

SID: 04618053
FBI: 73234DA1
Off. Code: 23990013

CAUSE NO. 15-10-14267-CR

INDICTMENT

THE STATE OF TEXAS

VS.

MICHAEL ANTHONY
COLLINS



FILED AT 1:07 O'CLOCK PM
R. DAVID GUERRERO
OCT 23 2015
CLERK, DIST COURT, JIM WELLS CO, TEXAS
BY [Signature] DEPUTY

Count 1
CHARGE: Theft
STATUTE: Texas Penal Code Sec. 31.09
DEGREE: First (1st) Degree Felony
TRN (TRS): 924495611X (A001)
BOND AMOUNT: \$ 25,000.00

Count 2
CHARGE: Securities Fraud
STATUTE: Vernon's Ann. Civ. Stat. Art. 581-29
DEGREE: First (1st) Degree Felony
TRN (TRS): 924495611X (A002)
BOND AMOUNT: \$ 250,000.00

Count 3
CHARGE: Money Laundering
STATUTE: Texas Penal Code Sec. 34.02
DEGREE: First (1st) Degree Felony
TRN (TRS): 924495611X (D001)
BOND AMOUNT: \$ 25,000.00

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS: THE GRAND JURORS for Jim Wells County, State aforesaid, duly selected, organized, impaneled and sworn as such at the July Term, A.D. 2015, of the District Court of the 79th Judicial District, in and for Jim Wells County, a quorum thereof being present, upon their oaths present in and to said court that,

MICHAEL ANTHONY COLLINS

COUNTY OF Jim Wells

I, R. David Guerrero, Clerk of the 79th District Court of Jim Wells County, Texas, do hereby certify that the within and foregoing is a true and correct copy of the Original Bill of Indictment, filed in said Court on the _____ day of October 2015 in Cause No. _____. Given under my hand and the seal of said Court, at office in Alice, Texas, on _____.

THE STATE OF TEXAS

By: _____ Deput:

34	Sonny Lopez	1/15/2015	\$50,000.00
35	Michael Valerio	1/22/2015	\$80,000.00
36	Denise Y. Munoz	1/29/2015	\$250,000.00
37	Christine A. Gonzalez	2/4/2015	\$50,000.00
38	Michael Valerio	2/4/2015	\$50,000.00
39	Christine A. Gonzalez	2/17/2015	\$5,000.00
40	Joe Valerio	2/17/2015	\$40,000.00
41	Michael Valerio	2/17/2015	\$25,000.00
42	Amanda M. Solis	2/26/2015	\$12,000.00
43	Amanda M. Solis	2/27/2015	\$10,000.00
44	Christine A. Gonzalez	3/3/2015	\$10,000.00
45	Guadalupe Lopez, Jr.	3/3/2015	\$50,000.00
46	Michael Valerio	3/3/2015	\$15,000.00
47	Roland Torres	3/3/2015	\$100,000.00
48	Leonel Camarillo	3/4/2015	\$100,000.00
49	Leonel Camarillo	3/4/2015	\$100,000.00
50	Florence Morales & Robert Gonzalez	3/4/2015	\$10,000.00
51	Michael Valerio	3/5/2015	\$10,000.00
52	Michael Valerio	3/5/2015	\$10,000.00
53	Leonel Camarillo	3/6/2015	\$100,000.00
54	Juan Jose Galvan	3/9/2015	\$30,000.00
55	Santos Perez	3/19/2015	\$75,000.00
56	Belen Garcia	3/25/2015	\$100,000.00
57	Guadalupe Lopez, Jr.	3/25/2015	\$25,000.00
58	Santos Perez	3/25/2015	\$20,000.00
59	Juan Jose Galvan	4/9/2015	\$6,000.00
60	Alfredo Garcia, Jr.	4/15/2015	\$20,000.00
61	Sylvia D. Moya	4/29/2015	\$20,000.00
62	Olga J. Monsevais	4/30/2015	\$12,500.00
63	Sandra Valerio	4/30/2015	\$15,000.00
64	Sandra Valerio	4/30/2015	\$5,000.00
65	Baltazar Ramirez	5/6/2015	\$2,000.00
66	Santos Perez	5/7/2015	\$35,267.98
67	Guadalupe & Annadel Lopez	5/8/2015	\$35,000.00
68	Sylvia D. Moya	5/8/2015	\$10,000.00
69	Scott McConal	5/14/2015	\$5,000.00
70	Baltazar Ramirez	5/15/2015	\$10,000.00
71	David Hernandez	5/19/2015	\$50,000.00
72	Baltazar Ramirez	6/3/2015	\$5,000.00
73	Heather & Miguel Elizondo	6/5/2015	\$5,000.00
74	Jesus Hernandez	6/5/2015	\$5,000.00
75	Jason & Nancy Buentello	6/9/2015	\$5,000.00
76	John Michael Aguilar	6/18/2015	\$10,000.00

COUNTY OF Jim Wells

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THE STATE OF TEXAS

By: _____ Deput

and said appropriations were without the effective consent of said owners in that consent was induced by deception, to wit:

- a. defendant created and confirmed by words and conduct false impressions of fact that were likely to affect the judgment of said owners in the transactions and that defendant did not believe to be true; and
- b. defendant failed to correct false impressions of fact that were likely to affect the judgment of said owners in the transactions, that defendant previously created and confirmed by words and conduct, and that defendant did not at the time believe to be true; and
- c. defendant acted with the intent to deprive said owners of said property by withholding said property permanently and for so extended a period of time that a major portion of the value and enjoyment of said property was lost to said owners, and by disposing of said property in a manner that made recovery of said property by said owners unlikely,

and all of said amounts were obtained, as alleged, as part of one scheme and continuing course of conduct, and the aggregate value of the property so appropriated was \$300,000.00 or more;

COUNT II

on or about the dates listed below, and before the presentment of this indictment, in Jim Wells County, Texas, did then and there, sell and offer for sale Investment Plans through Collins Financial Group; being securities, to wit: an investment contract, and/or evidence of indebtedness, and/or stock, to each of the persons listed below, and in the following amounts:

	OWNER	DATE	AMOUNT INVESTED
1	Aaron Sanchez	11/30/2012	\$700,000.00
2	Florence Morales & Robert Gonzalez	3/22/2013	\$2,250.00
3	Sylvia Mendoza	4/24/2013	\$189,566.59
4	Rolando Trigo	5/7/2013	\$83,709.90
5	David Hernandez	6/19/2013	\$60,000.00
6	Javier Barrera	6/28/2013	\$15,000.00
7	Belinda Everett	7/16/2013	\$5,000.00
8	Heather & Miguel Elizondo	8/8/2013	\$2,200.00
9	Richard & Amanda Everett	8/14/2013	\$5,000.00
10	Richard & Amanda Everett	8/31/2013	\$24,530.87

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11	Florence Morales & Robert Gonzalez	9/26/2013	\$18,000.00
12	Florence Morales & Robert Gonzalez	9/26/2013	\$25,000.00
13	Teresita G. Charles	11/15/2013	\$45,000.00
14	Teresita G. Charles	11/19/2013	\$75,000.00
15	Sylvia B. Cardenas	11/27/2013	\$20,000.00
16	Rolando Cantu	12/4/2013	\$52,101.37
17	Valentin G. Sepulveda	12/4/2013	\$62,241.52
18	Sylvia B. Cardenas	12/13/2013	\$100,000.00
19	Florence Morales & Robert Gonzalez	1/30/2014	\$18,000.00
20	Florence Morales & Robert Gonzalez	2/7/2014	\$166,654.00
21	Florence Morales & Robert Gonzalez	3/4/2014	\$219,267.00
22	Sylvia D. Moya	6/18/2014	\$5,000.00
23	Sylvia D. Moya	7/10/2014	\$10,000.00
24	Manuel Ramos	7/11/2014	\$20,000.00
25	Javier Barrera	7/16/2014	\$75,000.00
26	Reuben T. Garcia	7/30/2014	\$50,000.00
27	Francisca Garcia	8/17/2014	\$10,000.00
28	Simon Serna	8/21/2014	\$5,000.00
29	Javier Barrera	8/29/2014	\$20,000.00
30	Reuben T. Garcia	8/29/2014	\$50,000.00
31	Sergio S. Cantu	8/29/2014	\$15,000.00
32	Javier Barrera	9/9/2014	\$20,000.00
33	Javier Barrera	9/9/2014	\$38,000.00
34	Jason Garcia	9/11/2014	\$100,000.00
35	Reuben T. Garcia	9/11/2014	\$500,000.00
36	Arturo DelaPaz	9/29/2014	\$10,000.00
37	Reuben T. Garcia	10/9/2014	\$100,000.00
38	Francisca Garcia	10/10/2014	\$50,000.00
39	Sommer Ortiz	10/10/2014	\$2,500.00
40	Sergio S. Cantu	11/6/2014	\$50,000.00
41	Reuben T. Garcia	11/12/2014	\$10,000.00
42	Ronald A. Benavidez	12/1/2014	\$100,000.00
43	Ronald A. Benavidez	12/1/2014	\$200,000.00
44	Francisca Garcia	12/4/2014	\$100,000.00
45	Eleonor P. Lopez	12/16/2014	\$100,000.00
46	Selina Montemayor-Garcia	12/16/2014	\$25,000.00
47	Javier Barrera	12/23/2014	\$25,000.00
48	Sonny Lopez	1/15/2015	\$50,000.00
49	Michael Valerio	1/22/2015	\$80,000.00
50	Sandra Valerio	1/22/2015	\$2,500.00
51	Denise Y. Munoz	1/29/2015	\$250,000.00
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62	Roland Torres	3/3/2015	\$100,000.00
63	Annadel G. Lopez	3/4/2015	\$10,000.00
64	Florence Morales & Robert Gonzalez	3/4/2015	\$10,000.00
65	Leonel Camarillo	3/4/2015	\$100,000.00
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74	Santos Perez	3/25/2015	\$20,000.00
75	Olga J. Monsevais	3/27/2015	\$10,000.00
76	Sandra Valerio	3/27/2015	\$8,000.00
77	Sandra Valerio	3/27/2015	\$7,000.00
78	Roberto X. Galvan	4/8/2015	\$4,000.00
79	Juan Jose Galvan	4/9/2015	\$6,000.00
80	Alfredo Garcia, Jr.	4/15/2015	\$20,000.00
81	Sylvia D. Moya	4/29/2015	\$20,000.00
82	Olga J. Monsevais	4/30/2015	\$12,500.00
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and said defendant committed fraud in connection with the sales and offers for sale of said securities by:

PARAGRAPH ONE

Knowingly and intentionally representing that he was licensed to sell securities, said information being a misrepresentation of a relevant fact; and

PARAGRAPH TWO

Knowingly and intentionally representing funds invested in the Investment Plans of Collins Financial Group would be used for the purpose of trading stocks, said information being a misrepresentation of a relevant fact; and

PARAGRAPH THREE

Knowingly and intentionally representing that a significant amount of profits, referred to as "bonuses" would be generated from defendant's trading activities within a week to a few months; said information being a misrepresentation of a relevant fact; and

PARAGRAPH FOUR

Intentionally failing to disclose that the Defendant had not been licensed to sell securities since on or about March 19, 2008, said information being a material fact;

PARAGRAPH FIVE

Intentionally failing to disclose that funds invested in Investment Plans through Collins Financial Group would be used for purposes other than trading stocks, said information being a material fact; and

PARAGRAPH SIX

Intentionally failing to disclose that profits paid to investors, referred to as "bonuses," were not generated from defendant's trading of investor funds, said information being a material fact; and

PARAGRAPH SEVEN

Intentionally failing to disclose that previous investor funds were not used as promised, said information being a material fact; and

PARAGRAPH EIGHT

Intentionally failing to disclose that investor funds would be used to make payments to earlier investors, said information being a material fact; and

PARAGRAPH NINE

Intentionally failing to disclose that investor funds would be used for the benefit of and to pay the personal expenses of Defendant, said information being a material fact; and

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THE STATE OF TEXAS	' By: _____ Deput '

