

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(TOPEKA DOCKET)

FILED
U.S. DISTRICT COURT
DISTRICT OF KANSAS

2007 AUG -8 P 2:50

BY: B. Wood, DEPUTY
AT TOPEKA, KS

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

Case No. 06-40068-01/02/03/07/08/09/10-JAR

F. JEFFREY MILLER,)

TODD EARNSHAW,)

BRIAN ROUSE,)

JAMES MOSER,)

STEVE MIDDLETON)

LANNY ROSS, and)

JUDY BRUMBLE,)

Defendants.)

Ct. 1: 18 U.S.C. §371
Cts. 2-54: 18 U.S.C. §1344
Cts. 55-59: 18 U.S.C. §1957
Forfeiture Notice & Allegations

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Introduction

At all times material to this indictment:

- 1) F. JEFFREY MILLER ("MILLER") owned and operated Miller Enterprises and Star Land Development through which MILLER would build and develop homes in the greater Kansas City area. MILLER was the largest builder in the

area in 1999 and 2000.

2) MILLER targeted selling his homes to homebuyers with credit problems who had little or no money for a down payment. MILLER started, financed, controlled and was an officer in Associated Capital and Associated Finance, formed in June of 1998, and located in Kansas. Miller would cause buyers to be directed to Associated Capital, where loan applications would be prepared for submission to federally insured financial institutions throughout the United States, the proceeds from which were used to acquire homes built by MILLER. Associated Finance was established to service second mortgage payments to MILLER, on homes purchased from MILLER.

3) JUDY BRUMBLE ("BRUMBLE"), was a loan officer and processor, and acted as an ostensible real estate agent for MILLER.

4) TODD EARNSHAW ("EARNSHAW") and BRIAN ROUSE ("ROUSE"), were loan officers who worked for Maplewood Mortgage and Prosource Mortgage. EARNSHAW was also a real estate agent who sold many of MILLER's houses. ROUSE was also a sales representative for BNC Mortgage.

5) Commencing in 1999, MILLER became the subject of lawsuits, actions by state enforcement agencies, legislative action and adverse publicity, including:

A. Investigation by the Attorney General's Office for the State of

Kansas.

B. Investigation and injunctive relief by the Kansas State Bank Commissioner.

C. Investigation by the Attorney General's Office for the State of Missouri.

D. Action by the Kansas legislature to amend the Kansas Mortgage Business Act, which, beginning November 1, 2001, required any corporation, or any person, who regularly obtained second mortgages to be licensed with the State of Kansas.

As a result of these actions MILLER had to adapt and reconfigure the conspiracy set forth hereinafter. MILLER discontinued doing business through Associated Capital and Associated Finance, and started selling homes through codefendant middlemen, including: STEVE MIDDLETON ("MIDDLETON"), EARNSHAW and BRUMBLE. BRUMBLE, who held herself out as a bona fide real estate agent doing business as Classic Reality, in fact acted as a front for the sale of MILLER homes to circumvent Consent Judgments which prohibited MILLER from employing EARNSHAW directly or indirectly as a real estate agent or mortgage broker, and forever banned EARNSHAW from engaging in the mortgage business in Kansas. BRUMBLE would also kick-back a portion of her real estate commission to MILLER, as an overt act of

the conspiracy alleged hereinafter.

6) LANNY ROSS ("ROSS") was a real estate appraiser doing business in the greater Kansas City area, who provided inflated appraisals for MILLER, MIDDLETON and others.

7) JAMES MOSER ("MOSER") and Joe Frey were real estate investors. Beginning in approximately 2002, due to the adverse reputation and publicity MILLER generated in Missouri and Kansas because of his illegal marketing methods and the intentionally poor quality of his construction, there came a point in time when MILLER could no longer sell his houses in any volume directly to individuals. MILLER reconfigured the conspiracy described hereinafter, to market his houses to investors. MILLER agreed to sell houses to investors at a discount if they purchased in volume. This discounting was not disclosed to the lenders. MILLER sold homes in this manner directly to investors and through middlemen such as MIDDLETON.

COUNT 1
A VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371
THE CONSPIRACY:

8) Beginning in 1997, the precise date being unknown to the grand jury, and continuing through the return of the indictment, the defendants herein, **MILLER, EARNSHAW, ROUSE, MOSER, MIDDLETON, ROSS & BRUMBLE**, combined, conspired, confederated and agreed together and with Angela Parenza and

Beth Hessel,¹ to commit offenses against the United States of America, in the District of Kansas and elsewhere, by:

A) knowingly, wilfully and unlawfully devising and executing, and attempting to execute, a scheme and artifice to defraud financial institutions and obtain any of the moneys, funds, credits, assets, securities and other property owned by and under the custody and control of financial institutions, by means of material false and fraudulent pretenses, representations, promises and omissions of fact, in violation of Title 18 United States Code, Sections 2, and 1344; and,

B) knowingly, wilfully and unlawfully engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18 United States Code, Sections 2 & 1957.

Object of Conspiracy and Scheme

9) The object of said conspiracy and scheme to defraud was to enrich the conspirators by manipulating home buyers, manipulating appraisals and submitting materially false and fraudulent loan applications to obtain loan proceeds from federally insured financial institutions.

Overt Acts.

10) It was part of said conspiracy and scheme and artifice to defraud that the defendants and conspirators:

A) Advertised for home buyers with poor credit and financial problems. MILLER and others placed ads in newspapers offering to put such home

¹Parenza and Hessel are not named defendants in the Superseding Indictment, having plead guilty to the conspiracy charge in the original indictment in this case.

buyers into MILLER-built residences for little or no down payment.

B) Established a "One Stop Shop" for home buying. By establishing Associated Capital and Associated Finance to go along with his building company, Miller Enterprises, MILLER and his co-defendants and co-conspirators basically offered home buyers a "One Stop Shop." Home buyers only had to go to Miller Enterprises and they could pick out a house and obtain financing. By doing this MILLER controlled the flow of information that was submitted to the federally insured financial institution.

C) Turned the "One Stop Shop" into a fraudulent real estate machine. MILLER obtained intentionally inflated appraisals by refusing to pay appraisers if his price was not met, selling homes in subdivisions to employees at inflated prices and agreeing to forgive second mortgages on these home, by providing MILLER-built homes as the primary comparables. Through these deceptive and manipulative practices, MILLER and others caused lenders to lend up to, and in excess of, 100% of the property values.

D) Falsified Loan Documents. MILLER, and others, created and caused to be created, materially false loan applications and accompanying documents, such as tax returns, employment verifications, rental agreements, rental verifications and payment histories, to cause federally insured financial institutions to fund loans to home buyers that otherwise would not have been justified by their financial condition.

E) Provided home purchasers with down payments and closing costs, without the knowledge of the financial institutions providing the loan proceeds.

F) Increased the sales price of the house at or prior to closing, and caused a second mortgage to be prepared on the difference at an illegal interest rate. These second mortgages would be serviced through MILLER's company, Associated Finance. MILLER and EARNSHAW created a form called the Principal Reduction Form to reduce the second mortgage, which was provided to the home buyer after closing. At various times the defendants would fail to disclose the fact of second

and/or third mortgages, and/or the fact that there was a discount to the buyer on the second or third mortgages.

G) Manipulated home buyers into moving into MILLER-built houses in advance of closing. This created a situation in which home buyers, who were confronted with an increased sales price at closing, contrary to what the buyer had agreed upon, were coerced into closing on home sales, or face eviction and homelessness.

H) Reconfigured the conspiracy to sell homes in volume to investors as straw-buyers, such as MOSER, who were paid kickbacks out of the loan closings and simply planned to let the properties go into foreclosure. MILLER and others continued to submit material misrepresentations, including income of investors and false lease/purchase agreements. To induce investors to purchase multiple residences, MILLER agreed to discount the actual price of homes sold to investors. This discount was not disclosed in the loan documentation. To induce future purchases MILLER paid kickbacks to investors out of loan proceeds, concealing such payments as referral fees and interior design fees.

I) Obtained the disbursement of \$25,042,670.39 in loan proceeds from federally insured institutions to finance the conspiracy and scheme to defraud, pay off construction loans and enrich the conspirators.

11) In furtherance and execution of the foregoing conspiracy and scheme and artifice to defraud, the defendants committed additional overt acts in the State of Kansas, and elsewhere consisting of the following substantive offenses set forth as Counts 2 through 59, incorporated herein by reference.

COUNTS 2 THROUGH 54
BANK FRAUD
A VIOLATION OF TITLE 18, UNITED STATES CODE, SECTIONS 2 &
1344

12) Paragraphs 1 through 11 are incorporated herein as though fully set forth.

13) On or about the dates set forth below, in the District of Kansas and elsewhere, the defendants executed, and attempted to execute, a scheme and artifice to defraud the financial institutions identified below, as defined in 18 U.S.C. § 20, and to obtain the moneys, funds, credits, assets, securities, and other property, owned by or under the custody or control of these institutions, by means of false and fraudulent pretenses, representations, promises and omissions of material facts, thereby obtaining, and attempting to obtain, loan proceeds from the following financial institutions:

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 2 5/22/98	Pacific Thrift & Loan, Walnut Creek, CA - Deirick Dorrell	MILLER EARNSHAW MIDDLETON BRUMBLE	\$118,852

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 3 11/02/98	TCB Houston in Houston, TX on behalf of Long Beach Mortgage - Michele Johnson (White)	MILLER EARNSHAW MIDDLETON BRUMBLE	\$137,951.14
Ct. 4 1/19/99	Bank of New York in New York, NY on behalf of WMC Mortgage - Scott & Mary Lang	MILLER EARNSHAW MIDDLETON BRUMBLE	\$93,415 (attempted)
Ct. 5 3/12/99	U.S. Bank in Minneapolis, MN on behalf of New Century Mortgage - Gary Wellner	MILLER EARNSHAW MIDDLETON BRUMBLE	\$160,805.80
Ct. 6 4/1/99	U.S. Bank in Minneapolis, MN on behalf of New Century Mortgage - Lana C. Daniels-Crow	MILLER EARNSHAW MIDDLETON BRUMBLE	\$129,822.60
Ct. 7 4/1/99	Bank of Yorba Linda in Tustin, CA - Kim Vohl	MILLER EARNSHAW MIDDLETON BRUMBLE	\$205,601
Ct. 8 4/30/99	Fremont Investment & Loan in Brea, CA - Benjamin Kinney	MILLER EARNSHAW MIDDLETON BRUMBLE	\$116,200
Ct. 9 6/15/99	Centex Home Equity Corporation of Dallas - Jennifer & Eugene Kelly	MILLER EARNSHAW MIDDLETON BRUMBLE	\$136,500 (attempted)

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 10 7/1/99	Old Kent Mortgage in Salt Lake City, UT - Mike Brown	MILLER EARNSHAW MIDDLETON BRUMBLE	\$161,707
Ct. 11 9/1/99	Bank of New York in New York, NY on behalf of WMC Mortgage - Martin & Kim Pierce	MILLER EARNSHAW MIDDLETON BRUMBLE	\$126,980
Ct. 12 11/5/99	Bank One of Chicago, IL, on behalf of First Consolidated Mortgage in Dallas, TX - Thad Aber	MILLER EARNSHAW MIDDLETON BRUMBLE	\$95,950
Ct. 13 1/31/00	Mellon Bank in Pittsburgh, PA on behalf of Option One Mortgage - Scott Peeples	MILLER EARNSHAW MIDDLETON BRUMBLE	\$142,141.15
Ct. 14 3/31/00	First Union Bank of Delaware on behalf of Equity One - Deirick Dorrell	MILLER EARNSHAW MIDDLETON BRUMBLE	\$130,700
Ct. 15 5/1/00	Bank One in Chicago, IL on behalf of BNC Mortgage - Regina Rockers	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$137,597.81
Ct. 16 5/11/00	Bank One in Chicago, IL on behalf of BNC Mortgage - Andre L. Massey	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$185,851.28

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 17 5/25/00	Bank One in Chicago, IL on behalf of BNC Mortgage - Elizabeth K. Saunders	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$178,143.57
Ct. 18 5/25/00	Bank One in Chicago, IL on behalf of BNC Mortgage - Tim & Marilyn Arnold	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$118,366.95
Ct. 19 5/31/00	Bank One in Chicago, IL on behalf of BNC Mortgage - David and Vanessa Prewitt	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$120,605.76
Ct. 20 6/19/00	Bank of New York in New York, NY on behalf of BNC Mortgage - Gary & Monica Dennington	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$196,900.40
Ct. 21 6/28/00	Bank One in Chicago, IL on behalf of BNC Mortgage - Joy Rountree	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$123,069.90
Ct. 22 8/16/00	Bank of New York in New York, NY on behalf of BNC Mortgage - Felix Charles	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$159,055.04

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 23 9/5/00	Bank of New York in New York, NY on behalf of BNC Mortgage - Elliott & Adrian Bruce	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$126,340
Ct. 24 10/2/00	Bank of New York in New York, NY on behalf o BNC Mortgage - Rick Hayes	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$198,109.16
Ct. 25 4/30/01	Bank of America in Chicago, IL on behalf of Equicredit - Eric McMillian	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$232,466.12
Ct. 26 5/1/01	US Bank in Minneapolis, MN on behalf First Franklin Financial Corporation- Linda Schaefer	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$205,927.32
Ct. 27 5/2/01	Bank of New York in New York, NY on behalf of Countrywide - Paul Nicolace	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$285,940.10 \$9,230 (2 Wires)
Ct. 28 8/27/01	US Bank in Minneapolis, MN on behalf First Franklin Financial Corporation- Julia Barton	MILLER EARNSHAW ROUSE MIDDLETON BRUMBLE	\$256,824.90

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 29 6/28/02	Bank of New York, New York, NY on behalf of Countrywide – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$287,852.55
Ct. 30 7/31/02	Citibank in Buffalo, NY on behalf of National City Mortgage – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$283,762.12 (Check)
Ct. 31 8/21/02	Citibank in Buffalo, NY on behalf of National City Mortgage – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$291,434.66
Ct. 32 8/30/02	Bank of New York, NY on behalf of Countrywide – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$291,281.06
Ct. 33 10/2/02	Bank of New York, NYC, on behalf of Greenpoint Mortgage in Denver, CO – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$292,785.65
Ct. 34 10/18/02	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$290,633.85

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 35 10/18/02	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$301,921.07
Ct. 36 10/18/02	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$270,730.02
Ct. 37 11/26/02	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$239,105.79
Ct. 38 11/26/02	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$230,418.24
Ct. 39 2/7/03	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$244,323.43
Ct. 40 2/20/03	Bank One in Chicago, IL on behalf of Homecomings Financial Network - Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$307,616.61

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 41 2/20/03	Bank of New York, NYC, Greenpoint Mortgage in Denver, CO – Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$305,764.24
Ct. 42 3/5/03	US Bank in Minneapolis, MN on behalf of First Franklin Financial Corporation – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$240,488.76
Ct. 43 3/11/03	Bank One in Chicago, IL on behalf of Homecomings Financial Network – Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$322,156.40
Ct. 44 4/24/03	Union Federal Bank in Indianapolis, IN – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$207,653.11
Ct. 45 4/24/03	Union Federal Bank in Indianapolis, IN – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$207,659.11
Ct. 46 8/8/03	First Collateral Bank in Concord, CA, on behalf of Entrust Mortgage – Joseph & Nancy Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$252,630

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct.47 8/22/03	DBTCO Americas in New York, NY on behalf of Argent Mortgage – Joseph Frey	MILLER EARNSHAW ROUSE MOSER MIDDLETON	\$323,747.98
Ct. 48 10/8/03	Bank of New York in New York, NY on behalf of Countrywide – Kara Franks	MILLER EARNSHAW MOSER MIDDLETON	\$318,468.48
Ct. 49 3/5/04	Bear Stearns Bank in NYC on behalf of Aegis Financial in Houston, TX – Tracie Phillips	MILLER EARNSHAW MOSER MIDDLETON	\$280,592.41 \$69,914.57
Ct. 50 3/31/04	Wells Fargo Bank, San Francisco on behalf of Crevecor in St. Louis, MO – Shellie Nelson	MILLER EARNSHAW MOSER MIDDLETON ROSS	\$273,498
Ct. 51 4/5/04	Comerica Bank in Long Beach, California, on behalf of People's Choice Home Loans – Shellie Nelson	MILLER EARNSHAW MOSER MIDDLETON ROSS	\$244,000.68 \$44,798.02
Ct. 52 7/12/04	Citibank in Buffalo, NY on behalf of National City Mortgage – Emma Holmes	MILLER EARNSHAW MOSER MIDDLETON ROSS	\$308,722.07

Count & On or about Date	Financial Institution & Borrower	Defendants Involved	Loan Disbursement
Ct. 53 9/9/04	Comerica Bank in Long Beach, California, on behalf of People's Choice Home Loans - Emma Holmes	MILLER EARNSHAW MOSER MIDDLETON ROSS	\$290,078.69 \$71,418.36
Ct. 54 9/24/04	Bank One in Chicago, IL, on behalf of BNC Mortgage - Emma Holmes	MILLER EARNSHAW MOSER MIDDLETON ROSS	\$355,782.52

COUNTS 55 THROUGH 59
ENGAGING IN MONETARY TRANSACTIONS
IN PROPERTY DERIVED FROM SPECIFIED UNLAWFUL ACTIVITY
IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTIONS 2 &
1957

- 14) Paragraphs 1 through 13 are incorporated herein by reference.
- 15) On or about the dates set forth below, in the District of Kansas and elsewhere, the defendants knowingly and wilfully engaged and attempted to engage in monetary transactions affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from the specified unlawful activity of bank fraud, in violation of Title 18, United States Code, Section 1344, as follows:

Count	On or about Date	Defendants	Transaction
55	2/7/03	MILLER EARNSHAW ROUSE MOSER MIDDLETON ROSS	Proceeds from Count 39 used to fund Check #26359 to Commercial State Bank for \$176,140.15 to pay off MIDDLETON'S construction loan #51209.
56	2/20/03	MILLER EARNSHAW ROUSE MOSER MIDDLETON ROSS	Proceeds from Count 40 used to fund Check #27509 for \$217,287.52 to pay off MILLER's construction loan at Hillcrest Bank
57	2/25/03	MILLER EARNSHAW ROUSE MOSER MIDDLETON ROSS	Proceeds from Count 40 ostensibly used to pay MOSER \$90,700 for referral and consultation on decoration and interior design. Deposited into MOSER's account at Bank of America.
58	4/6/04	MILLER EARNSHAW MOSER MIDDLETON ROSS	Proceeds from Count 54 used to fund check#3330 for \$181,571.44 to pay of MILLER's construction loan at Commercial State Bank
59	4/6/04	MILLER EARNSHAW MOSER MIDDLETON ROSS	Proceeds of \$64,063, from Count 54 deposited into account of MOSER ostensibly for interior design work

FORFEITURE NOTICE & ALLEGATION

16) The allegations of the foregoing counts of this indictment, are realleged, and by this reference fully incorporated herein, for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 18 United States Code, Section 982(a)(2).

As a result of the conspiracy, and scheme alleged in the foregoing counts, involving the substantive offenses of bank fraud in violation of Title 18 United States Code, Section 1344, and money-laundering, in violation of Title 18 United States Code, Section 1957, the defendants **MILLER, EARNSHAW, ROUSE, MOSER, MIDDLETON, ROSS & BRUMBLE**, shall forfeit to the United States all property, real and personal, involved in and derived from the aforesaid offenses and all property traceable to such property, or proceeds, including, but not limited to:

A) the sum of \$25,042,670.39.

B) A residence at Foxhead Shores, Lots 25-33, 18665 Metcalf, Stilwell, Kansas 66223.

C) A 1995 Piper Saratoga II HP airplane, SN 3246015, N453KC.

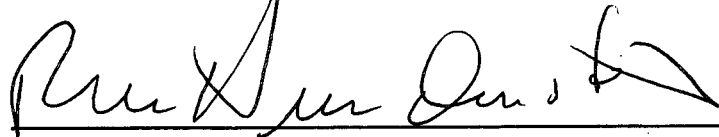
D) In the event any of the foregoing property: 1) cannot be located upon the exercise of due diligence; 2) is transferred, sold to, or deposited with, a third party;

3) is placed beyond the jurisdiction of the Court; 4) is substantially diminished in value; or, 5) is commingled with other property which cannot be divided without difficulty, as a result of any act or omission of any defendant, the Court shall order the forfeiture of any other property of the defendants, up to the value of the property described in paragraph 13A, B & C above.

A TRUE BILL.

August 8, 2007
DATE

FOREMAN OF THE GRAND JURY


ASSISTANT UNITED STATES ATTORNEY
District of Kansas

[It is requested that trial be held in Topeka, Kansas]

The Court acknowledges the receipt of this indictment in open court.


UNITED STATES DISTRICT JUDGE