



office in Broken Arrow, Tulsa County, Oklahoma, within the Northern District of Oklahoma.

4. Armstrong Bank (“Armstrong”) was a national banking association, the deposits of which were insured by the Federal Deposit Insurance Corporation, and maintained an office in Muskogee, Oklahoma, within the Eastern District of Oklahoma.

5. Pinnacle/Stampede, an Oklahoma Corporation, maintained its principal place of business in Tulsa, Oklahoma, within the Northern District of Oklahoma, and used seven (7) checking accounts as identified in the chart below:

BANK	ACCOUNT NAME	ACCOUNT #
Banc First	Pinnacle/Stampede	XXXX4329
Banc First	Pinnacle Controlled Disbursement	XXXX4410
Arkansas Valley Bank	Pinnacle/Stampede	XXXX5308
Arkansas Valley Bank	Pinnacle/Stampede Store #11	XXXX5332
Arkansas Valley Bank	Pinnacle/Stampede Store #5	XXXX5480
Arkansas Valley Bank	Pinnacle/Stampede Store #4	XXXX5498
Armstrong Bank	Pinnacle/Stampede Store #7	XXXX7137

6. The defendant, **MICHAEL JEFFREY MORRIS**, (“**MORRIS**”), the defendant, used the alias, Mark A. Morris and M.A. Morris in his discussions with Banc First to open Pinnacle/Stampede bank accounts. After opening the bank accounts the defendant, **MORRIS**, used those aliases to sign checks, sign documents and conduct business.

7. Although **MORRIS** did not hold an official position with Pinnacle/Stampede, he nevertheless orchestrated many of its financial activities. This included directing and

assisting employees of Pinnacle/Stampede to issue checks drawn upon its bank accounts and to make deposits into those bank accounts.

8. **MORRIS**, used forged signatures, that is, “Mark A. Morris” and “M.A. Morris” on checks drawn on Pinnacle/Stampede bank accounts.

9. **MORRIS** used a signature stamp to affix the signature of Kristi Lynn Brooks to checks drawn on Pinnacle/Stampede bank accounts.

### **OBJECTS OF SCHEME**

Beginning in or about the month of December 2012 and continuing until on or about February 13, 2013, within the Northern District of Oklahoma and elsewhere, **MORRIS**, devised and intended to devise a scheme and artifice to defraud Banc First, by writing and causing to be written a series of insufficient funds checks drawn against insufficient funds in the Pinnacle/Stampede accounts at Arkansas Valley Bank and Armstrong Bank, and causing the depositing and to be deposited, these insufficient funds checks into Pinnacle/Stampede accounts at Banc First, thereby disguising and concealing the actual balances of funds in the accounts at Banc First. The artificial balances created by the deposits of insufficient funds checks induced Banc First to pay checks drawn against insufficient funds in Pinnacle/Stampede accounts. By approximately February 13, 2013, the Pinnacle/Stampede accounts at Banc First were overdrawn by approximately \$117,000.

**MEANS OF EXECUTING SCHEME**

It was part of the scheme and artifice to defraud that:

10. **MORRIS**, would cause and encourage employees of Pinnacle/Stampede in Tulsa, Oklahoma, to write insufficient funds checks upon Pinnacle/Stampede accounts at AVB and Armstrong payable to Pinnacle/Stampede, for amounts in excess of the actual funds in the Pinnacle/Stampede accounts at AVB and Armstrong.

11. Upon presentation and refusal of AVB and Armstrong to pay worthless checks drawn upon the Pinnacle/Stampede account, **MORRIS** caused and encouraged employees of Pinnacle/Stampede, to write additional insufficient funds checks drawn upon the Pinnacle/Stampede account at AVB and Armstrong and deposit such additional checks into Pinnacle/Stampede accounts at Banc First, to replace insufficient funds checks previously written upon the Pinnacle/Stampede accounts at AVB and Armstrong.

On or about the dates stated below, within the Northern District of Oklahoma, **MORRIS**, for the purpose of executing the aforesaid scheme and artifice, and in attempting to do so, knowingly wrote, caused and encouraged to be written the numbered checks set out in the chart below, drawn against the Pinnacle/Stampede bank accounts set out in the chart below, dates of deposit set out in the chart below, check numbers and in the amounts set out in the chart below and caused those checks to be deposited in Pinnacle/Stampede bank accounts set out in the chart below.

<b>Date Deposited</b>	<b>Bank Acct Deposited</b>	<b>Check #; Bank &amp; Acct Check Drawn</b>	<b>Amount of Check Deposited</b>	<b>Balance of Account Deposited Check Drawn</b>
1/29/2013	BF 4329	501011 AVB 5480	\$7,014.50	\$6,122.76
1/30/2013	BF 4110	1401002 AVB 5498	\$8,864.82	\$5,429.94
1/30/2013	BF 4410	501012 AVB 5480	\$9,018.55	\$6,122.76
1/31/2013	BF 4410	501013 AVB 5480	\$5,797.05	(\$27.53)
1/31/2013	BF 4410	701018 AB 7137	\$6,792.82	\$1,539.31
2/1/2013	BF 4410	501014 AVB 5480	\$10,384.08	(\$55.53)
2/1/2013	BF 4410	1101000 AVB 5332	\$11,334.05	\$1,221.14
2/1/2013	BF 4410	5501017 AVB 5308	\$21,552.07	\$7,242.40
2/1/2013	BF 4110	5501016 AVB 5308	\$40,873.50	\$7,242.43
2/4/2013	BF 4410	1101001 AVB 5332	\$6,685.94	\$6,628.50
2/4/2013	BF 4410	501015 AVB 5480	\$6,739.87	(\$83.53)
2/6/2013	BF 4329	5501019 AVB 5308	\$8,735.08	(\$16,133.08)

All in violation of Title 18 United States Code, Section 1344(1).

**BANK FRAUD FORFEITURE ALLEGATION**  
**[18 U.S.C. § 982(a)(2)(A)]**

The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

Upon conviction of the bank fraud scheme alleged in Count One of this Information, as part of his sentence, the defendant, **MICHAEL JEFFREY MORRIS**, shall forfeit to the United States any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of such scheme. A criminal forfeiture money judgment shall also be entered in a sum of money in an amount of at least \$117,000 representing proceeds obtained as a result of the bank fraud scheme.

Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

**COUNT TWO**  
**[18 U.S.C. § 1028A(a)(1)]**

From on or about August 9, 2012, through on or about February 13, 2013, in the Northern District of Oklahoma, **MICHAEL JEFFREY MORRIS**, defendant herein, during and in relation to felony violations of the Bank Fraud statute, Title 18, United States Code, Section 1344(1), knowingly possessed and used, without lawful authority, a means of identification of another person, to-wit, name, signature, social security account number, Oklahoma driver's license number and date of birth.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNTS THREE THROUGH FIVE**  
**[18 U.S.C. § 1014]**

On or about the dates stated in the table below, in the Northern District of Oklahoma, the defendant, **MICHAEL JEFFREY MORRIS** in support of applications to secure loans for the purchase of real estate properties described below, knowingly made and caused to be made to Security Bank, a financial institution located in Tulsa, Oklahoma, the deposits of which were insured by the Federal Deposit Insurance Corporation, materially false statements for the purpose of influencing the action of the financial institution to approve loans, including that neither **MICHAEL JEFFREY MORRIS** and KLB, a person known to the United States Attorney, had not been involved in a bankruptcy proceeding in the past ten years when in truth and in fact, as **MICHAEL JEFFREY MORRIS**, well knew, those statements regarding the bankruptcy proceedings were false:

<b>COUNT</b>	<b>DATE</b>	<b>LOAN NUMBER</b>	<b>REAL ESTATE FINANCED</b>	<b>LOAN AMOUNTS</b>
3	05/05/2014	9540400	2933 S. 111 <sup>th</sup> E. Ave. 3413 S. 94 <sup>th</sup> E. Ave.	\$73,500
4	07/28/2014	9577900	4615 E. 3 <sup>rd</sup> St 4619 E. 3 <sup>rd</sup> St. 9115 E. Latimer Pl.	\$41,326.27
5	08/15/2014	9689500	5829 S. Evanston Ave.	\$137,311.48

All in violation of Title 18, United States Code, Section 1014 and Title 18, United States Code, Section 2(a).



**FALSE STATEMENT FORFEITURE ALLEGATION**  
**[18 U.S.C. § 982(a)(2)(A)]**

The allegations contained in Counts Three through Five of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

Upon conviction of the false statement to a financial institution offenses alleged in Counts Three through Five of this Information, as part of their sentence, the defendant, **MICHAEL JEFFREY MORRIS**, shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses, including but not limited to:

**MONEY JUDGMENT**

A sum of money in an amount of at least \$252,000 representing any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such false statement to financial institution offenses.

**REAL PROPERTY WITH ALL BUILDINGS, IMPROVEMENTS  
AND APPURTENANCES THEREON**

1. Real property commonly known as 2933 S. 111<sup>th</sup> East Avenue, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lot Five (5), Block Six (6), Valley Glen Third Addition, to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded plat thereof.

2. Real property commonly known as 3413 South 94<sup>th</sup> East Avenue, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lot Four (4), Block Twelve (12), Blocks 10 Thru 17, Inclusive, Briarwood Second Addition, Tulsa County, State of Oklahoma, according to the recorded plat thereof.

3. Real property commonly known as 4615 East 3<sup>rd</sup> Street, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lot Four Hundred Thirty-Five (435), Block 2, of the Resubdivision of Lots 11, 12, 13 14 and 15, Rodgers Heights Subdivision, Tulsa County, State of Oklahoma, according to the recorded plat thereof.

4. Real property commonly known as 4619 East 3<sup>rd</sup> Street, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lot Four Hundred Thirty-Six (436), Block Two (2), of the Resubdivision of Lots 11, 12, 13, 14 and 15, Rodgers Heights Subdivision, Tulsa County, State of Oklahoma according to the recorded plat thereof.

5. Real property commonly known as 9115 East Latimer Place, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lot Twelve (12), Block Eight (8), Layman Acres, an addition to the City of Tulsa, Tulsa County, State of Oklahoma, according to the recorded plat thereof.

6. Real property commonly known as 5829 South Evanston, Tulsa, Oklahoma, more particularly described as follows, to-wit:

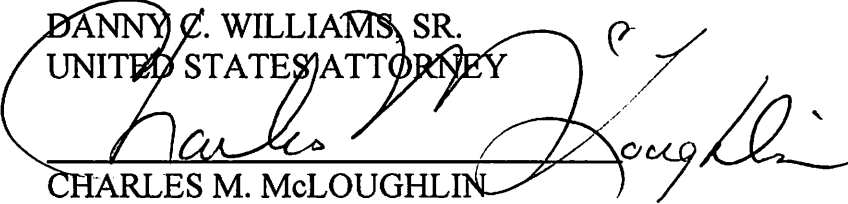
Lot Twelve (12), Block Two (2), Fairway Estates Addition, a subdivision in Tulsa County, State of Oklahoma, according to Recorded Plat No. 2227.

Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 18, United States Code, Section 982(b), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been

placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A).

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY



CHARLES M. McLOUGHLIN  
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