

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
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UNITED STATES OF AMERICA)	NO. <u>3:06-00204</u>
)	
v)	18 U.S.C. § 2
)	18 U.S.C. § 664
BARRY R. STOKES)	18 U.S.C. § 1341
)	18 U.S.C. § 1343
)	18 U.S.C. § 1957
)	18 U.S.C. § 152
)	18 U.S.C. § 401(3)

SUPERSEDING INDICTMENT

Introduction

The Grand Jury finds that at all times material to the indictment:

1. **BARRY R. STOKES** was the sole owner and Chief Executive Officer (CEO) of 1 Point Solutions, LLC (“1 Point Solutions”);
2. 1 Point Solutions was a limited liability company organized under the laws of the state of Tennessee, with its principal place of business located at 101 South Main Street in Dickson, Tennessee. 1 Point Solutions was engaged in the business of third party administration (“TPA”) for various types of employee benefit plans such as 401(k) retirement plans, Flexible Spending Accounts (FSAs), Health Savings Accounts (HSAs), Health Reimbursement Accounts (HRAs), and Dependent Care Plans (DCPs). In the summer of 2006, 1 Point Solutions administered various types of employee benefit plans for over approximately 35,000 individual employees (“participants”) from over approximately 800 different entities (“employers”).

3. **BARRY R. STOKES** and 1 Point Solutions offered TPA services for the 401(k) retirement plans of approximately fifty-five (55) employers, from which there were over 1,000 individual employee participants. These 401(k) retirement plans were “employee pension benefit plans” as defined by the Employee Retirement Income Security Act of 1974 (“ERISA”). The assets of these retirement plans entrusted to **BARRY R. STOKES** and 1 Point Solutions totaled over approximately \$15,000,000.

4. Under ERISA regulations, employers are permitted to establish and maintain employer sponsored retirement plans (“plans”) for the benefit of their employees. Once these plans are established, both employers and employees have the option of making regular contributions of funds to their plans. The accumulated plan assets are generally invested for the benefit of the plan and the plan participants, and any capital gains or income earned through such investment is added to the accumulated plan assets. Upon retirement, or when otherwise eligible, a plan participant may request and receive disbursements from the retirement plan assets. These disbursements correspond to contributions made to the plan by the participant, plus any associated gains made during the term of employment

5. Through advertising and sales presentations, **BARRY R. STOKES** convinced over 55 employers to entrust their employer-sponsored retirement plans to 1 Point Solutions. **BARRY R. STOKES** promised each employer that he and 1 Point Solutions would assume three functions for the retirement plans entrusted to 1 Point Solutions. First, **BARRY R. STOKES** promised to act as the investment advisor and offered an extensive list of mutual funds from which each participant could make choices as to how contributions were invested. **BARRY R. STOKES** promised to invest plan assets according to participant enrollment forms that directed **BARRY R. STOKES** to

invest in specific mutual funds according to the participant's election of percentages and contributions. Second, **BARRY R. STOKES** was to serve as the custodian of funds, exercising complete control and responsibility over the financial assets and investments for each respective retirement plan. Finally, **BARRY R. STOKES** and 1 Point Solutions were to act as the third party administrators, servicing the plans by overseeing enrollment of new plan participants, disseminating quarterly statements of account to each plan participant, and keeping track of plan contributions, distributions, loans and rollovers.

6. The quarterly statements were supposed to be reports that detailed investment performance and plan balances for each plan participant. In addition to the quarterly statements, **BARRY R. STOKES** also promised that his company would provide a state-of-the-art website through which plan participants could access and view individual account statements detailing investment performance, progress and balances on a daily basis.

Barry R. Stokes' Scheme To Defraud

7. From on or about January 1, 2002 to on or about October 13, 2006, in the Middle District of Tennessee and elsewhere, the defendant, **BARRY R. STOKES**, devised and intended to devise a scheme and artifice to defraud and obtain money and property from the clients of 1 Point Solutions, by means of materially false and fraudulent pretenses, representations and promises, knowing and having reason to know that said pretenses, representations and promises were and would be false. The scheme and artifice to defraud operated as follows:

A. It was part of his scheme to defraud and to obtain money and property that **BARRY R. STOKES** solicited numerous companies and convinced these employers to entrust their retirement plans to 1 Point Solutions. **BARRY R. STOKES** promised and agreed to act as

investment advisor, funds custodian, and third party administrator for each retirement plan. In so doing, he agreed to invest all plan assets according to participant elections, to provide accurate and detailed accountings and balance statements for each participant, and to act in the best interests of each retirement plan and its participants.

B. It was further part of his scheme to defraud and to obtain money and property that, on or about January 1, 2002, **BARRY R. STOKES** began to use plan assets entrusted to him for purposes other than investing the funds for the benefit of the 401(k) retirement plans. Instead of investing all of the employee contributions as he had promised, **BARRY R. STOKES** kept most of the plan assets in various commingled accounts from which he dispersed plan funds according to his own needs, uses and desires.

C. It was further part of his scheme to defraud that and to obtain money and property that, by September, 2006, **BARRY R. STOKES** had agreed and caused 1 Point Solutions to agree to act as third party administrator for the 401(k) retirement plans of approximately 1,092 employees from over approximately 55 companies.

D. It was further part of his scheme to defraud and to obtain money and property that **BARRY R. STOKES** maintained several different accounts at various financial institutions, and transferred funds to and from these various accounts. Some of these accounts included:

- i. An AmSouth Bank account ending in 6102 ("1 Point 401(k) Account");
- ii. An AmSouth Bank account ending in 4606 ("Personal Account"), and
- iii. A Fifth Third Bank account ("Fifth Third 401(k) Account")

E. It was further part of his scheme to defraud that **BARRY R. STOKES** established an account with Mid-Atlantic Capital Group, Inc. for the purposes of investing in various stocks,

annuities and mutual funds (referred to hereinafter as "Mid-Atlantic Account").

F. It was further part of his scheme to defraud and to obtain money and property that **BARRY R. STOKES**, in actuality, invested almost none of the plan assets, and instead pooled the plan assets in several accounts over which he had control and authority, including the 1 Point 401(k) Account, the Personal Account, and the Mid-Atlantic Account. From those accounts, **BARRY R. STOKES** was able to disseminate and disperse the plan assets to various other bank accounts under his control, including various other 1 Point Solutions operating accounts, and to spend the funds for **BARRY R. STOKES'** own uses.

G. It was further part of his scheme to defraud and to obtain money and property that **BARRY R. STOKES** caused employees of 1 Point Solutions to prepare and to distribute via the United States Postal Service false quarterly 401(k) account statements to employers and participants. These statements falsely stated that the assets of each respective participant's 401(k) retirement plan were invested in the stocks and mutual funds as elected by each respective participant. These statements falsely represented to each participant that the plan assets were safely invested, when, in fact, most of the assets had never been invested and had been converted for **BARRY R. STOKES'** own use.

H. It was further part of his scheme to defraud and to obtain money and property that **BARRY R. STOKES** caused employees of 1 Point Solutions to create and maintain a website through which plan participants could access their individual accounts on a daily basis to check on investment performance and account balances. The website falsely stated to each participant that the assets of the 401(k) retirement plan were invested in the stocks and mutual funds elected by each respective participant. The website falsely represented that the plan assets were safely invested,

when, in fact, most of the assets had never been invested and had been converted for **BARRY R. STOKES'** own use.

I. It was further part of his scheme to defraud that **BARRY R. STOKES** continued to receive and to accept regular employer and employee fund contributions to the retirement plans without disclosing that the plan assets had been converted to his own use, and without disclosing that the plan assets had never been invested as directed.

J. It was further part of his scheme to defraud that **BARRY R. STOKES** did misappropriate, embezzle and convert over \$15,000,000 in employee pension benefit plan assets from over 1,092 participants. These funds were misappropriated for a variety of purposes, none of which benefitted the participants of the retirement plans or the plans themselves. Purposes for which **BARRY R. STOKES** misappropriated plan assets included, but were not limited to, the following:

i. **BARRY R. STOKES** amassed an extensive collection of Japanese art, which he insured for approximately \$2,000,000;

ii. **BARRY R. STOKES** used plan assets to purchase real estate, including buildings in Dickson, Tennessee, two of which were purchased and remodeled for use by 1 Point Solutions as the company grew;

iii. **BARRY R. STOKES** used retirement plan assets as an improper source of capital to fund and to grow 1 Point Solutions by improperly using plan assets to pay for overhead costs and operating expenses, marketing, salaries, expense accounts, vehicles, insurance and other business expenditures necessary to maintain the daily functioning of 1 Point Solutions;

iv. When certain employers sought to withdraw their 401(k) retirement plans from the custody and control of 1 Point Solutions, in order to conceal the fact that he had

misappropriated the funds, **BARRY R. STOKES** used assets from other 401(k) plans to pay off the employers whose plan assets had been misappropriated;

v. **BARRY R. STOKES** used retirement plan assets to pay his own salary and his own personal expenses, including, but not limited to paying for: an allowance to his wife; personal credit card bills; investments in a restaurant in Nashville, Tennessee; fund-raising parties and events; funding the establishment of a charitable foundation ("1 Point Foundation"); psychic readings; political campaign contributions; jewelry; and numerous personal Pay Pal purchases made over the Internet.

COUNTS ONE THROUGH TWENTY-NINE:
EMBEZZLEMENT OF ERISA FUNDS

THE GRAND JURY CHARGES:

8. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

9. Between on or about January 1, 2002 and on or about October 13, 2006, **BARRY R. STOKES** did willfully embezzle, steal, and unlawfully and willfully abstract and convert to his own use, in the approximate amounts listed with respect to each count, the moneys, funds, securities, premiums, credits, property and other assets of employee pension benefit plans subject to Title I of the Employee Retirement Income Security Act of 1974, as follows:

COUNT	Sponsor of Plan	Value of Plan	Number of Participants
1	Beck Arnley Worldparts, Corp.	\$6,079,677.46	147
2	EFS, Inc.	\$1,208,919.14	59
3	Gonzales Memorial Hospital	\$1,201,076.96	176
4	Tatham & Associates	\$908,067.15	184
5	Cash Acme	\$787,752.92	68
6	Mastrapasqua Asset Management	\$661,064.77	29
7	Colbert & Winstead	\$558,393.15	20
8	Jimbo's Naturally	\$429,225.91	48
9	Hamilton Ryker, Inc.	\$257,350.84	43
10	Herbert Pounds	\$241,693.46	2

COUNT	Sponsor of Plan	Value of Plan	Number of Participants
11	Dr. Jay S. Cohen	\$240,661.85	3
12	National Contact Marketing	\$235,417.11	4
13	1 Point Solutions, LLC	\$172,183.31	42
14	Tennessee Association of Broadcasters	\$130,427.22	2
15	Atlanta Engineering	\$122,727.62	6
16	Angela Cotton, B.C.O. and Assoc.	\$119,479.51	3
17	Elemental Interactive	\$78,165.25	7
18	J. Michael's Clothiers	\$50,371.34	10
19	Altadena Valley Golf & Country Club	\$35,264.37	24
20	Tennessee Democratic Party	\$23,217.87	7
21	Salem Nurse Midwives	\$193,061.69	8
22	Bay Institute	\$158,181.42	13
23	Grist Magazine	\$144,418.83	13
24	VIDA Health Communications	\$133,764.80	12
25	Oregon Natural Resources	\$107,773.55	17
26	Southern Alliance For Clean Engery	\$101,679.43	19
27	Guadelupe Veterinary Clinic	\$88,033.97	6

COUNT	Sponsor of Plan	Value of Plan	Number of Participants
28	Summit Terminaling	\$50,441.45	2
29	Tennessee Hotel Lodging Association	\$22,984.56	3

In violation of Title 18, United States Code, Section 664.

COUNTS THIRTY THROUGH FIFTY: MAIL FRAUD

THE GRAND JURY FURTHER CHARGES:

10. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

11. Between on or about January 1, 2002 and on or about October 13, 2006, in the Middle District of Tennessee and elsewhere, **BARRY R. STOKES**, for the purpose of executing the aforesaid scheme to defraud and to obtain money and property, and in attempting so to do, did knowingly cause to be sent and delivered by United States Mail, from Dickson, Tennessee to over 1,000 retirement plan participants, false account statements for the participants of the 401(k) retirement plans listed below:

COUNT	Approximate Date of Mailing	Item Sent via United States Mail	Recipient of Mailing
30	On or about 6/30/2002	Participant level quarterly statement	Colbert and Winstead employee "S.M."
31	On or about 12/31/2002	Participant level quarterly statement	Colbert and Winstead employee "S.M."
32	On or about 6/30/2003	Plan and participant level quarterly statements	EFS, Inc.
33	On or about 9/30/2003	Plan and participant level quarterly statements	EFS, Inc.
34	On or about 12/31/2003.	Participant level quarterly statement	Colbert and Winstead employee "S M."

COUNT	Approximate Date of Mailing	Item Sent via United States Mail	Recipient of Mailing
35	On or about 1/11/2004	Participant level quarterly statement	Altadena Valley Golf and Country Club employee, "J.W."
36	On or about 3/31/04	Participant level quarterly statement	TN Assoc. of Broadcasters employee, "W.A."
37	On or about 10/01/2004	Plan level statement for Tatham & Assoc.	Tatham & Associates
38	On on or about 12/30/2004	Participant level quarterly statement	Colbert and Winstead employee "S.M."
39	On or about 12/30/2005	Participant level quarterly statement	Colbert and Winstead employee "S.M."
40	On or about 3/09/2005	Plan level statement covering plan activity from 1/1/2002 - 3/8/2005	Greenpeace, Inc.
41	On or about 6/24/2005	Plan level quarterly statement	Beck/Arnley Worldparts, Corp
42	On or about 6/24/2005	Participant level statement	Beck/Arnley employee "R.R."
43	On or about 6/24/2005	Participant level statement	Beck/Arnley employee "P.W."
44	On or about 6/24/2005	Participant level statement	Beck/Arnley employee "P.M."
45	On or about 6/24/2005	Participant level statement	Beck/Arnley employee "J.M."
46	On or about 6/30/2005	Participant level quarterly statement	J. Michael's Clothiers employee, "J.B."
47	On or about 12/31/2005	Participant level quarterly statement	J. Michael's Clothiers employee, "E.L."

COUNT	Approximate Date of Mailing	Item Sent via United States Mail	Recipient of Mailing
48	On or about 6/30/2006	Participant level quarterly statement	Colbert and Winstead employee "S.M."
49	On or about 6/30/2006	Participant level quarterly statement	J. Michael's Clothiers employee, "V.L."
50	On or about 7/27/2006	Participant level quarterly statement	Altadena Valley Golf and Country Club employee, "J.W."

In violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS FIFTY-ONE THROUGH SIXTY-ONE:
WIRE FRAUD

THE GRAND JURY FURTHER CHARGES:

12. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

13. On or about the dates set forth below with respect to each count, in the Middle District of Tennessee, **BARRY R. STOKES**, did, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud and to obtain money and property, knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, and pictures, to wit, **BARRY R. STOKES** did send electronic messages, or emails, to Mid-Atlantic Capital Group, Inc., to effect fraudulent transfers of ERISA funds, as follows:

Count	Date of Wire Communication	Amount of Transfer	Source Account	Destination Account
51	08/14/2002	\$191,873.23	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
52	02/18/2003	\$178,643.34	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
53	03/21/2003	\$148,904.91	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
54	03/31/2003	\$168,596.47	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
55	04/16/2003	\$149,297.51	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
56	04/22/2003	\$170,292.54	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
57	09/29/2003	\$198,623.89	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
58	05/31/2005	\$659,398.48	Mid Atlantic Capital Group	AmSouth 1 Point 401(k)
59	05/31/2005	\$1,648,702.07	Mid Atlantic Capital Group	Deutsche Bank (for Greenpeace, Inc.)
60	05/31/2005	\$2,241,695.62	Mid Atlantic Capital Group	Mellon Bank (for Crosslin Supply)

Count	Date of Wire Communication	Amount of Transfer	Source Account	Destination Account
61	06/10/2005	\$133,027.00	Mid Atlantic Capital Group	Wells Fargo Bank (Azuma)

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SIXTY-TWO THROUGH SEVENTY-TWO:
MONEY LAUNDERING

THE GRAND JURY FURTHER CHARGES:

14. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

15. On or about the dates set forth below with respect to each count, in the Middle District of Tennessee and elsewhere, **BARRY R. STOKES** did knowingly engage and attempt to engage in the following monetary transactions in criminally derived property of a value greater than \$10,000, affecting interstate commerce and by, through and to a financial institution, that is, the transfer of funds by the means set forth below, such property having been derived from a specified unlawful activity, that is, embezzlement from employee pension benefit plans in violation of Title 18, United States Code, Section 664:

Count	Source of 401(k) Funds To Custody of Barry R. Stokes	Date of Transaction Disposing of Embezzled 401(k) Funds	Transaction Disposing of Embezzled 401(k) Funds
62	1/15/2003 Wire transfer of \$1,565,324.02 in 401(k) funds from Crosslin Supply, Inc. to Mid-Atlantic Account.	2/20/2003	\$32,500.00 Wire from Barry R. Stokes' Personal Account to Floating World Art Gallery.
63	1/15/2003 Wire transfer of \$1,565,324.02 in 401(k) funds from Crosslin Supply, Inc. to Mid-Atlantic Account.	4/25/2003	\$23,640.00 Check from Barry R. Stokes' Personal Account to Stites Jewelers.

Count	Source of 401(k) Funds To Custody of Barry R. Stokes	Date of Transaction Disposing of Embezzled 401(k) Funds	Transaction Disposing of Embezzled 401(k) Funds
64	5/05/2003 Wire transfer of \$964,356.56 in 401(k) funds from Greenpeace, Inc. to Mid-Atlantic Account.	8/22/2003	\$142,500.00 Wire transfer from 1 Point 401(k) Account to North American Title, for purchase of 2011 Canterbury property in Austin, TX.
65	9/26/2003 Redemption of \$216,218.91 from mutual funds held in Mid-Atlantic Account.	10/02/2003	\$160,308.67 Purchase of official check made payable to "Dickson Title, LLC" for purchase of property at 103 South Main Street, Dickson, TN.
66	1/03/2005 Wire transfer of \$304,176.47 in 401(k) funds from Hamilton-Ryker Group to Mid-Atlantic Account.	1/19/2005	\$25,000 Wire from Barry R Stokes' Personal Account to Pentagon Credit Union Account of Darlene Wilson.
67	5/23/05 - 5/24/2005 Wire transfers of \$6,079,677.46 in 401(k) funds from Beck-Arnley Worldparts, Corp. to Mid-Atlantic Account.	5/26/2005	\$31,250.00 Wire from Barry R Stokes' Personal Account to Ed Skvarna, Art Dealer.

Count	Source of 401(k) Funds To Custody of Barry R. Stokes	Date of Transaction Disposing of Embezzled 401(k) Funds	Transaction Disposing of Embezzled 401(k) Funds
68	5/23/05 - 5/24/2005 Wire transfers of \$6,079,677.46 in 401(k) funds from Beck-Arnley Worldparts, Corp. to Mid-Atlantic Account.	5/31/2005	\$155,286.81 Counter check drawn on 1 Point 401(k) Account for amount due at closing for purchase of 107 South Main Street, Dickson, TN.
69	5/23/05 - 5/24/2005 Wire transfers of \$6,079,677.46 in 401(k) funds from Beck-Arnley Worldparts, Corp. to Mid-Atlantic Account.	5/31/2005	\$2,241,695.62 Wire transfer from Mid-Atlantic Account to Mellon Bank, closing Crosslin Supply, Inc. 401(k) account.
70	5/23/05 - 5/24/2005 Wire transfers of \$6,079,677.46 in 401(k) funds from Beck-Arnley Worldparts, Corp. to Mid-Atlantic Account.	5/31/2005	\$1,648,702.07 Wire transfer from Mid-Atlantic Account to Deutsche Bank, closing Greenpeace, Inc. 401(k) account.
71	5/23/05 - 5/24/2005 Wire transfers of \$6,079,677.46 in 401(k) funds from Beck-Arnley Worldparts, Corp. to Mid-Atlantic Account.	6/10/2005	\$133,027.00 Wire transfer from Mid-Atlantic Account to Wells Fargo, for payment to Azuma Art Gallery.

Count	Source of 401(k) Funds To Custody of Barry R. Stokes	Date of Transaction Disposing of Embezzled 401(k) Funds	Transaction Disposing of Embezzled 401(k) Funds
72	6/02/2006 Wire transfer of \$632,993.38 in 401(k) funds from Cash Acme to Fifth Third 401(k) Account.	6/05/2006	\$344,209.61 Wire transfer from Fifth Third 401(k) account, closing Jewish Fund For Justice 401(k) account.

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNT SEVENTY-THREE: BANKRUPTCY FRAUD

THE GRAND JURY FURTHER CHARGES:

16. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

17. On or about September, 2006, in the Middle District of Tennessee and elsewhere, **BARRY R. STOKES** in his personal capacity and as an agent and officer of 1 Point Solutions, LLC, in contemplation of a case under Title 11 and with the intent to defeat the provisions of Title 11, did knowingly and fraudulently transfer and conceal from the bankruptcy court, trustee and creditors, certain property of the bankruptcy estate, to wit, did hide and conceal an art collection, valued at approximately \$2 million, by using a sport-utility vehicle to transfer the art collection from his residence in Dickson, Tennessee to a residence in Austin, Texas.

In violation of Title 18, United States Code, Section 152(7).

COUNTS SEVENTY-FOUR THROUGH SEVENTY-SEVEN:
CRIMINAL CONTEMPT

THE GRAND JURY FURTHER CHARGES:

18. On or about the dates set forth below with respect to each count, in the Middle District of Tennessee, **BARRY R. STOKES**, did knowingly disobey and resist a lawful order of a Court of the United States, that is, the September 13, 2006 temporary restraining order of the Honorable Judge William J. Haynes, Jr., United States District Judge for the Middle District of Tennessee, which ordered **BARRY R. STOKES** to refrain selling, transferring, encumbering, giving away, hiding, or otherwise dissipating any assets held in the name of **BARRY R. STOKES** or 1 Point Solutions, which order **BARRY R. STOKES** disobeyed by transferring and dissipating assets in the following manner:

Count	Date	Check Number	Drawn on Account	Amount of Check	Payable To	Disposition
74	9/14/06	9697	1 Point General Account	\$9,882.65	Barry Stokes	CASH
75	9/14/06	9698	1 Point General Account	\$9,789.75	Barry Stokes	CASH
76	9/15/06	4505	1 Point 401(k)	\$9,795.35	Barry Stokes	CASH
77	9/16/06	09735	1 Point General Account	\$9,865.25	Barry Stokes	CASH

In violation of Title 18, United States Code, Sections 401(3) and 2.

COUNT SEVENTY-EIGHT: BANKRUPTCY FRAUD

THE GRAND JURY FURTHER CHARGES:

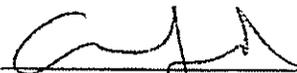
19. The allegations of paragraphs 1 through 7 of this Indictment are hereby realleged and incorporated as if fully set forth herein.

20. On or about March 21, 2007, in the Middle District of Tennessee and elsewhere, **BARRY R. STOKES**, after the filing of a bankruptcy case under Title 11 and in contemplation thereof, did knowingly and fraudulently create a false document relating to the property and financial affairs of a debtor, to wit, knowing that the bankruptcy trustee intended to seize an asset of the bankruptcy estate, to wit, a Chevrolet Malibu purchased by **BARRY R. STOKES** with \$7,496.00 in funds from 1 Point Solutions, **BARRY R. STOKES** did create a false receipt, dated July 16, 2006 that stated, in the hand-writing of **BARRY R. STOKES**, "I, Barry Stokes, received this day, July 16, 2006, from Gale Carrier, \$4,000.00 (Four Thousand Dollars and No Cents) as payment in full for the below vehicle. Her debt to me is paid in full "

In violation of Title 18, United States Code, Sections 152(8) and 2

A TRUE BILL


FOREPERSON


CRAIG S. MORFORD
UNITED STATES ATTORNEY