

**SEALED**  
**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ROBERT ALAN BLAKSLEY,  
BRUCE CARLTON WRIGHT,**

**Defendants.**

) **FILED UNDER SEAL**

)  
) **Case No. 14 CR 136 GKF**

) **INDICTMENT**

) **[COUNT 1: 18 U.S.C. § 1349 –**

) **Conspiracy to Commit Bank Fraud;**

) **COUNTS 2 through 13: 18 U.S.C. §**

) **1344(1) – Bank Fraud; Forfeiture**

) **Allegation: 18 U.S.C. § 982(a)(2)(A) –**

) **Bank Fraud Forfeiture]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. § 1349]**

**Introduction:**

At all times relevant to this Indictment:

1. **ROBERT ALAN BLAKSLEY**, defendant, hereinafter “**BLAKSLEY**”, was the Chief Executive Officer of various Oklahoma limited liability companies that he owned, operated, and otherwise controlled, to wit: Group Blaksley Center, LLC; Group Blaksley, LLC; Blaksley Construction Company; Group Blaksley Properties, LLC; and, The District at Bentonville, LLC, hereinafter collectively referred to as “The Blaksley Companies,” doing business in the Northern District of Oklahoma and elsewhere for the purpose of property construction and development.

2. **BRUCE CARLTON WRIGHT**, defendant, hereinafter “**WRIGHT**”, employed at times as the Vice-President and at others as President of Group Blaksley, LLC, had numerous responsibilities, including, but not limited to, the following:

managing the day-to-day operations of the Blaksley Companies; overseeing construction projects; and, supervising employees with the Blaksley Companies.

3. The International Bank & Trust Company ("IBC"), was a financial institution as defined in Title 18, United States Code, Section 20, doing business in the Northern District of Oklahoma and elsewhere.

4. In or about June 2007, **BLAKSLEY** obtained a loan from IBC for the future construction and improvements on property located in Bentonville, Arkansas. The collateral for the IBC loan included, but was not limited to, the cash equity value of the Bentonville property. Disbursements of the loan proceeds by IBC were contingent upon draw requests to be submitted by **BLAKSLEY** and the Blaksley Companies that described the construction performed on and improvements made to the Bentonville property and proof of costs incurred for such construction and improvements.

**The Conspiracy:**

5. Beginning at least as early as in or about June 2007 and continuing thereafter to the date of this Indictment, in the Northern District of Oklahoma and elsewhere, **BLAKSLEY** and **WRIGHT**, the defendants, did knowingly and intentionally conspire, confederate, and agree together to execute a scheme and artifice to defraud IBC, a violation of Title 18, United States Code, Section 1344(1).

**Methods and Means of the Conspiracy:**

6. The following methods and means were used to achieve the object of the conspiracy:

7. **BLAKSLEY and WRIGHT** would and did fraudulently submit, and cause to be submitted, monthly invoices to obtain disbursements of loan funds that were materially false claims of work performed on the Bentonville property

8. **BLAKSLEY and WRIGHT** would and did fraudulently submit, and cause to be submitted, invoices that were materially misleading because the invoices: described work performed in single line-items and often in whole dollar amounts; fraudulently omitted sufficient detail to determine if work was actually complete; fraudulently omitted how much work was completed as compared to the project as a whole; and, how much work remained on a particular property or project.

9. **BLAKSLEY and WRIGHT**, to avoid suspicion by IBC, would and did deplete and caused to be depleted, funds from allocated categories of the construction loan.

10. **BLAKSLEY** would and did establish and maintain bank accounts at IBC, including account number XXXX2267 into which he deposited, and caused to be deposited, loan proceeds.

11. **BLAKSLEY and WRIGHT** would and did fraudulently submit, and cause to be submitted, claims for loan disbursements for work performed prior to the loan.

12. **BLAKSLEY and WRIGHT** would and did fraudulently submit, and cause to be submitted, claims for loan disbursements for work performed at no cost to the Blaksley Companies.

13. Subsequent to submitting fraudulent documents in support of draw requests and receiving loan proceeds, **BLAKSLEY** and **WRIGHT** each responded to allegations that they had provided false documentation to IBC.

14. To conceal their submission of fraudulent draw request and supporting documentation, **BLAKSLEY** and **WRIGHT** identified specific projects that were done at the Bentonville location. However, in reality the projects were actually performed either prior to the term of the Bentonville loan or performed during the term of loan at little or no cost to the Blaksley Companies.

15. **BLAKSLEY** and **WRIGHT** submitted photographs as depictions of work performed at the Bentonville location when, in fact, the photographs were of various other locations and projects unrelated to the Bentonville project.

All in violation of Title 18, United States Code, Section 1349 and 1344.

**COUNTS TWO THROUGH THIRTEEN**  
**[18 U.S.C. §1344(1)]**

16. The allegations contained in paragraphs 1 through 15 are incorporated by reference for the purpose of Counts Two through Thirteen.

17. On or about the below-listed dates, in the Northern District of Oklahoma, **BLAKSLEY** and **WRIGHT**, knowingly and intentionally executed, and attempted to execute, a scheme and artifice to defraud IBC by submitting and causing to be submitted the draw requests described in the table below in the amounts stated for work described and purported to have been performed during the loan in order to receive disbursements of loan proceeds by IBC as described in the table, to wit:

COUNT	DATE	AMOUNT OF DRAW REQUEST	TOTAL DISBURSEMENT
2	8/13/2007	\$22,000 – Demolition	\$82,000
		\$42,000 – General Conditions & Supervision	
		\$18,000 – Overhead	
3	9/07/2007	\$ 28,000 – Demolition	\$88,000
		\$ 42,000 – General Conditions & Supervision	
		\$ 18,000 – Overhead	
4	10/03/2007	\$ 26,500 – Demolition	\$111,250
		\$ 24,750 – Land Clearing	
		\$ 42,000 – General Conditions & Supervision	
		\$ 18,000 – Overhead	
5	11/05/2007	\$ 17,500 – Demolition	\$102,500
		\$ 42,000 – General Conditions & Supervision	
		\$ 18,000 – Overhead	
		\$ 25,000 – Marketing	

COUNT	DATE	AMOUNT OF DRAW REQUEST	TOTAL DISBURSEMENT
6	12/04/2007	\$ 18,400 – Demolition \$ 42,000 – General Conditions & Supervision \$ 18,000 – Overhead \$ 14,000 – Marketing \$ 23,300 – Land Clearing	\$115,700
7	1/03/2008	\$ 50,000 – Demolition \$ 37,000 – Land Clearing \$ 7,500 – General Conditions & Supervision \$ 9,600 – Overhead	\$104,100
8	2/01/2008	\$ 6,900 – General Conditions & Supervision \$ 15,278 – Overhead \$ 21,000 – Dirt Work \$ 22,065 – Demolition \$ 46,000 – Land Clearing	\$111,243
9	3/04/2008	\$ 56,000 – Dirt Work \$ 25,000 – Marketing	\$81,000
10	3/31/2008	\$ 28,598.60 – Dirt Work \$ 9,459.40 – Land Clearing \$ 20,000 – Overhead	\$58,058

COUNT	DATE	AMOUNT OF DRAW REQUEST	TOTAL DISBURSEMENT
11	4/29/2008	\$ 10,589.60 – Dirt Work \$ 25,000 – Land Clearing \$ 65,000 – General Conditions & Supervision	\$100,589.60
12	6/03/2008	\$ 43,000 – Dirt Work \$ 17,000 – Erosion Control \$ 48,500 – Site Utilities	\$108,500
13	7/02/2008	\$ 21,800 – Dirt Work \$ 12,500 – Erosion Control \$ 15,000 – Land Clearing \$ 64,250 – Site Utilities	\$113,550

All in violation of Title 18, United States Code, Section 1344(1).

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 982(a)(2)(A)]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

Upon conviction of the bank fraud conspiracy and scheme alleged in this Indictment, as part of their sentence, the defendants, **ROBERT ALAN BLAKSLEY** and **BRUCE CARLTON WRIGHT**, shall forfeit to the United States any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the scheme. A criminal forfeiture money judgment shall also be entered in a sum of money in an amount of at least \$1,176,490.60 representing proceeds of the bank fraud scheme.

Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been

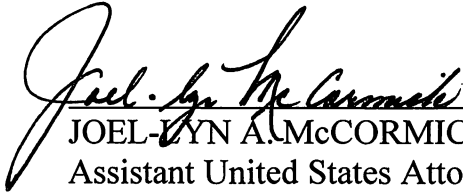


placed beyond the jurisdiction of the court; has been substantially diminished in value; or  
has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY

A TRUE BILL

  
\_\_\_\_\_  
JOEL-LYN A. McCORMICK  
Assistant United States Attorney

*/s/ Grand Jury Foreperson*  
\_\_\_\_\_  
Grand Jury Foreperson