

FILED

November 18, 2025
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

BY: VAR
DEPUTY

UNITED STATES OF AMERICA
Plaintiff

v

JOHN ROBISON
Defendant

INDICTMENT

[Vio: Ct. 1: 18 U.S.C. § 1343 – Wire Fraud;
Cts. 2-4: 18 U.S.C. § 1957 – Engaging in
Monetary Transaction in Criminally Derived
Property]

*Notice of Government’s Demand for
Forfeiture*

1:25-CR-00523-RP

THE GRAND JURY CHARGES:

INTRODUCTION

1. The following entity was formed at the direction of, used by, and/or maintained by the defendant, **JOHN ROBISON**:

a. Four Gates Property (Four Gates) was a Limited Partnership formed by Robison and another person in or about February 2022. Four Gates was established in Delaware. According to filings, the partnership was formed to acquire, own, hold for investment purposes, manage and ultimately sell, exchange or otherwise convey land and real estate interests in Bastrop County, Texas, as well as any other investment property located within the agreed area. The property to be acquired was to be developed into a comprehensive and integrated community for the University of Austin campus.

b. From at least as early as February 2022, Robison operated Four Gates from Austin, Texas, or its suburbs in the Western District of Texas. Robison was the Senior Managing Director for Four Gates and owned 75% of Four Gates.

c. The victim in this case was an investment trust, FG Trust. As part of the investment by FG Trust, Robison and Four Gates agreed to hold in escrow any investment money until subscriptions for Class A Units in Four Gates exceeded \$2,000,000. This money was to be raised by August 1, 2022. No investment money from FG Trust was to be used for non-partnership purposes.

2. Based on this promise, FG Trust invested \$1,000,000 with Four Gates on or about February 28, 2022, by wiring money to an account maintained and controlled by Four Gates. This money was solicited by Robison.

3. Robison used and/or maintained accounts at one or more financial institutions, including, but not limited to Bank of America.

THE SCHEME

4. Beginning at least as early as February 2022 and continuing until in or about June 2025, Robison devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

5. It was part of the scheme and artifice that Robison solicited money to be used ultimately to purchase land for building a campus for the University of Austin. The money solicited by Robison was to be held in escrow until \$2,000,000 had been raised by Four Gates. Robison made false and fraudulent promises, representations, material omissions and pretenses in connection with the investment in order to obtain money for his own personal use and benefit.

6. It was part of the scheme and artifice that Robison transmitted and caused to be transmitted by others, including investors and those working on behalf of Robison, by wire communications in interstate commerce, writings, signals, signs, pictures and sounds to and from the Western District of Texas to locations outside of the State of Texas. These wire communications included, but were not limited to, the following:

- a. telephone calls;
- b. email communications via the internet;
- c. electronic communications involving the clearing of financial transactions through the Federal Reserve banking system;
- d. transfer by wire and electronic means of funds between financial institutions and investment companies located outside the State of Texas and financial institutions and investment companies in the Western District of Texas.

7. It was part of the scheme and artifice that Robison represented the funds obtained from investors would be held in escrow until \$2,000,000 had been raised by Four Gates and would not be used for non-partnership purposes when, in truth and fact, the funds were applied to other investment purposes and for Robison's own personal use and benefit.

8. It was part of the scheme and artifice that accurate and material cash flow and accounting information was not provided to investors.

COUNT ONE
Wire Fraud
[18 U.S.C. § 1343]

9. Paragraphs 1 through 8 above are re-alleged and incorporated as though fully set forth here.

10. From at least as early as February 2022 and continuing until in or about June 2025, in the Western District of Texas and elsewhere, **JOHN ROBISON**, having devised and intended to devise a scheme and artifice to defraud, as set forth above, to obtain money and property by means of false, misleading, and fraudulent pretenses, representations, and promises, and omissions of material facts, did knowingly cause to be transmitted by wire, radio, or television communication in interstate and foreign commerce, a wire transfer of funds, constituting and containing a writing, sign, signal, picture, and sound, for the purpose of

executing and attempting to execute said scheme and artifice, on or about the date set forth below:

Count	Date (on or about)	Description of Wire Transmission
1	February 28, 2022	A wire transfer from First Republic Bank in Palo Alto, California, in the amount of \$1,000,000 drawn on account xxxx6498, and deposited to Bank of America Bank account xxxx9186 in the Western District of Texas to Four Gates Property, LP

All in violation of 18 U.S.C. § 1343.

COUNT TWO
Engaging in Monetary Transaction in Criminally Derived Property
[18 U.S.C. § 1957]

11. Paragraphs 1 through 8 above are re-alleged and incorporated as though fully set forth here.

12. On or about the dates set forth below, in the Western District of Texas and elsewhere, **JOHN ROBISON**, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, which property was derived from specified unlawful activity, namely, Wire Fraud, contrary to 18 U.S.C. § 1343:

Count	Date	Description of Monetary Transaction
2	May 23, 2022	A wire transfer in the amount of \$75,000 drawn on an account at Bank of America to Prosperity Bank.
3	July 5, 2022	An intrabank transfer of \$25,000 drawn on an account at Bank of America to a second Bank of America account.
4	July 22, 2022	An intrabank transfer of \$15,000 drawn on an account at Bank of America to a second Bank of America account.

All in violation of 18 U.S.C. § 1957.

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See FED. R. CRIM. P. 32.2]

I.

Wire Fraud Violation and Forfeiture Statute
[Title 18 U.S.C. § 1343, subject to forfeiture pursuant Title 18 U.S.C. § 981 (a)(1)(C)]

As a result of the criminal violation set forth in Count One, the United States gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 981(a)(1)(C), which states:

Title 18 U.S.C. § 981. Criminal Forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

* * *

(C) Any property, real, or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting "specific unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

II.

Money Laundering Violation and Forfeiture Statutes

[Title 18 U.S.C. § 1957, subject to forfeiture pursuant Title 18 U.S.C. § 982(a)(1)]

As a result of the criminal violation set forth in Counts Two through Four, the United States gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which states:

Title 18 U.S.C. § 982. Criminal Forfeiture

(a)(1) The court is imposing sentence on a person convicted of an offense in violation of sections 1956, 1957, or 1960 of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes, but is not limited to, the Money Judgment described below in Paragraph III.

III.

Money Judgment

A sum of money which represents the proceeds obtained, directly or indirectly, and real or personal property involved in or traceable to the violations set forth above for which the Defendant is solely liable.

Substitute Assets

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant:

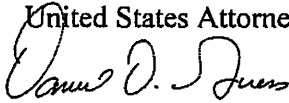
- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek the forfeiture, pursuant to Title 21 U.S.C. § 853(p), as incorporated by Title 28 U.S.C. § 2461(c), of any other property of said Defendant up to the value of the forfeitable property.

A TRUE BILL:

~~FOREPERSON~~ - - -

JUSTIN R. SIMMONS
United States Attorney



By:

Daniel D. Guess
Assistant United States Attorney