

FILED

AUG 13 2014

Phil Lombardi, Clerk
U.S. DISTRICT COURT

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLARD LENORD JONES,

Defendant.

) Case No. _____

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)
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14 CR 133 JED

) INFORMATION
) [COUNTS 1-3: 18 U.S.C. § 1343 –
) Wire Fraud; Forfeiture Allegation: 18
) U.S.C. § 981(a)(1)(C) and 28 U.S.C.
) § 2461(c) – Wire Fraud Forfeiture;
) COUNT 4: 26 U.S.C. § 7206(1) –
) Subscribing to False Tax Return]

THE UNITED STATES ATTORNEY CHARGES:

COUNTS ONE THROUGH THREE
[18 U.S.C. § 1343]

Introduction

1. At all times material to this Information:
2. The Greater Cornerstone Community Development Project, a non-profit corporation, was formed to raise money for the building and operation of a community center in South Haven, a neighborhood in West Tulsa, Oklahoma. The management of the Greater Cornerstone Community Development Project, hereinafter referred to as “the Community Center” was conducted by a Board of Directors and such officers and employees that it selected. The Community Center provided various services to members of the community, including medical, dental, mental health, family and youth counseling, food and clothing, job skills training, and after school programs.
3. **WILLARD LENORD JONES**, the defendant, hereinafter referred to as “Defendant **JONES**”, was the pastor of the Greater Cornerstone Baptist Church and the

Executive Director of the Community Center. As Executive Director, Defendant **JONES** oversaw the design, construction, and fund raising for building the Community Center. Defendant **JONES** solicited millions of dollars in contributions from donors, hereinafter referred to as “the Donors,” for funding the Community Center, hereinafter referred to as “the Donors”.

4. Defendant **JONES** was a fiduciary for the contributions and donated funds and as such owed a duty to avoid conflicts of interest, to act in the interest of the Community Center rather than his own personal interest, to oversee and assure that all disbursements of funds were transacted legally and free from fraud.

The Scheme

5. Beginning as early as sometime in or about September 2007, a more certain date being unknown to the United States Attorney, and continuing thereafter to in or about June 2013, in the Northern District of Oklahoma and elsewhere, Defendant **JONES** devised and intended to devise a scheme and artifice to defraud the Community Center and the Board of Directors of the Community Center, and to obtain their money and property by means of materially false and fraudulent pretenses, representations, and promises.

The Purpose of the Scheme

6. It was a purpose of the scheme and artifice to defraud the Community Center and the Board of Directors of the Community Center, and to obtain their money and property by means of materially false and fraudulent pretenses, representations, and promises, hereinafter referred to as “the Scheme”, to unlawfully enrich Defendant

JONES through the use such funds for personal expenses and luxury items, including, hotels, restaurants, casinos, liquor, and automobiles and to conceal the Scheme from the Donors, the Board of Directors of the Community Center, and the Officers of the Church.

Manner and Means of the Scheme

7. It was a part of the Scheme that Defendant **JONES** would and did control the bank accounts of the Greater Cornerstone Baptist Church, hereinafter “the Church”, and the Community Center.

8. It was further a part of the Scheme that Defendant **JONES** would and did fraudulently transfer funds from Community Center bank accounts to Church bank accounts to pay for his own personal expenses, rather than for construction of the Community Center.

9. It was further a part of the Scheme that Defendant **JONES** would and did unlawfully divert Community Center funds for his own personal benefit in the approximate amount of \$933,507.80.

10. It was further a part of the Scheme that Defendant **JONES** would and did fraudulently disburse Community Center funds from the Church bank account to pay for his own personal expenses.

11. It was further a part of the Scheme that Defendant **JONES** would and did withdraw large amounts of Community Center funds in the form of cash from the Church bank account for his own personal use.

12. It was further a part of the Scheme that Defendant **JONES** would and did fraudulently disburse Community Center funds from the Church bank account to his own personal bank accounts.

13. It was further a part of the Scheme that Defendant **JONES** would and did fraudulently use Community Center funds deposited into his personal bank accounts to pay for personal expenses.

The Wire Communications

14. On or about the dates stated in the chart below, Defendant **JONES** caused the writings, signs, signals, pictures, and sounds described in the chart below to be transmitted by means of wire communications in interstate commerce for the purpose of executing the Scheme, as follows:

Count	Date	Wire Communication
One	August 29, 2011	Payment of \$6,120 to Circle Services Construction from Greater Cornerstone Baptist Church Oklahoma National Bank Account Number, XXX19254, Check Number 9519, for construction at the residence of Defendant JONES .
Two	September 6, 2011	Payment of \$13,710 to Circle Services Construction from Community Center Oklahoma National Bank Account Number, XXX50229, Check Number 496, for construction at the residence of Defendant JONES .
Three	October 5, 2011	Payment of \$5,911 to Circle Services Construction from Community Center Oklahoma National Bank Account Number XXX50229, Check Number 518, for construction at the residence of Defendant JONES .

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION
[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

15. The allegations contained in Counts Ones through Three of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

16. Upon conviction of the wire fraud scheme alleged in Counts One through Three of this Information, as part of his sentence, the defendant, **WILLARD LENORD JONES**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such scheme, including, but not limited to:

MONEY JUDGMENT

A sum of money in an amount of at least \$933,507.80, representing proceeds obtained as a result of the wire fraud scheme.

REAL PROPERTY WITH ALL BUILDING, IMPROVEMENTS AND APPURTENANCES THEREON:

Real Property commonly known as 1928 North Santa Fe Place, Tulsa, Oklahoma, more particularly described as follows, to-wit:

Lots Two (2) and Three (3), Block Seventeen (17), GILCREASE HILLS VILLAGE II Block 17, a Subdivision in Osage County, Oklahoma, according to the recorded plat thereof.

LUXURY ITEMS

- a. One (1) Rolex 36MM Watch; and
- b. One (1) Mahogany Mink Full Length 54" Fur Coat, with "J J Jones" Monogram, and matching Kaitery Hat and Gloves with Mahogany Mink Trim.

17. Pursuant to Title 21, United States Code, Section 853(p), as adopted by Title 28, United States Code, Section 2461(c), 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 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

COUNT FOUR
[26 U.S.C. § 7206(1)]

18. On or about April 15, 2012, in the Northern District of Oklahoma and elsewhere, the defendant, **WILLARD LENORD JONES**, willfully made and subscribed a false 2011 Form 1040, U.S. Individual Income Tax Return, which contained and was verified by a written declaration that it was made under the penalties of perjury, and which he did not believe to be true and correct as to every material matter, in that he knowingly failed to report approximately \$390,061 of income on Line 21 of the return.

All in violation of Title 26, United States Code, Section 7206(1).

Respectfully submitted,

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY



KEVIN C. LEITCH
Assistant United States Attorney