

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**MARILYN LUANN NOLAN,**  
[DOB: 01/14/1951],

Defendant.

No.

18-03133-01-CR-S-BW  
18 U.S.C. § 371

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Mandatory Restitution

Class D Felony

\$100 Special Assessment

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this Information, unless otherwise set forth, with all dates and times alleged to be “on or about” or “in or about,” and all amounts alleged to be “approximately:”

**GENERAL ALLEGATIONS**

**The Charity**

1. Preferred Family Healthcare, Inc. (“PFH”) was a Missouri nonprofit corporation headquartered at 1111 South Glenstone Avenue, in Springfield, Greene County, Missouri, within the Western District of Missouri. PFH and its subsidiaries provided a variety of services to individuals in Missouri, Arkansas, Kansas, Oklahoma and Illinois, including mental and behavioral health treatment and counseling, substance abuse treatment and counseling, employment assistance, aid to individuals with developmental disabilities, and medical services. Originally, and for most of its existence, PFH was known as Alternative Opportunities, Inc. (“AO”), a Missouri nonprofit corporation formed on December 3, 1991, and headquartered at 1111 South Glenstone Avenue, in Springfield, Missouri. Effective May 1, 2015, AO merged with Preferred Family Healthcare, Inc., of Kirksville, Missouri, with the merged entity (the “Surviving

Corporation”) retaining the PFH name and corporate charter. (Hereinafter, “the Charity” shall refer to the entity known as Preferred Family Healthcare, Inc., after April 30, 2015, and Alternative Opportunities, Inc., prior to May 1, 2015.)

2. Both AO and PFH were recognized by the Internal Revenue Service (“IRS”) as non-profit public charities under Section 501(c)(3) of the Internal Revenue Code (United States Code, Title 26). AO applied for and was granted exemption from federal income tax under Internal Revenue Code Section 501(a)(2) as an organization described in Internal Revenue Code Section 501(c)(3) by Internal Revenue Service Letter 1045, dated August 25, 1993. AO’s Articles of Incorporation, attached to its application for tax-exempt status, stated that the corporation’s purpose was “[t]o provide supportive and alternative opportunities for individuals with mental retardation/developmental disabilities and other special needs. The organization is organized exclusively for charitable purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code.”

3. For the fiscal years 2005 through 2016, each fiscal year beginning July 1 of the indicated year, and ending on June 30 of the following year, the Charity had total revenue exceeding one billion dollars, as indicated below:

<b>Fiscal Year Ending</b>	<b>Fiscal Year</b>	<b>Entity</b>	<b>Total Revenue</b>
June 30, 2006	FY2005	AO	\$ 22,619,717
June 30, 2007	FY2006	AO	\$ 31,924,406
June 30, 2008	FY2007	AO	\$ 56,581,900
June 30, 2009	FY2008	AO	\$ 68,696,111
June 30, 2010	FY2009	AO	\$ 63,847,299
June 30, 2011	FY2010	AO	\$ 64,779,466
June 30, 2012	FY2011	AO	\$ 77,271,030
June 30, 2013	FY2012	AO	\$ 77,112,631
June 30, 2014	FY2013	AO	\$ 90,033,026
April 30, 2015*	FY2014	AO	\$ 89,844,968
June 30, 2015	FY2014	PFH	\$ 66,264,806
June 30, 2016	FY2015	PFH	\$ 181,724,157

<b>Fiscal Year Ending</b>	<b>Fiscal Year</b>	<b>Entity</b>	<b>Total Revenue</b>
June 30, 2017	FY2016	PFH	\$ 197,831,314
<b>Total:</b>			<b>\$1,088,530,831</b>

\* For AO, FY2014 ended 04/30/2015 because AO merged with the Kirksville, Missouri based Preferred Family Healthcare, Inc.

4. Most of PFH’s funding was from appropriated federal funds—the largest portion of that being Medicaid reimbursement. For the calendar years 2011 through 2016, the Charity received more than \$384,000,000 in Medicaid reimbursements from the states of Arkansas, Kansas, Missouri, and Oklahoma, the Federal portion of which was more than \$255,000,000.

5. For the fiscal years 2005 through 2017, each fiscal year beginning July 1 of the indicated year, and ending on June 30 of the following year, the Charity received annually at least \$10,000 in funds from the Federal government, more particularly, the Departments of Health and Human Services (“HHS”), Labor (“DOL”), Veterans Affairs (“VA”), Housing and Urban Development (“HUD”), Justice (“DOJ”), Agriculture (“USDA”), and Education (“DoED”) under programs involving grants, contracts, loans, guarantees, insurance, and other forms of federal assistance.

#### **The Defendant**

6. The defendant **MARILYN LUANN NOLAN** (“NOLAN”), a resident of Springfield, Missouri, began working at the charity in 1992. NOLAN was the Charity’s Chief Executive Officer (“CEO”), and oversaw the Charity’s lobbying and governmental affairs activities. NOLAN had authority to approve and direct payments of funds and enter into agreements on behalf of the Charity.

#### **Other Persons and Entities**

7. “Person #1,” a resident of Springfield, Missouri, Boulder, Colorado, and Westminster, Colorado, was one of the original founders of the Charity. Person #1 was the

Charity's Chief Financial Officer ("CFO"), and had authority to approve and direct payments of funds and enter into agreements on behalf of the Charity.

8. "Person #2," a resident of Springfield, Missouri, Boulder, Colorado, and Westminster, Colorado, began working for the charity in 1994. Person #2 was the Charity's Chief Operating Officer ("COO"), and served as the chief administrator over personnel in all programs and services. Person #2 had authority to approve and direct payments of funds and enter into agreements on behalf of the Charity, and was commonly recognized as the "boss" of the Charity.

9. Keith Fraser Noble ("Noble"), charged elsewhere, was a Licensed Psychologist and Certified Substance Abuse Counselor. Noble was a consultant for the Charity before joining the Charity in 1994, and thereafter held the position of Director of Clinical Services until approximately 2014 or 2015 when his title was changed to Chief Clinical Officer ("CCO"). Noble was responsible for overseeing clinical operations and the provision of services, quality control matters, and assisting in drafting the Charity's grant proposals involving clinical and medical grants.

10. The term "Resource Team," often abbreviated "RT," was used within the Charity to refer to the Charity's highest level of executive leadership. The composition of the Resource Team changed slightly over time, but throughout the period relevant to this Information, the RT included Person #1, Person #2, NOLAN, and Noble. "Person #15," one of the original founders of the Charity was a member of the RT until 2006. "Person #16" was a member of the RT from 2006 through 2015.

11. Milton Russell Cranford, also known as "Rusty" Cranford ("Cranford"), charged elsewhere, was a resident of Rogers, Arkansas and lobbyist registered with the Arkansas Secretary of State. Beginning in 2007, upon the Charity's acquisition of Dayspring Behavioral Health

Services, Cranford also was an employee of the Charity, serving as its executive overseeing company operations in the state of Arkansas. Also, Cranford operated three lobbying firms: The Cranford Coalition, The Capitol Hill Coalition, and Outcomes of Arkansas.

12. Eddie Wayne Cooper (“Cooper”), charged elsewhere, was an Arkansas State Representative from 2006 through January 2011, and a lobbyist registered with the Arkansas Secretary of State from January 20, 2011, onward. On April 20, 2009, the Charity hired Cooper as a full-time employee, with the job title of “Regional Director.” Cooper’s employment with the Charity ended on April 26, 2017. From October 2009 through April 2015, Cooper also was a member of AO’s Board of Directors. Cooper also worked for The Cranford Coalition as a lobbyist, and received payments from The Cranford Coalition as a contract employee.

13. Donald Andrew Jones, also known as “D.A.” Jones (“Jones”), charged elsewhere, was a resident of Willingboro, New Jersey, and a Philadelphia, Pennsylvania-based political operative. Jones owned and operated the firm, D.A. Jones & Associates, which purported to provide political and advocacy services, including consulting, analysis, and public relations.

14. “Entity A” was a Missouri limited liability company (“LLC”) that was used as the management company for AO. Entity A was formed in 1995 by Person #1, Person #2, NOLAN, Noble, and three of their associates. In 2006, Entity A was sold to “Company A,” a publicly-traded corporation, by its five remaining owners: Person #1, Person #2, NOLAN, Noble, and Person #15; however, Person #1 continued to exercise actual control over the bank accounts and activities of Entity A.

15. “Entity B” was a Missouri LLC formed in 2005, and owned by Person #1, Person #2, NOLAN, Noble, and one other person. Immediately prior to the 2006 sale of Entity A to Company A, Entity B acquired title to all real estate formerly held by Entity A.

16. “Entity C” was a Missouri LLC formed in 2007, and owned by Person #1, Person #2, NOLAN, Noble, and Entity B. Entity C held the title to the building located at 1111 Glenstone Avenue, in Springfield, Missouri, which was the corporation’s headquarters, and duplex homes located on Olive Street, in Springfield, Missouri.

17. Jonathan Earl Woods (“Woods”), charged elsewhere, served as a Senator in the Arkansas Senate from 2013 to 2017. As a member of the Arkansas Senate, Woods represented District 7 of the State of Arkansas, which includes Washington County, Arkansas. As a Senator, Woods had responsibility and authority to, among other things, draft and vote on proposed bills and legislation, to appropriate government monies including funds from the State of Arkansas’s General Improvement Fund (“GIF”), and to direct the allocation of GIF monies. Prior to his service in the Arkansas Senate, Woods served as a Representative of House District 93 in the Arkansas House of Representatives from 2007 until 2012. Both House District 93 and Senate District 7 are located in the Western District of Arkansas.

18. “Person #14” was an individual who was close to Woods.

19. “Arkansas Senator A” served as a Senator in the Arkansas Senate from 2011 to the present. Prior to his service in the Arkansas Senate, Arkansas Senator A previously served as a Representative in the Arkansas House of Representatives from 2000 until 2007. Arkansas Senator A was also an attorney during all times material to this Indictment doing business as Law Firm A.

20. Henry Wilkins IV (“Wilkins”), charged elsewhere, served as a Representative of House District 17 in the Arkansas House of Representatives from 1999 to 2001, and again from 2011 to 2015. Wilkins also served as a Senator representing District 5 in the Arkansas Senate from 2001 to 2011. Both House District 17 and Senate District 5 are located in the Eastern District

of Arkansas. Wilkins also served as a pastor at St. James United Methodist Church (“SJUMC”) located in Pine Bluff, Arkansas.

21. “Person #18” was a member of the Charity’s Board of Directors, and also a lobbyist registered with the State of Oklahoma. From September 2008 to August 2017, the Charity paid Person #18 funds totaling approximately \$413,575.

22. “Lobbying Firm D” was a Missouri LLC, located in Jefferson City, which provided various public affairs services to clients, including lobbying, consulting, governmental relations, and public relations. Lobbying Firm D was operated by “Person #19” and “Person #20.” From October 2008 until September 2017, the Charity paid Lobbying Firm D funds totaling approximately \$914,400.

#### **Restrictions on Political Activity by Public Charities**

23. Section 501(c)(3) organizations were absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of, or in opposition to, any candidate for elective public office. Contributions to political campaign funds violated this prohibition, and could have resulted in denial or revocation of tax-exempt status and the imposition of certain excise taxes.

24. Further, organizations not considered “electing organizations” (those making an election under Section 501(h), which election the Charity did not make) were subject to the “No Substantial Part” rule, which provided that no substantial part of the organization’s activities could constitute carrying on propaganda, or otherwise attempting to influence legislation. So the IRS and the public could monitor tax-exempt organizations’ compliance with the “No Substantial Part” Rule, Section 501(c)(3) organizations not making an election under Section 501(h), including the

Charity, were required to disclose any and all lobbying activity in Part IX (Statement of Functional Expenses) of their annually-filed IRS Forms 990.

**The Charity's IRS Forms 990**

25. For the fiscal years 2008 through 2016, each fiscal year beginning July 1 of the indicated year, and ending on June 30 of the following year, the Charity filed IRS Forms 990 as set forth below:

<u>Entity</u>	<u>Period</u>	<u>Form 990 Due Date</u>	<u>Form 990 Filed Date</u>	<u>Officer's signature</u>
AO	FY2008	05/15/2010	05/17/2010	Person #1
AO	FY2009	05/15/2011	05/16/2011	<b>NOLAN</b>
AO	FY2010	05/15/2012	05/15/2012	Person #1
AO	FY2011	05/15/2013	05/15/2013	Person #1
AO	FY2012	05/15/2014	05/15/2014	Person #1
AO	FY2013	05/15/2015	05/13/2015	Person #1
AO	FY2014	05/15/2016	03/15/2016	Person #1
PFH	FY2014	05/15/2016	05/16/2016	Person #1
PFH	FY2015	05/15/2017	05/15/2017	Person #1

26. In Part IX (Statement of Functional Expenses) of each IRS Form 990 listed above, the Charity reported that it had expenses related to lobbying and political activity in the amounts set forth below:

<u>Period</u>	<u>Fiscal Year Ending</u>	<u>Line 11d<sup>2</sup></u>	<u>Schedule C, Part II-B, Line 1f<sup>3</sup></u>	<u>Schedule C, Part II-B, Line 1g<sup>4</sup></u>	<u>Line 18<sup>5</sup></u>
FY2008	June 30, 2009	\$0	No	\$49,000	\$0
FY2009	June 30, 2010	\$0	No	\$54,000	\$0
FY2010	June 30, 2011	\$0	\$0	\$54,904	\$0
FY2011	June 30, 2012	\$0	\$0	\$78,248	\$0
FY2012	June 30, 2013	\$0	\$0	\$185,010	\$0
FY2013	June 30, 2014	\$0	\$843,700	\$48,000	\$0
FY2014 (AO)	April 30, 2015 <sup>1</sup>	\$109,254	\$0	\$109,254	\$0
FY2014 (PFH)	June 30, 2015	\$134,600	\$0	\$0	\$0
FY2015	June 30, 2016	\$367,700	\$0	\$0	\$0

<sup>1</sup> For AO, FY2014 ended 04/30/2015 because AO merged with the Kirksville, Missouri based Preferred Family Healthcare, Inc.

<sup>2</sup> Line 11d: Lobbying.



<sup>3</sup> Schedule C, Part II-B, Line 1f: Grants to other organizations for lobbying purposes.

<sup>4</sup> Schedule C, Part II-B, Line 1g: Direct contact with legislators, their staff, government officials, or a legislative body.

<sup>5</sup> Line 18: Payments of travel or entertainment expenses for any federal, state, or local public officials.

### **Restrictions on Political Activity by Recipients of Federal Grants**

27. Recipients of Federal contracts, grants, loans, and cooperative agreements, were prohibited by law from expending appropriated funds to pay any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

28. As a prerequisite for making or entering into any Federal contract, grant, loan, or cooperative agreement, Title 31, United States Code, Section 1352, required the applicant/recipient to agree to follow the lobbying restrictions in accordance with Title 29, Code of Federal Regulations, Part 93—Appendix A, and to certify that: (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement; and (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer

or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or a cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. The above certifications were material representations upon which Federal agencies, and State agencies disbursing Federal funds, relied in determining whether the recipients were eligible to receive Federal funds, and that they spent those funds in accordance with the law.

**THE CHARGE**  
**(Conspiracy)**

29. The factual allegations of Paragraphs 1-31 of this Indictment are hereby re-alleged and incorporated as though fully set forth.

**Object of the Conspiracy**

30. From a date unknown, but at least as early as 2008, until on or about June 30, 2017, in Greene County, Missouri, in the Western District of Missouri, and elsewhere, Person #1, Person #2, NOLAN, and Cranford, conspired and agreed with each other, and with others known and unknown to the United States, to embezzle, steal, obtain by fraud, and without authority knowingly misapply and convert to their use, property worth at least \$5,000 and under the care, custody, and control of the Charity, an organization receiving in each one-year period from July 1, 2008, through June 30, 2017, benefits in excess of \$10,000 under the Federal programs set forth above, that is, millions of dollars that were misapplied for substantial, undisclosed payments to lobbying firms and political advocates, monetary and in-kind contributions to the campaigns of candidates for public office, and to bribe public officials; in violation of Title 18, United States Code, Section 666(a)(1)(A).

### **Manner and Means**

31. The manner and means by which the conspirators achieved and attempted to achieve the objects of the conspiracy included but were not limited to the following:

32. The conspirators caused the Charity to misapply funds for substantial, undisclosed lobbying and political advocacy, monetary and in-kind contributions to the campaigns of candidates for public office, and to bribe public officials—jeopardizing the Charity’s tax-exempt status in order to increase revenue, and thereby enrich themselves.

### **Lobbying and Political Advocacy**

33. The conspirators caused the Charity to misapply its funds to pay for lobbying that violated the “No Substantial Part” rule applicable to tax-exempt organizations (meaning, attempting to influence legislation), and which they concealed from the IRS and did not disclose on the Charity’s Forms 990.

34. Moreover, the conspirators caused the Charity to misapply its funds for political advocacy, including lobbying in violation of the restrictions on organizations receiving public funds (meaning, expending appropriated funds to pay any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement), and which they concealed from and did not disclose to the agencies awarding grants and contracts.

35. The conspirators caused the Charity to expend resources for lobbying and political advocacy, directly and through Entity A and Entity B, including: (a) substantial work performed

by NOLAN, who in addition to holding the title of Chief Executive Officer supervised government relations for the Charity and directly lobbied legislators; (b) payments to Lobbying Firm D; (c) payments to the Cranford Coalition; (d) payments to Donald Andrew Jones; and (e) payments to Person #18.

### **Political Campaign Contributions**

36. Person #1, Person #2, NOLAN, and Cranford caused the Charity to contribute financially to the campaigns of candidates for public office through “straw donors” including the Charity’s lobbyists, which indirect contributions were prohibited by law just as if the payments had been made by the Charity directly.

37. Frequently, the conspirators caused the Charity to reimburse its lobbyists by way of invoices falsely describing the expenses as “training” and “consulting.”

38. Additionally, the conspirators encouraged some Charity employees to contribute to candidates for public office and caused the Charity to reimburse them for those contributions by providing funds described as reimbursement for travel or other expenses the employees had not actually incurred.

39. The making of illegal campaign contributions was an integral part of the Charity’s political operations, and regularly, Person #1 and Cranford discussed the Charity’s “budget” for campaign contributions—which was not a budget category in the Charity’s books and records.

### **Organizing and Paying For Candidates’ Fund-Raising Events**

40. The conspirators caused the Charity to provide in-kind contributions to the campaigns of candidates for public office, which were prohibited by law since the Charity was a tax-exempt organization.

41. In Arkansas, Cranford, Cooper and others organized fundraisers for many candidates running for seats in the Arkansas State Senate and Arkansas House of Representatives. At Cranford's direction, "Employee D" prepared and disseminated invitations for the events, which were often held at venues such as restaurants and hotels in Little Rock, Arkansas. Cranford, Cooper and others paid for expenses related to the fundraisers using their Charity-issued corporate credit cards.

42. In Missouri, at the direction of NOLAN and Person #1, "Employee H" organized fundraisers for several candidates running for seats in the Missouri State Senate, Missouri House of Representatives, and the Greene County Commission. At the direction of NOLAN, Employee H prepared and disseminated invitations to these fundraising events, using the Charity's resources. At the direction of NOLAN, Employee H arranged for catering, liquor, decorations, and other food. Employee H used his/her Charity-issued corporate credit card for the purchases, with NOLAN's knowledge.

### **Bribes**

43. Some of the funds misapplied by the conspirators were used to bribe elected public officials. Person #1, Person #2, and Cranford offered and gave things of value to numerous public officials, in exchange for their official actions benefitting the Charity and themselves personally, including: travel and entertainment not reported on IRS Forms 990, premium tickets to sporting events, hotel accommodations, and use of the Charity's luxury/recreational real estate; hiring public officials and family members of public officials as Charity employees; disguising bribes as contract payments for things such as consulting, training, and legal services; and cash.

44. In or about 2010-2017, Person #1, Person #2, Cranford, and others known and unknown to the United States, paid bribes in the form of money and other things of value to Woods,

Wilkins, Arkansas Senator A, and others known and unknown to the United States, in exchange for them providing favorable legislative action for the Charity, and others known and unknown to the United States.

### **Concealment and False Statements**

45. Concealment of the schemes was an integral and necessary part of the conspiracy. To provide a veneer of legitimacy for the unlawful payments to others and to disguise the nature and source of the payments, the conspirators caused the Charity's books and records to misrepresent, conceal, and cover up the nature of the services provided by elected public officials, lobbyists and advocates, and financial contributions to elected public officials and their political campaigns, by falsely describing such payments as being for training and consulting, and by causing the Charity to execute sham consulting agreements, training agreements, and agreements for other services.

### **Overt Acts**

46. In furtherance of the conspiracy, and to accomplish its objects, defendant **MARILYN LUANN NOLAN**, Person #1, Person #2, Cranford, and others known and unknown to the United States, committed the following overt acts, among others, in the Western District of Missouri and elsewhere:

#### **Payments to Lobbyists and Political Advocates**

##### *Payments to Lobbying Firm D*

47. At least as early as 2008, the conspirators, in their capacity as executives of the Charity, caused the Charity to pay for the services of Lobbying Firm D for lobbying and advocacy services. Lobbying Firm D solicited the assistance of elected and appointed officials regarding legislative issues that impacted the Charity.

48. From October 3, 2008, until September 3, 2017, the conspirators caused the Charity to disburse funds to Lobbying Firm D, directly and through its related for-profit corporation in the following amounts:

<b>Calendar Year</b>	<b>The Charity</b>	<b>Entity A</b>	<b>Total</b>
2008	\$ -	\$ 24,000.00	\$ 24,000.00
2009	\$ -	\$ 80,343.00	\$ 80,343.00
2010	\$ -	\$109,367.00	\$109,367.00
2011	\$ -	\$120,000.00	\$120,000.00
2012	\$ 10,000.00	\$ 75,912.00	\$ 85,912.00
2013	\$ 36,128.00	\$ 36,000.00	\$ 72,128.00
2014	\$ 72,000.00	\$ -	\$ 72,000.00
2015	\$132,000.00	\$ -	\$132,000.00
2016	\$120,000.00	\$ -	\$120,000.00
2017	\$ 98,650.46	\$ -	\$ 98,650.46
<b>Total</b>	\$468,778.46	\$445,622.00	\$914,400.46

49. On December 4, 2013, Person #1 e-mailed Person #2 and NOLAN, suggesting the company “drop” Lobbying Firm D. On December 4, 2013, NOLAN responded to Person #1 and Person #2 in part stating “[Person #19] is doing a whole lot on the license stuff to help assure we keep the ones we want to keep – they are also assisting VR with [U.S. Senator #3] as well...”

*Payments to The Cranford Coalition*

50. Person #1, acting in his capacity as an executive of the Charity, caused the Charity enter into a contract with The Cranford Coalition, and influenced the Charity in its award of the contract whereby the Charity paid The Cranford Coalition for lobbying and advocacy services.

51. Doing business as The Cranford Coalition, from 2010 through 2017, Cranford, Cooper, and others, known and unknown, solicited the assistance of elected and appointed officials regarding legislative issues that impacted the Charity, in particular matters involving the Charity,

and in steering grants and other sources of funding to the Charity. These funding sources included proceeds from the Arkansas General Improvement Fund (“GIF”).

52. From January 15, 2010, until April 11, 2017, Person #1, Person #2, and NOLAN caused the Charity to disburse funds to The Cranford Coalition, directly and through its related for-profit corporations, into Cranford Coalition’s checking account at BancorpSouth ending in 2316, from the following entities and in the following amounts:

<b>Calendar Year</b>	<b>The Charity</b>	<b>Entity A</b>	<b>Entity B</b>	<b>Total</b>
2010	\$0	\$81,550.00	\$2,000.00	\$83,550.00
2011	\$0	\$213,750.00	\$0	\$213,750.00
2012	\$7,900.00	\$304,500.00	\$0	\$312,400.00
2013	\$795,615.00	\$663,500.00	\$60,000.00	\$1,519,115.00
2014	\$337,024.73	\$0	\$0	\$337,024.73
2015	\$547,750.00	\$0	\$0	\$547,750.00
2016	\$310,000.00	\$0	\$0	\$310,000.00
2017	\$184,000.00	\$0	\$0	\$184,000.00
<b>Total</b>	<b>\$2,182,289.73</b>	<b>\$1,263,300.00</b>	<b>\$62,000.00</b>	<b>\$ 3,507,589.73</b>

*Payments to Donald Andrew Jones*

53. At least as early as 2012, Cranford and Person #1, acting in their capacity as executives of the Charity, caused the Charity to pay for the services of Donald Jones and his firm D.A. Jones & Associates. Jones, doing business as D.A. Jones & Associates, solicited the assistance of elected and appointed officials regarding legislative issues that impacted the Charity.

54. From January 2, 2012, until December 14, 2016, the conspirators caused the Charity to disburse funds to Jones, directly and through its related for-profit corporation in the following amounts:

<b>Calendar Year</b>	<b>The Charity</b>	<b>Entity A</b>	<b>Total</b>
2012	\$ 2,813.38	\$ 72,000.00	\$ 74,813.38
2013	\$180,000.00	\$125,000.00	\$305,000.00
2014	\$152,786.42	\$ -	\$152,786.42



<b>Calendar Year</b>	<b>The Charity</b>	<b>Entity A</b>	<b>Total</b>
2015	\$153,541.76	\$ -	\$153,541.76
2016	\$146,315.72	\$ -	\$146,315.72
<b>Total</b>	<b>\$635,457.28</b>	<b>\$197,000.00</b>	<b>\$832,457.28</b>

*Payments to Person #18*

55. At least as early as 2012, the conspirators, as executives of the Charity, caused the Charity to pay for the services of Person #18. In Oklahoma, Person #18 solicited the assistance of elected and appointed officials regarding legislative issues that impacted the Charity.

56. From at least September 29, 2008, until August 29, 2017, the conspirators caused the Charity to disburse funds to Person #18, directly and through its related for-profit corporation in the following amounts:

<b>Calendar Year</b>	<b>The Charity</b>	<b>Entity A</b>	<b>Total</b>
2008	\$ 3,000.00	\$ 9,000.00	\$ 12,000.00
2009	\$ -	\$ 33,000.00	\$ 33,000.00
2010	\$ -	\$ 37,000.00	\$ 37,000.00
2011	\$ -	\$ 48,000.00	\$ 48,000.00
2012	\$ -	\$ 36,000.00	\$ 36,000.00
2013	\$ 28,000.00	\$ 28,000.00	\$ 56,000.00
2014	\$ 48,000.00	\$ -	\$ 48,000.00
2015	\$ 66,000.00	\$ -	\$ 66,000.00
2016	\$ 77,575.00	\$ -	\$ 77,575.00
2017	\$ 42,000.00	\$ -	\$ -
<b>Total</b>	<b>\$264,575.00</b>	<b>\$191,000.00</b>	<b>\$413,575.00</b>

**Campaign Contributions and Fundraisers**

57. On August 6, 2010, Cranford sent an e-mail to Person #1 and Person #2, stating “I think we need to look at the geographic area too. Like Senators we are very close to for more gif. I didn’t want to say that in work group.”

58. On or about June 2, 2011, Cranford used his Charity corporate credit card at Sim's Bar-B-Que in Little Rock, Arkansas. The transaction totaled \$1,812 and was for a fundraiser for Arkansas Senator B.

59. On October 26, 2011, Person #2 sent an e-mail to Cranford, stating, "What has [Person #8] said?"

60. On October 26, 2011, Cranford responded to Person #2 stating "Nothing , could not reach him yesterday. All he wants is for us to give him a huge fundraiser like we did ["Arkansas Executive Branch Official B"] and he is not the person to do that for."

61. On or about November 8, 2011, Cranford and Cooper used their Charity corporate credit cards at Anderson's Cajun in Little Rock, Arkansas. The transaction totaled \$2,500. Cranford and Cooper divided the transaction and each put \$1,250 on their individually issued Charity corporate credit card.

62. On January 4, 2012, Cranford sent an e-mail to Person #1, stating, in part, "Here is [Person #8] check , we still have to do another \$8000. That is what [Person #2] wanted to do. This is not apart of our campaign budget." Attached to Cranford's e-mail to Person #1 was a copy of check #1719 in the amount of \$2,000, payable to [Person #8] for Senate.

63. On January 13, 2012, Cranford sent an e-mail to Person #1 stating:

Here is copies of checks we were hit with this week. Welcome to campaign season and 2012. " The YEAR of The Greed" is what it is called! We documented the big big checks so you would know who these people are, it came to \$7000.00. This is contributions well spent. The biggest wast [sic] of campaign funds is to our on employee and you know who that is.

Attached to Cranford's e-mail to Person #1 on January 13, 2012, were nine checks totaling \$7,000, all drawn on The Cranford Coalition's account and payable to elected public officials in the Arkansas State Senate and Arkansas State House of Representatives.

64. On or about May 30, 2012, Cranford and Cooper used their Charity corporate credit cards at The Capital Hotel in Little Rock, Arkansas. The transaction totaled \$5,000. Cranford and Cooper divided the transaction and each put \$2,500 on their individually issued Charity corporate credit card. This was to pay for a fundraiser for [“Arkansas Executive Branch Official C”], who was a candidate for Governor of Arkansas.

65. On June 1, 2012, Cranford sent an e-mail to Person #1, stating “Sir, [NOLAN] wanted me to send this to you, to see if you wanted [“Employee K”] to reimburse us or how you wanted it handled. This was the [Arkansas Executive Branch Official C] event that [they] wanted us to do and was coming down to it this week but could not make it at the last minute. Coop and I went instead.” Attached to Cranford’s e-mail to Person #1 on June 1, 2012, were two checks totaling \$5,000. One check, in the amount of \$2,000, was drawn on NOLAN’s personal account at Arvest Bank, and the other check, in the amount of \$3,000 was drawn on The Cranford Coalition’s account at Bancorp South. Both checks were made payable to the political action committee of Arkansas Executive Branch Official C.

66. NOLAN was listed as a host for the fundraising events:

- a. On September 2, 2010, Employee H sent an email to NOLAN, Person #1 and Person #2, in part stating, “Here is an update on where things are in regard to the fundraiser: I have ordered food from Touch and have gone over the menu with Marilyn.” Employee H also stated he/she had talked to four Charity employees about being at the fundraiser.
- b. On September 7, 2010, Person #1, Person #2, NOLAN, Noble, Person #16 and two others hosted a fundraiser for “Missouri Senator B,” who was then a candidate for the Missouri State Senate. This event was held at the home of Employee H. Expenses related to the reception were paid by Employee H, using the Charity’s corporate credit card.
- c. NOLAN requested Employee H attend a fundraiser for “Missouri Senator C” on February 22, 2011 in Jefferson City, Missouri. On February 21, 2011, NOLAN sent an e-mail to an individual associated with, Missouri Association of Rehabilitation Facilities (“MARF”), stating “I can’t make it but

[Employee H] has studied the bill and is ready to help---they have a pretty good relationship...he is bringing a check from me..."

- d. On February 16, 2012, Person #1, NOLAN, and others hosted a fundraiser for "Missouri Senator A," who was then a candidate for the Missouri State Senate. This event was held at the home of Employee H. Expenses related to the reception were paid by Employee H, using the Charity's corporate credit card.
- e. On March 15, 2012, the Charity's Board of Directors held a meeting at Employee H's condominium building, in conjunction with a fundraiser for Missouri Representative A, who was then a candidate for the Missouri State Senate. The fundraiser, also held at Employee H's residence, was hosted by Person #1, Person #2, NOLAN, Noble, and four others. Employee H prepared and disseminated invitations for the fundraiser as part of his/her job duties at the Charity.

67. On August 15, 2013, "Employee A," who then ran the accounting department at the Charity, sent an e-mail to Person #1 and Person #2, stating:

["Employee B"] wrote 3 checks to Cranford Coalition (\$24000, \$7000, \$144000) that were posted to prepaid as you wanted them expensed over FY 13-14.

They appear to be contribution checks to cover checks that Rusty wrote from The Cranford Coalition.

I don't think we can expense them to contributions so what would you like for ["Employee C"] to expense them to each month?"

68. On August 15, 2013, Person #2 forwarded the e-mail to Person #1 and NOLAN, stating "Pls keep [NOLAN] in the loop on this."

69. On August 16, 2013, NOLAN replied in an e-mail to Person #1 and Person #2, stating "Rusty told me he thought you were calling consultation - - - why does [Employee A] think contribution? We cannot call contribution..."

70. On August 16, 2013, Person #1 replied to NOLAN stating, "I told her consult and training. Will send again."

71. On August 16, 2013, NOLAN replied to Person #1's e-mail immediately above, stating, "I do not like her inferring contribution..."

72. On September 20, 2013, Employee B sent an e-mail to NOLAN stating, “Attached are the Cranford Coalition invoices for yesterday and today’s check.” Attached to the e-mail was Invoice 091913A, dated September 19, 2013, from “Cranford Coalition” requesting payment from the Charity in the amount of \$15,000. The invoice lists “Consulting/ Lobbying” in the description section.

73. On September 20, 2013, NOLAN sent an e-mail to Cranford, stating: “Do not --- and I repeat --- do not --- put lobbying on another invoice --- just put consultation or training and development...”

74. On or about November 5, 2013, Cranford and Cooper used their Charity corporate credit cards at Sue’s Kitchen in Jonesboro, Arkansas. The transaction totaled \$2,540. Cranford and Cooper divided the transaction and each put \$1,270 on their individually issued Charity corporate credit card. This was to pay for a fundraiser for Person #10, a candidate for the Arkansas State Senate.

75. On December 5, 2013, Person #1 sent an e-mail to Cranford, stating “Do you have a list of folks we need to give money to and how much each for 2014. I want to start working on that. Don’t payout of [The Cranford Coalition] because of taxes unless I tell you to. Just get me the list and I will figure out how to do it without you getting hit tax wise.”

76. On December 5, 2013, Cranford replied by e-mail to Person #1, stating “You are talking about contributions correct.”

77. On December 5, 2013, Person #1 replied by e-mail to Cranford, stating, “Yes. That \$75k to \$100k [NOLAN] was talking about for 2014.”

78. On December 6, 2013, Person #2 e-mailed Cranford and courtesy copied Person #1, stating, in part:

I talked to [Person #1] about the GIF issue today. Would you please discuss it with him in more detail.

I took the initiative to talk to [NOLAN] and [NOLAN] is comfortable with the last verbal agreement we had.

If you don't feel that is reasonable, please let me know and we will try to work out something else.

On Thursday we all need to discuss what agreements are in place if we pursue GIF again next year, so neither [Person #1] and you, or I, will be disappointed. I believe [NOLAN] will be okay with whatever I propose to [NOLAN].

79. On February 2, 2014, Cranford e-mailed NOLAN, stating:

Here are the (3) I was talking about. Let me know when you want to visit on the ones we need to have made from up there.

We need; Senator [redacted], Senator [redacted], [Arkansas Senator B], Senator [redacted], Senator [redacted] for sure. Also, we had talked about doing something at the Lake House for ["Arkansas Executive Branch Official A"] way back when, do we still want to do this? It doesn't matter to me.

Attached to Cranford's e-mail to NOLAN on February 2, 2014, were three checks totaling \$5,000, each payable to an Arkansas elected public official.

80. On February 11, 2014, Cranford e-mailed NOLAN with an invoice attached. The invoice, number 5999, was in the amount of \$5,000 and the purported purpose was "Training."

81. On September 18, 2014, Cranford sent NOLAN an e-mail stating "I have more if you need." Attached to this e-mail was a list of check numbers, payees and dollar amounts, totaling \$50,517.25. The individuals listed as the payees included politicians and Charity employees who were reimbursed for political donations.

82. On January 19, 2015, Cranford sent an e-mail to NOLAN with an attachment. The attachment was titled "doc12590820150119102313" and was a scanned image of a check #2464. This check was dated January 8, 2015, payable to [Missouri Senator A] in the amount of \$5,000. The check was written from The Cranford Coalition, Inc. checking account at BancorpSouth.

## **Bribes**

### *The Conspirators Offered and Gave Bribes to Woods*

83. In or about 2013, Cranford met Woods at various locations and times and offered and gave, and Woods accepted, more than five thousand dollars (\$5,000) in cash bribe payments. Cranford also provided other things of value to Woods, such as employment for Woods' associates. These cash payments and other things of value were provided to Woods with the understanding that in exchange, Woods would use his official position to take legislative action to benefit Cranford, Cranford clients, and the Charity.

84. In or about October 2013, Cranford assisted Person #14 in obtaining a job in exchange for Woods influencing and facilitating the granting of GIF funds to the Charity. Cranford caused, or caused others, to perform the following acts to obtain employment for Person #14:

a. In or about October 2013, Cranford discussed with Person #2 and other Charity employees that Person #14 was applying for a job at the Charity and that Person #14 was someone close to Woods.

b. On October 15, 2013, Person #1 sent an email to Cranford stating, "AO/Dayspring would like to interview [Person #14] for an executive position of Employee Placement for all of Arkansas. Pay would be \$90,000. Get with [Person #2]. A salary of that size needs a title to go with it." Approximately two minutes later, Cranford responded to Person #1, asking, "Are we in trouble." Person #1 responded, "[n]o, I told [Person #2] it would be funded. [Person #2] said it needed to be in [the Charity] because of the size and has exec team of similar levels." Person #1 also replied stating, "Senator is taken care of. He is new bubba for our team."

c. Cranford understood Person #14 was being interviewed and considered for the executive position in exchange for Woods influencing and facilitating the granting of GIF funds to the Charity.

d. On October 16, 2013, Person #14 sent an email to Cranford attaching his/her resume “as requested.”

e. On February 10, 2014, a “Request for New Hire/Personnel Changes” was generated relating to the hiring of Person #14. This request showed the creation of a new position for Person #14 with the title “AR-OJT Program Coordinator” and a salary of \$70,000 per year with \$300 per month mileage expense and a cell phone reimbursement.

f. After the AR-OJT Program Coordinator was eventually vacated by Person #14, the position was advertised and hired with a wage of \$16.83 per hour (or \$35,006.40 per year) as well as the mileage and cell phone expense.

*The Conspirators Offered and Gave Bribes to Wilkins*

85. Cranford directed cash and checks from the Charity to Wilkins in exchange for Wilkins taking favorable legislative action on behalf of the Charity, and others known and unknown to the United States. The checks to Wilkins were deposited into the SJUMC Discretionary account controlled by Wilkins, including a \$30,000 check issued by Person #1 from the Charity.

86. On December 13, 2013, Person #1 caused the Charity to issue check #91593, payable to “United Methodist Church” in the amount of \$30,000, to Representative Wilkins, who was the pastor of the SJUMC, and deposited into the SJUMC Discretionary account on December 18, 2013.



87. To conceal the check payments to Wilkins, Cranford varied the increments of the checks deposited into the SJUMC Discretionary account and also paid Wilkins directly by giving Wilkins cash. Cranford also continued to make payments to SJUMC after Wilkins left the legislature to conceal the scheme.

88. Cranford submitted, or caused to be submitted, the following payments to the Discretionary account of SJUMC by a written check:

<b>Date</b>	<b>Source</b>	<b>Amount</b>
06/24/2010	The Cranford Coalition	\$ 5,000.00
02/22/2012	The Cranford Coalition	\$ 3,000.00
06/08/2012	The Cranford Coalition	\$ 2,000.00
09/27/2012	The Cranford Coalition	\$ 1,500.00
10/16/2012	The Cranford Coalition	\$ 2,500.00
11/05/2012	The Capitol Hill Coalition	\$ 2,500.00
12/19/2012	The Capitol Hill Coalition	\$ 1,000.00
02/01/2013	Outcomes of Arkansas	\$ 1,000.00
03/11/2013	The Cranford Coalition	\$ 1,000.00
03/18/2013	Outcomes of Arkansas	\$ 1,000.00
03/29/2013	The Cranford Coalition	\$ 1,200.00
05/01/2013	The Cranford Coalition	\$ 2,500.00
06/04/2013	The Cranford Coalition	\$ 1,500.00
06/14/2013	The Cranford Coalition	\$ 5,000.00
06/26/2013	The Cranford Coalition	\$ 4,000.00
08/12/2013	The Cranford Coalition	\$ 1,200.00
08/12/2013	The Cranford Coalition	\$ 1,200.00
09/12/2013	The Cranford Coalition	\$ 2,400.00
11/12/2013	The Cranford Coalition	\$ 2,000.00
12/18/2013	The Charity	\$ 30,000.00
02/03/2014	The Cranford Coalition	\$ 1,000.00
02/06/2014	The Cranford Coalition	\$ 1,000.00
05/08/2014	The Cranford Coalition	\$ 3,000.00
08/01/2014	The Cranford Coalition	\$ 1,000.00
08/12/2014	The Cranford Coalition	\$ 2,000.00
11/20/2014	The Cranford Coalition	\$ 1,000.00
01/08/2015	The Cranford Coalition	\$ 2,973.55
01/16/2015	The Cranford Coalition	\$ 1,000.00
03/20/2015	The Cranford Coalition	\$ 1,000.00
08/13/2015	The Cranford Coalition	\$ 1,000.00

Date	Source	Amount
11/30/2015	The Cranford Coalition	\$ 1,000.00
01/20/2016	The Cranford Coalition	\$ 1,000.00

89. From in or about 2010 through in or about 2014, Cranford offered and gave, which Wilkins accepted, thousands of dollars in cash payments.

90. On February 20, 2015, Employee F e-mailed Person #1, stating:

[Accounting Firm] is asking about a \$30k donation to the United Methodist Church in December 2013? Apparently we have to disclose donations >\$5k on the 990. I had Linda pull the invoice but there isn't much detail. Do you know what this was for? Pesky auditors.

91. On February 25, 2015, Person #1 replied to Employee F's email, stating:

Donation to a youth summer program in Pine Bluff AR, United Methodist Church. That is about it. You will see one this year to OK City to a Youth Program at a Church.

*The Conspirators Offered and Gave Bribes to Arkansas Senator A*

92. From 2012 to 2017, Cranford offered and gave, directly and indirectly, cash; checks; wire transfers; retainers; attorney's fees; and professional referrals to Arkansas Senator A in exchange for Arkansas Senator A taking favorable legislative action on behalf of Cranford, the Charity, Cranford Clients, and others known and unknown to the United States, including but not limited to, holding up agency budgets; requesting legislative audits; sponsoring, filing and voting for legislative bills; and influencing the award of GIF funds to the Charity and Cranford clients.

93. From 2012 to 2017, Arkansas Senator A received over \$500,000 in cash; checks; wire transfers; retainers; and attorney's fees from Cranford, the Charity, Cranford Lobbying Firms, and Cranford Clients whom Cranford referred to Arkansas Senator A.

94. Between in or about 2012 to in or about 2017, Cranford offered and gave, which Arkansas Senator A accepted, approximately \$15,000 in cash.

95. In or about February 2013, Cranford arranged for a meeting between Person #2 and Arkansas Senator A to discuss his hiring by the Charity.

96. In or about March 2013, Cranford met with Person #2 and discussed the potential hiring of Arkansas Senator A by the Charity. Cranford and Person #2 specifically discussed hiring Arkansas Senator A, in part, because of his status as an Arkansas Senator and because of the favorable legislative acts Arkansas Senator A could perform on behalf of the Charity.

97. In or about April 2013, as a benefit to Arkansas Senator A, he was hired by the Charity and began receiving \$7,500 a month. Beginning in or about May 2014, and continuing until 2017, Arkansas Senator A was paid \$9,000 a month.

98. In or about 2013, Cranford arranged for and offered paid-for hotel rooms and tickets to Major League Baseball games, including luxury box seats and tickets to the 2013 World Series, to Arkansas Senator A, which he accepted.

99. On March 19, 2013, Person #1 e-mailed Cranford, stating, in part, "Rusty I have the tickets and hotel for the Senator." The e-mail referred to Arkansas Senator A.

100. On October 9, 2013, Cranford e-mailed "Employee D," in part stating, "Can you book me (2) rooms in St. Louis for Saturday close to Busch Stadium tell them AO at the Westin."

101. On October 10, 2013, Cranford e-mailed Employee D, stating "Can you book Senator Jon Woods a room at the same hotel in St. Louis 2 nights identical to [Arkansas Senator A] check in tomorrow afternoon please."

102. On July 28, 2014, Person #2 sent an e-mail addressed to Arkansas Senator A, and also to Cranford and NOLAN, having as its subject line "Marilyn," which stated:

[Arkansas Senator A's first name],

The Resource Team has agreed that as you proceed with representing Rusty on issues regarding Cranford Coalition, and any work it has done with/for AO, the communication needs to include Marilyn Nolan. Marilyn is in charge of all external

communications in the company, to include all aspects of governmental affairs. I will step out of it, unless you need information regarding programs that have been established. My role is primarily internal management of programs.

Having a single point person should eliminate any confusion regarding communication.

Thank you.

103. In response to email from Employee F stating the Charity's auditors wanted to send a letter to Arkansas Senator A, to confirm there was no pending or threatened litigation that could be a potential liability to the Charity, Person #1 sent an e-mail to Employee F and Cranford on October 21, 2015, in part stating "[Arkansas Senator A] doesn't work for us in a legal capacity though. He is a consultant."

#### **Other Acts of Concealment and False Statements**

104. On October 18, 2013, Cranford emailed Person #1 and Person #2, with the subject line, "Gif Appl," in part stating:

Make the application very nice. There will be groups mad that they didn't get any money. Other groups might request to see the applications from those who won. We don't want your application to look terrible but you get all the money. Make your application look as nice as possible.

105. On March 10, 2017, Person #2 e-mailed the Charity's legal counsel, in part, stating:

Ameriworks was a comprehensive project. My initial and ongoing involvement was primarily related to the vocational rehabilitation, which is my area of expertise. I wrote the 1mm grant. That foundation was used for the others, I believe.

106. On or about December 2, 2013, Cranford signed, as the Sub-grant Receipt Authorized Representative, to receive a \$1,000,000 Arkansas Department of Human Services Sub-Grant. The contract contained the following section:

D. CERTIFICATION REGARDING LOBBYING: The Recipient will comply with Public Law 101-121, Section 319 (Section 1352 of Title 31 U.S.C.) by certifying that appropriated federal funds have not been or will not be used to pay any person to influence or attempt to influence a federal official/employee in

connection with the awarding of any federal contract, sub-contract, loan or cooperative agreement for an award in excess of \$100,000.00.

If the Receipt has paid or will pay for lobbying using funds other than appropriated federal funds, Standard Form-LLL (Disclosure of Lobbying Activities) shall be completed and included as Attachment \_\_\_ to this sub-grant.

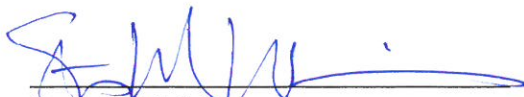
Cranford inserted "NA" (an abbreviation for "not applicable") into the Attachment blank for the Standard Form-LLL, and signed the contract. By signing the contract, Cranford falsely certified that no appropriated federal funds had been or would be used to lobby for any Federal contract, sub-contract, loan or cooperative agreement for an award in excess of \$100,000. However, in truth and in fact, as Cranford then well knew, the Charity paid appropriated funds, which comprised most of its budget, to lobby for Federal contracts, sub-contracts, loans and cooperative agreements in excess of \$100,000. Moreover, by not attaching a Standard Form-LLL, and certifying the form was not applicable, Cranford falsely represented the Charity had not paid and would not pay any expenses for lobbying related to obtaining the \$1,000,000 Arkansas Department of Human Services Sub-Grant that was the subject of the contract, when in truth and in fact, as Cranford then well knew, he had personally and extensively lobbied to obtain that sub-grant for the Charity.

All in violation of Title 18, United States Code, Section 371.

TIMOTHY A. GARRISON  
United States Attorney


ANNA LOU TIROL  
Acting Chief, Public Integrity Section

By:



STEVEN M. MOHLHENRICH  
Assistant United States Attorney

By:



MARCO A. PALMIERI  
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DATED:

11/8/18

Springfield, Missouri