UNITED STATES DISTRICT COURT

-District of Kansas ———

(Wichita Docket)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 16- 10025-JTM

DONALD M. COLLINS,

Defendant.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

Beginning on or about, February 26, 2014 and continuing through approximately March 25, 2014, in the District of Kansas, the defendant,

DONALD M. COLLINS,

did embezzle, steal, knowingly converted to his use or the use of another, willfully misapplied and willfully permitted to be misapplied money, funds, credits, assets, or other property belonging to an Indian tribal organization, to wit; the defendant manufactured, used, and knowingly allowed others to use, counterfeit "players cards" having a value of approximately \$13,326.00, to play various casino games at the Sac and Fox Casino of the Sac and Fox Nation of Kansas and Nebraska, and approximately \$17,443.00 was fraudulently won by the users of the

counterfeit "players cards." The Sac and Fox Nation of Kansas and Nebraska, is an Indian tribal organization, as defined by federal law.

The above acts were in violation of Title 18, United States Code, §§ 1163 and 2.

BARRY GRISSOM United States Attorney

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