

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Criminal Action
)	
v.)	No. 17- <u>10141</u> -01, 02, 03- <u>JTM</u>
)	
BROCK WEDMAN,)	FILED UNDER SEAL
MICHAEL ZAJKOWSKI,)	
and BRUCE MACKEY,)	
)	
Defendants.)	
_____)	

SEALED INDICTMENT

The Grand Jury charges:

INTRODUCTION

COUNT 1

OBSTRUCTION OF STATE OR LOCAL LAW ENFORCEMENT

From on or about February 12, 2014, through February 19, 2014, in the District of
Kansas,

**BROCK WEDMAN,
MICHAEL ZAJKOWSKI,
and BRUCE MACKEY,**

the defendants herein, did unlawfully conspire, with others known and unknown to the Grand
Jury, to obstruct the enforcement of the criminal laws of the State of Kansas, that is, KSA 21-
6406 *et. al*, with the intent to facilitate an illegal gambling business, and committed at least one
of the following acts to effect the conspiracy:

All in violation of Title 18, United States Code, Sections 1511(a)(1).

1. At all times, relevant to the allegations in this Indictment, defendants Zajkowski and Mackey were employees of a political subdivision of the State of Kansas, that is, they were commissioned law enforcement officers of the Wichita, Kansas Police Department (WPD).

2. At all times, relevant to the allegations in this Indictment, defendant Wedman and an unindicted co-conspirator, conducted, financed, managed, supervised, directed, and owned all and/or part of an illegal gambling business. This gambling business operated in violation of the laws of the State of Kansas, K.S.A. 21-6406 *et al*; involved five and more persons who conducted, financed, managed, supervised, directed and owned all and/or part of said business; remained in substantially continuous operation for a period in excess of thirty days and with a gross revenue in excess of \$2000 in a single day.

OVERT ACTS

(a) arranged a poker game for February 12, 2014, and arranged for dealers, waitresses, catering, and security for the game;

(b) participated and coerced another to participate, in an effort to investigate and learn the ownership of the vehicle of a participant at the game who was suspected of being an undercover police officer; and

(c) Defendants Zajkowski and Mackey made a series of telephone calls and texts, and used WPD resources, at the request of Defendant Wedman and other co-conspirators, in order to learn the ownership of the vehicle the undercover officer drove to the game, in an effort to learn the identity of the suspected undercover officer/participant.

(d) Defendants Zajkowski and Mackey provided the undercover officer's identity and the vehicle information (it was registered to the City of Wichita and in service of the WPD) to defendant Wedman and other co-conspirators.

COUNT TWO

3. Paragraphs 1 and 2 are incorporated herein.
4. On or about February 15, 2017, in the District of Kansas, the defendant,

BROCK WEDMAN,

did willfully and knowingly make and cause to be made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of a department or agency of the United States by falsely representing to the Federal Bureau of Investigation that he did not obtain information in an attempt to identify a suspected undercover police officer, knowing the statement and representation to be false because, as the defendant well knew, he obtained the license plate number and Vehicle Identification Number (VIN) of the undercover vehicle, and requested that a WPD employee check the numbers for identifying information.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL

October 11, 2017
DATE

s/Foreperson
FOREMAN OF THE GRAND JURY

s/Thomas E. Beall
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[It is requested that jury trial be held in Wichita, Kansas.]