

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

SEP 19 2012

ROBERT D. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DISTRICT OF OKLA.
BY *[Signature]*

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

TEDDY DRYDEN MITCHELL,)
DRYDEN RYLEY MITCHELL,)
BILLY NICK MITCHELL,)
DAVID BRUCE LOVELAND,)
JERRY WAYNE GILCHRIST,)
a/k/a Best Buy Jerry,)
MICHAEL LEE McCULLAH,)
JUSTIN EDWARD MUSGROVE,)
RICHARD ALLEN HANCOCK,)
GARY JOHN GIBB, and)
GORTATION MANAGEMENT, S.A.,)

Defendants.)

No. **CR 12-216 D**

- Violations: 18 U.S.C. § 1955
- 18 U.S.C. § 2
- 18 U.S.C. § 1084
- 18 U.S.C. § 1957
- 18 U.S.C. § 1956(a)(2)(A)
- 18 U.S.C. § 1956(a)(1)(B)(i)
- 18 U.S.C. § 1956(a)(1)(A)(i)
- 18 U.S.C. § 1956(h)
- 31 U.S.C. § 5363(3)
- 18 U.S.C. § 1952(a)(1)
- 18 U.S.C. § 981(a)
- 18 U.S.C. § 982(a)
- 18 U.S.C. § 1955(d)
- 21 U.S.C. § 853
- 28 U.S.C. § 2461

INTRODUCTION

1. At all times relevant to this Indictment, to include count 1 through 81 and forfeiture, the defendants **TEDDY DRYDEN MITCHELL** (hereinafter “MITCHELL”), **DRYDEN RYLEY MITCHELL** (hereinafter “DRYDEN MITCHELL”), **BILLY NICK MITCHELL**, **DAVID BRUCE LOVELAND** (hereinafter “LOVELAND”), **JUSTIN EDWARD MUSGROVE**, **JERRY WAYNE GILCHRIST**, **MICHAEL LEE McCULLAH**, **RICHARD ALLEN HANCOCK**

(hereinafter **“HANCOCK”**), **GARY JOHN GIBB** (hereinafter **“GIBB”**), **GORTATION MANAGEMENT, S.A.** and others known and unknown to the Grand Jury, were members and associates of an illegal gambling business organized for the purpose of, among other things: (1) operating “High Stakes” poker games from **MITCHELL’S** residence located at 640 N.W. 150th, Oklahoma City, Oklahoma; (2) acting as a “bookie” by taking bets and wagers on sporting events on behalf of betting clients; (3) using an illegal Internet gambling website in interstate and foreign commerce for the benefit of betting clients; (4) laundering the proceeds of illegal gambling activities; and (5) committing various crimes related to the operation of an illegal gambling business, including but not limited to interstate travel in aid of racketeering and use of a wire communication facility to transmit betting information.

2. **MITCHELL** organized poker games at his residence located at 640 N.W. 150th Street, Oklahoma City, Oklahoma. Professionals from local casinos, associates, and family members acted in various roles to include as dealers, including but not limited to **DRYDEN MITCHELL, BILLY NICK MITCHELL, JUSTIN EDWARD MUSGROVE, LOVELAND, MICHAEL LEE McCULLAH, and JERRY WAYNE GILCHRIST. MITCHELL and LOVELAND** greeted the poker participants and **LOVELAND** typically acted as the “banker,” exchanging poker chips for cash. There were two poker tables, one “Low Stakes” and the other “High Stakes.”

3. **MITCHELL** and co-conspirators took a “rake” (a percentage or commission from the amount of money bet for each hand of poker that was dealt) to

generate income from the poker games. This “rake” was taken from at least four hundred hands of poker each week, with half of those coming at the "High Stakes" poker table.

4. Initially, **MITCHELL** operated as a traditional bookmaker by taking sports bets for clients both in person and over the phone. Later, **MITCHELL** and co-conspirator **DRYDEN MITCHELL** provided their betting clients a password to gain access to a Costa Rican sports betting Internet website. This website was owned and operated by **GORTATION MANAGEMENT, S.A.**, a Costa Rican corporation. Their websites included but were not limited to www.betmmsports.com, www.playatmm.net and www.betmidsouth.com. **GORTATION MANAGEMENT, S.A.** operates as a “clearing house” for “bookies” throughout the United States by pooling gambling proceeds of their gambling clients and assisting them in paying off winnings to gambling clients. **MITCHELL** and co-conspirator **DRYDEN MITCHELL** would recruit, enlist and manage sports betting clients on behalf of **GORTATION MANAGEMENT, S.A.**, and provide a percentage of the money collected from their Internet sports betting clients to **GORTATION MANAGEMENT, S.A.**

5. **HANCOCK** is a co-conspirator of **MITCHELL** and **GORTATION MANAGEMENT, S.A.** **HANCOCK** received numerous checks payable to **GORTATION MANAGEMENT** from American clients, which included **MITCHELL**’s gambling clients. **HANCOCK** used California check cashing facilities to cash the majority of these checks – all payable to **GORTATION MANAGEMENT** – from gambling clients, which represented payment for unlawful sports wagers lost.

6. Co-conspirator **GIBB**, an associate of co-conspirator **HANCOCK**, is a "bookie" having signature authority for domestic financial accounts relating to **GORTATION MANAGEMENT, S.A.**, and is the listed representative on its Certificate of Business filed in Nevada. Co-conspirator **GIBB** received numerous checks for gambling losses of betting clients which were payable to **GORTATION MANAGEMENT** and deposited into his accounts.

7. **MITCHELL** maintained computers in furtherance of his illegal gambling operation. Records from the computers revealed deposits for companies owned and operated by **MITCHELL** under the headings of "Gambling Income," "Vending Games," and "Poker." These businesses included but are not limited to TEDDY D. MITCHELL Store Account, ABC Amusement, L.L.C., TITAN FINANCIAL, L.L.C., MITCHELL BOYS, L.L.C., DRYDEN Group, L.L.C., TAD DEVELOPMENT, L.L.C., and TD MARKETING, L.L.C.

8. Financial analysis of these accounts indicated that **MITCHELL** and co-conspirator **DRYDEN MITCHELL** used the accounts to launder money generated from illegal gambling activities by purchasing vehicles and residential properties. **MITCHELL** also used gambling clients to conceal gambling proceeds.

9. Co-conspirators **HANCOCK**, **GIBB**, and **GORTATION MANAGEMENT, S.A.**, laundered illegal gambling money by depositing checks in interstate and foreign commerce from Internet gambling clients which furthered and carried on their illegal Internet gambling business.

COUNT 1

(Illegal Gambling Business – Offshore Internet Sports Betting)

From in or before 2004, and continuing at least until in or about November 2010, in the Western District of Oklahoma, and elsewhere,

-----**TEDDY DRYDEN MITCHELL,
DRYDEN RYLEY MITCHELL,
DAVID BRUCE LOVELAND,
RICHARD ALLEN HANCOCK,
GARY JOHN GIBB, and
GORTATION MANAGEMENT, S.A.,**-----

and others known and unknown to the Grand Jury, each aiding and abetting the other, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business. The illegal gambling business involved an offshore Internet sports betting business in violation of Title 21, Oklahoma Statutes, Sections 982 and 987. The illegal gambling business involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day.

All in violation of Title 18, United States Code, Section 1955; and Title 18, United States Code, Section 2.

COUNT 2

(Illegal Gambling Business – High Stakes Poker and Sports Bookmaking)

From in or before 2004, and continuing at least until in or about July 2010, in the Western District of Oklahoma, and elsewhere,

-----**TEDDY DRYDEN MITCHELL,
DRYDEN RYLEY MITCHELL,
BILLY NICK MITCHELL,
DAVID BRUCE LOVELAND,**

**JERRY WAYNE GILCHRIST,
a/k/a “Best Buy Jerry,”
JUSTIN EDWARD MUSGROVE, and
MICHAEL LEE McCULLAH,-----**

and others known and unknown to the Grand Jury, each aiding and abetting the other, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business. The illegal gambling business involved the operation of poker games, including but not limited to “High Stakes” games, and a sports bookmaking business in violation of Title 21, Oklahoma Statutes, Section 982. The illegal gambling business involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day.

All in violation of Title 18, United States Code, Section 1955; and Title 18, United States Code, Section 2.

**COUNT 3
(Use of a Wire Communication Facility – Telephone)**

From in or before March 2004, and continuing at least until November 2010, in the Western District of Oklahoma, and elsewhere,

-----**TEDDY DRYDEN MITCHELL,
DRYDEN RYLEY MITCHELL, and
DAVID BRUCE LOVELAND,-----**

each aiding and abetting the other, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire

communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants providing their betting clients a toll-free telephone line to an offshore gambling facility located in San Jose, Costa Rica, for the purpose of placing wagers on sporting events.

All in violation of Title 18, United States Code, Section 1084; and Title 18, United States Code, Section 2.

COUNT 4
(Use of Wire Communication Facility – Internet)

From in or before March 2004, and continuing at least until November, 2010, in the Western District of Oklahoma, and elsewhere,

-----**TEDDY DRYDEN MITCHELL,**
DRYDEN RYLEY MITCHELL,
DAVID BRUCE LOVELAND,
RICHARD ALLEN HANCOCK, and
GARY JOHN GIBB,-----

each aiding and abetting the other, while being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants operated an Internet site located in San Jose, Costa Rica, for the purpose of placing wagers on sporting events.

All in violation of Title 18, United States Code, Section 1084; and Title 18, United States Code, Section 2.

COUNT 5
(Money Laundering)

On or about October 6, 2008, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, he issued a check from his MidFirst Bank account in the amount of \$20,200.00 payable to R.J., plus United States currency in the amount of \$2,500.00, for the purchase of a 2006 Cadillac Escalade EXT, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 6
(Money Laundering)

On or about October 20, 2008, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant issued and delivered a check drawn from his Bank of America account in the amount of \$10,500.00 payable to DRYDEN MITCHELL, such property having been derived from a specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 7
(Money Laundering)

On or about October 20, 2008, in the Western District of Oklahoma,

-----**DRYDEN RYLEY MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant issued a check drawn from his MidFirst Bank account in the amount of \$10,500.00 payable to Rick Jones Pontiac, plus United States currency in the amount of \$6,000.00, for the purchase of a 2003 Cadillac Escalade EXT, such property having been derived from a specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 8
(Money Laundering)

On or about October 8, 2008, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, defendant issued and delivered a check in the amount of \$30,000.00 drawn from his Bank of America account payable to J.M., such

property having been derived from a specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 9
(Money Laundering - International)

On or about February 25, 2008, in the Western District of Oklahoma,

-----**GORTATION MANAGEMENT, S.A.**,-----

and others known and unknown to the Grand Jury, each aiding and abetting the other, did transfer funds, and cause the transfer of funds, in the amount of \$50,000.00 from Oklahoma City, Oklahoma, to a place outside the United States to wit; Costa Rica, with the intent to promote the carrying on of a specified unlawful activity, that is, violation of the Wire Wagering Act in violation of Title 18, United States Code, Section 1084, and conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1956(a)(2)(A); and Title 18, United States Code, Section 2.

COUNT 10
(Money Laundering - International)

On or about February 24, 2009, in the Western District of Oklahoma,

-----**GORTATION MANAGEMENT, S.A.**,-----

and others known and unknown to the Grand Jury, each aiding and abetting the other, did transfer funds, and cause the transfer of funds, in the amount of \$30,000.00 from Oklahoma City, Oklahoma, to a place outside the United States to wit; Costa Rica, with

the intent to promote the carrying on of a specified unlawful activity, that is, violation of the Wire Wagering Act in violation of Title 18, United States Code, Section 1084, and conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1956(a)(2)(A); and Title 18, United States Code, Section 2.

COUNT 11
(Money Laundering - International)

On or about February 22, 2010, in the Western District of Oklahoma,

-----**GORTATION MANAGEMENT, S.A.**,-----

and others known and unknown to the Grand Jury, each aiding and abetting the other, did transfer funds, and cause the transfer of funds, in the amount of \$35,000.00 from Oklahoma City, Oklahoma, to a place outside the United States to wit; Costa Rica, with the intent to promote the carrying on of a specified unlawful activity, that is, violation of the Wire Wagering Act in violation of Title 18, United States Code, Section 1084, and conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1956(a)(2)(A); and Title 18, United States Code, Section 2.

COUNT 12
(Money Laundering - Concealment)

On or about October 15, 2009, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly conduct a financial transaction affecting interstate and foreign commerce to wit; defendant delivered \$50,000.00 in United States currency as a loan payment to R.A., which involved the proceeds of a specified unlawful activity, that is, conducting an illegal gambling business, in violation of Title 18, United States Code, Section 1955, knowing that the transaction was designed in whole or in part to conceal and disguise the source and ownership and control of the proceeds of said specific unlawful activity and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 13
(Money Laundering - Concealment)

On or about February 28, 2011, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

did knowingly conduct a financial transaction affecting interstate and foreign commerce to wit; defendant delivered \$30,000.00 in United States currency to L.W.J. to subsidize the purchase of a residence in Oklahoma City, Oklahoma, which involved the proceeds of a specified unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955, knowing that the transaction was designed in whole or in part to conceal and disguise the source and ownership and control of the proceeds of said specified a unlawful activity and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 14
(Money Laundering - Concealment)

On or about December 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

did knowingly conduct a financial transaction affecting interstate and foreign commerce to wit; defendant delivered and transferred at least \$200,000.00 in United States currency to R.H. to hold and conceal the true location, source, and ownership of the United States currency, which involved the proceeds of a specified unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955, knowing that the transaction was designed in whole or in part to conceal and disguise the source and ownership and control of the proceeds of said specified unlawful activity and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 15
(Money Laundering - Concealment)

On or about January 2011, through February 2011, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

did knowingly conduct a financial transaction affecting interstate and foreign commerce to wit; defendant delivered and transferred at least \$100,000.00 in United States currency

to R.S. to hold and conceal the true location, source, and ownership of the United States currency, which involved the proceeds of a specified unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955, knowing that the transaction was designed in whole or in part to conceal and disguise the source and ownership and control of the proceeds of said specified unlawful activity and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 16
(Money Laundering - International)

On or about February 4, 2008, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL and**
GORTATION MANAGEMENT S.A.,-----

did transfer funds, and cause the transfer of funds, in the amount of \$36,055.00, from a financial account inside the United States utilized by R.S. to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity, that is, a violation of the Wire Wagering Act in violation of Title 18, United States Code, Section 1084, and conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1956(a)(2)(A); and Title 18, United States Code, Section 2.

COUNT 17
(Money Laundering - Promotion)

On or about October 27, 2008, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**
RICHARD ALLEN HANCOCK and
GORTATION MANAGEMENT, S.A.,-----

did knowingly conduct a financial transaction affecting interstate and foreign commerce to wit; MITCHELL issued a check drawn from his Bank of America Bank account in the amount of \$9,650.00 payable to GORTATION MANAGEMENT, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of specified unlawful activity, to wit: operating an offshore Internet sports betting website, and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);
and Title 18, United States Code, Section 2.

COUNT 18
(Money Laundering)

On or about August 20, 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant issued and delivered check number 3323

drawn from his Bank of America account in the amount of \$13,000.00 payable to L.E.M. TRUST, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 19
(Money Laundering)

On or about August 20, 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant issued and delivered check number 3324 drawn from his Bank of America account in the amount of \$13,000.00 payable to L.E.M. TRUST, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 20
(Money Laundering)

On or about August 30, 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly and willfully engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived

property in a value greater than \$10,000.00, that is, defendant issued and delivered a check drawn from his Bank of America account in the amount of \$15,000.00 payable to L.M. TRUST, such property having been derived from specific unlawful activity in violation of Title 18, United States Code Section 1955, Illegal Gambling Business as alleged in Count 1 and Count 2.

All in violation of Title 18, United States Code, Section 1957.

COUNT 21
(Money Laundering)

On or about September 7, 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

did knowingly engaged in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant issued and delivered a check drawn from the L.E.M. Irrevocable Trust, TEDDY D. MITCHELL TRUSTEE, MidFirst Bank account, in the amount of \$50,000.00 payable to K.A., for a loan, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNT 22
(Money Laundering - Conspiracy)

From in or about 2004 and continuing through November 2010, within the Western District of Oklahoma, and elsewhere,

-----**TEDDY DRYDEN MITCHELL,**

**DRYDEN RYLEY MITCHELL,
DAVID BRUCE LOVELAND,
RICHARD ALLEN HANCOCK,
GARY JOHN GIBB, and
GORTATION MANAGEMENT, S.A.,-----**

and others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented proceeds of some form of unlawful activity, did interdependently, knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Sections 1955 and 1084, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity and with the intent to promote the carrying on of said illegal gambling activity in violation of Section 1956(h) of Title 18 of the United States Code.

a. It was part of the conspiracy that the defendants **MITCHELL, HANCOCK, GIBB, GORTATION MANAGEMENT, S.A.**, and others known and unknown to the Grand Jury, disguised gambling revenue due and owing to the offshore Internet sports betting business by instructing gamblers and agents of the offshore Internet sports betting business to create financial instruments payable to Gortation Management and Seven Capital, entities with no legitimate business purpose other than to launder the proceeds of the offshore Internet sports betting's illegal gambling business.

b. It was part of the conspiracy that approximately eight million dollars (\$8,000,000) was laundered by the defendants **MITCHELL, DRYDEN MITCHELL, LOVELAND, HANCOCK, GIBB, GORTATION MANAGEMENT, S.A.**, and others known and unknown to the Grand Jury, through the aforementioned entities.

c. It was a part of the conspiracy that the defendants **MITCHELL, DRYDEN MITCHELL, LOVELAND, HANCOCK, GIBB, GORTATION MANAGEMENT, S.A.**, and others known and unknown to the Grand Jury, used facilities in interstate and foreign commerce to distribute the proceeds of illegal gambling activity.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 23 THROUGH 29
(Acceptance of Financial Instruments for Unlawful Internet Gambling)

From in or about September 2008, and continuing through November 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL,**-----

being a person engaged in the business of betting and wagering, did knowingly accept, in connection with the participation of another person in unlawful Internet gambling, checks drawn by such other person and drawn on and payable at and through any financial institution as specifically set forth below:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Check No.</u>	<u>Financial Institution</u>
23	3/23/09	\$10,000.00	227962	Bank of America
24	10/27/09	\$21,500.00	7382	Arvest Bank
25	10/29/09	\$12,080.00	5765	Bank of Oklahoma

26	12/10/09	\$15,602.00	5778	Bank of Oklahoma
27	6/2/10	\$30,204.00	5857	Bank of Oklahoma
28	6/17/10	\$50,689.00	5861	Bank of Oklahoma
29	9/16/10	\$33,000.00	5919	Bank of Oklahoma

All in violation of Title 31, United States Code, Section 5363(3).

COUNTS 30 THROUGH 32
(Acceptance of Financial Instruments for Unlawful Internet Gambling)

From in or about February 2008, and continuing through November 2010,
in the Western District of Oklahoma,

-----**GORTATION MANAGEMENT, S.A.**,-----

being a corporation engaged in the business of betting and wagering, did knowingly accept, in connection with the participation of another person in unlawful Internet gambling, checks drawn by such other person and drawn on and payable at and through any financial institution as specifically set forth below:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Check No.</u>	<u>Financial Institution</u>
30	2/25/08	\$50,000.00	852	MidFirst Bank
31	2/24/09	\$30,000.00	1001	MidFirst Bank
32	2/22/10	\$35,000.00	1028	MidFirst Bank

All in violation of Title 31, United States Code, Section 5363(3).

COUNTS 33 THROUGH 41
(Acceptance of Financial Instruments for Unlawful Internet Gambling)

From in or about February 2008, and continuing through November 2010,
in the Western District of Oklahoma,

-----**DRYDEN RYLEY MITCHELL**,-----

being a person engaged in the business of betting and wagering, did knowingly accept, in connection with the participation of another person in unlawful Internet gambling, checks

drawn by such other person and drawn on and payable at and through any financial institution as specifically set forth below:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Check No.</u>	<u>Financial Institution</u>
33	2/11/08	\$1,100.00	898	IBC Bank
34	6/17/08	\$925.00	188	Bank of America
35	9/23/08	\$820.00	228	Bank of America
36	5/11/09	\$1,000.00	168	Bank of America
37	11/18/09	\$850.00	1082	IBC Bank
38	12/14/09	\$800.00	1084	IBC Bank
39	2/19/10	\$1,725.00	2950	The Farmer's Bank
40	4/2/10	\$1,000.00	2987	The Farmer's Bank
41	10/18/10	\$2,000.00	5121	The Farmer's Bank

All in violation of Title 31, United States Code, Section 5363(3).

COUNTS 42 THROUGH 48
(Money Laundering)

From in or about March 2009, and continuing through November 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is, defendant caused wire transfers in various amounts from his Bank of America and MidFirst accounts as detailed in the below schedule and payable to Ally Bank for payments on a line of credit, such property having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Transaction</u>	<u>Financial Institution</u>
42	3/10/09	\$20,000.00	ach debit	MidFirst Bank
43	9/15/09	\$50,000.00	web debit	Bank of America

44	9/15/09	\$20,000.00	ach debit	MidFirst Bank
45	2/17/10	\$30,000.00	web debit	Bank of America
46	2/17/10	\$30,000.00	ach debit	MidFirst Bank
47	2/22/10	\$19,155.13	web debit	Bank of America
48	6/23/10	\$20,201.72	web debit	Bank of America

All in violation of Title 18, United States Code, Section 1957; and Title 18, United States Code, Section 2.

COUNT 49
(Money Laundering)

On or about November 30, 2009, in the Western District of Oklahoma,
-----**DRYDEN RYLEY MITCHELL**,-----
did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property in a value greater than \$10,000.00, that is, defendant purchased a cashier's check by withdrawing \$95,675.00 from his InterBank account payable to AGT(American Guaranty Title Company) for the purchase of real property in Oklahoma City, Oklahoma, such proceeds having been derived from specific unlawful activity, that is, conducting an illegal gambling business in violation of Title 18, United States Code, Section 1955.

All in violation of Title 18, United States Code, Section 1957.

COUNTS 50 THROUGH 66
(Interstate Travel in Aid of Racketeering Enterprises)

Between September 26, 2007, to October 19, 2010, in the Western District of Oklahoma,

-----**TEDDY DRYDEN MITCHELL**,-----

did use the mail and any facility in interstate and foreign commerce with intent to distribute the proceeds of unlawful activity and to otherwise promote, manage, establish, carry on, and facilitate the promotion, management, and carrying on, of any unlawful activity, to wit, a gambling business in violation of Title 18, United States Code, Sections 1955 and 1084, in that defendant sent and received for deposit the following checks in interstate and foreign commerce, which represent proceeds of illegal gambling activity:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Check Source.</u>	<u>Check Destination</u>
50	9/26/07	\$5,160.00	Sugar Land, TX	Oklahoma City, OK
51	1/31/08	\$6,000.00	Sugar Land, TX	Oklahoma City, OK
52	1/18/08	\$1,010.00	Los Angeles, CA	Oklahoma City, OK
53	10/27/08	\$9,650.00	Oklahoma City, OK	Fullerton, CA
54	10/27/08	\$5,350.00	Miami, OK	Fullerton, CA
55	1/20/09	\$5,000.00	Franklin, TN	Oklahoma City, OK
56	1/23/09	\$9,200.00	Sugar Land, TX	Oklahoma City, OK
57	1/30/09	\$1,314.00	Los Angeles, CA	Oklahoma City, OK
58	1/18/08	\$8,710.00	Sugar Land, TX	Oklahoma City, OK
59	3/5/09	\$15,000.00	Franklin, TN	Oklahoma City, OK
60	12/23/09	\$5,000.00	Franklin, TN	Oklahoma City, OK
61	1/19/10	\$5,000.00	Franklin, TN	Oklahoma City, OK
62	2/23/10	\$6,357.00	Franklin, TN	Oklahoma City, OK
63	3/31/10	\$5,000.00	Franklin, TN	Oklahoma City, OK
64	10/8/10	\$5,310.00	Franklin, TN	Oklahoma City, OK
65	10/22/10	\$17,940.00	Franklin, TN	Oklahoma City, OK
66	2/4/08	\$36,055.00	Oklahoma City, OK	Costa Rica

All in violation of Title 18, United States Code, Section 1952(a)(1).

COUNTS 67 THROUGH 81
(Interstate Travel in Aid of Racketeering Enterprises)

Between October 31, 2007, to November 12, 2010, in the Western District
of Oklahoma,

-----**DRYDEN RYLEY MITCHELL**,-----

did use the mail and any facility in interstate and foreign commerce with intent to distribute the proceeds of unlawful activity and to otherwise promote, manage, establish, carry on, and facilitate the promotion, management, and carrying on, of any unlawful activity, to wit, a gambling business in violation of Title 18, United States Code, Sections 1955 and 1084, in that defendant received for deposit the following checks in interstate commerce, which represent proceeds of illegal gambling activity:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Check Source.</u>	<u>Check Destination</u>
67	10/31/07	\$650.00	League City, TX	Oklahoma City, OK
68	6/17/08	\$925.00	League City, TX	Oklahoma City, OK
69	9/23/08	\$820.00	League City, TX	Oklahoma City, OK
70	2/17/09	\$800.00	League City, TX	Oklahoma City, OK
71	5/11/09	\$1,000.00	League City, TX	Oklahoma City, OK
72	10/07/09	\$245.00	League City, TX	Oklahoma City, OK
73	10/07/09	\$245.00	League City, TX	Oklahoma City, OK
74	12/14/09	\$926.00	League City, TX	Oklahoma City, OK
75	1/19/10	\$926.00	League City, TX	Oklahoma City, OK
76	3/3/10	\$543.00	League City, TX	Oklahoma City, OK
77	8/10/10	\$2,000.00	Houston, TX	Oklahoma City, OK
78	9/2/10	\$460.00	Houston, TX	Oklahoma City, OK
79	9/20/10	\$300.00	Houston, TX	Oklahoma City, OK
80	10/4/10	\$1,000.00	Houston, TX	Oklahoma City, OK
81	11/12/10	\$2,190.00	Houston, TX	Oklahoma City, OK

All in violation of Title 18, United States Code, Section 1952(a)(1).

FORFEITURE NOTICE

The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of giving Rule 32.2(a) **NOTICE** to each of the defendants that upon conviction of any of the following counts, a defendant shall forfeit to the United States the associated property as listed below; for conviction for counts 1 or 2, all property involved in or used in, and all proceeds of the violation. For conviction of

counts 3, 4, or 50-81, all proceeds of the violation. For conviction of counts 5-22 or 42-49, all property involved in the violation of, including, but not limited to:

REAL PROPERTY

- (1) 640 N.W. 150th Street, Edmond, Oklahoma
- (2) 3137 Elmwood, Oklahoma City, Oklahoma
- (3) 3030-3032 Rosewood Lane, Oklahoma City, Oklahoma
- (4) 2901-2905 Rosewood Lane, Oklahoma City, Oklahoma
- (5) 14014 Crossing Way East, Edmond, Oklahoma
- (6) 3205-3207 Pioneer Street, Oklahoma City, Oklahoma
- (7) 3341 Pioneer Street, Oklahoma City, Oklahoma
- (8) 7001 N.W. 55th Street, Bethany, Oklahoma
- (9) 3200 N.W. 47th Street, Oklahoma City, Oklahoma
- (10) 3116 Somerset Place, Oklahoma City, Oklahoma
- (11) 1700 Erin Place, Oklahoma City, Oklahoma
- (12) 2733 N.W. 57th Street, Oklahoma City, Oklahoma
- (13) 1625 N.W. 28th Street, Oklahoma City, Oklahoma
- (14) 6004 Broadmoor Avenue, Oklahoma City, Oklahoma
- (15) 3304 N.W. 27th Street, Oklahoma City, Oklahoma
- (16) 2601 N.W. 47th Street, Oklahoma City, Oklahoma
- (17) 4300 Memory Lane, Oklahoma City, Oklahoma
- (18) 3101 Castle Rock Road, #46, a/k/a 46 Fountaingate, Oklahoma City, Oklahoma

(19) The Lost Forest Subdivision including:

Lot 1, Block 1; Lot 2, Block 1; Lot 3, Block 1; Lot 4, Block 1; A Part of Lots 8, 9, 10, Block 1; A Part of Lots 9 and 10, Block 1; Lot 11, Block 1; Lot 12, Block 1; Lot 13, Block 1; Lot 14, Block 1; Lot 15 and A Part of Lot 16, Block 1; A Part of Lot 16, Block 1; Lot 17, Block 1; A Tract of Land Situated in the North Half of South Half of NW/4 of Section 26, T-14-N, R-2-W of the Indian Meridian, Oklahoma County, Oklahoma; and a 10 foot in width utility easement being to the right of the following described line, situated in the N/2 of S/2 of NW/4 of Section 26, T-14-N, R-2-W of the Indian Meridian, Oklahoma County, Oklahoma.

- (20) Lot Three (3), Block Two (2), St. James Pointe, Section 1, being a part of the SW/4 of Section 19, Township 11 North, Range 4 West, I.M., Oklahoma County, Oklahoma City, Oklahoma.
- (21) Lot Four (4), Block Three (3), St. James Pointe, Section 1, being a part of the SW/4 of Section 19, Township 11 North, Range 4 West, I.M., Oklahoma County, Oklahoma City, Oklahoma.
- (22) Lot Twenty-two (22), Block Three (3), St. James Pointe, Section 1, being a part of the SW/4 of Section 19, Township 11 North, Range 4 West, I.M., Oklahoma County, Oklahoma City, Oklahoma.
- (23) Lot Twenty-four (24), Block One (1), St. James Pointe, Section 1, being a part of the SW/4 of Section 19, Township 11 North, Range 4 West, I.M., Oklahoma County, Oklahoma City, Oklahoma.
- (24) 1817 N.W. 39th Street, Oklahoma City, Oklahoma

PERSONAL PROPERTY

- (1) One 2007 Chevrolet Tahoe, VIN 1GNFK13037J356475
- (2) One 2006 Cadillac Escalade, VIN 3GYEK62NX6G131107
- (3) One 2003 Cadillac Escalade, VIN 3GYEK63N33G312804
- (4) One 2010 Carryall 2 Electric LSV Flatbed, VIN 5J5LC22B2AA093578
- (5) One 2010 Carryall 2 Electric LSV Flatbed, VIN 5J5LC22B8AA094377
- (6) One 2009 Global Electric Motors Electric Vehicle, VIN 5ASGRGA459F050039

- (7) \$199,434.20, more or less, in funds restrained in American Funds accounts
- (8) \$69,341.05 in U.S. currency more or less, seized from Coppermark Bank accounts
- (9) \$9,495.25 in U.S. currency, more or less, seized from a Bank of America account
- (10) \$3,037.95 in U.S. currency, more or less, seized from an Interbank account
- (11) \$74,045.53, more or less, in funds restrained in ScottTrade accounts.

MONEY JUDGMENT

A defendant convicted of count 1 and or count 2 and or count 22 shall forfeit jointly and severally with other similarly convicted defendants a personal forfeiture money judgment in the amount of not less than \$8,150,029.26, an amount representing the proceeds of the offense(s), less any proceeds recovered by the government in another manner.

SUBSTITUTE ASSETS

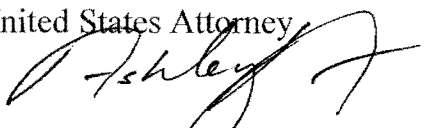
If any of the property above, as a result of any act or omission of a defendant(s), 1) cannot be located upon the exercise of due diligence; or, 2) has been transferred or sold to or deposited with a third person; or, 3) has been placed beyond the jurisdiction of the Court; or, 4) has been substantially diminished in value; or, 5) has been commingled with other property which cannot be divided without difficulty, it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of other property of the defendant(s) up to the value of the unavailable property.

All pursuant to Title 18, United States Code, Sections 981(a), 982(a), and 1955(d);
Title 21, United States Code, Section 853; and Title 28 United States Code, Section 2461.

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

SANFORD C. COATS
United States Attorney


ASHLEY L. ALTSHULER
EDWARD J. KUMIEGA
Assistant U.S. Attorneys