnson filed an application with the Red River Valley Rural Electric Association to change the electrical service on Riggs' home. More specifically, Laura Johnson

requested the electrical service be opened in the name of Innovative Transformations, with a mailing address of 12101 N. MacArthur, #A271, Oklahoma City, OK.

79. Defendants' efforts to take over Riggs' home continued on June 2, 2017, when Johnsons' Teenage Niece filed three fraudulent warranty deeds that each contained forged signatures with the Marshall County Clerk's Office. The first warranty deed transferred the home from Riggs to R. Bishop, followed by a second warranty deed that transferred the home from R. Bishop to OT LLC. A third warranty deed transferred the home from OT LLC to Innovative Transformations. Each of the three warranty deeds contained forged signatures and listed a return address of Duende Management, 12101 N. MacArthur, Ste. A#271, Oklahoma City, OK.

80. On the same day the fraudulent warranty deeds were filed, Tom Johnson contacted the water utility to change the billing address for Riggs' home to Innovative Transformations, at a billing address of 12101 N. MacArthur, #A271, Oklahoma City, OK.

81. Ten days later, on June 12, 2017, the Johnsons' Teenage Niece filed a fourth fraudulent warranty deed in the Marshall County Clerk's Office that transferred Riggs' home from Innovative Transformations to Latt Living Revocable Trust. This warranty deed contained a forged signature and listed a return address of Duende Management LLC, 12101 N. MacArthur, #A271, OKC, OK.

82. On the same day the fourth warranty deed was filed, the Johnsons' Teenage Niece filed a fraudulent mortgage between Latt Living Revocable Trust and The Texas Bank with the Marshall County Clerk's Office. The fraudulent mortgage gave the appearance that Riggs' home was encumbered by a \$285,000 loan. The mortgage

contained a forged signature and listed a return address of Duende Management LLC, 12101 N. MacArthur Blvd., A#271, Oklahoma City, OK.

83. Defendants thereafter gained entry into Riggs' home and removed personal property.

84. Discovery of the fraudulent warranty deeds and mortgage caused Riggs to file a lawsuit in Marshall County on June 13, 2017 to reclaim her home.

85. Defendants attempted to dismiss Riggs' lawsuit on August 4, 2017 when they caused a Special Entry of Appearance and Motion to Dismiss the lawsuit to be filed using the name of a fictitious lawyer, Andrew Daleone of 5800 Gulf Blvd., South Padre Island, TX ("Daleone"). The motion purportedly filed by Daleone was made on behalf of Duende Management, OT LLC, and Innovative Transformations Inc.

86. The Marshall County Court Clerk's Office mailed notice of a hearing to Daleone on August 28, 2017. The notice was returned because no such address existed. However, the Marshall County Court Clerk received a response on behalf of OT LLC purportedly from "Andrew Daleon" on September 7, 2017. This amended response was mailed to the Marshall County Court Clerk in Madill, Oklahoma, from Oklahoma City, Oklahoma.

87. On October 24, 2017, a Marshall County District Court Judge ruled Riggs was the actual owner of the home at 7476 Basket Court, Kingston, Oklahoma.

88. On July 12, 2017, Riggs filed a second lawsuit in Oklahoma County District Court alleging fraud by Laura Johnson, Tom Johnson, Cheryl Ashley, Duende

Management LLC, OT LLC and Innovative Transformations in the attempt to take over her lakefront home at 7476 Basket Court in Kingston, Oklahoma.

89. On August 1, 2017, the defendants caused a Special Entry of Appearance and Motion to Dismiss to be filed by Andrew Daleone, #597, 5800 Gulf Blvd., South Padre Island, TX, in the Oklahoma County case. The filing was made on behalf of Duende Management LLC, OT LLC, Cheryl Ashley, Help & Hope LLC, Thomas Johnson Sr., Laura Johnson, Innovative Transformations Inc., Hope & Help LLC and The Helping Hand LLC.

90. When served with a summons, Laura Johnson initially told the process server her name was "Christy" but on the same day she stated her name was "Laura Johnston."

91. Defendants caused another Special Entry of Appearance and Affidavit using the name "Arianna Jones" to be filed in the Riggs lawsuit on behalf of the defendants on October 6, 2017. This document contained the forged signature and seal of Texas notary V. Metcalf.

92. On November 6, 2017, Laura Johnson caused a fraudulent "Affidavit for Defendant Laura Johnson for Non-Service" to be filed in the Oklahoma County case. In the affidavit, "Lorelei Johnston of King County, State of Washington" claimed she, not Laura Johnson, had been served with notice of the lawsuit by the process server on August 18, 2017. The affidavit contained the forged signature and seal of Washington notary S.R. Mitchell.

**The Giovanni home
10204 Major Avenue
The Village, Oklahoma**

93. In 2016, L. Giovanni owned her home at 10204 Major Avenue in The Village, a suburb of Oklahoma City, Oklahoma. Although Giovanni lived and worked out-of-state, she planned to return to Oklahoma when she retired and live in her home in The Village. On May 2, 2016, at Giovanni's request, a friend paid the 2012 property taxes so that Giovanni's home would not be placed on the public auction list by the Treasurer's Office.

94. Defendants' efforts to take over Giovanni's home began on June 10, 2016, when Help & Hope LLC used cash to pay the property taxes on Giovanni's home for the tax years 2013, 2014 and 2015. Help & Hope LLC listed its address on the Oklahoma County Treasurer's Office Delinquent Tax Bill as 6252 Highland Gardens Drive, North Las Vegas, NV 89031.

95. On June 14, 2016, Giovanni faxed a note to the Oklahoma County Treasurer's Office saying a man claimed to have purchased her home at the Oklahoma County tax auction. A representative of the Treasurer's Office assured Giovanni that her home had not been auctioned.

96. Subsequently, Giovanni received a letter at her home in Kings Beach, California signed by "Nia Forte" on behalf of Help & Hope LLC with the phone number (405) 234-6151. The letter offered to allow Giovanni to keep her home if she paid \$13,500 to release all claims, or alternatively, asked Giovanni to sign a warranty deed transferring the home to Help & Hope LLC. Giovanni did not respond to the letter.

97. On June 24, 2016, Giovanni faxed a second note to the Oklahoma County Treasurer's Office, as well as a copy of the letter from "Nia Forte", which Giovanni had previously received in a priority mail package with a return address of Help & Hope, 12101 N. MacArthur # "A" or "H" 271, Oklahoma City, OK 73162.

98. Nearly a year later, on April 17, 2017, the Oklahoma County Clerk's Office prepared a Receipt for Services that listed the Johnsons' Teenage Niece with phone number 760-6541 as having paid cash to file a fraudulent warranty deed on Giovanni's home. This warranty deed, which contained forged signatures, transferred the home from Giovanni to OT LLC.

99. Approximately two months later, on June 27, 2017, the Oklahoma County Clerk's Office prepared a Receipt for Services that listed the Johnsons' Teenage Niece with phone number 234-6151 as having paid cash to file a second fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit. This second warranty deed transferred Giovanni's home from OT LLC to Helping Hand LLC. The confidential documentary stamp tax affidavit listed the purchase price of the home as \$78,000. The warranty deed and confidential documentary stamp tax affidavit contained forged signatures.

100. On the same day, the Oklahoma County Treasurer's Office prepared a receipt for a fraudulent mortgage between the Helping Hand LLC and The Texas Bank that listed the Johnsons' Teenage Niece as having paid the tax fee in cash. This mortgage gave the appearance that Giovanni's home was encumbered by a \$92,000 loan. The mortgage contained a forged signature and listed a return address for The Texas Bank at a postal box

opened that same day by Cheryl Ashley at 5830 NW Expressway #178, Oklahoma City, OK.

101. On June 30, 2017, Giovanni filed a lawsuit to reclaim her home and set aside the fraudulent warranty deeds and mortgage.

102. On July 17, 2017, the defendants caused a “Special Entry of Appearance and Motion to Dismiss” to be filed using the name of fictitious lawyer “George Crossanall” #21895, at 208 Fountainview Dr., Euless, TX 76039. The pleading falsely claimed a prior California small claims judgment required Giovanni to turn her home over to OT LLC. The pleading also attached several fraudulent exhibits that contained forged signatures.

103. In November 2017, an Oklahoma County District Court Judge found Giovanni was the actual owner of the property.

**The Willson home
10407 Ridgeview Drive
The Village, Oklahoma**

104. In 2017, B. Willson owned his home at 10407 Ridgeview Drive in The Village, a suburb of Oklahoma City, Oklahoma.

105. Defendants’ efforts to take over Willson’s home began on June 6, 2017 with the filing of a fraudulent warranty deed. The Oklahoma County Clerk’s Office prepared a Receipt for Services that listed “Cheryl” with phone number 388-0683 as having paid cash on behalf of Duende Management LLC to file the warranty deed on B. Willson’s home. This warranty deed transferred his home to “Natalie Willson”, a person unknown to B. Willson. The warranty deed also contained forged signatures.

106. Duende Management LLC paid the 2013 property taxes owed on Willson's home on June 9, 2017, only three days before the Oklahoma County tax auction was scheduled to occur on June 12, 2017. The Oklahoma County Treasurer's Office prepared a Delinquent Tax Affidavit and Delinquent Tax Bill to reflect payment of the taxes. Subsequently, defendants caused an eviction notice to be placed on Willson's home and his locks to be changed.

107. On July 20, 2017, Village police officers responded to a call from Willson about people trying to take over his property. Cheryl Ashley, who was present at the home when police officers arrived, gave police conflicting information about her presence. Cheryl Ashley also told police her name was "Carol Mary Ashton" and that she had been hired to clean up the home by a company. When contacted later by a Village Police detective, Ashley admitted she had not given her real name to the police officers at Willson's home. She also identified three of the five companies who purportedly hired her to clean up properties as Helping Hands, Hope & Help and Rejuvenation.

**The Gaines home
10504 Sunnymeade Place
Oklahoma City, Oklahoma**

108. In 2017, J.O. Gaines owned his home at 10504 Sunnymeade Place in Oklahoma City, Oklahoma.

109. Defendants' efforts to take over Gaines' home began on June 6, 2017, with the filing of a fraudulent warranty deed. The Oklahoma County Clerk's Office prepared a Receipt for Services that listed "Cheryl" with phone number 388-0683 as having paid cash on behalf of Duende Management LLC to file a warranty deed against Gaines' home. This

warranty deed, which contained forged signatures, transferred the home from J.O. Gaines to “Michelle Gaines”, a person unknown to him.

110. Subsequently, defendants caused an eviction notice to be placed on Gaines’ home.

**The Perkins home
5846 N. Mueller Avenue
Bethany, Oklahoma**

111. J.G. Perkins, who owned his home at 5846 N. Mueller Avenue in Bethany, Oklahoma, died on December 8, 2010. After his death, property taxes on the home became delinquent and subjected the home to being auctioned by the Oklahoma County Treasurer’s Office.

112. Defendants’ efforts to take over Perkins’ home began on June 6, 2017, with the filing of a fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit. The Oklahoma County Clerk’s Office prepared a Receipt for Services that listed “Cheryl” with phone number 388-0683 as having paid cash to file a warranty deed and a confidential documentary stamp tax affidavit on behalf of Duende Management LLC. This first warranty deed transferred the home from Perkins to OT LLC. The confidential documentary stamp tax affidavit listed the purchase price as \$14,000. Both documents contained forged signatures.

113. A few days later, on June 9, 2017, the defendants caused the 2013 property taxes to be paid and a Delinquent Tax Affidavit to be submitted to the Oklahoma County Treasurer’s Office on behalf of Duende Management LLC. The Treasurer’s Office

prepared a Delinquent Tax Bill for the cash payment of \$1,093.49. Payment of the 2013 property taxes removed Perkins' home from the June 12, 2017 public auction.

114. In 2017, Tom Johnson discussed his and Laura Johnson's acquisition of homes in the Oklahoma City area with M. Carattini, a business associate. Tom Johnson told Carattini that he and Laura Johnson had been successful acquiring properties at a low cost because the homes were in default on their taxes. Carattini was interested in partnering with the Johnsons to flip homes in the Oklahoma City area.

115. On August 28, 2017, Carattini wire transferred \$10,000 from his company's bank account in Las Vegas, Nevada, to Tom Johnson's Enginuity LLC business account at the Bank of Oklahoma in Oklahoma City. This \$10,000 was to be an investment on behalf of Carattini to acquire and flip homes.

116. Carattini asked Tom Johnson about his \$10,000 investment over several months. In February and March 2018, Carattini traveled to Oklahoma City to look at homes in which to invest his \$10,000. During the March 2018 trip to Oklahoma City, Tom Johnson drove Carattini around Oklahoma City and pointed out homes he and Laura Johnson had already obtained or were about to obtain including Perkins' home at 5846 N. Mueller Avenue in Bethany.

117. On March 6, 2018, the Oklahoma County Clerk's Office prepared a Receipt for Services that listed Johnsons' Teenage Niece with phone number 405-234-6151, as having paid cash to file two more fraudulent warranty deeds and a fraudulent confidential documentary stamp tax affidavit on Perkins' home. The second warranty deed purported to be a "correction" and differed from the June 6, 2017 warranty deed only by changing

Perkins' residence from Oklahoma County, Oklahoma, to Denton County, Texas. The warranty deed again transferred the home from Perkins to OT LLC. The third warranty deed transferred Perkins' home from OT LLC to MDOK Family Trust. The confidential documentary stamp tax affidavit listed the purchase price as \$17,000. All of these documents contained forged signatures.

118. Prior to June 2018, Carattini believed his \$10,000 was to be invested in a bid on a home located on Fawn Canyon Drive in Oklahoma City. At a meeting with Tom Johnson on June 7, 2018, Carattini learned his investment had not been used on the Fawn Canyon Drive home. Tom Johnson told Carattini the only way to get his \$10,000 investment back was through the 5846 N. Mueller Avenue home, which Laura Johnson had put in the name of the MDOK Family Trust. Carattini expressed concern about the MDOK Family Trust because he did not have ownership in the entity and knew it was only a fictitious name that Laura Johnson had created.

119. On June 13, 2018, the Oklahoma County Treasurer's Office sold Perkins' home for \$27,000 at the tax auction due to four years of unpaid property taxes. After payment of \$8,542.46 to Oklahoma County for delinquent property taxes, the remaining funds from the sale were available to the MDOK Family Trust, which was listed in the Oklahoma County records as the owner of the property based upon the March 6, 2018 fraudulent warranty deed.

120. On November 2, 2018, Carattini, acting on behalf of MDOK Family Trust, mailed documents to the Oklahoma County Treasurer to claim the excess funds from the sale of Perkins' home at the June 2018 auction.

121. On November 7, 2018, the Oklahoma County Treasurer's office sent Check #23879 in the amount of \$18,457.54 and made payable to MDOK Family Trust to Carattini in Las Vegas, Nevada. Carattini understood this check to be a repayment of his \$10,000 investment in Tom and Laura Johnson's real estate business.

**The Wallace home
11425 NE 54th Street
Spencer, Oklahoma**

122. B. Wallace, who owned her home at 11425 NE 54th Street in Spencer, Oklahoma, died on February 14, 2011. A family member continued to live in the home after her death. The property taxes eventually became delinquent and resulted in the home being placed on the Oklahoma County Treasurer's list of homes to be auctioned on June 12, 2017.

123. Between June 9, 2017 and June 12, 2017, Laura Johnson sent several text messages to C. Herrera about buying the Wallace home at the June tax auction on Herrera's behalf.

124. Defendants' efforts to take over Wallace's home began on June 12, 2017 when defendants caused the 2013 property taxes to be paid, which removed the home from the tax auction. The Oklahoma County Treasurer's Office prepared a Delinquent Tax Affidavit and a Delinquent Tax Bill for payment made in the name of Duende Management LLC.

125. On June 12, 2017, defendants caused a fictitious eviction notice to be placed on the Wallace home giving the resident 72 hours to leave the premises. This eviction notice contained a forged signature.

126. On June 14, 2017, Cheryl Ashley, using the name “Jan Kendel,” filed two fraudulent warranty deeds and a fraudulent confidential documentary stamp tax affidavit with the Oklahoma County Clerk’s Office on the Wallace home. The Clerk’s Office prepared a Receipt for Services listing “Jan Kendel” with the phone number 641-2331 as having paid cash to file the documents.

127. The first warranty deed transferred the home from B. Wallace to the Wallace Family Trust. The second warranty deed transferred the home from the Wallace Family Trust to OT LLC. The confidential documentary stamp tax affidavit listed the purchase price as \$80,000. Both warranty deeds and the confidential documentary stamp tax affidavit contained forged signatures.

128. On November 13, 2017, C. Herrera filed a third fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit with the Oklahoma County Clerk’s Office. The Clerk’s Office prepared a Receipt for Services that listed “Claudia” with phone number 405-628-2234 as having paid cash to file the documents. This warranty deed transferred the Wallace home from OT LLC to Horsing Around Family Farm LLC. The confidential documentary stamp tax affidavit listed a purchase price of \$98,000. Both documents contained forged signatures.

**The Hawkins home
13200 Cedar Bend Drive
Jones, Oklahoma**

129. In 2017, B. Hawkins and T. Hawkins owned their home at 13200 Cedar Bend Drive in Jones, Oklahoma.

130. Defendants' efforts to take over the Hawkinses' home began on June 14, 2017, when Cheryl Ashley, using the name "Jan Kendel," filed a fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit on the home. The Oklahoma County Clerk's Office prepared a "Receipt for Services" that listed "Jan Kendel" with the phone number 641-2331 as having paid cash to file the documents.

131. The first warranty deed transferred the home from the Hawkinses to Hope and Help LLC and listed a return address on the deed as Duende Management LLC, 12101 N. MacArthur, Ste. A#271, Oklahoma City, OK. The confidential documentary stamp tax affidavit listed the purchase price as \$12,000. Both documents contained forged signatures.

132. In June 2017, a relative of the Johnsons went to the Hawkinses' home and told B. Hawkins that Cheryl Ashley and Laura Johnson had purchased the home at the June 9, 2017 tax auction for \$12,000. The relative gave B. Hawkins a slip of paper that contained information about the purported sale including the name of the company that purchased the home, Hope & Help LLC.

133. On July 18, 2017, Cheryl Ashley, using the name "Cheryl Ashton," filed a second fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit with the Oklahoma County Clerk's Office on the Hawkinses' home. The Clerk's Office prepared a Receipt for Services that listed "Cheryl Ashton" with telephone number 388-0683 as having paid the filing fee in cash. This fraudulent warranty deed transferred the Hawkinses' home from Hope and Help LLC to Rejuvenation LLC. The confidential documentary stamp tax affidavit listed a purchase price of \$92,000. Both documents contained forged signatures.

134. On the same day, a fraudulent mortgage was filed against the Hawkinses' home between Rejuvenation LLC and the First National Texas Bank. The Oklahoma County Treasurer's Office prepared a Mortgage Tax Receipt that listed Cheryl Ashley as having paid the \$92 mortgage tax in cash. This fraudulent mortgage, which contained a forged signature, appeared to encumber the Hawkinses' home with a \$92,000 loan.

135. On July 24, 2017, the Hawkinses filed a quiet title lawsuit in Oklahoma County to reclaim their home and set aside the fraudulent warranty deeds and mortgage.

136. On August 3, 2017, a Special Entry of Appearance and Motion to Dismiss was filed using the name of fictitious lawyer "Lisa Lemons", P.O. Box 810, Edmond, Oklahoma. The pleading questioned the Hawkinses' right of ownership to their home by falsely representing the prior owners of the home, the Wisdoms, had not sold the home to the Hawkinses.

137. On October 17, 2017, an Oklahoma County District Court Judge found the Hawkinses were the actual owners of the home.

**The Roberson Property
The Elk Township
Section 1; Township 12N; Range 1E; Qtr SW**

138. In 2017, J. Roberson owned property located in the Elk Township at Section 1; Township 12N; Range 1E; Qtr SW in Oklahoma County.

139. Defendants' efforts to take over Roberson's property began on June 14, 2017, when Cheryl Ashley, using the name "Jan Kendel," filed a fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit. The Oklahoma County Clerk's

Office prepared a Receipt for Services that listed "Jan Kendel" with the phone number 641-2331 as having paid the filing fee in cash.

140. On the same day, the defendants caused the 2013 property taxes to be paid on Roberson's home with the Oklahoma County Treasurer's Office. The Treasurer's Office prepared a Delinquent Tax Affidavit and two Delinquent Tax Bill for the 2013 property taxes owed on the home. The Delinquent Tax Affidavit listed Roberson's return address as 12101 N. MacArthur, #A271, Oklahoma City, OK.

141. The fraudulent warranty deed transferred the home from Roberson to OT LLC, and listed a return address of 12101 N. MacArthur, #A271, Oklahoma City, OK. The fraudulent confidential documentary stamp tax affidavit listed the purchase price as \$42,000. Both documents contained forged signatures.

142. Due to non-payment of property taxes, the Oklahoma County Treasurer's Office sold the property during the June 2018 auction for \$34,000. After payment of the delinquent property taxes for tax years 2014, 2015, 2016 and 2017, the excess money was returned to Roberson because the fraudulent warranty deed filed June 14, 2017 listed an incorrect legal address for the property.

**The Jackson home
14531 Cedar Bend Drive
Jones, Oklahoma**

143. In 2017, Laura Johnson discussed trading property to J. Deemy in return for his doing construction work on homes she controlled. In June 2017, she texted property locations to Deemy to see if he was still interested in obtaining any of the properties. Deemy indicated he was interested. Laura Johnson later told Deemy that she obtained a

property for him. The property, located at 14531 Cedar Bend Drive, actually belonged to C.M.W. Jackson.

144. Defendants' efforts to take over Jackson's property began on June 14, 2017, when Cheryl Ashley, using the name "Jan Kendel", filed two fraudulent warranty deeds and a fraudulent confidential documentary stamp tax affidavit with the Oklahoma County Clerk's Office. The Oklahoma County Clerk's Office prepared a Receipt for Services that listed "Jan Kendel" with the phone number 641-2331 as having paid cash to file the documents.

145. The first warranty deed transferred the property from C.M.W. Jackson to Teresa Jackson, a person unknown to C.M.W. Jackson. The second warranty deed transferred the property from Teresa Jackson to J. Deemy and M. Deemy. A confidential documentary stamp tax affidavit filed in connection with the second warranty deed listed a purchase price of \$22,000. Both warranty deeds and the confidential documentary stamp tax affidavit contained forged signatures.

146. During March 2018, J. Deemy received a letter from the Oklahoma County Treasurer stating he owed delinquent property taxes on the Jackson property. Deemy gave the letter to Laura Johnson.

147. On June 8, 2018, the Oklahoma County Treasurer's Office received a Federal Express package that listed a return address of M. Deemy, C/O Postnet NV 175, 2880 Bicentennial Pkwy, Ste. 100, Henderson, NV. The package contained \$40 in cash, two \$500 AFS money orders and a \$175 AFS money order for payment of the 2014 property taxes on the Jackson property. The AFS money orders had been purchased at a 7-11 store

in Albuquerque, New Mexico. The Oklahoma County Treasurer's Office prepared a Delinquent Tax Bill to reflect payment of the taxes.

148. The Oklahoma County Treasurer's Office pulled the Jackson property from the June 11, 2018 tax auction after receipt of the 2014 property taxes.

149. On July 20, 2018, the Oklahoma County Treasurer's Office mailed a refund check for \$16.84 to M. Deemy at 14531 Cedar Bend Dr., Jones, OK, due to overpayment of the 2014 property taxes. The letter and check were returned to the Treasurer's Office because no mail receptacle was located on the property.

150. During March 2019, J. Deemy received a second letter from the Oklahoma County Treasurer's Office stating he owed four years of delinquent property taxes on the Jackson property.

151. On June 4, 2019, the Oklahoma County Treasurer's Office received an envelope by mail with a return address of Deemy, 14531 Cedar Bend Dr., Jones, OK, 73049. The envelope contained five Convenience Express Money Orders, each in the amount of \$300 to pay the 2015 property taxes on the Jackson property. The Convenience Express Money Orders had been purchased on June 2, 2019 at a 7-11 store located at 11231 N. Rockwell, Oklahoma City, Oklahoma.

152. The Jackson property was removed from the June 10, 2019 tax auction after payment of the 2015 property taxes.

**The Maguire home
5904 NW 62nd Terrace
Warr Acres, Oklahoma**

153. A.G. Maguire, who died on March 23, 2016, owned his home at 5904 NW 62nd Terrace in Warr Acres, Oklahoma subject to a mortgage held by the Bank of Oklahoma.

154. Defendants' efforts to take over Maguire's property began on June 27, 2017, with the filing of a fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit. The Oklahoma County Clerk's Office prepared a Receipt for Services that listed Johnsons' Teenage Niece with phone number 234-6151 as having paid cash to file the documents. The warranty deed represented Maguire had signed the deed on January 10, 2017, some 10 months after his death on March 23, 2016. This deed transferred the home from Maguire to "Lila Johnson." The confidential documentary stamp tax affidavit listed the purchase price as \$68,000. Both documents contained forged signatures.

155. On August 11, 2017, a foreclosure lawsuit was filed against Maguire by the Bank of Oklahoma for non-payment of his mortgage. The lawsuit also named "Lila Johnson" as a party. "Lila Johnson" never responded to the lawsuit. Judgment was awarded to the Bank of Oklahoma.

**The Creswell home
1727 Brighton Avenue
The Village, Oklahoma**

156. A. Creswell owned her home at 1727 Brighton Avenue in The Village, a suburb of Oklahoma City, Oklahoma.

157. On June 12, 2017, Creswell purchased a cashier's check to pay her 2013 delinquent property taxes and weed assessments. The Oklahoma County Treasurer's Office prepared a Delinquent Tax Affidavit and Delinquent Tax Bill for Creswell's payment of the 2013 property taxes and weed assessments. After paying the taxes, Creswell had to leave her home for a period of time due to a health issue. When she returned, Creswell found people removing property from her home. Creswell assumed she had been too late in paying the delinquent property taxes and that her home had been auctioned by the Oklahoma County Treasurer's Office. In actuality, the home had been removed from the auction list because of her payment of the 2013 property taxes.

158. Defendants' efforts to take over Creswell's home included directing C. Herrera to file a fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit with the Oklahoma County Clerk's Office in October 2017. The warranty deed transferred the home from Creswell to the C. Herrera Family Trust. The confidential documentary stamp tax affidavit listed the purchase price as \$12,000. Both documents contained forged signatures.

159. C. Herrera used a credit card to pay the filing fees for the fraudulent warranty deed and fraudulent confidential documentary stamp tax affidavit. The Oklahoma County Clerk's Office prepared a Receipt for Services on October 27, 2017 that listed "Claudia" with phone number 628-2237 as having paid the fees to file two fraudulent documents.

160. C. Herrera subsequently filed another fraudulent warranty deed that transferred the home on January 3, 2018, from the C. Herrera Family Trust to Claudia Herrera. C. Herrera understood that Laura Johnson was transferring the Creswell home to

her as payment for construction services rendered at defendants' properties, including work performed on Tom and Laura Johnson's backyard pool.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2
(False Statement to a Financial Institution)

161. The Grand Jury realleges and incorporates paragraph five of the Indictment as though fully set forth herein.

162. On or about July 25, 2016, in the Western District Oklahoma,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----

knowingly made and caused to be made false representations to MidFirst Bank for the purpose of influencing the action of MidFirst Bank.

163. In particular, Laura Johnson submitted a 2012 Power of Attorney form purportedly signed by J.M. Bartrug along with a MidFirst Bank Power of Attorney (POA) Checklist to obtain money from Bartrug's accounts. On the POA Checklist, Laura Johnson represented she needed \$10,000 to have Bartrug's teeth fixed. She also represented she needed \$96,000 because Bartrug wanted to prepay Help and Hope LLC for two years of care in the amount of \$4,000 per month. Finally, Laura Johnson represented Bartrug could not travel to MidFirst Bank to make the withdrawal herself because "Marvine is physically frail."

164. In truth and fact, as Laura Johnson well knew, each representation made to MidFirst Bank was false because Bartrug had died in 2012.

All in violation of Title 18, United States Code, Section 1014.

COUNT 3
(Aggravated Identity Theft)

165. On or about July 25, 2016, in the Western District Oklahoma,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----

knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically, the name and signature of J. M. Bartrug on a document purporting to be a 2012 Power of Attorney for Bartrug, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c)(4), that being making a false statement to a financial institution as set forth in Count 2 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 4
(Aggravated Identity Theft)

166. On or about July 25, 2016, in the Western District Oklahoma,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,

**a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----**

knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically the name, signature and seal of Oklahoma notary C.J. Loaiza, on a document purporting to be a 2012 Power of Attorney for J. M. Bartrug, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c)(4), that making a false statement to a financial institution as set forth in Count 2 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT 5
(Bank Fraud)**

167. The Grand Jury realleges and incorporates paragraph seven of the Indictment as though fully set forth herein.

168. Beginning on or about July 25, 2016, and continuing through July 29, 2016, in the Western District Oklahoma,

----- **THOMAS JOHNSON, SR.,
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck,-----**

knowingly executed and attempted to execute a scheme to defraud the Bank of Oklahoma (BOK) in a material manner by means of false representations regarding checks drawn on M. Bartrug's MidFirst Bank account x-6767.

169. On July 25, 2016, Laura Johnson appeared at MidFirst Bank in Oklahoma City where she unsuccessfully attempted to obtain more than \$100,000 from Bartrug's accounts.

170. After Laura Johnson's failure to withdraw money and in furtherance of the scheme to obtain money through materially false representations, Tom Johnson caused two checks written on Bartrug's MidFirst Bank account x-6767 to be presented to BOK. Each check contained the forged signature of "M. Bartrug" as the signer of the checks.

171. In particular, on July 25, 2016, Tom Johnson appeared at a BOK branch in Oklahoma City where he presented Check #357 drawn on Bartrug's MidFirst Bank account x-6767 in the amount of \$8,000 and made payable to Help & Hope LLC. Check #357 contained the forged signature of "M. Bartrug." Tom Johnson deposited Check #357 into his Showtech Distributors LLC, account x-3701 at BOK.

172. On July 26, 2016, Tom Johnson appeared at a BOK branch in Oklahoma City where he presented Check #358 drawn on Bartrug's MidFirst Bank account x-6767 in the amount of \$22,000 and made payable to Help & Hope LLC. Check #358 contained the forged signature of "M. Bartrug." Tom Johnson deposited Check #358 into his Showtech Distributors LLC, account x-3701 at BOK.

173. Between July 26, 2016 and July 29, 2016, Tom Johnson made withdrawals of approximately \$7,000 from the Showtech Distributors LLC account x-3701.

174. MidFirst Bank returned Check #357 and Check #358 drawn on Bartrug's account to the BOK due to insufficient funds. After the return of the two checks, the Showtech Distributors LLC account x-3701 had a negative balance of nearly \$7,000.

All in violation of Title 18, United States Code, Section 1344(2) and Title 18, United States Code, Section 2.

COUNT 6
(Aggravated Identity Theft)

175. On or about July 25, 2016 in the Western District Oklahoma,

----- **THOMAS JOHNSON, SR.,**
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck,-----

the defendant herein, knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically the name and signature of “M. Bartrug,” on Check #357 drawn on Bartrug’s MidFirst Bank account X-6767, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c), that being bank fraud as set forth in Count 5 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 7
(Aggravated Identity Theft)

176. On or about July 26, 2016 in the Western District Oklahoma,

----- **THOMAS JOHNSON, SR.,**
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck,-----

the defendant herein, knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically the name and signature of “M. Bartrug,” on Check #358 drawn on Bartrug’s MidFirst Bank account x-6767, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c), that being bank fraud as set forth in Count 5 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 8
(False Statement to a Financial Institution)

177. The Grand Jury realleges and incorporates paragraph seven of the Indictment as though fully set forth herein.

178. On or about October 6, 2016, in the Western District Oklahoma,

----- **THOMAS JOHNSON, SR.,**
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck,-----

knowingly made false representations to an investigator with the BOK for the purpose of influencing the bank’s action on the collection of funds overdrawn from his Showtech Distributors LLC account.

179. In particular, when asked about Check #357 for \$8,000 and Check #358 for \$22,000 drawn on M. Bartrug’s account at MidFirst Bank, and deposited into his Showtech Distributors LLC account at the BOK, Tom Johnson told K. Sloan, an investigator for the bank, that the checks represented payment for equipment Bartrug had purchased for her

church. He also told the investigator that some of the equipment had been delivered to the church. Johnson further stated he made several attempts to contact M. Bartrug and that finally someone from the church called him and said she had died.

180. In truth and fact, as Tom Johnson well knew, the representations he made to the BOK investigator were false because Bartrug, who died in 2012, had not signed the two checks deposited into his Showtech Distributors LLC account nor had she purchased equipment for her church.

All in violation of Title 18, United States Code, Section 1014.

COUNTS 9 – 11
(Wire Fraud)

181. The Grand Jury realleges and incorporates paragraph five of the Indictment as though fully set forth herein.

The Scheme to Defraud

182. Beginning in or about June 2016 and continuing through October 2016, Laura Johnson and Tom Johnson devised a scheme to defraud the estate of J. M. Bartrug and MidFirst Bank in a material manner by accessing her bank accounts at MidFirst Bank for their personal benefit.

183. After fraudulently entering Bartrug's home in 2015, the defendants discovered personal financial documents in the home. In particular, the defendants took Bartrug's MidFirst Bank records, showing more than \$100,000 in her account.

184. During the course of the scheme to defraud, the defendants accessed Bartrug's personal bank accounts so that they could make payments for their personal benefit.

185. During the course of the scheme to defraud, the defendants used Automated Clearinghouse (ACH) transactions to withdraw and attempt to withdraw money directly from Bartrug's MidFirst Bank accounts and electronically transfer those funds for their personal benefit.

186. During the course of the scheme to defraud, MidFirst Bank discovered the ACH transactions and froze Bartrug's accounts at the bank. In an attempt to regain access to the funds, Laura Johnson, while pretending to be Bartrug, contacted MidFirst Bank by phone on or about September 9, 2016 to find out why the accounts had been frozen.

Interstate Wire Transmissions in Furtherance of the Scheme

187. On or about the following dates in the Western District of Oklahoma and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte, and

THOMAS JOHNSON, SR.,
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck,-----

for the purpose of executing the scheme to defraud in a material manner knowingly caused and attempted to cause a wire communication to be transmitted in interstate commerce, that being ACH transactions between Bartrug's MidFirst Bank account in Oklahoma City and the below-listed companies:

Count	Date of Withdrawal	Account Number	Amount	Payee	Location
9	7/19/16	x-0443	\$5,405.10	Ocwen Loan Service	BMO Harris Bank Naperville, IL
10	7/27/16	x-0443	\$5,500.00	Discover Card	Wells Fargo Bank Minneapolis, MN
11	10/17/16	x-0916	\$1,857.14	Discover Card	Wells Fargo Bank Minneapolis, MN

All in violation of Title 18, United States Code, Section 1343.

COUNT 12
(Identity Theft)

188. Beginning in or about October 2016 and continuing through September 2017, in the Western District of Oklahoma,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte, -----

knowingly transferred, possessed and used, in and affecting interstate commerce, and without lawful authority, the means of identity of another person with the intent to commit an unlawful activity, that being procuring and offering a false and forged instrument to be filed in any public office, a felony under the laws of the State of Oklahoma in violation of

Title 21, OSA § 463, and thereby over the course of a year obtain property having an aggregate value of \$1,000 or more in violation of Title 18, United States Code, Section 1028(a)(7) and (c)(3)(A).

189. After learning of Bartrug's death, her nephew C. Bartrug initiated a probate proceeding in Oklahoma County District Court in October 2016. On November 1, 2016, Laura Johnson filed a false Last Will and Testament of J.M. Bartrug ("Will"), which contained forged signatures, in order to claim an interest in Bartrug's estate. In particular, Laura Johnson submitted a "Will" dated January 4, 2012 that contained the forged signatures of J.M. Bartrug and Oklahoma notary K. Griffith.

190. Laura Johnson also concealed Bartrug's actual Last Will and Testament, which she previously had removed from Bartrug's home. The fraudulent "Will" named Laura Johnson as the sole beneficiary of the estate.

191. To bolster the legitimacy of her claim to Bartrug's estate, Laura Johnson claimed in a pleading notarized by Cheryl Ashley and filed on December 28, 2016, in the Oklahoma County District Court case, that she had known Bartrug for more than two decades and had personally paid for Bartrug's funeral expenses. In fact, Laura Johnson had not known Bartrug nor had she paid Bartrug's funeral expenses.

192. Based upon the false and forged "Will," Laura Johnson was appointed as the Personal Representative of the Bartrug estate and given Letters Testamentary to represent the estate on March 15, 2017. Thereafter, Laura Johnson began accumulating Bartrug's financial interests including money in her MidFirst Bank accounts.

193. Beginning on March 16, 2017, Laura Johnson withdrew money from Bartrug's three accounts with MidFirst Bank and deposited those funds into accounts she opened in the name of the Estate of J.M. Bartrug with J P Morgan Chase Bank. More specifically, Laura Johnson deposited MidFirst Bank Official Check # 1677649 in the amount of \$101,355.13 into Chase account x-0587, MidFirst Bank Official Check #1677650 in the amount of \$44,023.39 into Chase account x-9864, and MidFirst Bank Official Check #1677651 in the amount of \$1,225.45 into Chase account x-0595. Laura Johnson then began spending those funds which she had obtained through the submission of the false and forged "Will" in the probate proceeding.

194. From March 31, 2017 through July 25, 2017, Laura Johnson made cash withdrawals totaling \$63,950 from Chase account x-0587 as shown below:

Date of Withdrawal	Cash Withdrawal Amount	
March 31, 2017	\$3,250.00	
April 7, 2017	\$4,700.00	
April 12, 2017	\$3,400.00	
April 20, 2017	\$3,800.00	
April 25, 2017	\$8,200.00	
April 28, 2017	\$2,000.00	
May 3, 2017	\$2,400.00	
May 8, 2017	\$8,200.00	
May 20, 2017	\$2,000.00	
June 2, 2017	\$6,200.00	
June 9, 2017	\$7,000.00	
June 23, 2017	\$2,000.00	
June 27, 2017	\$4,000.00	
June 30, 2017	\$3,800.00	
July 25, 2017	\$2,000.00	
Total Cash Withdrawn	\$63,950.00	

All in violation of Title 18, United States Code, Section 1028(a)(7) and (c)(3)(A).

COUNT 13
(Wire Fraud)

195. Beginning in or about June 2017 and continuing into 2018, in the Western District Oklahoma and elsewhere, Laura Johnson knowingly devised and intended to devise a scheme to obtain money and property from Antero Resources by means of materially false and fraudulent pretenses, representations and promises.

The Scheme to Defraud

196. During the course of the scheme to defraud, Laura Johnson caused documents including a fraudulent Last Will and Testament of J.M. Bartrug (“Will”) dated January 4, 2012, which contained forged signatures, to be sent to Antero Resources or its affiliate, Lonetree Energy, located in Denver, Colorado. Laura Johnson represented herself to be Bartrug’s sole heir in order to claim Bartrug’s mineral interests located in Wetzel County, West Virginia. Laura Johnson concealed from Antero Resources Bartrug’s actual Last Will and Testament.

197. During the course of the scheme to defraud, Laura Johnson submitted documents to Antero Resources in order to receive a financial benefit from Bartrug’s mineral interests. In particular, Laura Johnson submitted a Memorandum of Oil and Gas Lease, which contained the forged signature and seal of Oklahoma notary D. Wasiecko, and an Affidavit of Non-Development, which contained the forged signature and the seal of Oklahoma notary M.C. Newbold.

198. On or about April 18, 2018 in the Western District of Oklahoma and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----

for the purpose of executing the scheme to defraud through the use of materially false and fraudulent pretenses, representations and promises knowingly caused \$45,776.94 to be transferred by a wire communication in interstate commerce from Antero Resources' account at Wells Fargo Bank in Denver, Colorado to the Estate of J. M Bartrug account x-9864 at JPMorgan Chase in Oklahoma City, Oklahoma.

All in violation of Title 18, United States Code, Section 1343.

COUNT 14
(Aggravated Identity Theft)

199. On or about July 25, 2016, in the Western District Oklahoma, and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----

knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically the name, signature and seal of Oklahoma notary D. Wasiecko on a Memorandum of Oil and Gas Lease, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c), that being wire fraud as set forth in Count 13 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 15
(Aggravated Identity Theft)

200. On or about July 25, 2016, in the Western District Oklahoma, and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,-----

knowingly and without lawful authority, possessed and used a means of identification of another person, more specifically the name, signature and seal of Oklahoma notary M. C. Newbold on the Affidavit of Non-Development, during and in relation to a felony violation listed in 18 U.S.C. § 1028A(c)(5), that being wire fraud as set forth in Count 13 of this Indictment, knowing that the means of identification belonged to another person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 16
(Conspiracy to Commit Identity Theft)

201. The Grand Jury realleges and incorporates paragraphs one through four, nine, and 11 through 160 of the Indictment as though fully set forth herein.

202. Beginning in 2016 and continuing through 2018, in the Western District of Oklahoma, and elsewhere,

----- **LAURA R. JOHNSON,**
a/k/a Laura Ashley Johnson,
a/k/a Laura Johnson,
a/k/a Laura Johnston,
a/k/a Lorelei Johnston,
a/k/a Nia Forte,

**THOMAS JOHNSON, SR.,
a/k/a Thomas Clark Johnson,
a/k/a Thomas C. Johnson,
a/k/a Tom Johnson,
a/k/a King Redneck, and**

**CHERYL M. ASHLEY,
a/k/a Cheryl Ashley,
a/k/a Carol Mary Ashton,
a/k/a Cheryl Ashton,
a/k/a Jan Kendel,-----**

the defendants herein, knowingly, unlawfully and with interdependence conspired together and with others, both known and unknown to the Grand Jury, to commit offenses against the United States that is to transfer, possess, and use, in and affecting interstate commerce, and without lawful authority, the means of identification of other persons, specifically the names, signatures and seals of notaries, with the intent to commit and aid and abet the commission of an unlawful activity that constituted a felony under the laws of the State of Oklahoma, that is, offering a false and forged instrument to be recorded in any public office in Oklahoma, a violation of Oklahoma law 21 OSA § 463, and thereby over the course of a year obtain money and property having an aggregate value of \$1,000 or more, in violation of Title 18, United States Code, Section 1028(a)(7) and (c)(3)(A).

Manner and Means

203. During the course of the conspiracy, the defendants obtained and attempted to obtain title to homes and other property through the use of fraudulent documents that contained the forged names, signatures and seals of notaries.

204. During the course of the conspiracy, the defendants filed pleadings and affidavits that contained the forged names, signatures and seals of notaries in court cases brought by homeowners trying to reclaim their homes.

Overt Acts

205. To effect the objects of the conspiracy, the defendants committed and caused the commission of the following overt acts, among others, in the Western District of Oklahoma and elsewhere.

206. On or about the following dates, the defendants filed and caused to be filed in the offices of the County Clerks for Marshall and Oklahoma counties the following fraudulent mortgages that contained the forged names, signatures and seals of notaries.

Mortgages

Property	Date Filed	Filed By	Phone Number Provided	Document and Signed Date	Notary
Riggs	6/12/17	Teenage niece	None	Mortgage Between Latt Living Revocable Trust And The Texas Bank. Signed 6/2/17	M. Bylar
Giovanni	6/27/17	Teenage niece	234-6151	Mortgage Between Helping Hand LLC and The Texas Bank. Signed 2/14/17	M. Norton
Weems	6/27/17	Teenage niece	234-6151	Mortgage Between Helping Hand LLC and The Texas Bank. Signed 2/14/17	M. Norton
Hawkins	7/18/17	Cheryl Ashton	388-0683	Mortgage Between Rejuvenation LLC and The First Texas Bank. Signed 2/14/17	M. Norton

207. On or about the following dates, the defendants filed and caused to be filed in the offices of the County Clerks of Marshall and Oklahoma Counties the following fraudulent warranty deeds and affidavit that contained the forged names, signatures and seals of notaries.

Warranty Deeds

Property	Date Filed	Filed By	Phone Number Provided	Document and Date Signed	Notary
Bartrug	10/25/16	Laura Johnson	641-4016	Affidavit of Surviving Joint Tenant. Signed 1/4/12	K. Griffith
Bartrug	10/25/16	Laura Johnson	641-4016	Warranty Deed Bartrug to Innovative Transformations Inc. Signed 5/11/12	T. E. Putman
Bartrug	11/8/17	Mailed	None	Warranty Deed Innovative Transformations Inc. to Family Heritage Trust. Signed 7/18/16	A. T. Bergeron
Weems	1/25/17	Laura	204-5482	Warranty Deed Weems to Jets LLC. Signed 8/2/16	S. Russell
Weems	1/25/17	Laura	204-5482	Warranty Deed Jets LLC to Hope & Help LLC. Signed 12/20/16	W. D. Yarngo
Weems	6/27/17	Teenage Niece	234-6151	Warranty Deed Hope & Help LLC to Helping Hand LLC. Signed 2/14/17	D. S. Owen
Hayhurst	2/23/17	Teenage Niece	641-4016	Warranty Deed Hayhurst to OT LLC. Signed 8/2/16	D. Abbott
Hayhurst	2/23/17	Teenage Niece	641-4016	Warranty Deed OT LLC to C. Herrera Trust. Signed 2/2/17	D. Abbott
Giovanni	4/17/17	Teenage Niece	760-6541	Warranty Deed Giovanni to OT LLC. Signed 7/12/16	D. Abbott

Property	Date Filed	Filed By	Phone Number Provided	Document and Date Signed	Notary
Giovanni	6/27/17	Teenage Niece	234-6151	Warranty Deed OT LLC to Helping Hand LLC. Signed 2/12/17	J. Crawford
Riggs	6/2/17	Teenage Niece	None	Warranty Deed Riggs to Bishop. Signed 6/12/16	K. Lewis
Riggs	6/2/17	Teenage Niece	None	Warranty Deed Bishop to OT LLC. Signed 12/19/16	T. Koeppe
Riggs	6/2/17	Teenage Niece	None	Warranty Deed OT LLC to Innovative Transformations Inc. Signed 6/1/17	M. M. Harris
Riggs	6/12/17	Teenage Niece	None	Warranty Deed Innovative Transformations Inc. to Latt Liv Rev Trust. Signed 6/2/17	M. Norton
Willson	6/6/17	Cheryl	388-0683	Warranty Deed Willson to N. Willson. Signed 6/1/17	K. Lewis
Perkins	6/6/17	Cheryl	388-0683	Warranty Deed Perkins to OT LLC. Signed 12/20/16	C. Cina
Perkins	3/6/18	Teenage Niece	405-234-6151	Warranty Deed "corrected" Perkins to OT LLC. Signed 1/19/17	F. Taylor
Gaines	6/6/17	Cheryl	388-0683	Warranty Deed Gaines to M. Gaines. Signed 6/1/17	M. M. Harris
Hawkins	6/14/17	Jan Kendel	641-2331	Warranty Deed Hawkins to Hope & Help LLC. Signed 6/9/17	K. Lewis
Hawkins	7/18/17	Cheryl Ashton	388-0683	Warranty Deed Hope & Help LLC to Rejuvenation LLC. Signed 7/17/17	L. Armendariz
Wallace	6/14/17	Jan Kendel	641-2331	Warranty Deed Wallace to Wallace Family Trust. Signed 11/20/12	S. Henrici
Wallace	6/14/17	Jan Kendel	641-2331	Warranty Deed Wallace Family Trust to OT LLC. Signed 6/12/17	K. A. Greer

Property	Date Filed	Filed By	Phone Number Provided	Document and Date Signed	Notary
Wallace	11/13/17	Claudia	405-628-2234	Warranty Deed OT LLC to Horsing Around Family Farm LLC. Signed 6/13/17	K. A. Greer
Jackson	6/14/17	Jan Kendel	641-2331	Warranty Deed Jackson to T. Jackson. Signed 6/1/17	K. A. Greer
Jackson	6/14/17	Jan Kendel	641-2331	Warranty Deed T. Jackson to J. and M. Deemy. Signed 6/9/17	K. A. Greer
Maguire	6/27/17	Teenage Niece	234-6151	Warranty Deed Maguire to L. Johnson. Signed 1/10/17	J. Crawford
Creswell	10/27/17	Claudia	628-2237	Warranty Deed Creswell to C. Herrera Family Trust. Signed 6/9/17	K. Lewis
Roberson	6/14/17	Jan Kendel	641-2331	Warranty Deed Roberson to OT LLC. Signed 6/12/17	K. A. Greer

208. On or about the following dates, the defendants filed and caused to be filed in the Oklahoma County Clerk's Office the following fraudulent confidential documentary stamp tax affidavits that contained the forged names, signatures and seals of notaries.

Confidential Documentary Stamp Tax Affidavits

Property	Date Filed	Filed By	Phone Number Provided	Document	Notary
Bartrug	11/8/17	Mailed	None	Confidential Stamp Tax Affidavit \$88,000 purchase price. Signed 10/14/16	A. T. Bergeron
Weems	6/27/17	Teenage Niece	234-6151	Confidential Stamp Tax Affidavit \$69,000 purchase price. Signed 2/14/17	M. M. Harris

Property	Date Filed	Filed By	Phone Number Provided	Document	Notary
Giovanni	6/27/17	Teenage Niece	234-6151	Confidential Stamp Tax Affidavit \$78,000 purchase price. Signed 2/14/17	M. M. Harris
Perkins	6/6/17	Cheryl	388-0683	Confidential Stamp Tax Affidavit \$14,000 purchase price. Signed 6/1/17	M. M. Harris
Perkins	3/6/18	Teenage Niece	234-6151	Confidential Stamp Tax Affidavit \$17,000 purchase price. Signed 2/2/17	M. M. Harris
Hawkins	6/14/17	Jan Kendel	641-2331	Confidential Stamp Tax Affidavit \$12,000 purchase price. Signed 6/9/17	K. Lewis
Hawkins	7/18/17	Cheryl Ashton	388-0683	Confidential Stamp Tax Affidavit \$92,000 purchase price. Signed 7/17/17	M. M. Harris
Roberson	6/14/17	Jan Kendel	641-2331	Confidential Stamp Tax Affidavit \$78,000 purchase price. Signed 6/12/17	M. M. Harris
Wallace	6/14/17	Jan Kendel	641-2331	Confidential Stamp Tax Affidavit \$80,000 purchase price. Signed 6/12/17	M. M. Harris
Wallace	11/13/17	Claudia	405-628-2234	Confidential Stamp Tax Affidavit \$98,000 purchase price. Signed 6/13/17	M. M. Harris
Jackson	6/14/17	Jan Kendel	641-2331	Confidential Stamp Tax Affidavit \$22,000 purchase price. Signed 6/12/17	M. M. Harris

Property	Date Filed	Filed By	Phone Number Provided	Document	Notary
Maguire	6/27/17	Teenage Niece	234-6151	Confidential Stamp Tax Affidavit \$68,000 purchase price. Signed 2/14/17	M. M. Harris
Creswell	10/27/17	Claudia	628-2237	Confidential Stamp Tax Affidavit \$12,000 purchase price. Signed 6/9/17	K. Lewis

209. On or about the following dates, the defendants filed and caused to be filed in the Oklahoma County Court Clerk's Office pleadings and affidavits that contained the forged names, signatures and seals of notaries in lawsuits brought by homeowners to recover their homes.

Lawsuits

Property	Date Filed	Document	Notary
Giovanni	7/17/17	Special Entry of Appearance and Exhibits by George Crossanall	L. Lopez-Duran and T. Mercado
Riggs	10/6/17	Special Entry of Appearance Arianna Jones	V. Metcalf
Riggs	11/6/17	Affidavit signed by Lorelei Johnston	S. R. Mitchell

All in violation of Title 18, United States Code, Section 1028(f).

FORFEITURE

A. The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

B. Upon conviction of any of the offenses alleged in Counts 1, 9-11, and 13 of this Indictment, defendants **LAURA R. JOHNSON, THOMAS JOHNSON, SR., and CHERYL M. ASHLEY** shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s).

C. Upon conviction of any of the offenses alleged in Counts 2, 5-8, 12, and 16 of this Indictment, defendants **LAURA R. JOHNSON, THOMAS JOHNSON, SR., and CHERYL M. ASHLEY** shall forfeit to the United States, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense(s).

The property subject to forfeiture includes, but is not limited to:

1. Real property located at 5636 N.W. 58th Terrace, Warr Acres, Oklahoma 73122-7329;
2. Real property located at 5952 N.W. 60th, Oklahoma City, Oklahoma 73122-7207;
3. Real property located at 2728 Cambridge Court, Oklahoma City, Oklahoma 73116-4404;
4. Real property located at 10407 Ridgeview Drive, Oklahoma City, Oklahoma 73120;
5. Real property located at 10504 Sunnymeade Place, Oklahoma City, Oklahoma 73120;
6. Real property located at 11425 N.E. 54th Street, Spencer, Oklahoma 73084;
7. Real Property located at 14531 Cedar Bend Drive, Jones, Oklahoma 73049-8939;
8. Real property located at 1727 Brighton Avenue, Village, Oklahoma 73120;
9. Any and all oil, gas and mineral rights, title, and interests, and

income or proceeds therefrom, in and under the lands described as Church District, 2-8-43, p/o47, 51, 51.1, 52, 60, 61, 64, 64.1, p/o67; 2-12-p/o2; 2-20-50, 51, 52 in Wetzel County, West Virginia; and being bounded (now or formerly) substantially as follows, to wit:

Church District, Wetzel County, West Virginia, on waters of Fish Creek

Map 8; 12; 20 Parcel(s) 43, 51, 51.1, 52, 60, 61, 64, 64.1; p/o2; 50, 51, 52

North – Daniel L. Kelch & Carol L. Kelch; V.D. Himelrick Estate, et'al

East – Wayne H. Johnson; Lana S. Bartrug & Russell L. Bartrug

South – John D. Whitehill; Robert Hixenbaugh & Deborah Hixenbaugh, et'al

West – V.D. Himelrick Estate, et'al; Sherry M. Myers; John D. Whitehill; Lindsey Kerr; William M. Straight, et'al

Being also that same tract of land set forth in **Deed** dated **January 2, 2009** and recorded in and for **Wetzel** County, State of **West Virginia**, filed as Book **417**, Page **782**.

Church District, Wetzel County, West Virginia, on the waters of Fish Creek

Map 08 Parcel(s) p/o47, p/o67

North – Samuel M. Snyder & Jennifer A. Snyder

East – Marion County Line

South – John W. Hayes

West – Ralph Six; Robert G. Leezer & Pamela M. Leezer

Being also that same tract of land set forth in **Deed** dated **April 20, 1907** and recorded in and for **Wetzel** County, State of **West Virginia**, filed as Book **100**, Page **583**.

Containing **169,0325** acres, more or less in **Wetzel** County, **West Virginia**


10. Computer Equipment/Desktop - Make: Apple, Model: 1481, Serial Number: F5KN104CF694, MAC Pro computer with cord;
11. Computer Equipment/Desktop - Make: Apple, Model: IMAC, Serial Number: C02M20DPFLHH;

12. Cell Phone - Make: Apple, Model: iPhone, with pink glitter case.
13. Computer Equipment/Tablet - Make: Apple, Model: iPad, Serial Number F9FT6EYAFLMM, iPad;
14. Computer Equipment/hard Disk drives – Make: Western Digital, Serial Number PL2311LAG1NT4C; External hard drive My Book essential with cords.
15. in addition to the above-listed property, a money judgment in United States currency, representing the amount of proceeds obtained by the defendants' criminal conduct.

D. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant (i) cannot be located upon the exercise of due diligence; (ii) has been transferred or sold to, or deposited with, a third person; (iii) has been placed beyond the jurisdiction of the Court; (iv) has been substantially diminished in value; or (v) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(2), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

TIMOTHY J. DOWNING
United States Attorney



KERRY A. KELLY
Assistant United States Attorney



JESSICA L. PERRY
Assistant United States Attorney

CRIMINAL COVERSHEET

U.S. District Court, Western District of Oklahoma

CR-19 404 D

Petty ☐ Misdemeanor ☐ Felony ☒ USAO No.: _____ Case No.: _____

Charging Document: Indictment No. of Defendants: 3 Total No. of Counts: 16 Sealed: Y ☒

Forfeiture: Y ☒ OCDETF: Y ☐ Warrant: ☒ Summons: ☐ Notice: ☐ N ☐
N ☐ N ☒ Companion Case No. (if any): _____

DEFENDANT INFORMATION:

By: _____

Name: Laura R. Johnson		DEC 19 2019	
Alias(es): Laura Ashley Johnson, Laura Johnson, Laura Johnston, Lorelei Johnston, Nia Forte		Address: Oklahoma City, OK 73142	
		FBI No.: _____	
DOB: 1975; 44	SSN: xxx-xx-2688	Race: White	Interpreter: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Sex: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	Juvenile: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Language/Dialect: English	

DEFENDANT STATUS/RECOMMENDATION:

PRIOR MAGISTRATE

JUDGE PROCEEDINGS:

<input checked="" type="checkbox"/> Not in Custody	<input type="checkbox"/> Detention Requested	Complaint: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Type of Bond: <u>Unsecured</u>		Magistrate Judge Case No.: MJ-
<input type="checkbox"/> In Custody at: _____		Previously Detained: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Inmate/Prisoner/Register No.: _____		

ATTORNEY/AGENCY INFORMATION:

<input type="checkbox"/> Public Defender <input type="checkbox"/> CJA Panel <input type="checkbox"/> Retained	Name: _____	AUSA: <u>Kerry A. Kelly/Jessica Perry</u>
	Address: _____	Agent /Agency: <u>USSS</u>
	Phone: _____	Local Officer/Agency: _____

RECEIVED

DEC 19 2019

CARMELITA REEDER SHINN
CLERK, U.S. DISTRICT COURT
DEPUTY

CHARGING DETAILS

Count(s)	U.S.C. Citation(s)	Offense(s) Charged	Penalty
1	18 U.S.C. § 1349	Conspiracy to commit mail and wire fraud	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
2	18 U.S.C. § 1014	False statement to a financial institution	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
3, 4, 14, 15	18 U.S.C. § 1028A(a)(1)	Aggravated identity theft	Mandatory 2 years imprisonment consecutive; NMT \$250,000 fine, o/b; NMT 1 year. S/R, in the event of revocation of S/R NMT 1 year. \$100 special assessment; restitution
9, 10, 11, 13	18 U.S.C. § 1343	Wire fraud	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution

Signature of AUSA: _____

Date: 12/19/19

CRIMINAL COVERSHEET
U.S. District Court, Western District of Oklahoma

Name: Laura R. Johnson**CHARGING DETAILS (cont'd)**

Count(s)	U.S.C. Citation(s)	Offense(s) Charged	Penalty
12	18 U.S.C. § 1028(a)(7) and (c)(3)(A)	Identity theft	NMT 15 years; NMT \$250,000 fine, o/b; NMT 3 years S/R; an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
16	18 U.S.C. § 1028(f)	Conspiracy to commit identity theft	NMT 15 years; NMT \$250,000 fine, o/b; NMT 3 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
Forfeiture allegations	18 U.S.C. § 981(a)(1)(C) 18 U.S.C. § 982(a)(2) 28 U.S.C. § 2461(c)	Criminal forfeiture	

Signature of AUSA:



Date:



CRIMINAL COVERSHEET

U.S. District Court, Western District of Oklahoma

 Petty ☐ Misdemeanor ☐ Felony ☒ USAO No.: _____ Case No. **CR-19 404 D**

 Charging Document: Indictment No. of Defendants: 3 Total No. of Counts: 16 Sealed: Y ☒

 Forfeiture: Y ☒ N ☐ OCDEF: Y ☐ N ☒ Warrant: ☒ Summons: ☐ Notice: ☐ N ☐
 Companion Case No. (if any): _____
DEFENDANT INFORMATION:By: je**DEC 19 2019**Name: **Thomas Johnson, Sr.**Alias(es): Thomas Clark Johnson, Thomas C. Johnson,
Tom Johnson, King Redneck

Address: Oklahoma City, OK 73142

FBI No.: _____

DOB: 1968; 51

SSN: xxx-xx-3003

Race: White

Interpreter: Y ☐ N ☒Sex: M ☒ F ☐Juvenile: Y ☐ N ☒

Language/Dialect: English

DEFENDANT STATUS/RECOMMENDATION:**PRIOR MAGISTRATE****JUDGE PROCEEDINGS:**☒ Not in Custody ☐ Detention Requested☒ Type of Bond: Unsecured☐ In Custody at: _____

Inmate/Prisoner/Register No.: _____

Complaint: Y ☐ N ☒

Magistrate Judge Case No.: MJ-

Previously Detained: Y ☐ N ☒**ATTORNEY/AGENCY INFORMATION:**☐ Public Defender☐ CJA Panel☐ Retained

Name: _____

Address: _____

Phone: _____

AUSA: Kerry A. Kelly/Jessica PerryAgent /Agency: USSS

Local Officer/Agency: _____

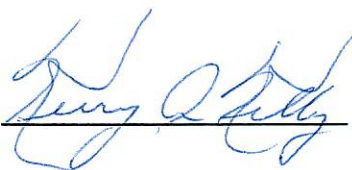
RECEIVED**DEC 19 2019**CARMELITA REEDER SHINN
CLERK, U.S. DISTRICT COURT

BY: _____

DLPJ: /

CHARGING DETAILS

Count(s)	U.S.C. Citation(s)	Offense(s) Charged	Penalty
1	18 U.S.C. § 1349	Conspiracy to commit mail and wire fraud	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
5	18 U.S.C. § 1344(2) 18 U.S.C. § 2	Bank fraud and aiding and abetting	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
6, 7	18 U.S.C. § 1028A(a)(1)	Aggravated identity theft	Mandatory 2 years imprisonment consecutive; NMT \$250,000 fine, o/b; NMT 1 year. S/R, in the event of revocation of S/R NMT 1 year; \$100 special assessment; restitution
8	18 U.S.C. § 1014	False statement to a financial institution	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution

Signature of AUSA: Date: 12/17/19

CRIMINAL COVERSHEET
U.S. District Court, Western District of Oklahoma

Name: Thomas Johnson, Sr.

CHARGING DETAILS (cont'd)

Count(s)	U.S.C. Citation(s)	Offense(s) Charged	Penalty
9, 10, 11	18 U.S.C. § 1343	Wire fraud	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
16	18 U.S.C. § 1028(f)	Conspiracy to commit identity theft	NMT 15 years; NMT \$250,000 fine, o/b; NMT 3 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
Forfeiture allegations	18 U.S.C. § 981(a)(1)(C) 18 U.S.C. § 982(a)(2) 28 U.S.C. § 2461(c)	Criminal forfeiture	

Signature of AUSA: _____



Date: _____

12/17/19

CRIMINAL COVERSHEET

U.S. District Court, Western District of Oklahoma

Petty ☐ Misdemeanor ☐ Felony ☒ USAO No.: _____ Case No. **CR-19 404 D**

Charging Document: Indictment No. of Defendants: 3 Total No. of Counts: 16 Sealed: Y ☒

Forfeiture: Y ☒ OCDEF: Y ☐ Warrant: ☒ Summons: ☐ Notice: ☐ N ☐
N ☐ N ☒ Companion Case No. (if any): _____

DEFENDANT INFORMATION:

By: je

Name: Cheryl M. Ashley		DEC 19 2019	
Alias(es): Cheryl Ashley, Carol Mary Ashton, Cheryl Ashton, Jan Kendel		Address: Oklahoma City, OK 73142	
		FBI No.:	
DOB: 1950; 69	SSN: xxx-xx-9285	Race: White	Interpreter: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Sex: M <input type="checkbox"/> F <input checked="" type="checkbox"/>	Juvenile: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Language/Dialect: English	

DEFENDANT STATUS/RECOMMENDATION:

PRIOR MAGISTRATE JUDGE PROCEEDINGS:

<input checked="" type="checkbox"/> Not in Custody	<input type="checkbox"/> Detention Requested	Complaint: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Type of Bond: <u>Unsecured</u>		Magistrate Judge Case No.: MJ-
<input type="checkbox"/> In Custody at: _____		Previously Detained: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Inmate/Prisoner/Register No.: _____		

ATTORNEY/AGENCY INFORMATION:

<input type="checkbox"/> Public Defender	Name: _____	AUSA: <u>Kerry A. Kelly/ Jessica Perry</u>
<input type="checkbox"/> CJA Panel	Address: _____	Agent /Agency: <u>USSS</u>
<input type="checkbox"/> Retained	Phone: _____	Local Officer/Agency: <u>DEC 19 2019</u>

CHARGING DETAILS

CARMELITA REEDER SHINN
CLERK, U.S. DISTRICT COURT

BY _____
Penalty _____

Count(s)	U.S.C. Citation(s)	Offense(s) Charged	Penalty
1	18 U.S.C. § 1349	Conspiracy to commit mail and wire fraud	NMT 30 years; NMT \$1,000,000 fine, o/b; NMT 5 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
16	18 U.S.C. § 1028(f)	Conspiracy to commit identity theft	NMT 15 years; NMT \$250,000 fine, o/b; NMT 3 years S/R; NMT an additl 2 years imprisonment in the event of a revocation of S/R; \$100 special assessment; restitution
Forfeiture allegations	18 U.S.C. § 981(a)(1)(C) 18 U.S.C. § 982(a)(2) 28 U.S.C. § 2461(c)	Criminal forfeiture	

Signature of AUSA: _____

Date: 12/17/19