

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. ^{CR} CIV -17-136-R
-vs-)	
)	Violations: 18 U.S.C. § 1343
KAY ANN LOCKE,)	26 U.S.C. § 7206(1)
)	
Defendant.)	

INFORMATION

The United States Attorney charges:

Introduction

At all times relevant to this Information:

1. **KAY ANN LOCKE** lived and worked in Oklahoma County, within the Western District of Oklahoma.
2. From approximately 2005 until in or around April 2016, **LOCKE** worked as a bookkeeper at Delta Promotions Team Corporation (“Delta Promotions”) in Oklahoma City.
3. As part of her duties, **LOCKE** could access bank accounts of Delta Promotions and its affiliates to deposit customer payments and pay

business expenses. **LOCKE** could also use a Capital One business credit card, issued to Delta Promotions, for authorized business transactions.

4. Sometime before 2011, Delta Promotions' Chief Executive Officer, W.T.T., established a Chase Bank Southwest Rapid Rewards credit card ("Chase card"). In or around July 2011, W.T.T. directed **LOCKE** to close the Chase card account. Unbeknownst to Delta Promotions and W.T.T., **LOCKE** kept the Chase card account open.

5. **LOCKE** did not have authorization from Delta Promotions or W.T.T. to use the Capital One card or Chase card for her personal benefit.

COUNT ONE
(Wire Fraud)

6. The United States Attorney incorporates paragraphs 1-5 by reference.

The Scheme to Defraud

7. It was part of the scheme that from approximately 2010 until in or around April 2016, **LOCKE** used the Capital One card and Chase card to make unauthorized purchases and to obtain cash advances for her personal benefit, without the knowledge or permission of Delta Promotions and W.T.T. These fraudulent purchases and cash advances totaled approximately \$454,824.69.

8. It was further part of the scheme that **LOCKE** paid for the Capital One card and Chase card balances with funds from Delta Promotions, without the knowledge or permission of Delta Promotions and W.T.T.

9. It was further part of the scheme that **LOCKE** concealed the unauthorized credit card payments from Delta Promotions by transferring funds from affiliated accounts to Delta Promotions.

The Wiring in Furtherance of the Scheme

10. On or about December 2, 2015, in the Western District of Oklahoma and elsewhere,

----- **KAY ANN LOCKE**, -----

for the purpose of executing a scheme to defraud in a material manner, knowingly caused signals to be transmitted by means of wire communications in interstate commerce. In particular, **LOCKE** caused an interstate wire to be sent from Oklahoma City to a Chase server outside Oklahoma, directing Chase to transfer \$1,627.97 to Candlewood Automotive in Oklahoma City, based on **LOCKE's** unauthorized transaction on the Chase card for her personal benefit.

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

COUNT TWO
(False Federal Income Tax Return)

11. The United States Attorney incorporates paragraphs 1-5 and 7 by reference.

12. On or about March 15, 2016, in the Western District of Oklahoma,

----- **KAY ANN LOCKE** -----

willfully made and subscribed a United States Individual Income Tax Return Form 1040 for calendar year 2015, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. **LOCKE's** income tax return, electronically filed with the Internal Revenue Service, reported total income of \$29,337. **LOCKE**, though, knew that the return was false because she received substantially more income during calendar year 2015 than she reported on the return.

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

MARK A. YANCEY
United States Attorney


CHRIS M. STEPHENS
Assistant U.S. Attorney