

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) O. GENE BICKNELL,)	
)	Case No. 4:25-cv-00383-CDL
Plaintiff,)	
)	
v.)	JURY TRIAL DEMANDED
)	
(1) RICHARD M. SILANSKAS JR.,)	
(2) LARRY K. WILHITE, and)	
(3) STEPHEN D. HEDRICK,)	
)	
Defendants.)	

VERIFIED COMPLAINT

Defendants Richard M. Silanskas Jr. and Larry K. Wilhite orchestrated a campaign of deception to defraud 91-year-old Plaintiff O. Gene Bicknell. They coerced him into sinking more than \$60 million into the design and construction of the American Heartland Theme Park, a project they claimed would rival the size and scale of Disney World but would be built in an unlikely location: Vinita, Oklahoma.

Silanskas and Wilhite executed a predatory conspiracy of psychological manipulation—convincing Gene, through fraud and impersonation, that God himself was commanding him both to finance the park’s construction and to grant Silanskas and Wilhite two-thirds ownership over the completed venture, which was to be worth \$2 billion.

Inevitably, it all fell apart, leaving a trail of victims—foremost among them Gene Bicknell, as well as the citizenry of northeast Oklahoma, whose hopes for an economic

renaissance caused by the American Heartland Theme Park were falsely raised and cruelly dashed.

Gene Bicknell brings this action to hold Silanskas and Wilhite accountable under the federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.* (“RICO”) and Oklahoma law, and to recover what Defendants wrongfully took from him. He alleges as follows, based on his personal knowledge or upon information and belief:

INTRODUCTION

1. Vinita, Oklahoma, sits along U.S. Route 66, about an hour’s drive northeast of Tulsa. Vinita has a population of less than 6,000 people.

2. From 2021 through 2024, Defendants Richard “Rick” Silanskas Jr. and Larry Wilhite, assisted by Stephen “Steve” Hedrick, operated a criminal enterprise that defrauded O. Gene Bickell (“Gene”) and duped him into sinking his remaining fortune into the attempted development of the “American Heartland Theme Park” (the “American Heartland Project” or the “Project”) in Vinita.

3. This is a rendering of the American Heartland Theme Park as Defendants told Gene it would be:



4. Silanskas and Wilhite’s plan was not to steal Gene’s money—although they did that. The plan was to *use* Gene’s money to build the American Heartland Project *and then steal it*, paying themselves handsomely along the way.

5. Silanskas already had a record of involvement in failed theme park projects that left empty-handed investors in their wake. Following one of Silanskas’s more recent endeavors, his business partner went to prison. But that did not deter Silanskas. He teamed up with Wilhite. They enlisted Hedrick. And together they embarked on another theme park fraud.

6. To commit this fraud, Silanskas and Wilhite embarked on a years-long campaign of psychological and spiritual abuse. Silanskas and Wilhite tricked Gene by impersonating God and religious figures purportedly communicating “God’s” directives in hundreds of electronic messages targeted at Gene. Silanskas and Wilhite made Gene believe that God Himself was commanding Gene to infuse ever more cash into the Project

and to trust them completely with its management. For years, those electronic messages preyed upon Gene's devout Christian faith and admonished Gene to obey "God's" will without doubts or second-guessing.

7. Silanskas and Wilhite used the word of "God" to convince Gene he must equally share ownership of the completed Project with them. Meanwhile, Silanskas, Wilhite, and Hedrick paid themselves handsomely and otherwise took money out of the Project for themselves and their families.

8. As part of the scheme, Silanskas and Wilhite drove a wedge between Gene and his family, which isolated Gene and prevented his family from adequately protecting him. The intensity of Silanskas and Wilhite's manipulation of Gene made it impossible for Gene's family and friends to dissuade him from putting more money into the Project or convince Gene that the texts and emails he was receiving were not really from God. The resulting strife caused Gene's estrangement from his family—an estrangement that, in turn, aided Silanskas and Wilhite in their scheme. Silanskas and Wilhite's fraud caused Gene to lose a substantial portion of his remaining wealth, even prompting him to try to sell his personal possessions to raise additional money for the Project.

9. Ultimately, however, with Defendants in charge, the Project failed, and Gene was left with no more money for Defendants to take. And after years of conning Gene out of more than \$60 million and spending all of that money, including on themselves and their family members, Defendants constructed nothing more than a fence and a gravel road.

10. The fraud has been devastating to both Gene's physical health and mental wellbeing. It has resulted in severe emotional distress and, ultimately, a stroke. Most


painfully, Defendants' actions have jeopardized Gene's well-earned reputation as a philanthropic, honest, and scrupulous businessman.

11. Gene was not Defendants' only victim. Multiple vendors who were hired and directed by Defendants have also gone unpaid and have brought lawsuits seeking millions of dollars. Innocent people lost money by buying up land near Vinita with property values inflated by news of a theme park that would never exist. And the hopes of people in northeast Oklahoma, many of whom believed what they were told about the Project and expected it to transform their community, were shattered.


12. Defendants had no respect for human decency, and their greed knew no bounds. Now Gene seeks to have them face some of the consequences of their wrongdoing.

THE PARTIES

13. Plaintiff O. Gene Bicknell is a citizen of Florida, residing in Englewood, Florida.

14. Defendant Richard M. Silanskas Jr. is a citizen of Missouri, residing at 

 Blue Eye, Missouri.

15. Defendant Larry K. Wilhite is a citizen of Missouri, residing at 

, Branson, Missouri.

16. Defendant Stephen D. Hedrick is a citizen of Arizona, residing at 

, Prescott, Arizona.

JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1331 because Counts I and II are brought under the federal civil RICO statutes and therefore arise under the laws of the United States.

18. This Court has supplemental jurisdiction over Counts III, IV, V, VI, VII, and VIII under 28 U.S.C. § 1367(a). Those Counts, which allege violations of Oklahoma law, are so related to Plaintiff's federal civil RICO claims that they form part of the same case or controversy under Article III of the United States Constitution.

19. This Court also has subject matter jurisdiction over this action under 28 U.S.C. § 1332(a)(1) because this is a civil action between citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

20. Each Defendant is subject to personal jurisdiction in Oklahoma, at least because of their extensive contacts with and transactions in Oklahoma as part of their perpetration of the scheme set forth herein.

21. Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because a substantial portion of the events giving rise to this suit occurred in the Northern District of Oklahoma.

22. Venue is also proper in this District under 18 U.S.C. § 1965(a) because Defendants transacted affairs in and are subject to personal jurisdiction in the Northern District of Oklahoma.

THE FACTS

Origins of the Scheme

23. Gene Bicknell is a 91-year-old widower, father, and grandfather, who worked hard throughout his life to build a legacy, provide for his family, and fund philanthropic endeavors.

24. Gene was born in 1932 in Pitcher, Oklahoma. His upbringing was humble. After working his way through college, Gene bought his first Pizza Hut franchise in 1962.

25. Over many years, Gene built out an 800-store Pizza Hut franchise and became the world's largest Pizza Hut franchisee.

26. Gene also invested in other business ventures and founded several companies along the way, which resulted in a substantial personal fortune.

27. Gene became involved in the community in Branson, Missouri, and he invested in the Mansion Theatre for the Performing Arts (the "Mansion Theatre") there.

28. Gene met Larry Wilhite, a preacher in Branson. Gene eventually hired Wilhite to manage the Mansion Theatre, which Wilhite did for over two decades.

29. In late 2019, while managing the Mansion Theatre, Wilhite came into contact with Rick Silanskas.

30. Silanskas held himself out as a man with a breadth and depth of experience in the entertainment industry. Silanskas claimed to have worked for the Walt Disney Company, as a marketing director for a CBS Television Affiliate, a producer for ESPN Network Sports, and a creative developer of various theme parks in Asia.

31. In reality, by that time, Silanskas had been involved in at least two theme park projects that proved to be fraudulent. According to public reports, in or about 2015, Silanskas founded a company called DreamVision as part of a purported effort to build multi-billion-dollar theme parks in Fort Worth, Texas and Muscle Shoals, Alabama. At the time, Silanskas claimed the parks were meant to be “10 times the size of Disney World’s Magic Kingdom” and promised 20,000 new jobs. Silanskas brought on retired Disney executive Ronald Logan to the DreamVision project, so that Logan’s own credibility in the entertainment industry could legitimize DreamVision. Silanskas leveraged Logan’s reputation to acquire investments for the theme park projects and partnered with Bryan Robinson of Provident Global Capital to manage the funds. In 2016, the Alabama Securities Commission posted a “cease and desist” order against Robinson and criminal charges were filed against Robinson in Lauderdale County Circuit Court in Alabama. The Alabama Securities Commission Director said that Robinson stole millions of dollars from over 40 Alabama investors who “trusted [Robinson] with their life savings.” Alabama Securities Commission, Press Release, *DreamVision Promoter Pleads Guilty to Securities Fraud*, available at <https://perma.cc/D6ZP-ZTFM>. In 2018, Robinson pleaded guilty to one count of securities fraud and was sentenced to 10 years in prison. Robinson was also ordered to repay more than \$7 million to investors he duped over the park scheme. It appears Silanskas escaped charges. Within just a few years of the collapse of the DreamVision fraud, Silanskas set his sights on a new theme park fraud, this time targeting Gene.

32. Shortly after Wilhite and Silanskas met in late 2019, they began emailing back and forth about music produced by Silanskas. Within a week, Wilhite was emailing Silanskas copies of the Mansion Theatre’s specifications for sets and detailed information about the Mansion Theatre’s layout and dimensions.

33. Silanskas pitched an idea to Wilhite for a dramatic expansion of the Mansion Theatre. That idea eventually morphed into the American Heartland Project.

34. Silanskas and Wilhite corresponded for several months. Then, in November 2020, Silanskas asked Wilhite to share Silanskas’s biography with Gene. Silanskas wrote to Wilhite: “I truly believe that there is a very special path ahead.” Silanskas noted that he “will forever be thankful for that moment” that he met Wilhite.

35. In January 2021, Wilhite introduced Silanskas to Gene by email, forwarding a video of a symphony produced by Silanskas. Wilhite wrote: “Rick is the gentleman I was talking about. We had met and started working on producing the Disney production along with other concepts and ideas last year. We met a week ago and again discussed the endeavor along with other ideas.” Wilhite sent Gene a copy of Silanskas’s biography and an email from Silanskas outlining his vision for the Mansion Theatre and how he would expand the venture into “a shining light of hope and a re-definition of the family entertainment market not only in Branson, but for the industry.” Silanskas’s biography claimed that his career “spanned more than 39 years within the creative industry” and that he worked under a “Disney Legend.”

36. Initially, Silanskas pitched ideas to expand the Mansion Theatre into a “regional family entertainment destination” and specifically referenced the potential involvement of Logan.

37. By March 2021, Silanskas had set up weekly meetings with the Mansion Theatre team and, with Wilhite’s endorsement, had become a full-time Mansion Theatre employee himself.

38. In June 2021, Silanskas facilitated a meeting between the then 88-year-old Gene and the then 83-year-old Logan.

39. After the meeting, Silanskas emailed Logan’s *work* email account. Silanskas used a distinctly formatted subject line common to many of Silanskas’s emails from the period: “TO: Ron Logan FROM: Rick Silanskas RE: LETTER.” Silanskas wrote: “Here is the letter as we discussed for Gene. Larry [Wilhite] sends his gratitude for all of your help. Please put the letter on your letterhead signed and send me the scanned copy back to my email today if at all possible. You may want to add some words to the letter.” Silanskas drafted his own letter of recommendation. The draft Silanskas provided stated:

When Rick [Silanskas] first shared of his relationship with Larry [Wilhite] and the theatre, I was very pleased. Rick’s history within the industry for the past 40 years will be a great blessing to you and the film studio/themed attraction development. Rick’s knowledge is invaluable and I am very happy he is working with a team of integrity and honor based people.

As I shared with you, I believe it is extremely important to take advantage of the window of opportunity that is upon you at this moment within the industry. Time is of the essence as the need for motion picture and television studios/production/post production/animation is increasing exponentially and will continue

based upon the current and future content needs. I hope you have had the opportunity to view some of Rick's CGI [computer generated-imagery] animation productions. This area is another highly profitable center for the studio.

In addition, the "studio tour themed attraction" element as defined by Rick and Larry in the conceptual profile creates the perfect tourism element which will enhance the entire effort.

I look forward to a great future filled with blessings and success. Thank you so very much Gene.

40. The next day, on June 11, 2021, a Gmail account purporting to belong to Logan—namely ronlogan909@gmail.com, not Logan's work email account—sent a PDF of almost exactly the same letter drafted by Silanskas to Gene, copying Silanskas and Wilhite. Notably, the subject line of the email purporting to be from Logan contained the same distinctive subject line that was typically used by Silanskas in his emails (which listed who the email was "To" and "From" in the subject line): "Fwd: To: Gene Bicknell/Larry Wilhite From: Ron Logan Great Meeting."

41. The letter was *not* sent by Logan. *Silanskas* sent the letter to Gene from an email account he created to impersonate Logan.

42. The letter of recommendation for Silanskas, written *by* Silanskas and then fraudulently sent to Gene by Silanskas under Logan's name, was Silanskas's ticket into Gene's inner circle. Gene replied to the fake Logan account operated by Silanskas: "It will be a great comfort to have you involved. You are Rick are stars in this horizon."

43. Several months later, on September 23, 2021, Silanskas used the same email account impersonating Logan to send another fake email pushing his plan forward. Under

the distinctive subject line “To: Rick Silanskas From: Ron Logan Re: Rosen,” Silanskas, pretending to be Logan, wrote to himself, copying Gene and Wilhite:

9/23/21
Rick,
Good morning Rick. I have updated the Dean and awaiting the time when you and Larry can lock in the meeting we have discussed. Time to move forward. Rosen ready for this relationship and no time to waste. Let me know ASAP so we can get this ball rolling.

Don't lose any momentum Rick. The industry is on fire and you are on the cutting edge with the Mansion Studios complete plan. Timing is impeccable. Will call you tomorrow.

44. Silanskas convinced Gene to give him a position as Executive Producer at the Mansion Theatre with a base salary of \$110,000—a salary that Silanskas could not legitimately obtain based on his qualifications or his responsibilities, to say nothing of his reputation.

2022: *The American Heartland Project, Commanded by Messages from “God”*

45. In mid-January 2022, the Mansion Theatre issued a press release that announced a “major expansion.” According to the press release, a “state of the art classically designed motion picture and television studio complex” including multiple soundstages and a “studio tour/attraction,” would be developed on several hundred acres in Southwest Missouri.

46. Quickly, however, the plan developed by Silanskas and Wilhite shifted and grew. The central objective became the construction of the American Heartland Project—a theme park, R.V. park, and resort in Oklahoma. Development would cost *billions*. Although the money would all come from Gene—and Silanskas and Wilhite believed (incorrectly) that Gene *had* billions of dollars—majority ownership (at least) and control

would belong to Silanskas and Wilhite, who would live comfortably off Gene’s money in the interim.

47. To manipulate Gene to fund the Project while surrendering to their control, Silanskas and Wilhite launched a campaign of text and email messages to manipulate Gene by playing upon his religious faith.

48. They began sending Gene daily devotional text messages called “Todays Word.” The messages were crafted to appear to be written and sent by God Himself. From the start, the messages were intended to obtain Gene’s money and absolute obedience.

49. A “Todays Word” message dated May 2, 2022, stated as follows:

Thia [sic] is today’s devotion!!!
TODAYS WORD
AWAKE MY CHILD.
THIS IS A DAY OF GREAT DECISION AND URGENCY.
I HAVE SPOKEN TO YOU SO VERY LONG PREPARING
YOU FOR THIS JUNCTURE IN TIME.
BUT TODAY YOU MUST FINALLY MAKE A CRUCIAL
DECISION
...
This mission will not tolerate anything but ABSOLUTE
OBEDIENCE and ABSOLUTE CLIFF DIVING FAITH FROM
THE HIGHEST MOUNT ABOVE THE SEA.

50. The message then told Gene to follow “God’s” vision and give all of his wealth to the Project:

REMOVE EVERY THOUGHT OF OPERATING AS YOU HAVE IN THE PAST WITH BUSINESS AND DECISION MAKING.

YOUR PAST BUSINESS PRACTICES AND STRATEGY HAVE NO PLACE IN THIS WORK FOR NOW YOU HAVE EXITED THE NATURAL AND ENTERED THE SUPERNATURAL.

HOW MUCH MORE MUST I SHOW YOU?

I HAVE SHOWN YOU A VISION AND SPECIFIC PLAN FEW WILL EVER BE BLESSED TO EXPERIENCE AND YET YOU SEEK TO PROTECT THE STOREHOUSES RATHER THAN TRUSTING ME!

I FILLED YOUR STOREHOUSES OVER THE YEARS FOR THIS MOMENT.

I ALONE HAVE BEEN YOUR SOURCE.

I ALONE HAVE BEEN YOUR PROVISION.

WHATEVER YOU HAVE ACCUMULATED WITHIN THE STOREHOUSES CAME FROM ME ALONE.

NOW LISTEN.

I AM INSTRUCTING YOU TO EMPTY THE STOREHOUSES AND ACCELERATE THIS MISSION WITHOUT DELAY.

STOP DELAYING!

The Lord will open for you His good storehouse, the heavens, to give rain to your land in its season and to bless all the work of your hand

Deuteronomy 28:12

IN YOUR OBEDIENCE AND TRUST YOU WILL SEE A MULTIPLICATION OF STOREHOUSES BEYOND ANY EARTHLY CALCULATION AND THUS UNLIMITED RESOURCES AS THE VISION IS FULLY REVEALED!

51. Finally, the message also commanded Gene to trust Silanskas and Wilhite completely:

HAVE I NOT SENT YOU SPECIFIC TRUSTED AND GIFTED LEADERS TO COMPLETE THIS WORK?

LOOK BY YOUR SIDE SINCE THE MOMENT THIS ALL BEGAN.

HOW MANY TIMES MUST I REMIND YOU?

Allow those I sent to you to move forward without obstruction or delay.

TRUST THEM COMPLETELY AND AVOID INSERTING ANY DISTRACTIONS OR DOUBTFUL QUESTIONS.

52. Four days after that message, on May 6, 2022, Wilhite emailed Gene a project development plan for a theme park to be built in Oklahoma, complete with detailed plans and aerial images of a proposed location for the theme park in Oklahoma.

53. Obeying the command of “God” to trust Silanskas and Wilhite completely, Gene began acquiring the land on which the American Heartland Theme Park was to be built. Over the course of two months in spring 2022, Gene, through a holding company, bought more than 1,600 acres of land in Vinita, Oklahoma, for the Project at a cost of almost \$7 million. This is downtown Vinita:



54. Gene believed the “Today’s Word” messages were coming from God. Gene expressed his belief that he was being called by God to complete the American Heartland Project. For example, when a friend suggested to Gene that he should consider developing the theme park in Branson, Missouri, instead of Vinita, Oklahoma, because of Branson’s superior location and infrastructure, Gene responded: “This is much bigger and more [Missouri] has no leadership. Land is much better to build. 4-7 years. In steps. . . . This is God’s plan. Not mine. He has laid it on me.”

55. Meanwhile, Silanskas and Wilhite appointed Hedrick to be the Project’s “Vice President Project Development” and then “Executive Producer.” Hedrick held himself out as a businessman and executive producer and claimed to have 40 years of

relevant industry experience working for major theme park and entertainment companies around the world, including Disney.

56. With the land secured, Defendants began the development phase of the Project. Using an entity owned by Gene, they committed millions of dollars to contractors for the development of the Project. To pay these contractors and vendors, Silanskas and Wilhite used more messages from “God” to manipulate Gene into providing cash for the Project.

57. Gene began to infuse the American Heartland Project with cash directly from his personal trust accounts.

58. On July 28, 2022, Gene contributed \$500,000 to the Project. He transferred the funds directly to an entity owned and controlled by Wilhite.

59. On August 31, 2022, General transferred another \$600,000 to Wilhite’s entity.

60. On October 17, 2022, Gene transferred yet another \$600,000 to Wilhite’s entity.

61. On November 29, 2022, Gene transferred still another \$600,000 to Wilhite’s entity.

62. On December 19, 2022, Gene again transferred \$500,000 to Wilhite’s entity.

63. By the end of 2022, Silanskas and Wilhite had manipulated Gene into sinking a total of almost *\$10 million* into the Project.

2023: The Project Ramps Up

64. As 2023 began, Gene was swept up in the Project. On January 18, 2023, Gene transferred an additional \$600,000 to Wilhite's entity.

65. Silanskas and Wilhite convinced Gene that more land was needed for additional developments in connection with the Project. In early 2023, Gene, through a holding company, spent *almost \$5.5 million* on approximately 1,200 more acres near the location of the planned theme park.

66. Then, on February 14, 2023, Gene transferred *\$1.5 million* to Wilhite's entity.

67. Silanskas and Wilhite became increasingly close as the scheme began to take off. Silanskas even sent Wilhite a story called "THE BALLAD OF RICK AND LARRY (A True Legend)" describing their relationship. The story was about a "tough, no-nonsense cowboy" named Larry who met a Sicilian immigrant named Rick "who had come to America in search of a better life." The story goes on to describe Silanskas and Wilhite sharing a "deep bond" and how despite many obstacles they "set out to explore this new land, to conquer it, and to make it their own," which dovetails with the primary goal of their scheme against Gene—to take over the ownership of the American Heartland Project. The story ends with Silanskas and Wilhite building a life for themselves and "remain[ing] the best of friends, united by their love of adventure and their deep bond of friendship." Gene was not part of their story—he was the conquest.

68. In February 2023, Hedrick emailed Gene and Wilhite in preparation for a meeting with Oklahoma officials to ask for their support for the Project. Hedrick outlined

the types of support sought from the State, including infrastructure and tax incentives. Hedrick attached an overview of an economic analysis purportedly conducted by an economic research firm. The overview stated, among other things, that (i) the American Heartland Project “is of transformative quality”; (ii) “[t]here is a clear market opportunity for the project” and it is “consistent with attracting an anticipated 3.9 million visitors annually”; (iii) it would “become one of the state’s anchor tourist destinations”; (iv) the “proposed location can support the resort and market”; and (v) the “facility will generate approximately \$500 million in annual spending.” Those conclusions were baseless, and the economic analysis was unreliable at best, as Hedrick well knew.

69. On February 28, 2023, Gene transferred an additional \$500,000 to Wilhite’s entity. The next day, at Rick’s direction, Gene funded the payment of \$400,000 to an animation company.

70. Then Gene’s infusions of cash into the Project escalated dramatically. On March 10, 2023, Gene transferred *\$4 million* to Wilhite’s entity.

71. On April 19, 2023, Gene transferred an additional *\$3 million* to Wilhite’s entity.

72. The following week, on April 25, 2023, Gene provided an additional \$1,388,000 to the animation company.

73. The next day, Gene paid approximately \$161,862 to a purported vendor associated with the Project. That vendor was affiliated with Silanskas’s son.

74. On May 8, 2023, Gene transferred another *\$2 million* to Wilhite’s entity.

75. On May 16, 2023, Gene emailed Hedrick: “God is at work!!! You’re the leader . . . Bless you.” Hedrick replied, in part:

I just got some excellent news from our feasibility study consultant. With the latest info we sent, they now consider us to be more than a regional park, like Dollywood. We’re now classified as a destination park, drawing visitors from all over the country. They said, ‘It’s like you’re plopping a Universal Studios in the middle of the US.’ They said the attendance numbers I showed you today will increase even more. The new study should be done by end of next week. It just keeps getting better!

The referenced feasibility study ignored critical considerations, such as how the park would function in the winter months. In fact, Hedrick did not even consider winter operations or investigate average snowfall in Vinita until July of 2023. Hedrick was lying about what was said to him by the feasibility study consultant and/or knew that the feasibility consultant’s statements were false and that the attendance numbers Hedrick was promising Gene would never be attainable.

76. On June 9, 2023, Hedrick sent Silanskas and Wilhite photos of a completed model of the park, which Silanskas forwarded to Gene. And the same day, Gene transferred another \$504,699 to Wilhite’s entity.

77. Hedrick convinced Gene that he had assembled “the dream team of all dream teams,” consisting of more than a dozen former Disney engineers and designers, to work on the Project. Those engineers and designers were even listed on the American Heartland Theme Park website as part of the “executive team” along with Hedrick. Few, if any, of them substantially participated in the Project, however. It was just more knowing deception—of Gene, and of the public.

78. On June 15, 2023, Gene transferred *\$3 million* to Wilhite’s entity.

79. At about this time, the messages from “God” cranked up, and they appear to have switched medium, from text to email. Silanskas and Wilhite arranged for Gene to receive the “Todays Word” message from a “Heavenly Word” Gmail account with the address heavendirectword@gmail.com. Over the course of about six months, Gene received more than 500 such emails purportedly from God, sent on a nearly daily basis and sometimes more than once a day. They consistently urged Gene to be compliant with “God’s will”—which was really the will of Silanskas and Wilhite.

80. On June 29, 2023, the “Todays Word” email stated: “I present clear opportunities and send them your way to fulfill needed resources and yet you turn a blind eye thinking you know better than I, your Father.” The email explicitly underscored the need for obedience:

<p>When you step out in obedience and approach the wealthy with humility and a heart full of gratitude, you will witness My provision flowing abundantly!</p> <p>...</p> <p>Trust in Me, follow My directives, and witness the manifestation of My glory through the fulfillment of the vision.</p> <p>...</p> <p>Embrace the path I have laid before you, and experience the joy and fulfillment of walking in obedience to My will.</p>

81. The next day, the “Todays Word” repeated: “I repeat My words to you again this morning as they represent a call to immediate obedience in a pivotal hour. Allow nothing to distract you from doing exactly what I have instructed regarding resources and provision.”

The “Triune” and the Public Rollout

82. In July 2023, Hedrick commented publicly that Gene was the sole financial backer of the theme park and referred to Gene as “our benefactor.” And he was—but not to a great enough extent to satisfy Defendants. So they turned up the manipulation dial by introducing the concept of the “triune”—an idea built around the Christian idea of the Holy Trinity. Here, the triune was Silanskas, Wilhite, and Gene. Silanskas and Wilhite used the “triune” device to emphasize that Gene should trust them because “God” chose them to pursue His mission to build the American Heartland Project.

83. Silanskas and Wilhite used the “triune” concept to support one of the core goals of the scheme—to coerce Gene into sharing equal ownership of the Project with them as Gene’s fellow Triune members. As part of the “triune,” Silanskas and Wilhite *each* would have had one-third ownership—and together, a controlling stake—in a theme park venture they believed would be worth billions of dollars—without investing *any* money themselves.

84. During the same period, the “Todays Word” emails became increasingly aggressive in their calls for obedience. For example, on July 3, 2023, Gene received a stern “Todays Word” email that criticized his disobedience. The email stated: “For many months, I have clearly instructed you on how to obtain the required resources and provision to complete the vision I entrusted to you. But you ignored Me day after day, attempting to execute your ‘own’ plan rather than following My instructions.” Gene forwarded this email to Wilhite, Silanskas, and Hedrick and wrote: “If you all feel that we should wait

until the 18th...I will yield to. The majority.” Gene was making decisions based on communications purportedly from God. Wilhite, Silanskas, and Hedrick knew it.

85. On July 4, 2023, the “Todays Word” email stated:

When I began speaking to you through these words each day long ago, the triune foundation was not yet completed.

I was preparing you and laying the foundation for what has now become the mission ordained by Me as your Father.

As I completed the formation of My chosen triune leadership, you became one under My Holy calling.

86. The email further advised: “Even within My triune structure, look to your side and trust the one next to you with much experience in such things, whom I alone brought into this trinity of leadership not by chance. . . . You, as My triune foundation, are to maintain the ‘lion’s share,’ allowing for continuity, protection, and leadership of this blessed vision. You are to share the harvest equally without fail as My blessing for your obedience and trust.”* This was “God’s” command to trust Silanskas and Wilhite—and to divide the results of the Project equally, which would leave Silanskas and Wilhite each with a third.

87. On July 5, 2023, the “Todays Word” email account castigated Gene: “Remember, the delay in resources and provision you are experiencing occurred due to your lack of obedience many months ago when I first gave you these instructions! Your desire to control delayed My blessings!” It also said: “The fulfillment of this vision awaits your faithful obedience immediately! DO NOT ENTER THIS DAY WITH YOUR OWN

* In this Complaint, emphasis is added unless otherwise stated.

PLANS AND DECISIONS! FOLLOW MY INSTRUCTIONS PRECISELY AND NOTHING MORE!”

88. In another interaction, Gene forwarded a Heavenly Word email he had received to Wilhite with the comment “This is what we must heed.” Wilhite reinforced his belief by responding, “You are so right!!!”

89. Gene referenced the “triune” in communications with third parties, underscoring the sincerity of his belief. For example, a purported individual named “Joseph,” who appears to have been a stranger to Gene, introduced himself to Gene via email and said that he had learned about Gene “after looking up the more pertinent details of what is going on around me in Vinita, Oklahoma”—presumably the construction of the American Heartland Project. “Joseph” referenced a “prophecy” that he and his wife received and also told Gene that he was praying “so that you are a blessing to others and that the plans that you have in your heart, God will order your steps. . . . God is expanding His kingdom, and I believe you, sir, have a great part in it.” Rather than disregarding the email outright or questioning its contents, Gene responded to this unknown sender and wrote, “God has blessed you... I have a connection with God. He has chosen a triune with me and my two associates. I am undeserving and humbled. I can’t explain it but I am chosen and overwhelmed. Perhaps we’ll meet sometime when I’m there. you have the vision and the dreams from heaven.” The “two associates” Gene referenced were, of course, Silanskas and Wilhite.

90. “Joseph” informed Gene that he had 5 acres “less than 1 mile from where I’m told you desire to put in the [Project]” and offered to allow Gene to “harvest from my

evergreen cedars to plant in your parks at no cost.” “Joseph” stated that this was “a small offering of my appreciation for your obedience to the Lord.”

91. Gene forwarded these emails with “Joseph” to Hedrick, who responded, “Very interesting” and said he would have the landscape architect look at the trees on Joseph’s property once they located it. Hedrick did not voice any concerns about the fact that a stranger was offering to support the Project and discussing a “prophecy,” nor the fact that Gene believed he was operating as part of a triune chosen by God.

92. Silanskas himself also referred to the “triune,” writing to Gene by email: “It is my desire to keep the triune fully updated with any and all progress forward to ensure we are all current and fully informed.”

93. On July 15, 2023, the Todays Word to Gene stated:

My beloved triune leaders,
hear these prophetic and scriptural words, for they carry the
divine truth and guidance that you need at this very moment.

...

Maintain control over the “lions share” of this entire endeavor,
distributing it equally among yourselves as My triune chosen
ones.

Let no one else claim this control, for it is essential for the
continuity of My plan for generations to come.

94. On July 18, 2023, the Todays Word to Gene stated:

You are the triune leaders chosen by Me to carry out this mission, and you must ensure that you are following every single instruction and directive given to you from the beginning.

...

It is imperative that you, as the triune foundation of this vision, hold onto the "lion's share" of this entire entity.

Share equally among yourselves as My triune leaders and allow no one else to have or share this dominant portion!

This control and protection are necessary and critical for the present and the future! Hear My voice!

95. On July 19, 2023, Defendants publicly unveiled the Project. They sent out a press release announcing: "American Heartland Announced \$2 Billion Theme Park and Resort Development in Northeast Oklahoma." The sub-headline read: "The 1,000-area resort destination is expected to attract more than 4.9 million guests per year to Oklahoma."

96. Defendants' press release, with a Vinita dateline, stated: "Today Oklahoma state and local officials joined American Heartland leadership to announce American Heartland Theme Park and Resort, a more than \$2 billion entertainment destination development in northeast Oklahoma, just west of Grand Lake on Route 66. The development will be built in phases starting with a large-scale RV park with cabins scheduled to open phase one in spring 2025 and a world-class theme park and resort scheduled to open in 2026. The American Heartland Theme Park and Resort will offer a unique visitor experience rivaling the world's top resort destinations."

97. Wilhite was identified as the American Heartland's CEO and quoted as saying: "We are thrilled to make Oklahoma the home of American Heartland Theme Park and Resort. . . . At the crossroads of the heartland, Oklahoma is an attractive location for

a family entertainment destination. The state’s business-friendly approach and innovative partnership efforts have helped make this possible. We look forward to bringing unforgettable generational experiences to Oklahoma.”

98. According to the press release, “American Heartland will be a 1,000-acre development with a 125-acre theme park, which is comparable to the size of Magic Kingdom® Theme Park and Disneyland® Park. The park will feature an Americana-themed environment with a variety of entertaining rides, live shows, family attractions, waterways as well as restaurant-quality food and beverage offerings.”

99. The press release continued: “The adjacent 320-acre Three Ponies RV Park and Campground, designed by Oklahoma architects ADG Blatt, will be the largest campground in the central U.S. with 750 RV spaces and 300 cabins plus amenities. . . . The development will also include a top-tier 300 room hotel and modern indoor water park.”

100. In a CityNewsOKC article, Oklahoma State Senator Micheal Bergstrom expressed the public’s hopes: “There’s no better place to represent the heart of America than northeast Oklahoma,” said Senator Bergstrom. He continued: “This \$2 billion investment in our state will create more than 4,000 jobs and introduce a new category of entertainment to the region, and its long-term economic impact will be transformative. . . . Tourism is already one of Oklahoma’s top industries and this project will elevate our state and this region to another level. Since tourism is a doorway to economic development, American Heartland Theme Park and Resort will draw new businesses not only to the area nearby but also throughout the region and state.”

101. Defendants coordinated an announcement event. Standing before a giant model of the theme park, Hedrick introduced the American Heartland Project to the public, as shown in this photograph from the archives of the *Tulsa World*:



102. The announcement received widespread regional news coverage. One local mayor was quoted as saying that his community “has been looking for a great opportunity for 30 years. . . . Today that opportunity was presented to us in the form of the American Heartland Theme Park. Now as a community we have to capitalize on this once in a lifetime opportunity.”

103. On July 20, 2023, in an attempt to convince Gene of the legitimacy of the Project, Silanskas emailed Gene a copy of an “official” feasibility study purportedly prepared by a third party. Like the economic analysis referenced above, the claims about the feasibility of the Project are baseless on their face, including claims that the American

Heartland Project (i) would have the “same market appeal as Universal Studios Orlando, as though a park of that magnitude were transported to the Oklahoma plains”; (ii) would have a yearly attendance of 4.9 million annual guests and gross revenue of \$585 million by its third year of operation; and (iii) would have an 81% return on investment over a 10-year period. Notably, Oklahoma’s total population is just over 4 million.

104. On July 24, 2023, the “Todays Word” to Gene stated:

Do you not understand that the three of you were specifically chosen from every person upon your planet? . . .

I have chosen you, and the three of you alone, to form this triune alliance, for your hearts are aligned with My divine will, and your spirits resonate with the harmony of the cosmos.

. . .

Within this triune structure, no others shall enter, for it is uniquely crafted and designed to carry out the grand purpose I have set forth only through each of you. Do not attempt to disturb this triune structure for it is protected by My angelic forces to ensure this monumental life changing vision is completed now!

United you stand, indivisible, as the three in one in My eyes.

As you journey together, all that flows from the success of every project, every effort, and every aspiration born from this vision shall be shared equally, for in unity lies the strength to transform the hearts of nations. I remind you again that the three of you shall specifically hold all of the “lions share” to ensure absolute control and continuity of My vision now and in the future.

105. The characterization of the Project as a type of spiritual quest or God-given vision had its intended effect, enabling Wilhite and Silanskas to wield undue influence over

Gene. The emails between and among Gene, Wilhite, and Silanskas are replete with references to religion. On one occasion where Gene raised concerns to Wilhite and Silanskas about the need to secure cash flow because they are not “bringing in a small % of what’s going out,” Wilhite responded “God we pray for your Divine intervention!!!” and “we will give You All the glory and praise!!!” Wilhite’s frequent use of three exclamation marks was also featured in many of the “Todays Word” emails from “God.”

106. Then on July 26, 2023, the “Todays Word” email cautioned Gene against using his business expertise. “God” all but shouted: “Do not fall back upon your old business practices trying to push forward what is not ready! Do not exhibit impatience or set deadlines with your own worldly wisdom from your past business ways.”

107. Complying, the next day, July 27, 2023, Gene infused the Project with an additional *\$10 million*. But of course it was—and never could be—enough.

Breaking Ground as the Money Is Running Out

108. On July 29, 2023, Hedrick provided an update on Project costs going forward. According to Hedrick, the projected costs of the Project from August to December 2023 would exceed *\$118 million*. Gene responded: “I’m not concerned about the funding. . . . Moving assets can run into [r]oad blocks.” But the wheels were already beginning to come off the wagon.

109. In August 2023, Hedrick was meeting with additional contractors and seeking to expand the design and future construction work being done on the Project. Hedrick informed Gene and Wilhite that they needed a “river of money” and that the

Project was already “millions behind on overdue invoices” and was getting the reputation of being a “slow payer[.]”

110. In September 2023, the American Heartland Project team addressed some bad press regarding Silanskas’s involvement in the Project by claiming publicly—and falsely—that Silanskas was “not part of any American Heartland . . . entit[y], nor is he involved in the development of these projects.”

111. Indeed, the American Heartland Project team—other than Gene—was determined to avoid Silanskas’s public association with the American Heartland Project. In October 2023, in anticipation of the Project’s groundbreaking ceremony, proposed responses to common questions from reporters were prepared by the team. Someone on the American Heartland Project team—not Silanskas nor Wilhite—sent a “Media Interview Brief” to Gene to ensure that all members of the team were consistent in messaging. One of the potential questions was: “Rick Silanskas with Mansion Theatre was involved in two failed proposals for large theme parks in Texas and Alabama. Tell me about his involvement with the RV park and theme park.” The suggested false response was: “[Rick Silanskas] is not part of American Heartland or [the R.V. park that was part of the Project], nor is he involved in the development of these projects.”

112. Several other questions from the media brief related to whether the Project was realistic. The prepared responses instructed team members to refer to how the Project “hired top international and local consultants and economists to conduct feasibility studies as well as economic impact assessments that validate the proposed concept of American Heartland.” Another prepared response stated that “Studies conclude American

Heartland’s unprecedented scale and quality will introduce a new category of entertainment to the region, and that there is a clear market opportunity for the project.” In fact, there were never any legitimate studies, nor any top international or local consultants hired to conduct such studies. The proposed concept of the American Heartland Project was not, and could never be, validated.

113. In response to the question “How confident are you that this theme park will be built?” the prepared response stated the following: “[T]he design team is made up of the world’s best theme park designers including 20+ former Disney Parks builders and Imagineers.” That was a reference to the designers and engineers purportedly recruited by Hedrick—and it was not true either. This was just one of many times the false information about the supposed 20+ former Disney Park builders was conveyed to Gene by Defendants.

114. Later, an American Heartland Project employee sent an email with the subject line “good and BAD stuff” and circulated an article from the *Tulsa World* that included a photo of Silanskas behind a model of the theme park. She wrote: “We all need to be aware that Tulsa World ran with this yesterday – although Rick [Silanskas] is not mentioned – it’s not good that he is in this photo.” The American Heartland Project staff were again trying to cover up Silanskas’s involvement in the Project based on concerns with his history.

115. Gene suffered emotional and mental distress. On October 3, 2023, Gene texted the following to Silanskas and Wilhite:

\$5 million from sales will come this week. Bank loan next week \$10 mil. That's all I can do. If it needs any more I'm out of options. Loan must be repaid in 6 months. I'm really Down. No where to go. I'm basically broke. If this goes on without revenue. I'm bankrupt just letting you know. I'm still positive of this happening but I can't do it any more.

116. However, in the sway of Silanskas and Wilhite and the religious fervor they continued to engineer, Gene got in deeper and deeper. On October 5, 2023, Gene plowed another \$5 million into the Project, which he obtained through selling stock.

117. Despite the clear emotional and physical toll that these financial difficulties were having on Gene, at no time did Defendants stop pressuring Gene to come up with money. They only ramped it up.

118. Silanskas and Wilhite supplemented the "Todays Word" emails with text messages they crafted to appear to be from God. On October 11, 2023, "God" texted:

HEED MY VOICE MY CHILDREN

"As obedient children, do not be conformed to the passions of your former ignorance"
1 Peter 1:14

I return upon this blessed day to underscore My Word with great emphasis My children.

Act from this moment on with Extreme obedience without questions, arguments or delays.

Return to My Word brought forth this morning and My Word revealed yesterday..

Read every Word and do not dilute My directives. I am with you.

Forge forward My child.

“But if you carefully obey his voice and do all that I say, then I will be an enemy to your enemies and an adversary to your adversaries.”
Exodus 23:22

119. As if in response, on October 12, 2023, Gene plunged in another *\$10 million* through a short-term loan from a bank. Wilhite and Silanskas knew that Gene was now reduced to taking on debt to keep financing the Project. But they kept the fraud going anyway.

120. The next day, Gene received two related text messages. One linked to print and television news reports on the American Heartland Project from the NBC affiliate serving Pittsburg, Kansas (about an hour away from Vinita), where Gene raised his family. The reports included renderings of the theme park:





On camera, in the television report sent to Gene, Wilhite stated: “I’m not going to say anything is easy at this magnitude, but we have not had any hurdles.”

121. On October 23, 2023, Gene received another text message:

HEED MY VOICE MY CHILDREN

As you seek to embrace My Word brought forth for My triune leaders, you must understand fully the urgency of obedience within All I have asked of you. Delays and self made obstructions must be ended. This is an hour of great pivotal reflection.

“32 Those who ignore instruction despise themselves, but those who heed admonition gain understanding. 33 The fear of the Lord is instruction in wisdom, and humility goes before honor”

Psalm 15:32-33

122. On October 25, 2023, Gene received yet another text message purportedly from God and directed to the “triune.”

HEED MY HEART MY CHILDREN

“And let us not grow weary of doing good, for in due season we will reap, if we do not give up”

Galatians 6:9

I return to you again upon this blessed morning with a word of intense strength My triune.

You are now upon the brink of the miraculous! Allow nothing to deter you or affect your faith! Only act in pure obedience without any of your own calculations or plans. You are so close and all of heaven is watching!

Run with confidence and humility! This is your hour. This is My faithfulness!

Allow nothing to stop you! I am with you and a legion of angels protects you!

“But you, take courage! Do not let your hands be weak, for your work shall be rewarded.”

2 Corinthians 15:7.

123. On October 26, 2023, Gene received another text from “God”:

HEED MY HEART MY CHILDREN

“A stubborn fool considers his own way the right one, but a person who listens to Gods advice is wise”

Proverbs 12:15

The hour has arrived to face your stubborn heart and make a firm decision to finally obey all so have instructed. Only in such humility shall My promises be fulfilled.

Return to My Word again this morning from the past 12 days reading Every word and do what you have avoided for so long that has caused delay and obstruction!

A stubborn heart cannot please Me but a humble heart shall know a peace that surpasses understanding and My Vision will shine like the sun!

“Be not like a horse or a mule, without understanding, which must be curbed with bit and bridle, or it will not stay near you”
Psalm 32:9

124. On October 30, 2023, ground was broken on the Three Ponies R.V. Park and Campground component of the Project. The ground-breaking event is shown here:



125. Gene’s happiness at the groundbreaking is evident from a *Tulsa World* photograph of him taken at the ceremony:



But Gene’s happiness was based on Defendants’ misrepresentations and false promises, and the photography now underscores their cruelty. The groundbreaking was essentially the beginning *and the end* of the construction work on the entire Project.

126. On December 4, 2023, Hedrick emailed Gene and Willhite and wrote, “We need to put our heads together and map out a plan forward.” Gene responded:

I feel better today about us than I have been. I believe we’re about ready to break through this struggle. Not sugar coating. Good reasons to believe. No more excuses. I’ve been sick over circumstances. First time in my life.

127. The next day, December 5, 2023, Gene received a missive from a “Today’s Word” email that urged him:

I address another within this triune, tasked with acquiring all immediate resources and provisions required to fulfill every obligation before you this very day.

...

I have provided clear instructions on obtaining these resources, and though the path may seem arduous, I assure you, if you follow My guidance, your mission will be accomplished.

...

The wealth acquired and built throughout your business life before truly knowing Me was intended for this very moment!

...

Remember, Do Not even contemplate or speak an utterance of delaying, pausing or stopping all that has begun!

128. Once again, the email from “God” had its intended effect. That day, Gene personally funded the Project’s insurance, at a cost of more than \$500,000. And on December 8, 2023, Gene transferred an additional \$200,000 into the Project, which caused him to overdraft on his account.

129. Meanwhile, Silanskas and Wilhite took to impersonating Gene in order to authorize additional expenditures.

130. On December 11, 2023, Wilhite used DocuSign to fraudulently sign Gene’s name to vendor contracts, including a contract with a vendor, purportedly increasing the not-to-exceed labor fee owed to the vendor by \$619,590. Gene had not authorized Wilhite to sign his name.

131. Perhaps Wilhite realized that he had just committed a crime by impersonating Gene without his authorization—and called Silanskas in a panic—because almost immediately thereafter, Silanskas emailed Wilhite a statement that purported to be Gene’s

authorization for Silanskas and/or Wilhite to execute contracts related to the American Heartland Project on Gene's behalf. Wilhite then forwarded this message to the accounting department and asked them to keep it "on file." The purported authorization bears Silanskas's distinctive subject line style and appears to be crafted by Silanskas, not Gene:

From: Larry wilhite <lwilhite@themansiontheatre.com>
Sent: Mon 12/11/2023 3:11:43 PM (UTC-06:00)
To: Accounting <accounting@themansiontheatre.com>
Subject: FW: From: Gene Bicknell/12-11-23/APPROVAL TO SIGN CONTRACTS

Would you please keep this on file?

-----Original Message-----
From: Rick Silanskas <rsilanskas@themansiontheatre.com>
Sent: Monday, December 11, 2023 2:58 PM
To: Larry wilhite <lwilhite@themansiontheatre.com>
Subject: FWD: From: Gene Bicknell/12-11-23/APPROVAL TO SIGN CONTRACTS

December 11, 2023

I ask you to send and sign all Park contracts on my behalf as I have approved.
O Gene Bicknell
12-11-23

132. Over the next few days, Wilhite repeatedly impersonated Gene by signing Gene's name to vendor contracts using DocuSign without Gene's knowledge or authorization. This continued for months.

133. Over the course of 2023 alone, Gene sunk *almost \$48 million* into the Project, most of which fell directly under the control of Silanskas and Wilhite. All the while, Silanskas and Wilhite were misappropriating the profits from the Mansion Theatre, another one of Gene's entities, to help fund the Project. Every penny Gene put into the Project was siphoned off or spent by Defendants.

2024: “Sister Catherine” Demands Even More Money

134. By early 2024, the Project had once again run out of money and the lack of funding threatened to halt all progress.

135. The ultimate aim of Silanskas and Wilhite was not just to misappropriate funds to themselves along the way but to complete the Project and take majority ownership and control of it. However, the American Heartland Project was projected to cost *billions* to build. Silanskas and Wilhite originally believed they could get all the money they needed from Gene. They came to realize, however, that they had dramatically overestimated the amount of money within Gene’s own control. So they turned their attention to Gene’s family, who they believed were hindering their access to the funds needed to achieve their grand plan of completing the Project and taking it over.

136. Silanskas and Wilhite began to target Gene with emails from a fictional figure named “Sister Catherine” who purported to be a nun at “Mission Agape.” “Sister Catherine” also frequently spoke about another nun, “Sister Marie,” and based on what “Sister Catherine” told Gene, they often prayed together for Gene. Beginning in January 2024, approximately 100 “Sister Catherine” emails were sent from a variety of Gmail and Yahoo email accounts with a similar naming convention: catherinesister12@yahoo.com, catherinesister24@gmail.com, catherinesister909@yahoo.com (which contains the same number as the ronlogan909@gmail.com address Silanskas used to impersonate Logan), etc. That, by itself, is indicative of fraud. But by this time, Gene had been the subject of Silanskas and Wilhite’s campaign of psychological manipulation for at least 18 months. In his vulnerable state, Gene did not recognize the fraud.

137. The “Sister Catherine” emails were personalized for Gene and the subject lines contained his name “Mr Bicknell” followed by a religious reference such as “TERCE PRAYER IN YOUR NAME,” “Devotionals,” or “Evening Vespers.”

138. The “Sister Catherine” emails also continued the “triune” motif and often instructed Gene to turn to or rely upon his fellow Triune members. For example, in one email sent on February 3, 2024, “Sister Catherine” urged Gene: “Our Lord spoke further of your responsibility to provide immediate urgent resources to those who serve by your side in a Triune.”

139. In another email, “Sister Catherine” told Gene: “Be not depressed but give thanks for the two others within Gods triune who are true warriors and support for you in this hour.” That is an obvious reference to Silanskas and Wilhite.

140. The “Sister Catherine” emails began on January 15, 2024 and immediately bore fruit for Defendants. Four days later, on January 19, Gene transferred \$60,000 to the Project by writing a check to Wilhite personally.

141. Then on January 25, 2024, Gene put together a list of properties and other personal assets he could sell. With the “assistance” of Silanskas, Gene worked on selling his properties and even his coin, stamp, and fine art collections throughout the first half of 2024 to raise more funds on his own.

142. One of the first “Sister Catherine” emails targeted Gene’s family and commanded him to cast them aside through a prayer by “Sister Catherine”:

Today I dress myself in Your armor so that I will be able to stand firm against all strategies of evil even that within those in my family who allow evil to dictate their hearts. . . . I stand firm against every demonic attack in the form of bullies, terrorists, character assassins, abusers, rebels, and rivals even my own loved ones who act in such sin and greed denying my very heart. . . . I now will advance as the warrior you have enabled me to be to slay this enemy that has blocked my path to all you have commanded.

143. Gene responded: “I am enamored by the grace of your words. The love of Jesus and the encouragement from your words in the Vespers and the message of salvation bringing me closer to comfort of knowing I am loved and my faith will carry me to victory for God’s intentions.”

144. A few days later, on January 21, 2024, “Sister Catherine” sent the following prayer to Gene for not providing more funds fast enough: “Please forgive me for my unfaithfulness to Your Word as I confess my sins. . . . Have mercy on me O God as I make a decision to turn from my sinful disobedience and finally follow what you have asked of me. I plead in your precious holy name.”

145. Gene responded, explaining that he left the bulk of his wealth in irrevocable trusts to take care of his five children and 45 grandchildren and that “My family will not return it yet (God will step in 🙏) it has caused me depression and guilt.”

146. Gene went on to describe the state of Project funding, making clear his genuine belief that “Sister Catherine” was in touch with God:

We are in Dire need of funds to continue the project God assigned to our Triune. I am the only financial contributor and I have \$10 Million of debt that I don't know if I can pay and I have contributed all I could get my hands on..until I sell my controlled assets which I am trying to do now. Land buildings and collections So I'm struggling. All Night prayers last Monday bad Tuesday as result if the Lord takes me today that's ok. Just wanted you to know my heart is trying to resolve this. Many people are suffering because of my disobedience. Your prayers are a blessing!!! God keeps me weak and hopeful.

147. Silanskas and Wilhite used the "Sister Catherine" emails to manipulate Gene into bringing legal claims against his family to access more money and to change his estate planning. They also began to compile any negative information they could find about Gene's family.

148. On February 2, 2024, "Sister Catherine" told Gene that "Today's Mass has been offered in your name Mr Bicknell. During Mass through prayer it was shown that God is seeking your repentance for not obeying what He is asking of you. He is imploring you to change your heart today and do all He has told you."

149. In response, Gene relented: "Absolutely i will repent and start on my journey to obey my Lord. Not easy and requires legal action against my family which brings another sorrow along with disobedience."

150. On February 5, 2024, "Sister Catherine" wrote to Gene:

Our Father is speaking quite strong regarding your immediate active obedience based upon the words He is sending you directly each day. He does not want you to wait but act immediately in all areas He has told you. He spoke specifically of the Counsel you must retain to retrieve All He has told you and the urgency of this which must not be delayed even one more day.

With “the words [God] is sending [Gene] directly each day,” “Sister Catherine” referred to the “Todays Word” emails. And “Sister Catherine’s” directive regarding retaining counsel was a reference to Gene changing his estate to benefit Silanskas and Wilhite, who each wanted one-third of the Project, and bringing legal action against Gene’s family so that they could access the vast fortune that they had been surprised to learn was closed off to them.

151. Troublingly, Gene responded: “I am so blessed I cry out for the way to be obedient. God has touched me and my connection is so overwhelming...i will get it done. . . . *I’m getting Counsel now and changing my will.*” Gene also forwarded this email to both Silanskas and Wilhite, so that they knew that Gene was planning to change his will based on “God’s” instructions—which were actually *their* instructions. And Gene *did* get counsel.

152. On February 9, 2024, Gene transferred more than \$2 million for the Project, again from the sale of stock.

153. On February 18, 2024, “Sister Catherine” wrote: “As Mass concluded today, Sister Marie shared her heart speaking of how our dear Lord is deeply seeking your obedience to words He has been providing to you. There seems to be a great urgency in your full obedience in this time.”

154. Gene’s reply shows the command to which he was being directed to obey: “I’m happy (ecstatic) to tell you my obedience is happening. Legal counsel is working and my Father is letting me know.”

155. On February 20, 2024, “Sister Catherine” wrote: “This morning has affected us with much concern as our Lord wants you to move with His authority to retrieve All He has told you right now.”

156. Gene replied: “I have been too slow to realize God has this project and my trust has been confused. I feel that I’ve finally awakened to know what is reality . . . Thank you so very much for helping me...You sisters ROCK!! Bless you 🙏!!!”

157. Gene also wrote: “I will take nothing financially for this project. It all goes to Gods work through charity.” Silanskas and Wilhite had other ideas for their shares of the Project, however.

158. On March 1, 2024, the attorney Gene engaged under the influence of “Sister Catherine” sent a letter announcing that Gene was making substantial changes to his estate plan, had named a new executor of his estate, had named a new successor trustee, and had revoked the power of attorney previously granted to his son. This was the result of Silanskas and Wilhite’s attempt to obtain funding for and control over the Project and, ultimately, to share sole ownership of the Project.

159. At about this time, Gene set up a new email account. Almost immediately, “Sister Catherine” had the new address as well. On March 4, 2024, “Sister Catherine” wrote, in part: “Our blessed Lord and Savior is calling you with great urgency to a pure disobedience without disagreement. As Sister Marie spoke, our Father requires complete submission without any return to your past business acumen or any demands or mandates to anyone. There appears to be a great urgency for your obedience to the word He alone has sent you.”

160. On March 8, 2024, “Sister Catherine” wrote, in part: “The silence you are experiencing is God crying for your trust and full obedience to the Word He sent you so many days. His silence is a very serious message.”

161. Gene responded: “I hear my Lord and I’m taking steps to follow. He told me to get counsel and I have. I’ve been in desperation to follow. He has blessed me soooooo much and brought me to where I am and I know that He has this mission for me and I want to be obedient and listening to every word. . . . I want to please my God and the steps are so challenging I’m depressed and begging for forgiveness please keep praying. I need them badly.”

162. “Sister Catherine” promptly replied:

Be not depressed Mr Bicknell. You and the two men beside you were chosen by the Almighty. . . . Be not depressed but give thanks for the two others within Gods triune who are true warriors and support for you in this hour. Their love for you is your strength Allow these two by your side to act in obedience to All God has instructed them to do with your encouragement!

163. Silanskas and Wilhite needed more money for the Project, desperately. On March 17, 2024, “Sister Catherine” wrote: “Our blessed Lord has given you complete authority and strength to retrieved All He has commanded you without another moment in delay. The intensity of this word today is so deep. Your days of waiting, questioning, doubting, fearing and attempts to seek other ways are to end today. Sister Marie also said that the Words God has sent you over the past several days are of extremely great importance and must be followed exactly.”

164. As if in response, on March 19, 2024, Gene promptly transferred another \$400,000 to the Project.

165. Northeast Oklahoma, meanwhile, was still largely unaware of the reality of the Project. On April 8, 2024, the *Tulsa World* reported:

Plans to build a \$2 billion Disney-like theme park in Vinita may have plenty of doubters, but U.S. Sen. Markwayne Mullin isn't one of them.

"I don't think they are wanting to — they are doing it," he said. "I think it's neat. You're talking about building and changing an area really quick — and keep in mind, Orlando (Florida) wasn't a very popular place until Disney started building, then Orlando became something different.

"Critics can point to holes in everything, but most of the time ... I'd ask them, 'And what have you done?' Because most of the critics are pointing out all the holes and they are the people that are too afraid to do anything different."

...

American Heartland — which now will likely exceed its initial \$2 billion estimated cost — will be similar to Disneyland and the Magic Kingdom and is planned for Vinita, officials announced in July.

The development will be built in phases, starting with an RV park with 750 spaces and 300 cabins, scheduled to open in spring of 2025.

The world-class theme park and resort is scheduled to open in 2026, officials have said. That timeline, while ambitious, may not be met for a couple of reasons, but the project remains on track, Vinita Mayor Josh Lee told the *Tulsa World*.

...

[Sen. Mullin stated:] “I’m very supportive and thankful that these individuals ... they know what they are doing — some of these executives that have left Disney to begin with — and they saw value in our rural areas of Oklahoma. And they’re going to change that area of Oklahoma. And they are already changing it,” he said.

“There are people’s lives that have already been changed forever — just because the value of the property (in the area) went through the roof,” Mullin said.

“It’s already made a difference, but it’s going to be pretty neat that we don’t have to drive to Dallas to go a theme park,” he said.

...

[Vinita Mayor Josh] Lee said after the announcement of the theme park, calls to city officials from investors, restaurants, hotels and other businesses interesting in building in Vinita were virtually nonstop.

“It’s slowed down since the initial announcement, but once they start building, I think it’s just going to skyrocket,” Lee said.

166. On April 10, 2024, Gene sunk another \$2.2 million into the Project.

167. The next day, “Sister Catherine” again wrote to Gene about how he must obey “God’s” every word: “our Lord does not want you to seek Any Alternatives to what He has told you to do! He said this is so critically important in your relationship with Him. His final words this....My son must obey Me fully today and not ever again speak of any other way but My way and My directives and My instructions. The time is Now and I demand his obedience, trust, faith and immediate action.”

168. In response, Gene wrote: “I have been sick with guilt and now I believe I have now found obedience. His words were directly to me. In a non wavering way. He has finally made me realize how to do His will!!! Hard lesson to learn but my tears have been abundant and my body has been physically weakened from disobedience Its not easy due to family disagreements. I stand with my God against all....All!!”

169. Five days later, on April 15, 2024, Gene transferred an additional \$228,258 for the Project.

170. At that point, Gene’s son made clear to Gene that before any further funding for the Project could be released, there would need to be due diligence conducted on the Project, and that stricter oversight and financial controls would need to be put in place. Not surprisingly, Silanskas and Wilhite did not take this news well. On May 7, 2024, “Sister Catherine” wrote to Gene about his son: “Sister Marie then spoke about one who is very close to you who has sinned against you in dishonor and great disrespect. She said this one has no power over you and his words are born from a heart of greed and sin. Allow not this one to affect your resolve in Christ.”

171. Gene responded, thanking “Sister Catherine” and noting that “God lifted me from my bindings and illness yesterday . . . His love is all I want..no material things. I will give all I have and *my share of the project* to charity.” The other shares were to go to Silanskas and Wilhite.

172. Three days later, on May 10, 2024, “Sister Catherine” again targeted Gene’s son, writing to Gene:

[O]ur Lord is directing you to stand up to this one so very close to you who has been very deceitful and dishonest for many years regarding your wealth. He is to be called out! Sister Marie then said that you must not allow this one to use his arrogance, threats or demands to intimidate you in any way! You owe him nothing! Although this one was supposed to honor you since you first provided him much to begin his life, this one has greatly been dishonest . . . if you Stand in intense form this day against this one who has been intimidating you, you will be able to release immediate needs today! But you must not make any deals with the devil.

173. On May 13, 2024, Gene conveyed to Wilhite his reaction to his family's concerns, which was exactly what Wilhite and Silanskas had wanted to elicit: "We will Not give in or yield to these restrictions. I have the right to demand repayment of the millions I loaned them [his family] to start all branches of this estate I will continue to talk to my lawyers. . . . My adversary is now my family. !!!!They don't want to see what we have now!!!! I no longer will keep the gloves on!!!!"

174. On May 29, 2024, Sister Catherine wrote to Gene and continued to implore him to take action against his family to get more money for the Project: "Sister Marie . . . said that you must not allow those so close to you to intimidate you another moment! . . . She said that you are their elder and God has given you the authority to silence their hateful ways! . . . Your alternatives did not work because God told you not to seek alternatives. But in His great Mercy, He is ready to bless you and end this financial battle! **Today you are David and it is time to slay Goliath!**" (emphasis in original).

175. Ultimately, however, there was no more money to put into the Project. The over \$4.8 million Gene spent in 2024 brought the total he put toward the Project to more than \$60 million.

The Project Fails

176. Notwithstanding all the money that Gene was deceived into investing, the Project ran out of money to pay its vendors. All development work and any promises of construction ground to a halt.

177. Silanskas proposed a public relations strategy of falsely blaming all delays and lack of funding on the State of Oklahoma's delays in confirming infrastructure support for the Project. But that, of course, was not true either.

178. In the end, the vast majority of the money that went into the Project—all of it from Gene—was squandered or misappropriated by Defendants.

179. Silanskas made at least approximately \$648,000 through the scheme for himself and his family members. Silanskas received \$380,000 in salary payments and over \$10,000 for various expenses that he incurred without any formal approval or clearance process. In addition, two companies linked to Silanskas's son, Tony Silanskas—Hungry Cliff and Fourth West Productions—received approximately \$224,000 for purported production work. Silanskas's brother, Vincent "Vince" Silanskas, also received over \$4,000 purportedly for some consulting work he and his wife did as a producer on a television special for the Mansion Theatre. The funds retained by Silanskas and his family members were ultimately paid by Gene in return for no corresponding benefit.

180. Wilhite made at least approximately \$450,000 from the scheme for himself and his companies. Specifically, Wilhite received approximately \$400,000 in salary payments, over \$20,000 in disbursements from Gene's personal bank accounts, and approximately \$30,000 in "owner's draws" from a company called Big Time Productions, LLC, which initially ran the operations of the Mansion Theatre. Wilhite's company, Backstage Ministries, also received approximately \$10,000 in purported donations during this period. The funds retained by Wilhite and his companies were ultimately paid by Gene in return for no corresponding benefit.

181. Hedrick made at least \$1.5 million through the scheme for himself and his family members. Hedrick received approximately \$900,000 in consulting fees alone, which started at a rate of \$1,200 per day and ultimately increased to \$2,000 per day, without submitting any accounting of the work he did. Hedrick also received another approximately \$250,000 for various and often extravagant expenses that appear to have been approved by Wilhite, which included rent for an apartment and office space in the Los Angeles area and regular travel to California for purported meetings in the area related to the Project. Further, Hedrick enlisted his two sons, Aaron Hedrick and Nathaniel "Nate" Hedrick, to work on the Project, and they received approximately \$260,000 and \$141,000, respectively over this time period. The funds retained by Hedrick and his family members were ultimately paid by Gene in return for no corresponding benefit.

182. In spring 2024, Gene began receiving lien notices regarding the Oklahoma land intended to be the location of the theme park. At least five lawsuits or arbitrations were filed by vendors that were hired for work on the Project. Gene's business reputation

has been harmed. Gene's wholly owned business, OBG Holdings, LLC, has also been the subject of legal claims and loans.

183. The burden of all the debt for the Project piling up and Gene's belief that he was not satisfying "God's" will to build the theme park resulted in Gene experiencing severe stress and, ultimately, suffering a stroke in July 2024.

184. As of this writing, there has been no further progress on the Project, leaving behind millions of dollars in debt, multiple legal proceedings (with the prospect of more to come), and, in northeast Oklahoma, a profoundly disappointed community.

Aftermath: The Investigation

185. By the end of 2024, with over \$60 million gone and the Project visibly dead, the persistence of Gene's family and friends paid off. Gene began to realize what Silanskas and Wilhite had done to him.

186. Gene engaged attorneys and forensic accountants to investigate the fraud perpetrated upon him.

187. They uncovered the facts set forth above. And they discovered proof that Silanskas and Wilhite were behind the cruel "Todays Word" and "Sister Catherine" campaign of psychological manipulation.

188. Wilhite left behind incriminating evidence showing his involvement in the emails. Using a Mansion Theatre email account, Wilhite sent to his wife's personal email account an electronic compilation of "Todays Word" messages that were sent to Gene in February, March, and April of 2022.

189. Silanskas appears to have engaged in an attempted cover-up, deleting “Todays Word” messages that were sent to his Mansion Theatre email account as well as other emails connecting him to these messages from “God.” Unfortunately for him, those messages were left behind elsewhere, and his deletions are just additional evidence of his consciousness of guilt.

190. The investigation revealed that in at least one instance, Silanskas sent an email with a “Todays Word” message to Wilhite. The same day, heavendirectword@gmail.com sent a nearly identical email to Gene.

191. Another time, Silanskas sent the contents of a “Todays Word” message from his Mansion Theatre email to his personal email. Two days later, heavendirectword@gmail.com sent Gene a nearly identical message. And then Wilhite texted Gene the same message.

192. The investigation revealed that on January 15, 2024, Silanskas sent an email with the subject “TEST” to the Gmail account susanloveshorses@gmail.com. That was the same day of the first “Sister Catherine” email to Gene. While subsequent “Sister Catherine” messages came from accounts like catherinesister4@gmail.com, the first message came from susanloveshorses789@gmail.com—an account created on January 2, 2024 and then deleted on January 16, 2024, the day right after it sent the first “Sister Catherine” email to Gene.

193. Indeed, each of the “Sister Catherine” Gmail accounts were created and deleted within a short period of time. For example:

- a. Between January 16 and February 2, 2024, the email account catherinesister24@gmail.com sent Gene 31 emails. The final email on February 2 preceded the account's deletion later that day.
- b. The next "Sister Catherine" email address, catherinesister23@gmail.com, was created on February 3, 2024, sent 21 emails to Gene, and was deleted on February 13, 2024.
- c. The next "Sister Catherine" email address, catherinesister364@gmail.com, was created on February 14, 2024, sent Gene nine emails, and was deleted on February 25, 2024.
- d. The next "Sister Catherine" Gmail email address, catherinesister4@gmail.com, was created on March 28, 2024, sent Gene three emails, and was deleted the same day.
- e. The next "Sister Catherine" email address, catherinesister804@gmail.com, was created on April 1, 2024, sent Gene three emails, and was deleted on April 3, 2024.

194. The investigation also uncovered "smoking gun" evidence that Silanskas and Wilhite were behind the "Sister Catherine" emails. As discussed above, Gene would often reply directly to "Sister Catherine," without copying anyone else on the email. Those replies to "Sister Catherine" would make their way directly to Silanskas, who would forward them to Wilhite. Silanskas deleted those emails, but they remain in Wilhite's account, where Silanskas had sent them. For example, when Gene told only "Sister

Catherine,” “I will take nothing financially for this project,” that reply wound up in Silanskas’s email, and he forwarded it to Wilhite.

195. Wilhite, in turn, sometimes forwarded Gene’s replies to “Sister Catherine,” which he received from Silanskas, to mjmcduffey@gmail.com, an account opened in the name of Wilhite’s deceased mother-in-law, which Wilhite and/or Wilhite’s wife controlled.

196. On one occasion, “Sister Catherine” sent Gene an email titled “Mr Bicknell/MASS OFFERED FOR YOU.” The next day, Wilhite sent the same message, under the subject “Nuns,” to his late mother-in-law’s email account.

197. On another occasion, “Sister Catherine” sent Gene an email titled “Mr Bicknell/Gods Heart” demanding “full obedience” to the “Word” that “God” was sending Gene. Gene responded, at 1:23 PM, that “God” had told him to get counsel and that he had, that he was depressed, and that he was begging for forgiveness. By 1:55 PM, Silanskas had Gene’s reply. Silanskas changed the subject to “NUN LETTER” and forwarded it to Wilhite. The next day, Wilhite forwarded that reply to his late mother-in-law’s email account.

198. On yet another occasion, “Sister Catherine” sent an email to only Gene titled “Mr Bicknell/Lenten Sunday Devotionals” urging Gene to “retrieve All He has commanded you without another moment in delay”—in other words, to get access to money from Gene’s family. Half an hour later, Silanskas forwarded that message to Wilhite, changing the title to “Sister Catherine email.” Five minutes after that, Wilhite forwarded the message to his late mother-in-law’s email account.

199. Defendants' exploitation of Gene was persistent and calculated. It was evil. And it was in violation of several laws.

COUNT I
VIOLATIONS OF RICO
18 U.S.C. §§ 1962(c), 1964(c)
(Against Silanskas and Wilhite)

200. Plaintiff incorporates all foregoing allegations as if separately asserted herein.

201. Silanskas and Wilhite participated in the conduct of an enterprise through a pattern of racketeering activity.

202. An association-in-fact requires: (1) a purpose, (2) relationships among those associated with the enterprise, and (3) longevity sufficient to permit those associated with the enterprise to pursue the enterprise's purpose.

203. At all relevant times, each of Silanskas and Wilhite is and has been a "person" within the meaning of 18 U.S.C. § 1961(3), in that they are individuals who are "capable of holding a legal or beneficial interest in property."

204. Silanskas and Wilhite formed a group of individuals who associated in fact to form an unlawful enterprise. The object of the unlawful enterprise was to defraud Gene out of his hard-earned life savings, to improperly redirect funds to themselves and to their family members, and finally, to psychologically manipulate Gene over the course of years through extremely targeted fraudulent text and email communications to coerce him into sinking more funds into the American Heartland Project and hand Silanskas and Wilhite majority ownership of the Project. In addition to the campaign of targeted religious

messaging, Silanskas and Wilhite, along with Hedrick, also inflated and misrepresented their expertise, qualifications, and endorsements to lead a project of this magnitude in order to further secure Gene's trust, employment for themselves, and funding.

205. Silanskas and Wilhite acted in interdependence where each individual had a formal role on the American Heartland Project, and they relied upon each other to achieve the goals of the enterprise. It is clear from the pattern of communications that Silanskas was the leader of the enterprise. As the principal architect of the scheme, Silanskas provided instructions to Wilhite and Hedrick and orchestrated the central fraud involving the religious messaging and the provision of fraudulent information about the Project, which was done by each of Silanskas, Wilhite, and Hedrick.

206. The enterprise was engaged in, and its activities affected, interstate commerce. Gene resides in Florida and spent significant time in Kansas during the relevant period. He was targeted by Silanskas and Wilhite with communications while he was in Florida and Kansas and they were in other states. Gene was fraudulently induced to provide funds for payment of invoices for corporations and other entities formed in other states, including Minnesota, Missouri, Florida, Kansas, and California. Gene was also induced to purchase real property in Oklahoma. Silanskas and Wilhite and others acting at their direction, including Hedrick, also made presentations and false promises to government officials in Oklahoma and pitched potential investors incorporated in other states.

207. As part of the enterprise, Silanskas and Wilhite engaged in a pattern of racketeering activity including, but not limited to, acts of wire fraud in violation of 18 U.S.C. § 1343.

208. Silanskas and Wilhite, and others acting at their direction, including Hedrick, sent Gene by email fraudulent economic forecasting and one or more feasibility studies upon which Gene relied in agreeing to provide funding.

209. Silanskas and Wilhite sent or caused to be sent hundreds of fraudulent email and text message communications claiming to be from either religious nuns or “God” to induce investments from Gene.

210. Silanskas and Wilhite used the facilities of interstate communication, specifically the internet and telephones, to impersonate religious figures using email accounts and phone numbers under their control to reinforce Gene’s belief in the legitimacy of those religious messages.

211. Wilhite also fraudulently signed contracts electronically as Gene, using DocuSign without authority to do so, to advance the enterprise. Silanskas then used email to send a fake authorization for Wilhite to sign contracts on behalf of Gene.

212. Silanskas also impersonated Ron Logan to give himself an endorsement in order to gain Gene’s trust. And then continued to impersonate Logan to help trick Gene into pursuing the Project.

213. Although Gene was the principal target of the scheme, other people were caught up in the fraud and fell victim to the false promises and affirmative misrepresentations of Silanskas, Wilhite, and Hedrick. For example, on April 7, 2024, a consultant working on behalf of the American Heartland Project informed Hedrick that he would be presenting legislation to support the theme park in front of a Senate Committee in Oklahoma. The consultant requested the amount spent on the Project so far, and Hedrick

responded, “approximately \$102,000,000.” Yet on April 10, 2024, a member of the team emailed Hedrick a status log of the finances for the American Heartland Project. This log suggested that the total amount of money claimed by vendors was roughly \$143 million and the amount paid to date was approximately \$36 million with approximately \$19 million in invoices pending.

214. Later in April 2024, Hedrick and other members of the American Heartland Project, at the direction of Silanskas and Wilhite, gave a presentation to the City Council of Vinita. During this presentation, Hedrick said the Project was “lagging a little behind” due to design changes that were needed due to a FEMA flood plain. But at that point, Hedrick knew that design work on the Project had halted because there was no funding. After the presentation, a councilmember asked the team how long it would be until the team “move[d] dirt,” and Hedrick said they were waiting on \$35 million to be released by the Oklahoma legislature through the appropriations process. But the Oklahoma legislature had not approved *any* funding for the Project, and Hedrick’s statement was patently misleading.

215. Silanskas and Wilhite also made false representations over the wires to contractors about the Project’s funding and ability to pay often without consulting Gene, thereby causing these contractors to perform work for the Project even though Silanskas and Wilhite knew there was no money to pay them at the time.

216. In addition to and distinct from the American Heartland Project, the members of the enterprise also defrauded Gene by siphoning off funding to set up their relatives with

employment or business opportunities. For example, Hedrick hired his sons to work on designs for the Project, and Silanskas hired his son and brother.

217. As a direct and proximate result of Silanskas and Wilhite's racketeering activities, Gene has been injured in his business and property.

COUNT II
VIOLATIONS OF RICO - CONSPIRACY
18 U.S.C. § 1962(d), 1964(c)
(Against Silanskas and Wilhite)

218. Plaintiff hereby incorporates all foregoing allegations as if separately stated herein.

219. Under 18 U.S.C. § 1962(d), it is "unlawful for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section."

220. Silanskas and Wilhite conspired with each other to violate at least 18 U.S.C. § 1962(c) as set forth in Count I above.

221. As a direct and proximate result of Silanskas and Wilhite's conspiracy to engage in racketeering activities, Gene has been injured in his business and property.

COUNT III
CIVIL CONSPIRACY
(Against Silanskas and Wilhite)

222. Plaintiff incorporates the foregoing allegations as if separately stated herein.

223. Silanskas and Wilhite intentionally engaged in a combination of two or more persons to accomplish an unlawful act (obtaining Gene's money through fraud and deceit) and to accomplish a lawful act by unlawful means (building the American Heartland Project using fraud and funds acquired through fraud).

224. The conspiracy consisted of wrongs that could have been, and are, actionable against the individual conspirators.

225. Silanskas and Wilhite had a meeting of the minds in their efforts to obtain Gene's money through fraud and deceit and build the American Heartland Project using fraud and funds acquired through fraud.

226. As a direct and proximate result of Silanskas and Wilhite's conspiracy, Gene has been harmed.

**COUNT IV
FRAUD
(Against Silanskas and Wilhite)**

227. Plaintiff incorporates the foregoing allegations as if separately stated herein.

228. Silanskas and Wilhite made false material misrepresentations to Gene and directed at Gene.

229. Silanskas and Wilhite's misrepresentations were known by them to be false, or at least were made recklessly without knowledge of the truth.

230. Silanskas and Wilhite intended that their misrepresentations be acted upon by Gene.

231. Gene relied on Silanskas and Wilhite's volleys of materially false misrepresentations to his detriment and suffered harm. Gene lost a substantial portion of his personal fortune and experienced severe emotional harm and injury to his business and reputation because of Silanskas and Wilhite's misrepresentations.

**COUNT V
DECEIT
OKLAHOMA STATUTES TITLE 76, §§ 2-4
(Against Silanskas and Wilhite)**

232. Plaintiff incorporates all foregoing allegations as if separately stated herein.

233. Silanskas and Wilhite willfully deceived Gene, with intent to induce Gene to alter his position to his injury or risk.

234. Silanskas and Wilhite also intended to deceive and did deceive the public and misled numerous individuals.

235. Gene was harmed by the deceit of Silanskas and Wilhite.

**COUNT VI
CONSTRUCTIVE FRAUD
OKLAHOMA STATUTE TITLE 15, § 59
(Against Silanskas and Wilhite)**

236. Plaintiff incorporates all foregoing allegations as if separately stated herein.

237. Silanskas and Wilhite owed Gene a duty of full disclosure based upon a special relationship of trust.

238. Silanskas and Wilhite breached their duty to Gene, gaining an advantage over him by misleading Gene, and others, to Gene's prejudice by misstating facts and failing to disclose facts to Gene. Silanskas and Wilhite's various misrepresentations were material.

239. Gene relied on Silanskas and Wilhite's material misstatements and omissions.

240. As a result of Silanskas and Wilhite's misrepresentations, Gene lost a substantial portion of his personal fortune and suffered emotional harm and injury to his business and reputation.

COUNT VII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Against Silanskas and Wilhite)

241. Plaintiff incorporates all foregoing allegations as if separately stated herein.

242. Silanskas and Wilhite acted intentionally in their action of making multiple materially false misrepresentations to Plaintiff.

243. Silanskas and Wilhite's actions of crafting false religious messages for years and sending those messages to Gene in order to control Gene's actions is extreme and outrageous conduct that is unacceptable in civilized society. In essence, they intentionally targeted Gene—a 90+-year-old who they knew was a devout Christian—and executed a sophisticated scheme of manipulation to induce Gene to spend a substantial portion of his personal fortune on the American Heartland Project.

244. In doing so, Silanskas and Wilhite acted intentionally.

245. Silanskas and Wilhite's actions caused Plaintiff emotional distress.

246. The emotional distress was severe. For instance, due to his emotional distress, Plaintiff suffered a crippling stroke in July 2024.

247. Because of Silanskas and Wilhite's actions, Gene has suffered harm.

**COUNT VIII
UNJUST ENRICHMENT
(Against All Defendants)**

248. Plaintiff incorporates the foregoing allegations as if separately stated herein.

249. It would be unjust for Defendants to retain the benefits they received as a result of their fraudulent scheme.

250. Defendants received many benefits as a result of their fraudulent scheme at Gene's expense. For example, Defendants received a salary and had expenses reimbursed and also profited from hiring their family members for the Project. These funds were ultimately paid by Gene in return for no corresponding benefit.

251. Defendants have been unjustly enriched by Gene's multiple investments for the Project that resulted from Defendants' fraudulent scheme.

252. Because of Defendants' actions, Gene has suffered harm.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Plaintiff respectfully requests that this Court enter judgment for Plaintiff and against Defendants Silanskas, Wilhite, and Hedrick, and award:

a. Money damages, including compensatory damages, treble damages (including those authorized by 18 U.S.C. § 1964(c)), punitive damages, exemplary damages, and nominal damages, all in amounts to be proven at trial;

b. Disgorgement, in an amount to be proven at trial;

- c. Injunctive relief;
- d. Plaintiff's attorneys' fees, including those authorized by 18 U.S.C.

§ 1964(c);

- e. Plaintiff's costs, including those authorized by 18 U.S.C. § 1964 (c) and 28 U.S.C. § 1920; and

- f. Other such relief as the Court may consider just and proper.

July 25, 2025

Pro hac vice forthcoming:

Michael S. Nadel
Sagar K. Ravi
Rachel M. Peltzer
Theresa M. Babendreier
MCDERMOTT WILL & EMERY LLP
500 North Capitol Street, N.W.
Washington, D.C. 20001
(202) 756-8000

Respectfully submitted,

/s/ Amelia A. Fogelman

Amelia A. Fogleman, OBA No. 16221
Joseph W. Lang, OBA No. 33019
GABLEGOTWALS
110 N. Elgin Avenue, Suite 200
Tulsa, Oklahoma 74120
(918) 595-4800

Attorneys for Plaintiff O. Gene Bicknell

VERIFICATION

I, O. Gene Bicknell, have read the foregoing Verified Complaint and authorized my attorneys to file it on my behalf. I am familiar with the contents of the Verified Complaint. I verify under penalty of perjury under the laws of the United States of America that the matters stated herein are true and correct to the best of my knowledge and are either based on my personal knowledge or stated upon information and belief.

Dated: 7/22/2025 | 3:43:00 PM CDT

Signed by:

3974881387174A8...

O. GENE BICKNELL