

Lubbock Indictment Summary, Case No. 5:97-CR-074-C

Count(s)	Defendants Charged	Statutory Offense	Acts Alleged
1	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 371	Conspired to commit bank fraud, to make false statements to a bank, to launder monetary instruments, and to engage in monetary transactions in property derived from specified unlawful activity.
2	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1344, 18 U.S.C. § 2	Knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution by representing that the Wootens were the purchasers and future occupants of the Lubbock house in order to obtain a mortgage loan.

Count(s)	Defendants Charged	Statutory Offense	Acts Alleged
3	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Signed a "Customer Notice" form falsely stating that Wootens intended to occupy property as their primary residence.
4	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Made false representations on "Request for Verification of Employment" form.
5	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Made false representations on "Request for Verification of Employment" form.
6	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Signed "Uniform Residential Loan Application" containing misrepresentations.
7	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Signed "Deed of Trust" containing misrepresentations.
8	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Signed "Owner Occupancy Affidavit" containing misrepresentations.

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9	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1014, 18 U.S.C. § 2	Signed and initialed "Affidavit and Agreement" containing misrepresentations.
10	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$74,292.16 check to be transferred from The Plains National Bank to Stewart Title Co.
11	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$900 check made payable to "Patsy Wooten" and drawn on Norwest Bank account to be transferred to Patsy Wooten.
12	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$450 check made payable to "Patsy Wooten" and drawn on Norwest Bank account to be transferred to Patsy Wooten.

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13	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$180 check made payable to "Patsy Wooten" and drawn on Norwest Bank account to be transferred to Patsy Wooten.
14	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$90 check made payable to "Patsy Wooten" and drawn on Norwest Bank account to be transferred to Patsy Wooten.
15	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$660 check made payable to "Patsy Wooten" and drawn on Norwest bank account to be transferred to Patsy Wooten.

Count(s)	Defendants Charged	Statutory Offense	Acts Alleged
16	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$79,950.35 check made payable to "Fleet Mortgage Group" and drawn on American State Bank escrow account to be transferred by Lubbock Abstract & Title Co to Fleet Mortgage Group.
17	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1956, 18 U.S.C. § 2	Caused a \$6,182.14 check made payable to "Allen Wooten and wife Patsy Wooten" and drawn on American State Bank escrow account to be transferred by Lubbock Abstract & Title Co. to Allen and Patsy Wooten.
18	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1957, 18 U.S.C. § 2	Caused a \$74,292.16 check to be transferred from The Plains National Bank of Lubbock to Stewart Title Co. of Lubbock.

Count(s)	Defendants Charged	Statutory Offense	Acts Alleged
19	Medlar, Patsy Wooten, Allen Wooten	18 U.S.C. § 1957, 18 U.S.C. § 2	Caused a \$79,950.35 check made payable to "Fleet Mortgage Group" and drawn on American State Bank escrow account to be transferred by Lubbock Abstract & Title Co. to Fleet Mortgage Group.
20	Medlar	18 U.S.C. § 1503	Falsely stated in her 4/26/96 FBI interview that she furnished original tapes to the IRS on May 31, 1995.
21	Medlar	18 U.S.C. § 1503	Falsely stated in her 4/26/96 FBI interview that she rented a safety deposit box in July or August 1994.
22	Medlar	18 U.S.C. § 1503	Withheld from Grand Jury the recording devices she used to record her conversations with Cisneros and others.

Count(s)	Defendants Charged	Statutory Offense	Acts Alleged
23	Medlar	18 U.S.C. § 1001	Concealed and covered up the fact that she had not turned over all records requested by OIC.
24	Medlar	18 U.S.C. § 1001	Concealed and covered up the fact that she first rented safety deposit box on or about September 16, 1993.
25	Medlar	18 U.S.C. § 1001	Concealed and covered up the fact that she furnished copies of the tapes, not originals, to the IRS on May 31, 1995.
26	Medlar	18 U.S.C. § 1001	Concealed and covered up the fact that she spoke to Shirley Thomas on or about April 12, 1996.

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27	Medlar	18 U.S.C. § 1001	Concealed and covered up the fact that she had in her possession, custody, and control the devices she used to record her conversations with Cisneros and others.
28	Medlar	18 U.S.C. § 1001	Falsely stated in her May 31, 1995 IRS interview that she was late for the interview because she stopped to retrieve tapes from safety deposit box.