
UNITED STATES DISTRICT COURT

District of Kansas

(Wichita Docket)

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 18-10043-01 –EFM

v.

MICHAEL B. O'DONNELL, II,

Defendant.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Counts 1 through 23

**18 U.S.C. § 1343
(Wire Fraud)**

That beginning on and about the dates specified below, in the District of Kansas,
and elsewhere, the defendant,

MICHAEL B. O'DONNELL, II,

having devised and intending to devise a scheme and artifice to defraud, to wit: the
defendant obtained money from the public in the form of donations to his “Michael for

Kansas” and “Michael for Sedgwick County” campaigns, which he then converted to his personal use, and in order to execute the scheme and artifice, and for the purpose of obtaining money by means of false and fraudulent pretenses, did knowingly and willfully transmit and cause to be transmitted by means of wire communication in interstate commerce writings, sounds and signals, that transmitted checks through the financial system more fully described below, when the defendant knew and should have known that no such moneys shall be used or be made available for his personal use:

Count	Date	Wire Transmission	Check Value
1	1/2/2016 – 1/5/2016	Electronic check #220 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to C.R.	\$1000
2	1/2/2016 – 1/5/2016	Electronic check #221 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.D.	\$1000
3	1/30/2015 – 2/2/2015	Electronic check #210 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$500
4	2/15/2015 – 2/20/2015	Electronic check #211 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$1000
5	3/14/2015 – 3/23/2015	Electronic check #237 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$300
6	4/21/2015 – 4/23/2015	Electronic check #239 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$250
7	5/10/2015 – 5/13/2015	Electronic check #242 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$500
8	6/27/2015 – 7/1/2015	Electronic check #212 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$200

Count	Date	Wire Transmission	Check Value
9	8/1/2015 – 8/5/2015	Electronic check #252 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$400
10	9/7/2015 – 9/10/2015	Electronic check #257 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$500
11	10/6/2015 – 10/8/2015	Electronic check #263 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J..	\$500
12	4/15/2016 – 4/20/2016	Electronic check #300 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$500
13	unknown – 5/31/2016	Electronic check #397 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J..	\$500
14	8/18/16 – 8/23/2016	Electronic check #190 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to D.J.	\$500
15	9/12/2016 – 9/14/2016	Electronic check #1016 wired by Federal Reserve Bank, Atlanta, GA to Vintage Bank, Wichita, KS written to D.J.	\$250
16	unknown – 12/16/2016	Electronic check #1062 wired by Federal Reserve Bank, Atlanta, GA to Vintage Bank, Wichita, KS written to D.J..	\$250
17	12/27/2016 – 1/24/2017	Electronic check #1065 wired by Federal Reserve Bank, Atlanta, GA to Vintage Bank, Wichita, KS written to D.J.	\$250
18	12/15/15 – 12/17/2015	Electronic check #219 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$300
19	1/15/16 – 1/21/2016	Electronic check #222 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$300
20	2/6/2016 – 2/16/2016	Electronic check #293 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$550

Count	Date	Wire Transmission	Check Value
21	3/6/2016 – 3/14/2016	Electronic check #298 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$300
22	4/3/2016 – 4/5/2016	Electronic check #187 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$350
23	5/5/2016	Electronic check #304 wired by Federal Reserve Bank, Kansas City, MO to Sunflower Bank, Wichita, KS written to J.M.	\$300

All in violation of Title 18, United States Code, Sections 1343 and 2.

Counts 24 - 26

**18 U.S.C. Section 1956
(MONEY LAUNDERING)**

That beginning on or about January 2, 2016, and continuing through January 4, 2016, in the District of Kansas, the defendant,

MICHAEL B. O'DONNELL, II

did knowingly and willfully engage in monetary transactions by and through financial institutions, affecting interstate commerce, that is, defendant **MICHAEL B.**

O'DONNELL, II caused money to be deposited into his personal checking account at Intrust Bank, knowing that the property involved in the financial transactions represented the proceeds derived from specified unlawful activity, that is, Wire Fraud, in violation of 18 U.S.C. Section 1343. The defendant, **MICHAEL B. O'DONNELL, II**, conducted these transactions, knowing that they were designed in whole and in part, to conceal and

disguise the nature, location, source, and ownership of the proceeds of said specified unlawful activity:

Count	Date Range	Amount	Transaction
24	01/02/2016	\$1,000	Cashing of Sunflower Bank check #220 written to C.R.
25	01/02/2016 – 01/04/2016	\$1,000	Cash from C.R. deposited to Intrust Bank checking account.
26	01/02/2016 – 01/04/2016	\$1,000	Check from J.D. deposited to Intrust Bank checking account.

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

FORFEITURE ALLEGATION

The allegations contained in the preceding paragraphs of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982, (a)(1), (a)(2) and Title 28, United States Code, Section 2461. As a result of committing the offenses alleged in Counts 1 through 26 of this Indictment, the defendant,

MICHAEL B. O'DONNELL, II

shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), (a)(2) and Title 28, United States Code, Section 2461, any and all proceeds of the crimes, including, but not limited to the following:

1. Money Judgment

A sum of money equal to and representing the amount of proceeds obtained as a result of the offenses in Counts 1 through 26, for which the defendant is liable.

All in violation of Title 18, United States Code, Sections 1343, and 1956.

A TRUE BILL.

August 14, 2018
DATE

s/Foreperson
FOREPERSON OF THE GRAND JURY

s/Stephen R. McAllister
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[It is requested that jury trial be held in Wichita, Kansas.]