

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. CR-17-94-M _____
-vs-)	
)	Violations: 18 U.S.C. § 1344(2)
MELISSA DAY MORTON,)	26 U.S.C. § 7206(1)
)	
Defendant.)	

INFORMATION

The United States Attorney charges:

Introduction

At all times relevant to this Information:

1. **MELISSA DAY MORTON** was a resident of the Western District of Oklahoma.

2. **MORTON** was employed from in or around October 1995 until late July 2016 at the Oklahoma Beef Council (the “Beef Council”) in Oklahoma City, Oklahoma. **MORTON** worked as the Accounting and Compliance Manager at the Beef Council. Among other duties, she prepared checks, paid invoices, managed the accounting system, and generated financial statements for audits of the Beef Council.

3. BOKF, National Association—commonly known as Bank of Oklahoma—was a financial institution that held deposits insured by the Federal Deposit Insurance Corporation (“FDIC”).

4. The Beef Council owned account number xxxxx-8519 at Bank of Oklahoma. The Beef Council’s executive director, H.B., had authority to sign checks drawn on this account. **MORTON** did not have signature authority on the Beef Council’s account.

5. Several years ago, **MORTON** had access to a rubber stamp, with H.B.’s signature, that **MORTON** could use to prepare Beef Council checks on limited occasions—and only with H.B.’s permission. In or around 2010, H.B. instructed **MORTON** to stop using the signature stamp. **MORTON**, though, kept the stamp without the knowledge or permission of the Beef Council or H.B.

COUNT 1
(Bank 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 in or around August of 2009 through in or around July of 2016, **MORTON** prepared approximately 790

unauthorized Beef Council checks, made payable to herself, drawn on the Beef Council's account at Bank of Oklahoma.

8. It was further part of the scheme that **MORTON** forged these checks either by using H.B.'s signature stamp or by manually signing H.B.'s name on the signature line of the checks, all without the knowledge or permission of the Beef Council or H.B. These unauthorized checks from the Beef Council to **MORTON** totaled approximately \$2,681,400.73.

9. It was further part of the scheme that **MORTON** made false accounting entries in the Beef Council's general ledger to disguise these forged checks made payable to herself.

10. It was further part of the scheme that **MORTON** deposited these forged checks into a joint account that she owned with her husband at Bank of Oklahoma.

11. It was further part of the scheme that **MORTON** ultimately caused these forged Beef Council checks to be negotiated through Bank of Oklahoma and debited against the Beef Council's account at the bank.

12. It was further part of the scheme that **MORTON** used the proceeds of these unauthorized Beef Council checks for her personal purposes, including funding her retail clothing business.

Execution of the Scheme

13. On or about February 10, 2016, in the Western District of Oklahoma,

----- **MELISSA DAY MORTON**, -----

with the intent to defraud, knowingly executed a scheme and artifice to obtain money owned by and under the custody and control of Bank of Oklahoma, a financial institution that maintained accounts insured by the FDIC, by means of materially false and fraudulent pretenses and representations. In particular, **MORTON** fraudulently obtained money under the custody and control of Bank of Oklahoma by causing a forged Beef Council check—specifically, check number 34893, in the amount of \$5,652.25, made payable to herself—to be presented for payment against the Beef Council’s account number xxxxx-8519 at Bank of Oklahoma.

All in violation of Title 18, United States Code, Section 1344(2).

COUNT 2
(False Federal Income Tax Return)

14. The United States Attorney incorporates paragraphs 1-2, 7-8, 10, and 12 by reference.

15. On or about October 12, 2015, in the Western District of Oklahoma,

----- **MELISSA DAY MORTON** -----

willfully made and subscribed a United States Individual Income Tax Return Form 1040 for calendar year 2014, 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.

MORTON's income tax return, filed with the Internal Revenue Service, reported total income in the amount of \$183,545. **MORTON**, though, knew that the return was false because she received substantially more income during calendar year 2014 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