

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

THE STATE OF OKLAHOMA,)
)
 Plaintiff,)

CF - 2009 - 5279

v.)

Case No. _____

WILLIAM J. ANTON and)
 FRED M. SCHRAEDER,)

Defendants.)

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

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 \$15,000.00, said money being the property of David Loub 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 David Loub, 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 16 - EMBEZZLEMENT (GALLOWAY)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after October 17, 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 \$13,954.00, 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 the 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 17 - EMBEZZLEMENT (JONES)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after November 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 \$71,184.00 said money being the property of Lillian Jones 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 Lillian Jones, 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 18 - EMBEZZLEMENT (WILKINS-RICHARDS)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after January 23, 2006, 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 \$13,791.75 said money being the property of Tina Wilkins-Richards 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 Tina Wilkins-Richards, 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 19 - EMBEZZLEMENT (COLBERT)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after February 6, 2006, 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 \$7,375.00, said money being the property of Shirley Colbert 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 Shirley Colbert, 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 20 - EMBEZZLEMENT (WOOLSEY)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after July 7, 2006, 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 \$19,466.00, said money being the property of Tina and Danny Woolsey and which sum had been delivered and entrusted to the care and custody of said defendant as 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 Tina and Danny Woolsey, 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 21 - EMBEZZLEMENT (KENNEDY)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after August 31, 2006, 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 \$2,498.98, said money being the property of Jacqueline Kennedy 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 Jacqueline Kennedy, 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 22 - EMBEZZLEMENT (MYERS)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after September 1, 2006, 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 \$248,406.00, said money being the property of Jonnie Myers and which sum had been delivered and entrusted to the care and custody of said defendant as her attorney for the specific purpose of life insurance benefits, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Jonnie Myers, 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 23 - EMBEZZLEMENT (EGELER/DHS)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after December 14, 2006, 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 \$32,000.00 said money being the property of William Egeler and the Department of Human Services which sum had been delivered and entrusted to the care and custody of said defendant as Egeler's 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 William Egeler or Department of Human Services, 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 24 - UTTERING A FORGED INSTRUMENT (EGELER/DHS)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or about December 14, 2006, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 14th day of December, 2006, the Defendant uttered and published as true to JP Morgan Chase Bank, N.A., in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

CompSource Oklahoma, Check No. 03446055, Check Date December 8, 2006, Check Amount \$32,000.00, To the order of William J. Anton, Attorney, Department of Human Services, WF Egeler & Bill Anton, Attorney, State of Oklahoma, Account No. 2139001. The reverse side of said check reflects an endorsement as follows: William Egeler, William J. Anton, Bill Anton and Tammy Bruce on behalf of Department of Human Services.

The endorsement of Tammy Bruce had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 25 - EMBEZZLEMENT (BABB/HERD)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after January 25, 2007, 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 \$23,368.66, said money being the property of Stella Babb and Patti Herd and which sum had been delivered and entrusted to the care and custody of said defendant as 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 Stella Babb and/or Patti Herd, 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 26 - EMBEZZLEMENT (GRAHAM)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after February 2, 2007, 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 \$16,000.00, said money being the property of Sandra Graham 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 Sandra Graham, 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 27 - UTTERING A FORGED INSTRUMENT (GRAHAM)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or about February 2, 2007, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 2nd day of February, 2007, the Defendant uttered and published as true to JP Morgan Chase Bank, N.A., in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

SRS., Check No. 33197486, Check Date January 31, 2007 , Check Amount \$20,000.00, To the order of William J. Anton, Attorney and Sandra Graham, 4528 S. Sheridan, Suite 103, Tulsa, OK 74145, Bank of America, N.A., Account No. 3299990673. The reverse side of said check reflects an endorsement as follows: Sandra Graham and William J. Anton.

The endorsement of Sandra Graham had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 28 - EMBEZZLEMENT (MOSES)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after March 14, 2007, 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 \$40,000.00, said money being the property of Helen Moses 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 Helen Moses, 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 29 - EMBEZZLEMENT (LOGAN)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after March 19, 2007, 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 \$6,214.00, said money being the property of Sandra Logan 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 Sandra Logan, 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 30 - EMBEZZLEMENT (BORTMES)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after May 24, 2007, 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 \$3,255.86, said money being the property of Dana Bortmes 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 Dana Bortmes, 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.

, and the peace and dignity of the State of Oklahoma.

COUNT 31 - EMBEZZLEMENT (LEE)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after July 10, 2007, 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 \$4,685.00, said money being the property of Angela Lee 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 Angela Lee, 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 32 - EMBEZZLEMENT (MCGHIE)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after July 30, 2007, 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 \$18,585.60, said money being the property of Anthony McGhie 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 Anthony McGhie, 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 33 - UTTERING A FORGED INSTRUMENT (MCGHIE)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or about July 30, 2007, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A**

FORGED INSTRUMENT, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 30th day of July, 2007, the Defendant uttered and published as true to JP Morgan Chase Bank, N.A., in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

Cambridge Integrates Services Group, Inc., Check No. 1119253, Check Date July 27, 2007, Check Amount \$23,232.00, To the order of Anthony McGhie & William J. Anton, Attorney, 4528 S. Sheridan, #103, Tulsa, OK 74145, Wachovia, Account No. 2079971050008. The reverse side of said check reflects an endorsement as follows: Anthony McGhie and William J. Anton.

The endorsement of Anthony McGhie had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 34 - EMBEZZLEMENT (TULSA HAND SURGERY CENTER)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after September 5, 2007, 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 \$2,575.94, said money being the property of Tulsa Hand Surgery Center and which sum had been delivered and entrusted to the care and custody of said defendant as its attorney for the specific purpose of paying medical services rendered in a workers' compensation claim, and which money the said defendant did thereafter appropriate to his own use and benefit without the knowledge and consent of Tulsa Hand Surgery Center, 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 35 - UTTERING A FORGER INSTRUMENT (TULSA HAND SURGERY CENTER)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or about September 5, 2007, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING**

A FORGED INSTRUMENT, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 5th day of September, 2007, the Defendant uttered and published as true to JP Morgan Chase Bank, N.A., in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

ESIS, Check No. FC38539760, Check Date August 30, 2007 , Check Amount \$2,575.94, To the order of Tulsa Hand Surgery Center, c/o Amanda Smallwood, Fleet National Bank, Account No. 47692. The reverse side of said check reflects an endorsement as follows: Tulsa Hand Surgery Center by Michael B. Clendenin and William J. Anton.

The endorsement of Michael B. Clendenin had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 36 - EMBEZZLEMENT (MCALEXANDER/CARE FAMILY MEDICAL)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after October 26, 2007, 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 \$9,641.00, said money being the property of Camillia McAlexander and Care Family Medical and which sum had been delivered and entrusted to the care and custody of said defendant as the attorney of Camillia McAlexander 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 Camillia McAlexander and/or Care Family Medical, 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 37 - EMBEZZLEMENT (HITCH/CARE FAMILY MEDICAL)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after December 12, 2007, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$5,405.00, said money being the property of Joycelyn Hitch and/or Care Family Medical which sum had been delivered and entrusted to the care and custody of said defendants as her attorneys for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Joycelyn Hitch and/or Care Family Medical, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 38 - EMBEZZLEMENT (NOLAN)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or sometime after February 14, 2008, 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 \$15,500.00 said money being the property of Lloyd Nolan 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 Lloyd Nolan, 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 39 - UTTERING A FORGED INSTRUMENT (NOLAN)

WILLIAM J. ANTON, in Tulsa County, State of Oklahoma, on or about February 14, 2008, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 14th day of February, 2008, the Defendant uttered and published as true to JPMorgan Chase Bank, in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

Specialty Risk Services, Check No. 1018732012, Check Date February 8, 2008, Check Amount \$15,500.00, To the order of Bill Anton, atty and Lloyd Nolan, JPMorgan Chase Bank, Account No. 632559753. The reverse side of said check reflects an endorsement as follows: Bill Anton and Lloyd Nolan

The endorsement of Lloyd Nolan had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 40 - WORKERS' COMPENSATION FRAUD (NOLAN)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or about March 12, 2008, did unlawfully, willfully, intentionally, knowingly and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, in violation of Title 21 O.S. §1663(C)(1) in the manner and form as follows to-wit:

Said Defendants, with intent to defraud and deceive Lloyd Nolan and the Oklahoma Workers' Compensation Court with respect to a claim for payment or other workers' compensation benefits pursuant to a contract of insurance, did knowingly, intentionally and fraudulently present or cause to be presented false, misleading or incomplete statements, specifically as follows:

On March 12, 2008, the Defendants conspired to prepare, present and or caused to be presented a Form 100 to the Oklahoma Workers' Compensation Court in Case No. 2007-13025R, Lloyd Nolan vs. American Airlines and New Hampshire Insurance Company, with the signature of Lloyd Nolan forged. The Form 100 also stated to the Court that Fred M. Schraeder was Lloyd Nolan's attorney and that he agreed to dismiss his claim, both of which were not true. The Defendants made the above statements with the intent to defraud and deceive Lloyd Nolan and the Oklahoma Workers' Compensation Court when they then and there knew that the said statements were false, misleading or incomplete,

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

COUNT 41 - EMBEZZLEMENT (CHAPMAN)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after May 30, 2008, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$4,000.00, said money being the property of Rilla Chapman, and which sum had been delivered and entrusted to the care and custody of said defendants as her attorney(s) for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Rilla Chapman, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 42 - WORKERS' COMPENSATION FRAUD (CHAPMAN)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or about June 3, 2008, did unlawfully, willfully, intentionally, knowingly and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, in violation of Title 21 O.S. §1663(C)(1), in the manner and form as follows to-wit:

Said Defendants, with intent to defraud and deceive Rilla Chapman and the Oklahoma Workers' Compensation Court with respect to a claim for payment or other workers' compensation benefits pursuant to a contract of insurance, did knowingly, intentionally and fraudulently present or cause to be presented false, misleading or incomplete statements, specifically as follows:

On June 3, 2008, the Defendants conspired to prepare, present and or caused to be presented a Form 100 to the Oklahoma Workers' Compensation Court in Case No. 2006 -05954J, Rilla Lorine Chapman vs. American Airlines and American Home Assurance, with the signature of Rilla Chapman forged. The Form 100 also stated to the Court that Fred M. Schraeder was Rilla Chapman's attorney and that she agreed to dismiss her claim, both of which were not true. The Defendants made the above statements with the intent to defraud and deceive Rilla Chapman and the Oklahoma

Workers' Compensation Court when they then and there knew that the said statements were false, misleading or incomplete,

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

COUNT 43 - EMBEZZLEMENT (AMOAH)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after July 25, 2008, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$18,000.00, said money being the property of Linda Amoah, and which sum had been delivered and entrusted to the care and custody of said defendants as her attorney(s) for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Linda Amoah, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 44 - UTTERING A FORGED INSTRUMENT (AMOAH)

FRED M. SCHRAEDER, in Tulsa County, State of Oklahoma, on or about July 25, 2008, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 25th day of July, 2008, the Defendant uttered and published as true to Arvest Bank, in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

America First Insurance Co., Check No. 64-975/612, Check Date July 22, 2008, Check Amount \$18,000.00, To the order of Linda Amoah, William J. Anton and Martin Medical Clinic, Wachovia Bank, N.A., Account No. 2079900411553. The reverse side of said check reflects an endorsement as follows: Linda Amoah, Martin Medical Clinic, Jeff Martin, William J. Anton and Fred M. Schraeder.

The endorsement of Linda Amoah had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 45 - WORKERS' COMPENSATION FRAUD (RICHARDSON)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or about August 14, 2008, did unlawfully, willfully, intentionally, knowingly and feloniously commit the crime of **WORKERS' COMPENSATION FRAUD**, in violation of Title 21 O.S. §1663(C)(1), in the manner and form as follows to-wit:

Said Defendants, with intent to defraud and deceive Frazier Richardson and the Oklahoma Workers' Compensation Court with respect to a claim for payment or other workers' compensation benefits pursuant to a contract of insurance, did knowingly, intentionally and fraudulently present or cause to be presented false, misleading or incomplete statements, specifically as follows:

On August 14, 2008, the Defendants conspired to prepare, present and or caused to be presented a Form 100 to the Oklahoma Workers' Compensation Court in Case No. 2007-13022F, Frazier Richardson vs. Central States Community Service and American Home Assurance, with the signature of Frazier Richardson forged. The Form 100 also stated to the Court that Fred M. Schraeder was Frazier Richardson's attorney and that she agreed to dismiss her claim, both of which were not true. The Defendants made the above statements with the intent to defraud and deceive Frazier Richardson and the Oklahoma Workers' Compensation Court when they then and there knew that the said statements were false, misleading or incomplete,

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

COUNT 46 - EMBEZZLEMENT (RICHARDSON)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after August 14, 2008, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$13,500.00, said money being the property of Frazier Richardson, and which sum had been delivered and entrusted to the care and custody of said defendants as her attorney(s) for the specific purpose of paying workers' compensation benefits, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Frazier Richardson, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 47 - EMBEZZLEMENT (BENNETT)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after October 3, 2008, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$25,000.00, said money being the property of Sandra Bennett, and which sum had been delivered and entrusted to the care and custody of said defendants as her attorney(s) for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Sandra Bennett, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 48 - UTTERING A FORGED INSTRUMENT (BENNETT)

FRED M. SCHRAEDER, in Tulsa County, State of Oklahoma, on or about October 3, 2008, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 3rd day of October, 2008, the Defendant uttered and published as true to Arvest Bank, in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

Oklahoma Farm Mutual Insurance Co., Check No. 7135314, Check Date October 2, 2008 , Check Amount \$25,000.00, To the order of Sandra Bennett, Fred M. Scraeder, Jeff Martin, and Claims Management, Inc., Bancfirst Oklahoma, Account No. 330647816. The reverse side of said check reflects an endorsement as follows: Sandra Bennett, Fred M. Schraeder, Jeff Martin, and Linda Hanes, on behalf of Claims Management, Inc.

The endorsement of Sandra Bennett had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 49- EMBEZZLEMENT (CONN)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after November 14, 2008, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$6,069.00, said money being the property of Billy Conn, and which sum had been delivered and entrusted to the care and custody of said defendants as his attorney(s) for the specific purpose of workers' compensation benefits, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Billy Conn, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 50 - UTTERING A FORGED INSTRUMENT (JEDREY)

FRED M. SCHRAEDER, in Tulsa County, State of Oklahoma, on or about January 5, 2009, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING**

A FORGED INSTRUMENT, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 5th day of January, 2009, the Defendant uttered and published as true to Arvest Bank, in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

ESIS, Check No. 018113, Check Date January 2, 2009 , Check Amount \$60,617.50, To the order of Fred M. Schraeder, atty and James Jedrey, Fleet National Bank, Account No. 70049. The reverse side of said check reflects an endorsement as follows: Fred M. Schraeder and James Jedrey.

The endorsement of James Jedrey had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

COUNT 51 - EMBEZZLEMENT (JEDREY)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after January 5, 2009, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$60,617.50, said money being the property of James Jedrey, and which sum had been delivered and entrusted to the care and custody of said defendants as his attorney(s) for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of James Jedrey, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 52 - EMBEZZLEMENT (TATE)

WILLIAM J. ANTON and **FRED M. SCHRAEDER**, in Tulsa County, State of Oklahoma, on or sometime after February 23, 2009, 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 defendants did willfully, fraudulently and feloniously embezzle the sum of \$7,500.00, said money being the property of Mark Tate, and which sum had been delivered and entrusted to the care and custody of said defendants as his attorney(s) for the specific purpose of paying insurance settlement funds, and which money the said defendants did thereafter appropriate to their own use and benefit without the knowledge and consent of Mark Tate, and with the willful, unlawful, fraudulent and felonious intent on the part of said defendants to embezzle, convert and appropriate said money aforesaid to their own use,

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

COUNT 53 - UTTERING A FORGED INSTRUMENT (TATE)

FRED M. SCHRAEDER, in Tulsa County, State of Oklahoma, on or about February 23, 2009, did unlawfully, willfully, intentionally, knowingly, and feloniously commit the crime of **UTTERING A FORGED INSTRUMENT**, a felony, in violation of Title 21 O.S. §1592, in the manner and form as follows to-wit:

On or about the 23rd day of February, 2009, the Defendant uttered and published as true to Arvest Bank, in Tulsa County, Oklahoma, a certain instrument, to wit: a check, which is in words and figures as follows:

CNA Continental Casualty Co., Check No. 109518113, Check Date February 18, 2009 , Check Amount \$7,500.00, To the order of William J. Anton and Mark Tate, Account No. 630505857. The reverse side of said check reflects an endorsement as follows: William J. Anton, Mark Tate, and Fred M. Schraeder.

The endorsement of Mark Tate had been forged and the defendant then and there knew at the time that the check was false, forged, and altered, but said defendant did then and there offer the same as true with the felonious intent then and there to beat, cheat, and defraud,

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

W.A. DREW EDMONDSON
ATTORNEY GENERAL OF OKLAHOMA

By: 

TOMMY HUMPHRIES, OBA #19130
Assistant Attorney General
313 N.E. 21st Street
Oklahoma City, OK 73105
(405) 522-3403

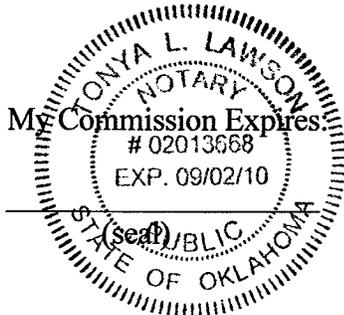
STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA) ss.

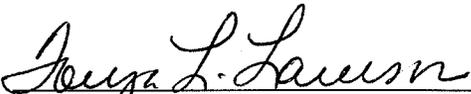
I do solemnly swear that the statements and allegations set forth in the within Information are true and correct to the best of my information and belief.



TOMMY HUMPHRIES
Assistant Attorney General

SUBSCRIBED AND SWORN to before me this 4th day of Nov., 2009,
by Tommy Humphries.

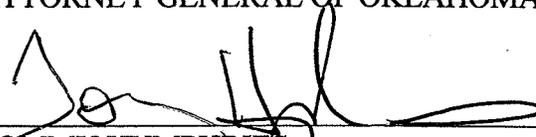




Notary Public

I have examined the facts in this case and recommend a warrant issue.

W.A. DREW EDMONDSON
ATTORNEY GENERAL OF OKLAHOMA

By: 

TOMMY HUMPHRIES
Assistant Attorney General

RANGE OF PUNISHMENTS

Racketeering, 22 O.S. § 1403,1404: Imprisonment for a term of not less than ten (10) years and shall not be eligible for a deferred sentence, probation, suspension, work furlough, or release from confinement on any other basis until the person has served one-half (1/2) of his or her sentence, and a fine not exceeding three (3) times the gross value gained or gross loss caused, whichever is greater.

Conspiracy, 22 O.S. § 421: Imprisonment In the State Penitentiary for a term of not more than ten (10) years, and a fine not exceeding Five Thousand Dollars (\$5,000.00).

Embezzlement, 21 O.S. § 1451(B)(3): Imprisonment in the State Penitentiary for a term of not more than five (5) years, and a fine of not exceeding Five Thousand Dollars (\$5,000.00).

Embezzlement, 21 O.S. § 1451(B)(4): Imprisonment in the State Penitentiary for a term of not more than ten (10) years, and a fine of not exceeding Ten Thousand Dollars (\$10,000.00).

Uttering a Forged Instrument, 21 O.S. § 1592, 1621: Imprisonment in the State Penitentiary not exceeding seven (7) years.

Workers' Compensation Fraud, 21 O.S. § 1663: Imprisonment in the State Penitentiary not exceeding seven (7) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00).

WITNESSES

Linda Amoah
1827 N. Peoria Avenue
Tulsa, OK 74102

Larry Scofield
and/or Custodian of Records
America First Insurance
2250 Fuller Wiser Rd., #15108
Eules, TX 76039

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Cynthia Paramoure
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Tulsa, OK 74169

Patti Herd
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Tulsa, OK 74146

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Melissa Gonzalez, Investigator
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Sandra Bennett
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Clarence Richard
and/or Custodian of Records
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Monica Wilke
and/or Custodian of Records
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Dale Wade, SIU
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Charlotte Buchanan
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Vearl Carmichael
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Owasso, OK 74055

Debbie Coffee
and/or Custodian of Records
AIG / American Home Assurance
6324 Birchmont Drive
Plano, TX 75093

Rilla Chapman
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