

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(TOPEKA DOCKET)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 14-40017-JAR

TRENT K. LEDOUX

Defendant.

INDICTMENT

The Grand Jury charges:

Background:

1. Farmers and Merchants Bank of Colby, Kansas, is a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation.

2. Farmers State Bank of Holton, Kansas, is also a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation.

3. The defendant Trent K. LeDoux is a resident of Holton, Kansas and was a member of the House of Representatives for the State of Kansas from 2011 to 2013. LeDoux maintained an account at Farmer's State Bank of Holton, and a political account at Denison State Bank.

The Scheme:

4. Commencing in July of 2011 and continuing through April 2012, in the District of Kansas, the defendant Trent K. LeDoux devised a scheme and artifice to

obtain money, funds, credits, assets, securities, and other property owned by and under the custody and control of the Farmers and Merchants Bank of Colby, Kansas, by means of materially false and fraudulent pretenses, representations, and promises.

5. It was part of the scheme and artifice that the defendant Trent K. LeDoux applied for three loans from Farmers and Merchants Bank of Colby, Kansas, falsely representing that he was going to use all the funds to purchase cattle which would serve as the collateral for the loans. The first loan - 40021968 – was received by LeDoux on or about 07/15/2011, in the amount of \$106,600. The second loan - 4022017 - was received by LeDoux on or about 12/22/2011 in the amount \$175,500. The third loan - 4022077 - was received by LeDoux on or about 04/19/2012 in the amount \$183,000. In truth and in fact as the defendant fully well knew when he was applying for the loans, he did not intend to use all the funds to purchase cattle, but to pay off existing indebtedness to others as well as to make contributions to his political account.

Counts 1 through 3
(Bank Fraud)

6. Paragraphs 1 through 5 are reincorporated herein as though fully set forth.
7. On or about the dates set forth below, in the District of Kansas, defendant

TRENT K. LEDOUX

executed and attempted to execute the foregoing scheme and artifice to defraud as set forth above, in that the defendant received loan proceeds from Farmers and Merchants Bank of Colby in the amounts and on the dates set forth below:

Count	Date	Amount
1	July 15, 2011	Cashier's check in the amount of \$81,783.29

2	December 22, 2011	Wire Transfer of \$175,000
3	April 19, 2012	Wire Transfer of \$183,000

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

Counts 4 & 5
(Money Laundering)

9. Paragraphs 1 through 8 are reincorporated herein as though fully set forth.

10. On or about the dates listed below, in the District of Kansas, the defendant,

TRENT K. LEDOUX,

did knowingly engage and attempt to engage in monetary transactions, that is, the transactions listed below, in the amounts listed below, by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, Bank Fraud, in violation of 18 U.S.C. § 1344:

Count	Date	The Transaction
4	December 31, 2011	\$15,000 deposit from loan 40022017 proceeds into defendant's campaign account
5	August 1, 2012	\$12,000 deposit from loan 40022077 proceeds into defendant's campaign account

11. All the foregoing is in violation of Title 18 United States Code, Section 1957.

FORFEITURE ALLEGATION:

12. Paragraphs 1 through 10 are reincorporated herein as though fully set forth herein for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 18 United States Code, Section 982(a)(1) & (2).

13. As a result of committing the offenses alleged in Counts 1 through 3 of this

indictment, involving the substantive offenses of bank fraud in violation of Title 18, United States Code Section 1344; and, Counts 4 and 5, involving the substantive offenses of money-laundering in violation of Title 18, United States Code Section 1957, the defendant,

TRENT K. LEDOUX

shall forfeit to the United States all property, real and personal, which constitutes proceeds of, is derived from or involved in the aforesaid offense and all property traceable to such property, including, but not limited to:

A) A monetary judgment of approximately \$465,100.

14. In the event any of the foregoing property: i) cannot be located upon the exercise of due diligence; ii) is transferred, sold to, or deposited with, a third party; iii) is placed beyond the jurisdiction of the Court; iv) is substantially diminished in value; or, v) is commingled with other property which cannot be divided without difficulty, as a result of any act or omission of any defendant, the Court shall order the forfeiture of any other property of the defendants, up to the value of the property described in the foregoing paragraphs.

A TRUE BILL.

March 12, 2014
DATE

s/ Foreperson
FOREPERSON OF THE GRAND JURY

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[It is requested that trial be held in Topeka, Kansas]