June 15, 2026

Bill Johnson
11067 W. 151st Ave.
Cedar Lake, IN 46303-8559
219-488-7631
bill.johnson@mylaw101.com

Oscar Stilley, DOJ-FBOP #10579-062
FCC Yazoo City Camp
PO Box 5000
Yazoo City, MS 39194
oscarstilley@gmail.com

The following are copied because I communicated with them on behalf of Oscar Stilley via bill.johnson@mylaw101.com

vani.singhal@usdoj.gov
Charles.A.O'Reilly@usdoj.gov
Elissa.R.Hart@usdoj.gov

and via oscarstilley@gmail.com:

jeanna.sherrill@arkansasag.gov
krholmes@co.crawford.ar.us
prosecutor@co.crawford.ar.us
Elissa.R.Hart@usdoj.gov
katie.s.bagley@usdoj.gov
Samuel.R.Lyons@usdoj.gov
Joseph.B.Syverson@usdoj.gov
clinton.j.johnson@usdoj.gov
Charles.A.O'Reilly@usdoj.gov
Laura_Griffin@oknd.uscourts.gov (There may be others.)

Dear Oscar,

I am disassociating with you via an open letter copied to the above.

On Friday, June 12, 2026, while reviewing caselaw on Justia, I saw a seminar advertisement titled, *"The most common ethical pitfalls attorneys face when managing IOLTA accounts and drafting fee agreements."*

This caused me to want to understand the government's and your position.

Why? I realized I had absorbed your position from your book, Busting the Feds, and our conversations. I never read any of the state's filings and responses.

From our discussions, I understood that the IOLTA was central to money-laundering charges.

This position is generically summarized in your Nov. 15, 2023 Substack post:

> *I went to trial because the government's pretrial theory, distilled to its essence, was that I had paid Lindsey Springer money for work done, at the express direction of my clients, from my IOLTA (lawyer's trust) account. That's a lawyer's ethical duty, not a crime. I couldn't see how I could be convicted for doing my ethical duty.*
>
> *After trial, and after a special dispositive motion deadline, the government switched to a "theft theory." I got "maxed out" with a 15-year prison sentence.*

I wanted the jury's view, and yes, I understand juries have limited legal insight.

I did several queries, which follow, starting with generic IOLTA account issues.

By the end of my queries, I determined that your portrayal was one-sided. This puts me in the awkward position of having to disassociate with you—a painful choice.

I do not feel it fair to drop you like a hot-horseshoe. You are reliant on me, especially while in SHU during a hunger strike.

- Until the end of your hunger-strike or release, I will monitor and forward your G-mail through CorrLinks. I will also archive CorrlLinks, knowing that messages are viewable for 30-day. Your hunger strike would exceed this window.
- Upon the end of your hunger-strike or release, I will provide a link for you to download all you docket filings I've archived to date.

Please understand I am wired to fight for underdogs with high ethical standards. Case in point: when my associates were making shit-tons of commissions, something did not sit well with me. I queried/alerted the Indiana Commissioner of Insurance.

I was quickly connected to an attorney named John Cochran—not the famous one. My disclosure was to be anonymous, but the investigators messed up, disclosing my identity. I was contacted by the perpetrators in Mexico. Though offered, I declined the witness-protection program.

At the bottom of this long PDF, after the links, you will see the SEC press release resulting from my disclosure (page 18).

Respectfully,

Bill Johnson

Contents

Per Perplexity AI, June 12, 2026:

What are the most common ethical pitfalls attorneys face when managing IOLTA accounts and drafting fee agreements? And what are the penalties, civil and criminal?

The most common ethical pitfalls cluster around mishandling “unearned” funds in IOLTA/trust accounts and drafting fee agreements that obscure scope, allocation of risk, or the client’s right to terminate, and serious violations can trigger bar discipline, civil liability, and in egregious cases felony theft or fraud charges. While details vary by jurisdiction, misappropriation or commingling of client funds and clearly excessive or misleading fee arrangements are near-universal grounds for suspension or disbarment, restitution, and sometimes imprisonment.[1][2][3][4][5][6][7][8][9][10]

Common IOLTA / Trust Account Pitfalls

- Commingling client and firm funds: Using a trust account as an operating account, failing to promptly move earned fees out, or leaving firm funds in trust beyond minimal amounts to cover bank charges is a frequent violation.[4][5][8]
- Misappropriation/borrowing: “Borrowing” from trust to cover cash-flow, paying firm expenses directly from IOLTA, or treating advances as firm revenue before they are earned is classic misappropriation and often characterized as theft even if the lawyer intends to repay.[3][5][9]
- Mishandling advances and flat fees: Treating advance fees (including “evergreen” retainers and many flat fees) as immediately earned and depositing them into operating accounts instead of trust until work is performed is a recurrent issue, especially where rules require unearned fees to remain in trust absent a proper, disclosed “true retainer.”[11][4]
- Poor recordkeeping and reconciliation: Failing to maintain client-by-client ledgers, not reconciling bank statements with internal trust records, or inability to show at any time how much each client has in trust is a common basis for discipline even without proof of theft.[5][6][8]
- Improper handling of bank charges and interest: Passing improper bank fees or service charges to clients from trust (instead of debiting the operating account) and misunderstanding who owns interest (IOLTA funds vs separate interest-bearing accounts) can violate rules.[12][13][5]
- Inadequate client communication about funds: Not giving clients written explanations of how retainers will be deposited, when funds will be transferred from trust, or how refunds of unearned fees will be handled increases the risk of grievances and fee disputes.[4][5]

Common Fee Agreement Ethical Pitfalls

- Unclear scope of representation: Failing to define what is and is not included (e.g., appeals, post-judgment work, tax or QDRO drafting) is repeatedly cited as a driver of disputes and malpractice exposure, and ambiguous terms are usually construed in the client's favor.[2][4]
- Ambiguous or deceptive "nonrefundable" fees: Labeling fees "nonrefundable" without clarifying that any unearned portion will be refunded, or without complying with applicable requirements for true retainers, is a common trap and can be found unethical as against public policy.[7][11][4]
- Clearly excessive or unreasonable fees: Charging fees a lawyer of ordinary prudence would deem excessive under Rule 1.5 factors, double-billing multiple clients for the same time, or padding time entries are recurring grounds for discipline.[2][11]
- Improper contingent fees: Using contingent fees in prohibited matters (e.g., criminal or certain domestic cases in many jurisdictions), failing to put contingency agreements in writing, or not explaining alternative billing arrangements violates fee rules.[14][11][2]
- Conflicts in multiple-client arrangements: Representing multiple parties without adequate disclosure and informed consent, or using fee provisions to shift conflicts or communication burdens improperly, often leads to ethics issues.[2][4]
- Hidden or improper surcharges: Adding "administrative" or credit-card surcharges beyond actual costs incurred (e.g., marking up third-party expenses, charging more than the processor's fee) is generally considered unethical.[11][2]

Typical Disciplinary Consequences

- Private or public reprimand: For technical or lower-level violations (e.g., sloppy recordkeeping, minor commingling without client harm), bars frequently impose admonitions, reprimands, and requirements for trust-accounting training or audits.[6][8][5]
- Suspension: Misuse of client funds, significant recordkeeping failures, repeated commingling, or clearly excessive fees often lead to fixed-term suspensions, sometimes with conditions such as restitution, monitoring, trust-accounting courses, or practice limitations.[10][3][6]
- Disbarment: Intentional misappropriation, using IOLTA funds as a personal credit line, orchestrating fraudulent fee arrangements, or repeated violations after prior discipline are classic grounds for disbarment, and many bars treat proven misappropriation as presumptively warranting disbarment absent extraordinary mitigation.[9][3][10]

Civil Liability Exposure

- Fee forfeiture and disgorgement: Courts frequently order disgorgement of clearly excessive or unethical fees and may require return of all fees in cases of serious conflicts, fiduciary breaches, or illegal fee provisions.[7][11][2]
- Legal malpractice and breach of fiduciary duty claims: Mishandling trust accounts and fee agreements can support malpractice claims (e.g., loss of client funds, adverse tax or financial consequences) and independent claims for breach of fiduciary duty or conversion, potentially allowing punitive damages.[15][4][7]
- Restitution orders: In disciplinary and some civil proceedings, lawyers are often ordered to make clients whole for misapplied funds, improper surcharges, or unearned fees kept contrary to rules, sometimes as a condition of reinstatement.[3][6][10]
- Third-party liability: Where IOLTA misuse is part of a larger scheme (e.g., Ponzi or escrow fraud), courts may hold lawyers and even financial institutions liable under aiding-and-abetting theories if they recklessly disregard red flags, especially in jurisdictions that no longer extend statutory immunity.[15]

Criminal Exposure

- Theft and embezzlement: Intentional or knowing diversion of client funds for personal or firm use, even with an intent to "borrow," is often charged under generic theft, embezzlement, or conversion statutes, and convictions can carry substantial prison terms and mandatory restitution.[9][10][3]
- Fraud and false statements: Fabricating billing records, double-billing, misrepresenting fee arrangements, or issuing false trust-account statements can support charges such as mail/wire fraud, bank fraud, or making false statements to regulators or clients.[10][9]
- Contempt and court-related sanctions: Violations of court-approved fee arrangements (e.g., in class actions, guardianships, or bankruptcy) can result in contempt sanctions, fines, and referral to disciplinary authorities in addition to separate criminal exposure where conduct overlaps with fraud or theft.[4][11][7]

Practical Risk-Reduction Strategies

- Treat advances as client property until clearly earned, absent a properly structured and disclosed true retainer authorized by local rule or opinion, and use trust-accounting software with monthly three-way reconciliations.[5][6][4]
- Draft fee agreements that plainly define client identity, scope, fee structure (including who pays costs and when), refundability of fees, and the client's right to terminate, and avoid "gotcha" provisions that would likely be construed against the lawyer.[11][2][4]

- Separate operations and trust processes: Prohibit paying any operating expense directly from IOLTA, ensure bank fees hit operating, and train staff that any "shortcuts" involving trust funds are non-negotiable red lines.[13][3][5]

Given your multi-jurisdictional practice focus, are you more interested in a jurisdiction-specific breakdown (e.g., Louisiana and a couple of target states) or a more model-rule-driven checklist you can adapt across forums?

Can an attorney be accused of money laundering with an IOLTA?

Yes. An attorney can be charged with money laundering if an IOLTA or other client trust account is used to move, conceal, or structure proceeds of unlawful activity, and the lawyer meets the mens rea elements under the federal (or state) money laundering statutes.[16][17][18]

How IOLTA Use Can Become Money Laundering

- Conduit for criminal proceeds: DOJ and regulators have identified schemes where large amounts of stolen or fraudulently obtained funds were funneled through law firm IOLTA accounts as "settlement" or "escrow" funds, then disbursed to shell companies; in one notable scandal, U.S. law firm IOLTAs were used to launder approximately 1.3 billion dollars in misappropriated Malaysian government funds.[16]

- Avoiding AML reporting: In a reported case, a California attorney used multiple trust accounts to run an unlicensed money transfer business, collecting millions in cash and wiring it abroad so that banks' currency-reporting and AML controls were effectively bypassed; he pled guilty and received a five-year prison sentence.[17]

- Abuse of client trust status: Because FinCEN's CDD rule treats the lawyer—not each client—as the "customer," banks do not identify underlying beneficial owners on IOLTAs, which makes those accounts attractive for launderers and heightens the risk that a lawyer who knowingly facilitates such activity will be treated as part of a laundering scheme.[19]

Legal Framework and Theories of Liability

- Federal statutes: Lawyers who knowingly conduct or attempt financial transactions involving criminal proceeds through an IOLTA can be charged under 18 U.S.C. 1956 (money laundering), 18 U.S.C. 1957 (monetary transactions with criminally derived property), or aiding and abetting those offenses.[18]

- Knowledge and willful blindness: Direct knowledge is not always required; "willful blindness" (consciously avoiding learning that funds are illicit) can satisfy the knowledge element if the facts surrounding the IOLTA transactions would alert a reasonable attorney to a high risk of criminal activity.[20][18]

- Parallel ethical duties: Professional conduct rules (e.g., the analogue to Model Rule 1.2(d)) independently prohibit counseling or assisting a client in criminal or fraudulent conduct—such as money laundering—even if the lawyer is not ultimately charged criminally.[18][20]

Examples and Consequences

- Typology cases: Enforcement agencies have documented instances in which conspirators forged checks or manufactured "settlement" narratives, opened small trust accounts through lawyers, then rapidly moved large deposits to shell entities; one Texas scheme resulted in a conviction for conspiracy to commit money laundering tied to abuse of multiple IOLTA accounts.[16]
- Criminal penalties: Convictions can bring substantial imprisonment, fines, asset forfeiture, and mandatory restitution, in addition to near-certain disciplinary sanctions such as suspension or disbarment for misuse of the trust account and assisting client crime.[17][18][16]

Risk Management for Lawyers

- AML red-flag awareness: Bar and regulatory materials emphasize that lawyers must recognize and respond to red flags—unusual cash deposits, pressure for rapid cross-border transfers, inconsistent "settlement" stories—and avoid becoming "gatekeepers" for laundering schemes via trust accounts.[20][18]
- Exit and reporting options: Ethical guidance in some jurisdictions encourages (and in some circumstances may require) withdrawing from representation and, where permitted, notifying appropriate authorities if the lawyer reasonably believes a client is using the trust account structure to launder funds.[18][20]

If helpful, I can sketch a checklist of concrete red flags and response steps tailored to trust-account handling in a litigation or transactional practice.

What information is available regarding disbarred attorney Oscar Stilley in the case United States v. Springer, N.D. Oklahoma?

Oscar Amos Stilley is a disbarred Arkansas attorney who was convicted in the Northern District of Oklahoma in United States v. Springer for his role in a tax-evasion scheme, and later disbarred by the Arkansas Supreme Court and the Tenth Circuit based on both the criminal conduct and extensive litigation misconduct. The Springer case and subsequent appellate and disciplinary materials describe his use of an Arkansas IOLTA trust account to help conceal a client's income, along with a long history of abusive, vexatious litigation and defiance of court orders.[23][24][25][26][27]

Role in United States v. Springer (N.D. Okla.)

- Convictions and sentence: Stilley and co-defendant Lindsey Kent Springer were tried in the Northern District of Oklahoma and convicted by a jury on charges including conspiracy to defraud the United States and tax evasion; Springer also faced failure-to-file counts. Both men were sentenced in 2010 by Judge Stephen P. Friot to 180 months' imprisonment and remanded to Bureau of Prisons custody.[24][25]
- Use of IOLTA account: DOJ's press release notes that Stilley, a tax attorney, maintained an interest-bearing Arkansas IOLTA trust account and used it, along with cashier's checks, money orders, and other devices, to help Springer conceal his actual income and avoid ordinary financial-institution records. Funds flowing through the IOLTA were used for multiple large purchases, including about 166,000 dollars for a motor home and over 25,000 dollars for a Lexus titled to Springer or his family.[25]

Disbarment and Professional Discipline

- Arkansas disbarment: Reporting on his disciplinary history notes that Stilley was placed on interim suspension in 2007 and formally disbarred in 2010 by the Arkansas Supreme Court. A special judge found multiple charges of misconduct proven, including repeatedly relitigating decided issues, disrespecting courts, suing judges who ruled against him, violating court orders, and withholding material information from courts.[26]
- Tenth Circuit disbarment: In a 2010 Tenth Circuit opinion, the court records that Stilley was disbarred from practice before that court after he failed to respond timely to an order to show cause why his conviction should not lead to disbarment. Subsequent Tenth Circuit and Supreme Court filings in his supervised-release and collateral-attack litigation also state that he "is no longer a licensed attorney because he was disbarred."[28][27][23]

Post-Conviction and Supervised Release Proceedings

- Post-conviction litigation: Stilley has pursued numerous post-conviction challenges to his Springer conviction and sentence; a 2022 Tenth Circuit opinion notes his Springer conviction and describes him as a disbarred Arkansas lawyer.[27][24]
- Supervised release and revocation: More recent appellate materials and media reports indicate that Stilley, after serving much of his 15-year term, has been on supervised release and then home confinement, and that the Tenth Circuit has addressed appeals arising from revocation proceedings. A 2024 media item reports that a federal judge in Oklahoma ordered him back to prison for violating release conditions, although details of the violations are not fully set out there.[29][30][26][27]

Characterization in Later Coverage

- Anti-tax crusader and litigation history: The ABA Journal describes Stilley as an “anti-tax crusader” with a long history of ballot initiatives, lawsuits against Arkansas officials, and aggressive litigation tactics predating his federal conviction. The Arkansas Supreme Court’s adopted findings, quoted in that reporting, emphasize his refusal to accept final decisions, harassment of opposing counsel and judges, and waste of judicial resources as central reasons for disbarment.[26]
- Subsequent public activity: After his release to home confinement, Stilley drew national attention again by filing one of the first civil actions seeking the Texas abortion law’s private “bounty,” and more recent federal appellate documents continue to note his disbarred status and criminal history when addressing his filings.[28][27][26]

If you’re looking at Springer primarily as a trust-account/money-laundering case study, I can extract and organize the specific factual allegations about his IOLTA usage and how they were framed in the indictment, jury instructions, and appellate opinions.

Yes, I am looking at Springer primarily as a trust-account/money-laundering case study, prepare, extract, and organize the specific factual allegations about his IOLTA usage and how they were framed in the indictment, jury instructions, and appellate opinions.

For Springer, the trust-account piece centers on using Stilley’s IOLTA as a conduit to channel, disguise, and spend Springer’s unreported income, framed in the indictment and jury instructions as part of a Klein-style conspiracy and aiding-and-abetting tax evasion rather than as a standalone money-laundering count. The Tenth Circuit’s opinion then treats the IOLTA usage as a key overt act and evidentiary pillar showing an agreement to defraud the United States and willful evasion of Springer’s income-tax obligations.[31][32][33][34]

Indictment / Charging Theory

The summary of the indictment reflects a classic tax-evasion conspiracy spanning roughly 2000–2009, charging Springer and Stilley with conspiring to defraud the United States by obstructing the IRS’s ability to identify and collect Springer’s income and by aiding and abetting his tax evasion. Within that broader conspiracy, the trust-account/IOLTA facts appear as specific means and overt acts, not as a separate money-laundering object, with allegations that:[32][31]

- Springer earned "thousands upon thousands of dollars" through Bondage Breakers Ministries for tax and legal services, which he treated as "donations" in name only and never reported as income.[34][31]
- Stilley, an Arkansas lawyer, "devised a scheme to channel Mr. Springer's unreported income through Mr. Stilley's client trust account," an Arkansas IOLTA, thereby avoiding normal banking records that would associate payments directly with Springer.[31][34]
- The defendants used cashier's checks, money orders, and trust-account transactions to pay for significant personal items (e.g., approximately 166,000 dollars for a motor home and more than 25,000 dollars for a Lexus) in ways designed to prevent creation of a straightforward trail tying Springer's income and assets to him.[32][34]

In other words, the indictment frames the IOLTA as the mechanism by which Springer's "donations" (actually fee income) are first received and then transformed into personal expenditures, forming part of the affirmative acts of evasion and the obstructive conduct directed at the IRS.[34][31][32]

Factual Allegations About IOLTA Usage

The trial and appellate record synthesize the government's evidence about the IOLTA into a narrative along roughly these lines:

- Structure of the arrangement: Springer operated Bondage Breakers Ministries as his platform for providing tax advice and litigation assistance; clients testified that they paid substantial sums to Springer (or at his direction) for those services, despite the "donation" label, undercutting the defense narrative that there was no taxable income.[31][34]
- Use of Stilley's trust account: Stilley's client trust account functioned as the receptacle and clearinghouse for Springer's inflows—funds attributable to Springer's work were routed into the IOLTA instead of to accounts in Springer's name. The government argued that this routing significantly impaired IRS visibility and supported an inference that both men understood the income was taxable and were attempting to conceal it.[34][31]
- Concealment of ownership and expenditures: The evidence included large payments from the IOLTA and related instruments for assets titled in Springer's or his family's name, such as the motor home and Lexus, even though the funds never passed through an account bearing Springer's name, reinforcing the concealment theme.[31][34]
- False narratives to investigators: When confronted, Springer and Stilley told IRS agents and grand-jury investigators that they had received no income and that any funds were merely gifts/donations to a ministry with no expectation of services; the government juxtaposed this with client testimony and IOLTA transaction records to show that this was knowingly false.[34][31]

Functionally, the IOLTA usage is depicted not as a passive background fact but as an active means chosen to frustrate IRS detection and to distance Springer's income stream from him in the banking system.[32][31][34]

Jury Instructions – How the IOLTA Conduct Was Legally Framed

The Tenth Circuit's opinion does not reproduce the full jury instructions but describes the legal theories submitted: conspiracy to defraud the United States (Klein conspiracy) and aiding and abetting tax evasion under 26 U.S.C. 7201. From that description and the summary of the indictment, the trust-account allegations are folded into the instructions under the elements of conspiracy and tax evasion, rather than given separate "money-laundering" instructions:[31]

- Conspiracy instructions: The jury was told it could find a conspiracy to defraud the United States if the government proved an agreement to impair and obstruct the IRS's lawful functions, that the defendants knowingly and willfully joined that agreement, and that one of them committed at least one overt act in furtherance of it. The IOLTA transactions, payments for assets, and concealment of income serve as the "overt acts" satisfying that element.[32][31]
- Tax evasion / aiding-and-abetting instructions: For Springer's substantive 7201 counts and Stilley's aiding-and-abetting liability, the instructions would have required proof of a tax deficiency, an affirmative act of evasion, and willfulness; channeling income through the IOLTA and using it to pay for personal assets under another's name were presented as affirmative acts of evasion.[32][31]
- No standalone money-laundering charge: The appellate opinion makes no reference to an 18 U.S.C. 1956/1957 count or specific money-laundering instructions; instead, the government uses the "scheming to channel income through a trust account" as evidence of intent to defraud the IRS and to evade taxes, not as a separate laundering offense.[34][31]

Thus, in the instructions, the trust-account conduct is legally significant insofar as it demonstrates agreement, willfulness, and affirmative steps to obstruct the IRS and evade taxes, rather than as an independent AML crime.[31][32]

Appellate Characterization in United States v. Springer (10th Cir. 2011)

The Tenth Circuit opinion, affirming both convictions, repeatedly uses the IOLTA story as the factual backbone for rejecting sufficiency and instructional challenges:

- Framing of the scheme: The panel summarizes the case by stating that Springer and Stilley "devised a scheme to channel Mr. Springer's unreported income through Mr. Stilley's client trust account," making this the central factual description of the conspiracy. That synopsis is used to show that there was ample evidence of a concerted plan and overt acts.[31]

- Evidence of willfulness: The court notes that defendants told the IRS and grand jury that they received no income, yet clients testified to large fee payments and financial records showed those funds funneled through the IOLTA and converted into personal assets, supporting the finding of willfulness and intent to defraud.[34][31]
- Response to defense theories: To the extent defendants argued that the funds were "gifts" or that routing money through the trust account was benign, the Tenth Circuit treats the IOLTA evidence as part of the mosaic showing the jury could reasonably reject those narratives and find tax-evasion intent.[31]

Later appellate and Supreme Court filings continue to summarize the case in essentially the same way: that Stilley, as an Arkansas lawyer, used his IOLTA account and other means to help Springer avoid paying taxes on substantial income.[35][33]

How This Functions as a Trust-Account / AML Case Study

For your purposes, Springer illustrates how DOJ can:

- Treat a lawyer's IOLTA as the linchpin of a tax-evasion conspiracy without necessarily charging separate money-laundering counts, by depicting the trust-account usage as the primary affirmative act of tax evasion and obstruction.[32][34][31]
- Use client testimony and trust-account transaction records to dismantle "donation" and "no income" narratives and to show that the lawyer's trust-account practices were designed to avoid ordinary banking records and IRS visibility.[34][31]
- Leverage the IOLTA facts in later disciplinary proceedings, where the same conduct (using a trust account to help a client hide income) supports disbarment for both underlying criminality and broader litigation misconduct.[36][35]

If you'd like, I can next lay this out as a structured template (elements, evidentiary building blocks, and trust-account fact patterns) that could be adapted for analyzing or drafting in future Klein/7201 or AML-adjacent cases.

Provide a historical narrative of Springer's Bondage Breakers Ministries. And identify those whe ran similar scams.

There is very little reliable public record that reconstructs a detailed "historical narrative" of Lindsey Springer's Bondage Breakers Ministries itself; what we have comes almost entirely from the criminal case, which frames it as the vehicle for a tax-evasion scheme in which "donations" were in substance taxable fees for tax and legal services. The record also places Springer and Oscar Stilley within a broader pattern of anti-tax/"tax protester" operators who used religious or quasi-religious entities and “ministries” as fronts to collect income while claiming exemption from income tax.[48][49][50]

Bondage Breakers Ministries in the Springer Record

The Tenth Circuit opinion and DOJ materials give the only coherent narrative of Bondage Breakers Ministries’ role:

- Origins and self-description: Springer operated “Bondage Breakers Ministries” (sometimes “Bondage Breakers”) as a purported religious ministry or charitable organization, and he solicited payments labeled as “donations” to the ministry. Clients, however, testified that they paid these “donations” in exchange for tax-related advice, legal assistance, and litigation support, not as purely gratuitous gifts.[49][48]
- Functional role: In practical terms, Bondage Breakers Ministries functioned as Springer’s business platform for providing tax and legal services to paying clients while avoiding characterization of the inflows as taxable income. The ministry label was central to his narrative that he had no “income” within the meaning of the tax code, despite the substantial sums received.[48][49]
- Integration with Stilley’s IOLTA: The government’s theory (and the Tenth Circuit’s summary) was that Springer and Stilley “devised a scheme to channel Mr. Springer’s unreported income through Mr. Stilley’s client trust account,” using the Bondage Breakers “donations” as the inflow and the IOLTA and related instruments as the outflow for personal expenditures. This structure allowed Springer to maintain that he had no reportable income personally while still enjoying the economic benefits of the funds.[49][48]

The record does not provide a full timeline (founding date, internal governance, dissolution, etc.), but it supports the conclusion that from roughly 2000 through the indictment period, Bondage Breakers Ministries operated as Springer’s primary vehicle for generating and channeling income under a religious/ministerial facade.[51][48][49]

Narrative Arc as Reflected in the Case

Within that evidentiary framework, you can reconstruct a rough narrative arc:

- Early operation: Springer, presenting himself as a religious figure and tax advisor, created Bondage Breakers Ministries to receive “donations” that corresponded in practice to fees for his tax and legal services.[48][49]
- Growth and pattern of receipts: Over years, he received “thousands upon thousands of dollars” through the ministry from individuals seeking tax advice and litigation assistance, who understood that their payments secured Springer’s services.[49][48]
- Structuring to avoid income characterization: Springer maintained that he personally had no income and that all payments were gifts or donations to a ministry, even as he and Stilley arranged for those funds to

be routed through Stilley's IOLTA and then used to buy substantial personal assets (e.g., a motor home and a Lexus) associated with Springer.[48][49]

- Collapse via criminal prosecution: The indictment, trial, and conviction in United States v. Springer effectively ended this arrangement, with the court and jury rejecting the "ministry" and "donation" framing and treating Bondage Breakers Ministries as a vehicle for unreported taxable income and affirmative acts of tax evasion.[51][49][48]

To be precise, public court records do not show detailed corporate history, bylaws, or internal doctrinal materials for Bondage Breakers Ministries; those details, if they exist, were not central to the published opinions but rather to the tax-evasion narrative.[49][48]

Similar Schemes Using Ministries or Religious Fronts

The Springer/Stilley pattern sits within a broader category of schemes where purported ministries, religious organizations, or "outreach" entities are used to mask what are, economically, commercial or advisory services. While the specific label "Bondage Breakers" is used by multiple unrelated groups today, the type of misconduct at issue in Springer resembles:

- "Tax protester" ministries: Numerous anti-tax operators have used churches, ministries, or "Bible-based" organizations as fronts to receive "love offerings" or "donations" tied to tax-avoidance seminars, packages, or individualized advice, while arguing that such receipts are not taxable income; Springer is expressly treated by the ABA Journal and others as part of that "anti-tax crusader" ecosystem.[50][48]
- Rehab/"outreach" ministries as fund-raising fronts: Contemporary reporting about "rehab cults" and "false ministries" describes entities that style themselves as "Bondage Breakers" or "Outreach Ministries," send individuals to solicit donations or sell items in public places, and then provide minimal actual charitable services while leaders capture most of the revenue. These modern "Bondage Breakers Outreach Ministries" are not the same legal entity as Springer's Bondage Breakers Ministries, but their pattern—religious branding, quasi-charitable language, and commercial or exploitative reality—parallels the misuse of religious framing in Springer's tax-evasion case.[52][53][54][55]

Because your question asks to "identify those who ran similar scams," it is important to distinguish:

- Directly comparable, litigated schemes: Springer's case is one of many federal prosecutions involving tax-protester or anti-tax figures who used religious or quasi-religious fronts; however, the specific names and fact patterns vary and are not always tied to "Bondage Breakers" nomenclature.[48][49]
- Current entities with similar branding: There are present-day organizations using names like "Bondage Breakers Outreach Ministries," led by individuals such as Jeff and Tracie Dowell, that operate addiction-recovery or outreach programs and solicit donations; third-party commentary has raised

concerns that some such groups resemble “rehab cults” or exploitative fundraising operations. Those entities are distinct from Springer’s ministry but illustrate how similar branding and structures can be used in ways that invite scrutiny.[56][54][52]

The public sources I can see do not clearly tie specific named individuals (other than Springer and Stilley) to criminal convictions for “similar scams” involving a ministry named Bondage Breakers; rather, they show broader patterns of questionable ministries and tax-avoidance schemes that share the same basic mechanics of using religious labels to disguise fee-for-service income.[54][52][49][48]

Limits of the Historical Record

- Court-centric narrative: Nearly all substantive information about Springer’s Bondage Breakers Ministries comes from federal charging documents and the Tenth Circuit’s opinion, which view the ministry primarily as a vehicle in a tax-evasion conspiracy, not as a freestanding religious institution with a detailed public history.[51][49][48]
- No comprehensive public chronicle: There is no publicly available, authoritative “history” of Bondage Breakers Ministries (in the Springer sense) comparable to a corporate annual report or denominational record; beyond the criminal case, the entity largely disappears from the record.[49][48]

If you’re using Springer as a case study, one productive way forward would be to treat Bondage Breakers Ministries as a paradigmatic “front ministry” in a Klein/7201 prosecution, and then map its features (branding, payment structures, banking arrangements) onto a checklist for identifying similar fact patterns in other investigations or civil enforcement contexts. Would you like a structured matrix comparing Springer’s ministry to generic “front” ministries and modern rehab/“outreach” operations that have drawn regulatory or investigative scrutiny?

Sources

1. https://connect.justia.com/webinars/iolta-and-fee-agreements-avoiding-common-ethical-pitfalls
2. https://www.michbar.org/journal/Details/Price-to-play-Ethics-and-attorneys-fees?ArticleID=4971
3. https://www.texassecuritybank.com/business-education/resource-center/resource-listing/banking-basics/what-you-need-to-know-about-ioltas-client-trust-accounts/
4. https://wealthcounsel.swoogo.com/ethical_traps_03-19-2026
5. https://capitalbankmd.com/resources/articles/iolta-account-rules-5-common-mistakes-lawyers-make/
6. https://anderscpa.com/learn/blog/iolta-trust-account-management-common-mistakes/
7. https://ir.law.utk.edu/cgi/viewcontent.cgi?article=1332&context=utklaw_facpubs
8. https://kaufmanrossin.com/blog/law-firms-avoid-the-6-most-common-trust-accounting-pitfalls/
9. https://www.filevine.com/blog/common-iolta-mistakes-to-avoid-a-checklist-for-law-firms/

10. https://www.texasbar.com/Content/NavigationMenu/ForLawyers/ResourceGuides1/TrustAccounts/GuidetoTrustAccounts.pdf
11. https://calawyers.org/wp-content/uploads/2024/05/Show_Me_the_Money.pdf
12. https://www.calbar.ca.gov/legal-professionals/maintaining-compliance/client-trust-account-protection-program-ctapp/iolta-guidelines-attorneys
13. https://www.okbarfoundation.org/iolta/for-lawyers-and-firms/
14. https://campbelltriallawyers.com/wp-content/uploads/2018/01/Alternative-Fee-Arrangements.pdf
15. https://sepalaw.com/the-relatively-unknown-loss-of-financial-institution-iolta-account-immunity/
16. https://www.niceactimize.com/blog/where-attorneys-connect-to-money-laundering-typologies-535
17. https://www.l2insuranceagency.com/blog/money-laundering-using-attorneys-iolta-accounts-lands-him-in-jail/
18. https://clarkcountybar.org/five-tips-to-avoid-client-trust-account-money-laundering/
19. https://www.sia-partners.com/en/insights/publications/do-banks-have-aml-problem-with-iolta
20. https://www.calbar.ca.gov/sites/default/files/portals/0/documents/ctapp/Daily-Journal-CTAPP-Part-Three.pdf
21. https://www.reddit.com/r/Ask_Lawyers/comments/1fggix7/how_do_lawyers_get_disbarred_by_messing_with/
22. https://firstfedweb.com/what-is-an-iolta-account-and-who-needs-one.html
23. https://www.ca10.uscourts.gov/sites/ca10/files/opinions/01018486365.pdf
24. https://ca10.washburnlaw.edu/cases/2022/06/22-5000.pdf
25. https://www.justice.gov/archive/usao/okn/news/2010/4-23-10.html
26. https://www.abajournal.com/news/article/oscar-stilley-the-convicted-lawyer-who-sued-a-texas-abortion-doc-was-disbarred-over-litigation-conduct
27. https://www.justice.gov/d9/2023-12/united_states_v._stilley_no._22-5133_10th_cir._2023.pdf
28. https://www.supremecourt.gov/DocketPDF/23/23-966/302394/20240306145809456_20240306-145450-95762000-00001483.pdf
29. https://www.facebook.com/arkansasonline/posts/a-federal-judge-in-oklahoma-ordered-former-arkansas-attorney-oscar-stilley-back-/977424897750861/
30. https://www.supremecourt.gov/DocketPDF/23/23-966/302394/20240306145809836_20240306-145450-95762000-00001484.pdf
31. https://law.justia.com/cases/federal/appellate-courts/ca10/10-5055/10-5055-2011-10-26.html
32. https://bustingthefeds.com/wp-content/uploads/2021/05/139_SummaryIndictGov.pdf
33. https://www.supremecourt.gov/DocketPDF/23/23-966/302394/20240306145809456_20240306-145450-95762000-00001483.pdf
34. https://www.justice.gov/archive/usao/okn/news/2010/4-23-10.html
35. https://www.abajournal.com/news/article/oscar-stilley-the-convicted-lawyer-who-sued-a-texas-abortion-doc-was-disbarred-over-litigation-conduct
36. https://www.ca10.uscourts.gov/sites/ca10/files/opinions/01018486365.pdf
37. https://blog.federaldefendersny.org/category/jury-instructions/
38. https://www.gibsondunn.com/wp-content/uploads/2025/02/TD-Bank-N.A.-plea-agreement-TD-Bank-1-of-2.pdf
39. http://www.brunelaw.com/publications/2012-10-09-jury-instructions-key-topics-federal-white-collar-cases
40. https://www.millerchevalier.com/publication/money-laundering-enforcement-trends-winter-2024
41. https://www.fjc.gov/subject/jury-instructions

42. https://www.justice.gov/d9/2023-12/united_states_v._stilley_no._22-5133_10th_cir._2023.pdf
43. https://www.wilmerhale.com/-/media/6ed78d76719140af9161b32f082c248c.pdf
44. https://www.oyez.org/issues/212
45. https://law.justia.com/cases/federal/appellate-courts/ca8/16-3695/16-3695-2017-08-09.html
46. https://www.ca10.uscourts.gov/opinion/18-5104
47. https://www.fincen.gov/sites/default/files/shared/sar_tti_02.pdf
48. https://law.justia.com/cases/federal/appellate-courts/ca10/10-5055/10-5055-2011-10-26.html
49. https://www.justice.gov/archive/usao/okn/news/2010/4-23-10.html
50. https://www.abajournal.com/news/article/oscar-stilley-the-convicted-lawyer-who-sued-a-texas-abortion-doc-was-disbarred-over-litigation-conduct
51. https://bustingthefeds.com/wp-content/uploads/2021/05/139_SummaryIndictGov.pdf
52. https://www.eyesopenedministries.org/blogs/rehab-cults-false-ministries-and-street-corner-deceptions
53. https://projects.propublica.org/nonprofits/organizations/833082755
54. https://www.bondagebreakersoutreach.org
55. https://www.charitynavigator.org/ein/833082755
56. https://www.bondagebreakersoutreach.org/about
57. https://www.facebook.com/bondagebreakerministry/
58. https://www.facebook.com/groups/252632683519590/posts/1062163982566452/
59. https://www.youtube.com/watch?v=j0cEL7hp8v4
60. https://www.facebook.com/peterjyoungren/videos/bondage-breakers-or-bondage-makers/979950147152908/
61. https://www.equip.org/articles/the-bondage-maker-examining-the-message-and-method-of-neil-t-anderson-part-three-spiritual-warfare-and-the-seven-steps-to-freedom/
62. https://www.ficm.org.uk/node/285
63. https://cicministry.org/commentary/issue78.htm
64. https://www.youtube.com/watch?v=buE012Xa6C4
65. https://www.reddit.com/r/TrueChristian/comments/owymjo/warning_about_getting_scammed_by_people_here/
66. https://books.google.com/books/about/The_Bondage_Breaker.html?id=RHHWQT_TvrkC

SEC Charges 26 Defendants in $428 Million Securities Fraud That Targeted Senior Citizens and Retirement Savings

Commission's Crackdown on Financial Fraud Against Seniors Continues
FOR IMMEDIATE RELEASE
2007-172

Washington, D.C., Sept. 5, 2007 - The Securities and Exchange Commission today filed charges stemming from a $428 million securities fraud that victimized thousands of seniors and other investors throughout the United States. The SEC's action, filed in federal district court in Chicago, Ill., charges 26 defendants and alleges that they participated in a massive fraud that involved the sale of securities in the form of "Universal Leases." The investments were structured as timeshares in several hotels in Cancun, Mexico, coupled with a pre-arranged rental agreement that promised investors a high, fixed rate of return. The fraudulent Universal Lease scheme eventually collapsed, leaving investors with losses that exceed $300 million.

The case is part of the Commission's crackdown on financial fraud against senior citizens, which has already resulted in more than 40 enforcement actions over the past two years.

In the latest action, the SEC alleges that Michael E. Kelly and those working with him duped thousands of U.S. investors into using their retirement savings to buy Universal Leases on the false promise of safe and guaranteed returns. The SEC alleges that from 1999 until 2005, Kelly and others raised at least $428 million through the Universal Lease scheme from investors throughout the United States, with more than $136 million of the funds invested coming from IRA accounts. The SEC further alleges that a nationwide network of unregistered salespeople who sold the Universal Leases collected undisclosed commissions totaling more than $72 million. For most of the scheme, the complaint alleges, Kelly and his organization used new investor funds raised in the scheme to make illusory "rental income" payments to Universal Lease investors. The SEC also alleges that Kelly and others ran the scheme from Cancun through a number of foreign entities in Mexico and Panama.

"This case illustrates the Commission's continuing commitment to hold accountable those who prey upon the retirement funds of older Americans," said Linda Chatman Thomsen, Director of the SEC's Division of Enforcement. "Kelly and his cohorts told investors they were purchasing a safe, high-income investment suitable for a retirement account. In reality, investor funds were at grave risk as investor funds were used in a way that guaranteed the collapse of the scheme."

Merri Jo Gillette, Regional Director of the SEC's Chicago Regional Office, added, "Kelly and those involved in his operation may have hoped to evade U.S. law enforcement by operating the Universal Lease scheme from abroad. The action we filed today shows that the SEC will vigilantly pursue those who target older Americans, no matter what the obstacles. The SEC plans to aggressively seek recovery from the defendants to offset the huge losses they inflicted on investors."

According to the SEC's complaint, Kelly and others told investors that Universal Leases would generate guaranteed income through the leasing of investor timeshares by a large, independent leasing agent. In fact, the complaint alleges, the leasing agent was a small Panamanian travel agency controlled by Kelly, and for most of the scheme its payments to investors came from accounts funded by money raised from new investors. Further, the complaint alleges that Kelly and the other defendants failed to disclose several key facts about the Universal Lease investment, including the risks of the investment and that more than $72 million in investor funds were used to pay commissions as high as 27 percent to the selling brokers.

The SEC's complaint names the following individuals and entities as defendants: Kelly, Michael P. Kelly, Donald L. Kelly, John Corwin, Corporativo Nola, S.A. de C.V. Resort Holding International (RHI) S.A., Panorama Communities, S.A., World Phantasy Tours, Inc. (Viajest Fantasia Por El Mundo, S.A.), also doing business as Majesty Travel, Galaxy Properties Management, S.A., Yucatan Resorts, S.A. de C.V., Resort Holdings International, S.A. de C.V. The complaint also names as defendants a number of the unregistered brokers who sold the Universal Leases to the investing public. They are: Mark Ruttenberg, Ruttenberg and Associates Financial Marketing, Inc., Mark G. Meyer, Mark Meyer and Associates, Inc., Richard E. Riner, Southwest Income Marketing, Inc., George Phelps, also doing business as Safe Estate Plans, John E. Tencza, also doing business under the name of American Investment Management Group, Inc., American Elder Group, L.L.C., Carl Q. Lee, Carl Lee and Associates, Inc., Roy D. Higgs, Warren T. Chambers, William K. Boston, Jr. and Century Estate Planning, Inc. Finally, the complaint names Avanti Motor Corp. and DMK Properties, L.L.C., two entities affiliated with Kelly, as relief defendants, alleging that they received ill-gotten gains from the scheme.

The SEC's complaint charges the defendants with violating the antifraud and registration provisions of the federal securities laws, and seeks permanent injunctions, disgorgement of ill-gotten gains, and civil penalties. The SEC acknowledges the assistance of the German government (Bundesanstalt für Finanzdienstleistungsaufsicht), the Mexican government (Comisión Nacional Bancaria y de Valores) and a significant number of state securities agencies.

Combating financial fraud against older investors will be a focus of the Commission's second annual Seniors Summit in Washington, D.C., on Sept. 10. The Summit also will include the release of findings from regulatory examinations of 110 firms offering "free lunch" investment seminars aimed at seniors.