

**STATE OF INDIANA
MARION COUNTY, ss:**

**IN THE MARION SUPERIOR COURT
CRIMINAL DIVISION**

Cause No: 49

STATE OF INDIANA)
)
vs.)
)

INFORMATION

COUNT I

THEFT

I.C. 35-43-4-2(a) and I.C. 35-43-4-2(a)(2)(A)

A LEVEL 5 FELONY

COUNT II

THEFT

I.C. 35-43-4-2(a) and I.C. 35-43-4-2(a)(2)(A)

A LEVEL 5 FELONY

COUNT III

MONEY LAUNDERING

I.C. 35-45-15-5(a)(1) and I.C. 35-45-15-5(a)(1)
(A)

A LEVEL 5 FELONY

**FRED DEWEY BEAR Jr. W/Male
DOB 2/19/1970**

Co-Defendant with:

ROBBIE J MCCOLLEY

On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on his/her oath (or having affirmed), says that in Marion County, Indiana

COUNT I

Between December 14, 2021 and January 10, 2022, FRED DEWEY BEAR Jr. did knowingly exert unauthorized control over the property of Mays Chemical Company, to-wit: suite tickets and/or US currency; with the intent to deprive said person of any part of the use or value of the property, said property having a value in excess of fifty thousand dollars, to-wit: \$75,000;

COUNT II

Between December 14, 2021 and January 10, 2022, FRED DEWEY BEAR Jr. did knowingly exert unauthorized control over the property of Ticket Exchange Inc. , to-wit: suite tickets and/or US currency; with the intent to deprive said person of any part of the use or value of the property, said property having a value in excess of fifty thousand dollars, to-wit: \$75,000;

COUNT III

Between December 27, 2021 and January 31, 2022, FRED DEWEY BEAR Jr. did knowingly or intentionally possess and/or transfer the proceeds of criminal activity, to wit: US currency, said proceeds having a value of at least \$50,000;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

November 12, 2024

Date

RYAN MEARS

Marion County Prosecutor

19th Judicial Circuit

/s/ Anne Frangos

Anne Frangos, #28367-49

Deputy Prosecuting Attorney

State's Witnesses:

Jason Fletcher, Marion County Prosecutor's Office

Kristin Mays-Corbitt, Mays Chemical Company

Tim Moyer, Ticket Exchange Inc.

KOR Chase Bank

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Jason Fletcher swears (affirms) that:

On 12/18/2023, I, Jason Fletcher, an Investigator with the Marion County Prosecutors Office, was assigned to investigate a possible threat and fraud case involving Fred Bear, DOB 02/19/1970, and Mays Chemical Company.

I spoke with Marc T. Quigley, a lawyer with Krieg DeVault, who represents Mays Chemical Company.

Quigley stated Mays Chemical Company is a national distributor of chemicals, ingredients, and raw materials located at 5611 E. 71st Indianapolis, IN 46220. Fred Bear, a self-employed ticket broker, has an established business relationship with Mays Chemical Company for the buying and selling of sporting tickets.

Mays Chemical Company leases a corporate suite and corresponding event tickets at Lucas Oil Stadium in Indianapolis, Indiana. When Mays Chemical is unable or elects not to use the suite or other corporate tickets for sporting/entertainment events, it enlists third parties, including Fred Bear, to resell those tickets.

Quigley stated that on or around December 14, 2021, Mays Chemical, through its President and CEO, Kristin Mays-Corbitt, engaged Bear to resell tickets to the suite at Lucas Oil Stadium for the College Football National Championship game on January 10, 2022. Mays Chemical purchased the suite tickets for \$55,000. As a ticket broker, Bear sold the suite tickets to Ticket Exchange, Inc., an Arizona company, for \$75,000. The sale of the Suite tickets to Ticket Exchange generated a profit of \$20,000. Bear agreed to pay Mays Chemical \$65,000 and was to retain \$10,000 as his sales commission. However, to date, Bear has not fulfilled his financial obligations, unlawfully retaining all benefits and profits from selling the suite tickets.

I received the following text messages from Mays Chemical, which documents a conversation between Kristin Mays-Corbitt and Fred Bear:

Tuesday, December 14, 4:17 PM

Fred Bear – *“Sorry what’s our cost on the suite.”*

Kristin Mays-Corbitt – *“\$55,000 plus \$6,000 for the food and beverage package (that is mandatory if you want to order any food and beverage)”*

Fred Bear – *“Does that include the SRO’s”*

Fred Bear – *“Thank you”*

Kristin Mays-Corbitt – *“No that is for 20 tickets”*

Affidavit for Probable Cause

From: Jason Fletcher

Wednesday, December 22, 7:14 PM

Fred Bear – “Okay did you check your schedule for either December 29th or January 5th Pacer game if any tix available. Thank you”

Fred Bear – “Also I’m quoting the suite out to a few Corporate Customers, do we have a in hand date. Thx”

Kristin Mays-Corbit – “Yes we can download tix any time. They are on the app as well.”

Kristin Mays-Corbit – “Dec 29 is potentially available. Will need to check how many. 1/5 is not available.”

Fred Bear – “Either 2 or 4 for either game.”

Fred Bear – “I quoted the suite @75,000.00 without food. With food. “81,000. Are you good with these numbers? Im not listing the suite on the open market to protect you. So I think this number is really good. Just let me know. Thank you.”

I contacted Ticket Exchange Inc., located at 4020 N 20th Street, #305 Phoenix, AZ 85016. Their representative, Tim Moyer, stated that Bear sold his company Ticket Exchange the suite tickets for the College Football National Championship game on January 10, 2022, for \$75,000. Ticket Exchange processed a wire transfer of \$71,000.00 to an account belonging to Crossroads of America Transport for a delivery date of December 27, 2021. Moyer said they paid Bear \$4,000 short of the ticket price because Bear had past outstanding invoices. Bear asked Moyer to use the bank account with Crossroads of America Transport Inc., an Indianapolis company, for the wire transfer.

Moyer noted that he had a buyer lined up for the suite tickets, but they backed out. Bear told Moyer that he could sell the suite tickets for Moyer and return the \$75,000 to Ticket Exchange Inc. To date, Bear has never paid Ticket Exchange any funds nor returned the suite tickets even though Bear did receive the tickets back.

I looked at the public website for the Indiana Secretary of State Indiana. Crossroads of America Transport Inc. is located at 4726 E Calhoun Street, Indianapolis, IN 46203, and is owned by Robbie McColley.

I contacted McColley DOB 03/30/1977, and he stated he knew that in the past, Bear would use the Crossroads of America’s Chase company bank account to transfer large sums of money to hide the funds from his wife. McColley stated that he and Bear had fallen out, and Bear had a gambling problem and was known to “rob Peter to pay Paul.” I asked McColley if he remembered this wire transfer of \$71,000 on December 27, 2021, and he stated that he remembered it a little. Fred Bear would often ask him to receive money, and he would get paid to

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

/s/ Jason Fletcher

AFFIANT

DATED: November 12, 2024

Affidavit for Probable Cause

From: Jason Fletcher

do so. I asked McColley if he could look it up in his records, and he advised that he couldn't, as Chase Bank closed his account for no reason. McColley then stated that he would send the money to Fred Bear. I asked McColley what method he would use to send the funds to Bear, and he said he really couldn't remember, but he believes he has transferred some via Venmo and some cash withdrawals. McColley also said we would get \$500 from Bear for doing this.

I submitted a subpoena for bank records, and I received the records from the Crossroads of America Transport Inc. bank account ending 6356 at JPMorgan Chase Bank. Those records included monthly statements, all paid items, all deposit items, and signature cards for the time period of November 1, 2021, through February 1, 2022.

I located the signature card for the account ending 6356. The account is a "Chase Total Business Checking account" with an account title of Crossroads of America Transport, Inc. Robbie McColley is listed as "President" and is the only signatory on the account.

For account ending 6356, I reviewed the account activity on the monthly statements from December 27, 2021 (date of \$71,000 deposit) through January 31, 2022. I found that this account, while listed a business account, appeared to have been used as a personal account. The withdrawals were expenses such as: Apple.com/bill, food, Microsoft, Amazon, Walmart, pet expenses, Onlyfans, phone bills, and Fanduel Stardust (gambling).

I confirmed that the \$71,000 wire transfer from Ticket Exchange Inc. was deposited into this account on December 27, 2021. I then reviewed the account for any withdrawals completed on or after December 27, 2021, that may have been for the benefit of Fred Bear. I located the following withdrawals:

Date	Description	Amount
12/28/2021	Withdrawal	\$ 9,000.00
12/28/2021	Zelle Payment to Q	\$ 2,700.00
12/29/2021	Withdrawal	\$ 9,000.00
12/30/2021	ATM Cash Withdrawal	\$ 3,000.00
12/30/2021	ATM Cash Withdrawal	\$ 3,000.00
12/31/2021	ATM Cash Withdrawal	\$ 3,000.00
12/31/2021	Withdrawal	\$ 6,000.00
12/31/2021	Zelle Payment to Q	\$ 3,100.00
1/6/2022	ATM Cash Withdrawal	\$ 3,000.00
1/6/2022	Check #2183 payable to Fred Bear	\$ 2,500.00

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

/s/ Jason Fletcher

AFFIANT

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1/6/2022	Check #2184 payable to Fred Bear	\$ 2,500.00
1/7/2022	ATM Cash Withdrawal	\$ 9,000.00
1/8/2022	Check #2185 payable to Fred Bear	\$ 2,500.00
1/10/2022	ATM Cash Withdrawal	\$ 3,000.00
Total:		\$ 61,300.00

Additionally, I did find the following withdrawals paid directly to Robbie McColley. These withdrawals all occurred after December 27, 2021 (the date of the \$71,000 deposit):

Date	Description	Amount
12/28/2021	Venmo - Robbie McColley	\$500.00
12/29/2021	Venmo - Robbie McColley	\$130.00
12/30/2021	Venmo - Robbie McColley	\$500.00
1/3/2022	Venmo - Robbie McColley	\$1,000.00
1/3/2022	Venmo - Robbie McColley	\$2,050.00
1/3/2022	Venmo - Robbie McColley	\$500.00
1/10/2022	Venmo - Robbie McColley	\$600.00
1/10/2022	Venmo - Robbie McColley	\$600.00
1/18/2022	Venmo - Robbie McColley	\$90.00
1/20/2022	Venmon - Robbie McColley	\$100.00
1/27/2022	Venmon - Robbie McColley	\$65.00
1/31/2022	Venmon - Robbie McColley	\$35.00
Total:		\$6,170.00

In conclusion, Fred Bear was authorized to sell Mays Chemical’s suite tickets for the College Football National Championship game on January 10, 2022. The agreement was that Mays Chemical would receive the funds from the proceeds of the sale minus a \$10,000 commission. However, on December 27, 2021, Fred Bear sold those suite tickets to Ticket Exchange, Inc. for \$75,000 and had those funds routed through Robbie McColley’s bank account. Robbie McColley received payments for the deposit. Fred Bear has never paid Mays Chemical any funds from that ticket sale. Further, Ticket Exchange, Inc. allowed Fred Bear to sell the tickets, but Ticket Exchange, Inc. has never received any funds for the sale of those tickets nor the return of the tickets.

All the above events occurred in Marion County, State of Indiana.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

/s/ Jason Fletcher

AFFIANT

DATED: November 12, 2024