

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,

Plaintiff,

v.

WILLIAM J. ANTON and
FRED M. SCHRAEDER,

Defendants.

CF - 2009 - 5279

Case No. _____

DISTRICT COURT
FILED

NOV 05 2009

INFORMATION

In the name and by the authority of the State of Oklahoma:

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

W.A. DREW EDMONDSON, Attorney General of Oklahoma, in and for the State and County
aforesaid, gives the court to know and be informed as follows:

COUNT 1 - RACKETEERING

During the period of March 24, 2004, and continuously thereafter through February 23, 2009,
WILLIAM J. ANTON and FRED M. SCHRAEDER did, in Tulsa County, State of Oklahoma,
willfully, knowingly, fraudulently and feloniously commit the crime of Racketeering, a felony, while
they were employed by or associated with an enterprise as defined by 22 O.S. 1402, to-wit: the law
practice of WILLIAM J. ANTON, which after his resignation from the bar on November 5, 2007,
became the law practice of FRED M. SCHRAEDER, through a pattern of racketeering activity, to-
wit:

- A. Defendant WILLIAM J. ANTON conducted or participated in the conduct of the
enterprise affairs through all of the acts of conspiracy, embezzlement and uttering
forged instruments, more fully described as Counts 2-39, 41, 43, 46, 47, 49, 51, and 52.

B. Defendant **FRED M. SCHRAEDER**, conducted or participated in the conduct of the enterprise affairs through all of the acts of conspiracy, embezzlement and uttering forged instruments, more fully described as Counts 2, 37, 41, 43, 44, and 46-53.

Each of the activities described below constituting a pattern of racketeering activities as defined by 22 O.S. §1402(5) is a felony crime; constitute racketeering activity as defined by 22 O.S. § 1402(10); were related to the affairs of the law practice of **WILLIAM J. ANTON** and/or **FRED M. SCHRAEDER**; were not isolated; were not so closely related to each other and connected in point of time and place so as to constitute a single event; and the last of such activities was committed within three (3) years of a prior occasion of such conduct. All of said activities are contrary to the provisions of 22 O.S. §1403(A), and against the peace and dignity of the State of Oklahoma.

COUNT 2 - CONSPIRACY

During the period of February 14, 2008 through February 23, 2009, **WILLIAM J. ANTON** and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, committed the crime of **CONSPIRACY TO COMMIT A FELONY** in violation of 21 O.S. §421, by conspiring and agreeing to commit **EMBEZZLEMENT**, a felony; to-wit: **WILLIAM J. ANTON** and **FRED M. SCHRAEDER** appropriated to their own use and benefit insurance settlement funds and workers' compensation benefits entrusted to them as attorneys without the knowledge and consent of their clients, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

COUNT 3 - EMBEZZLEMENT (CARMICHAEL)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after March 24, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$19,207.37, said money being the property of Vearl Carmichael, and which sum had been delivered and entrusted to the care and custody of said defendant as his attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Vearl Carmichael, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 4 - EMBEZZLEMENT (REYNOLDS)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after July 1, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$80,238.00, said money being the property of Johnna Reynolds, and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Johnna Reynolds, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 5 - EMBEZZLEMENT (CARMICHAEL)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after September 8, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$85,000.00, said money being the property of Vearl Carmichael, and which sum had been delivered and entrusted to the care and custody of said defendant as his attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Vearl Carmichael, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 6 - EMBEZZLEMENT (GALLOWAY)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after October 12, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$10,000.00, said money being the property of Marie Galloway and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying insurance settlement funds, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Marie Galloway, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 7 - EMBEZZLEMENT (VANN)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after October 28, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$18,803.42, said money being the property of Larry and Tamie Vann, and which sum had been delivered and entrusted to the care and custody of said defendant as the their attorney for the specific purpose of paying insurance settlement funds, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Larry Vann and/or Tamie Vann, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 8 - EMBEZZLEMENT (RYDER)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after November 24, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$28,881.60, said money being the property of Erma Ryder, and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Erma Ryder, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 9 - EMBEZZLEMENT (POPE)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after December 15, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$49,235.50, said money being the property of Donald Pope, and which sum had been delivered and entrusted to the care and custody of said defendant as his attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Donald Pope, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 10 - EMBEZZLEMENT (BUCHANAN)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after December 24, 2004, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$7,500.00, said money being the property of Charlotte Buchanan and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Charlotte Buchanan, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 11 - EMBEZZLEMENT (CONLEY)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after February 10, 2005, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$76,935.00 said money being the property of Rubin Conley and which sum had been delivered and entrusted to the care and custody of said defendant as his attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Rubin Conley, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 12 - EMBEZZLEMENT (FLORES)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after February 24, 2005, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$34,000.00, said money being the property of Martha Flores and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Martha Flores, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 13 - EMBEZZLEMENT(RYDER)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after June 9, 2005, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$22,000.00 said money being the property of Erma Ryder and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying insurance settlement funds, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Erma Ryder, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 14 - EMBEZZLEMENT (HORTON)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after July 28, 2005, did unlawfully, willfully, knowingly and feloniously commit the crime of **EMBEZZLEMENT** in violation of Title 21 O.S. §1451, in the manner and form as follows, to-wit:

Said defendant did willfully, fraudulently and feloniously embezzle the sum of \$34,120.00, said money being the property of Dovie Horton and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of paying workers' compensation benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Dovie Horton, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendant to embezzle, convert and appropriate said money aforesaid to his own use,

all of which is contrary to the law and the statutes, and the peace and dignity of the State of Oklahoma.

COUNT 15 - EMBEZZLEMENT (LOUB)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after October 7, 2005, did unlawfully, willfully, knowingly and feloniously commit the crime of

