

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

OCT 30 2013

CHRIS R. JOHNSON, Clerk
By
Deputy Clerk

UNITED STATES OF AMERICA)	
)	No. 5:13CR50085-001
v.)	18 U.S.C. § 1341
)	18 U.S.C. § 1343
JAMES BOLT)	18 U.S.C. § 1957

SUPERSEDING INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to this Superseding Indictment, the defendant, **JAMES W. BOLT ("BOLT")**, was a resident of Benton County, Arkansas, who operated and controlled various business entities, including, but not limited to, "Situs Cancer Research Center" ("**SITUS**"), Woodland Cancer Research Center ("**WOODLAND**"), and "Life Preservers Inc., ("**LPI**").

2. Beginning on or about October 10, 2010, and continuing through and including August, 2013, in the Western District of Arkansas, Fayetteville Division, and elsewhere, **BOLT** unlawfully and knowingly devised and intended to devise schemes and artifices to defraud and to obtain money, by means of false and fraudulent pretenses, representations and promises by using interstate wire transfers and mailings to fraudulently obtain unclaimed property and money that belonged to others.

SCHEME TO DEFRAUD IN HOUSE PHARMACIES INC.

3. As part of the scheme to defraud In House Pharmacies Inc., the defendant, **BOLT**, created false and fraudulent documentation that created the false appearance that **SITUS** was the rightful owner of unclaimed property of In House Pharmacies Inc., consisting of cash assets which were registered with the state of California as unclaimed property. NetRX Inc./

Express Scripts Inc. handled and processed claims made for the unclaimed property of In House Pharmacies Inc.

4. As part of the scheme to defraud In House Pharmacies Inc., the defendant, **BOLT**, caused an interstate wire transfer to be made from the Western District of Arkansas to a representative of Net RX Inc./ Express Scripts Inc., outside the state of Arkansas, consisting of a fax containing the aforesaid false and fraudulent documentation, thereby seeking to cause Net RX Inc./ Express Scripts Inc. to transfer ownership of the unclaimed property of In House Pharmacies Inc., to **SITUS** and **BOLT**.

5. As part of the scheme to defraud In House Pharmacies Inc., the defendant, **BOLT**, caused Net RX Inc./ Express Scripts Inc. to mail checks made out to **SITUS** consisting of unclaimed property of In House Pharmacies Inc., to **SITUS**'s business office located in the Western District of Arkansas.

SCHEME TO DEFRAUD COMMUNITY MEDICAL GROUP OF CORONA, INC.

6. As part of the scheme to defraud Community Medical Group of Corona, Inc., the defendant, **BOLT**, created false and fraudulent documentation that created the false appearance that **SITUS** was the rightful owner of unclaimed property of Community Medical Group of Corona, Inc., consisting of cash assets which were held by Wellpoint Inc./Anthem Blue Cross, as unclaimed property. Wellpoint Inc./Anthem Blue Cross handled and processed claims made for the unclaimed property of Community Medical Group of Corona, Inc.

7. As part of the scheme to defraud Community Medical Group of Corona, Inc., the defendant, **BOLT**, caused an interstate wire transfer to be made from the Western District of Arkansas to a representative of Wellpoint Inc./Anthem Blue Cross, outside the state of Arkansas, consisting of a fax containing the aforesaid false and fraudulent documentation, thereby seeking

to cause Wellpoint Inc./Anthem Blue Cross to transfer ownership of the unclaimed property of Community Medical Group of Corona, Inc., to **SITUS** and **BOLT**.

8. As part of the scheme to defraud Community Medical Group of Corona, Inc., the defendant, **BOLT**, caused Wellpoint Inc./Anthem Blue Cross, to mail a check made out to **SITUS** consisting of unclaimed property of Community Medical Group of Corona, Inc., to **SITUS**'s business office located in the Western District of Arkansas.

SCHEME TO DEFRAUD PFR INC.

9. As part of the scheme to defraud PFR Inc., the defendant, **BOLT**, created false and fraudulent documentation that created the false appearance that **SITUS** was the rightful owner of certain shares of PFR Inc. which were registered with the state of California as unclaimed property. Computershares, Inc. handled and processed claims made for the unclaimed property of PFR Inc.

10. As part of the scheme to defraud PFR Inc. the defendant, **BOLT** mailed a letter with the aforesaid false and fraudulent documentation to a representative of Computershares, Inc, thereby seeking to cause Computershares Inc. to transfer ownership of the unclaimed PFR Inc. shares to **SITUS** and **BOLT**.

11. As part of the scheme to defraud PFR Inc. the defendant, **BOLT**, made at least one phone call to a representative of Computershares, Inc., claiming that **SITUS** was the rightful owner of the unclaimed PFR Inc. shares based on the aforesaid false and fraudulent documentation.

12. As part of the scheme to defraud PFR Inc. the defendant, **BOLT**, caused Computershares Inc. to transfer the unclaimed PFR Inc. shares to a Scottrade Inc. account in the name of **SITUS** which **BOLT** had created, set up, and controlled.

13. As part of the scheme to defraud PFR Inc. the defendant, **BOLT**, caused the PFR Inc. shares to be sold and the proceeds to be transferred via interstate wire transfer from outside the state of Arkansas to a **SITUS** bank account in the Western District of Arkansas.

COUNTS 1 - 5
Wire Fraud

14. The Grand Jury hereby adopts, re-alleges, and incorporates by reference herein, the allegations set forth in paragraphs 1-13 of this Superseding Indictment.

15. On or about the dates listed below, in the Western District of Arkansas, Fayetteville Division and elsewhere, **BOLT**, for the purpose of executing and attempting to execute the aforesaid schemes and artifices to defraud, did knowingly and willfully transmit and cause to be transmitted by means of interstate wire communication in interstate commerce, each transmission a separate count, as set forth below:

Count	Date	Contents	From	To	Scheme
1	02/17/2011	Fax from BOLT to NetRX Services, Inc., of "Corporate Donation Agreement."	Rogers, AR	St. Louis, MO	In House Pharmacies Inc.
2	05/31/2011	Fax from BOLT to Wellpoint Inc./Anthem Blue Cross of letter and "Corporate Donation Agreement."	Rogers, AR	Thousand Oaks, CA	Community Medical Group of Corona, Inc.
3	01/18/2013	Wire transfer in the amount of \$116,000.00	Scottrade, Inc., St. Louis, MO	SITUS bank account at Liberty Bank, Rogers, AR	PFR Inc.
4	01/22/2013	Wire transfer in the amount of \$1,336,170.00	Scottrade, Inc., St. Louis, MO	SITUS bank account at Liberty Bank, Rogers, AR	PFR Inc.
5	01/24/2013	Wire transfer in the amount of \$440,000.00	Scottrade, Inc., St. Louis, MO	SITUS bank account at Liberty Bank, Rogers, AR	PFR Inc.

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

COUNTS 6 - 12**Mail Fraud**

16. The Grand Jury hereby adopts, re-alleges, and incorporates by reference herein, the allegations set forth in paragraphs 1-13 of this Superseding Indictment.

17. On or about the dates listed below, in the Western District of Arkansas, Fayetteville Division and elsewhere, **BOLT**, for the purpose of executing and attempting to execute the aforesaid schemes and artifices to defraud, did knowingly and willfully cause to be delivered by the United States Postal Service, according to the direction thereon, an envelope, each mailing a separate count, as set forth below:

Count	Date	Contents	Mailed From	Mailed To	Scheme To Defraud
6	04/12/2011	Check payable to SITUS in the amount of \$47,546.56	Express Scripts, 1 Express Way, St. Louis, MO, 63121	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	In House Pharmacies Inc.
7	04/12/2011	Check payable to SITUS in the amount of \$63,239.73	Express Scripts, 1 Express Way, St. Louis, MO, 63121	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	In House Pharmacies Inc.
8	04/12/2011	Check payable to SITUS in the amount of \$30,131.00	Express Scripts, 1 Express Way, St. Louis, MO, 63121	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	In House Pharmacies Inc.
9	04/12/2011	Check payable to SITUS in the amount of \$9,162.00	Express Scripts, 1 Express Way, St. Louis, MO, 63121	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	In House Pharmacies Inc.
10	04/12/2011	Check payable to SITUS in the amount of \$3,365.45	Express Scripts, 1 Express Way, St. Louis, MO, 63121	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	In House Pharmacies Inc.
11	07/20/2011	Check payable to SITUS in the amount of \$317,042.75	Cincinnati, OH	SITUS Cancer Research Center, 1222 West Poplar, Rogers, AR 72756	Community Medical Group of Corona, Inc.
12	12/19/2012	Letter on SITUS letterhead, signed by BOLT, entitled "letter of transmittal," including a document entitled "donation agreement dated September 29, 2006," and a document entitled "durable power of attorney, dated December 31, 2001."	Rogers, Arkansas	Shareowner Services, Computershare, 500 Ross Street FL6, Pittsburgh, PA 15219	PFR Inc.

All in violation of Title 18, United States Code, Section 1341.

COUNT 13
Money Laundering

18. The Grand Jury hereby adopts, re-alleges, and incorporates by reference herein, the allegations set forth in paragraphs 1-13 of this Superseding Indictment.

19. On or about January 25, 2013, in the Western District of Arkansas, Fayetteville Division and elsewhere, **BOLT** knowingly engaged and attempted to engage in a monetary transaction through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000 and was derived from specified unlawful activity; that is, mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, to wit: the defendant, **BOLT**, caused a cashier's check in the amount of \$208,394.42 to be issued by Liberty Bank in Rogers, Arkansas, from funds held in the **SITUS** account at Liberty Bank, said funds consisting in whole or part of proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1957 (a) and (d).

COUNT 14
Money Laundering

20. The Grand Jury hereby adopts, re-alleges, and incorporates by reference herein, the allegations set forth in paragraphs 1-13 of this Superseding Indictment.

21. On or about January 28, 2013, in the Western District of Arkansas, Fayetteville Division and elsewhere, **BOLT** knowingly engaged and attempted to engage in a monetary transaction through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000 and was derived from specified unlawful activity; that is, mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, to wit: the defendant, **BOLT**, caused a cashier's check in the amount of \$660,626.11 to be issued by

Liberty Bank in Rogers, Arkansas, from funds held in the **SITUS** account at Liberty Bank, said funds consisting in whole or part of proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1957 (a) and (d).

FORFEITURE ALLEGATION

22. The factual allegations contained in Paragraphs 1 through 21 of this Superseding Indictment and in Counts One through Fourteen are re-alleged and incorporated herein as if copied verbatim.

23. As a result of committing the offenses as alleged in this Superseding Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C), (a)(1)(A) and 28 U.S.C. § 2461, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations or property involved in the offenses alleged above, to wit:

- A. 2009 Volvo XC90 VIN YV4CM982791502665;
- B. 2002 Chevrolet Tahoe VIN 1GNEK13Z42R119725;
- C. 1977 Cessna 172N N734UE;
- D. 1974 Cessna 310Q N69HB;
- E. 1979 Cessna 172N N6231F;
- F. 1981 Cessna 172P N55256;
- G. 1977 Piper PA-31-350 N27478;
- H. Two Calumet Coaches one with VIN 44KFB6284WWZ18697;
- I. 2006 Volvo XC9 VIN YV4CY592361242434;
- J. 2005 Toyota Tundra VIN 5TBET38175S486718;
- K. 1999 Hino 302 TB VIN JHBFF2JM9X2S10060;
- L. 1995 Ford FS5 Motor Home VIN 3FCMF53G1SJA13296;

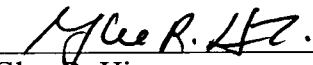
- M. 1222 West Poplar Street, Rogers, Arkansas;
 - N. 1204 West Poplar Street, Rogers, Arkansas; and
 - O. 303 South Rife Street, Rogers, Arkansas.
 - P. \$111,971.08 seized from the Liberty Bank account ending in 457;
 - Q. \$8,900.00 in United States currency seized during the execution of the search warrant; and
 - R. \$7,500.00 seized from Preferred Airparts in Kidron, Ohio, on October 7, 2013.
24. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty,
- it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above or a sum of United States currency representing the amount of proceeds obtained by the defendant named herein as a result of the offense described in this Superseding Indictment.

A True Bill.

CONNER ELDRIDGE
UNITED STATES ATTORNEY

/s/ Foreperson
Foreperson

By:



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