

REINDICT

16FC-1670C

STATE OF TEXAS VS EVERETT CRAIG WILLIAMS

In the 94th District Court of Nueces County, Texas
PROSECUTOR: 16-F-1088

SO. NO.: 10108476	STATE ID:	PERSON ID: 3405629
ARRESTING AGENCY:		ARREST DATE: Not arrested on this charge
TRN:		

CHARGE CODE	STATUTE	DEGREE	OFFENSE	OFFENSE DATE	TRS
26990127	581-29(C)	First Degree Felony	FRAUD IN THE SALE OR OFFER FOR SALE OF A SECURITY >100,000.00 OR MORE	05/12/2011-04/21/2012	

BOND: \$30,000.00 JUDGE INITIALS: _____

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

The duly organized Grand Jury of Nueces County, Texas, presents in the District Court of Nueces County, Texas, that

EVERETT CRAIG WILLIAMS, defendant,

on or about the dates listed below, and before the presentment of this indictment, in Nueces County, Texas, did then and there, sell and offer for sale Investment Agreements and interests in real estate issued by Favor Ministries, Inc. (hereinafter referred to as "The Favor Investment Program"), being securities, to wit: investment contracts, promissory notes, and evidences of indebtedness to each of the persons listed below, and in the following amounts:

DATE	NAME	AMOUNT
05/12/2011	John McNeill	\$50,000
07/24/2011	Errol White	\$25,000
09/04/2011	Errol White	\$20,000
09/07/2011	Errol White	\$5,000

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12/20/2011	Janet Kearney	\$70,000
04/18/2012	Robert Pierce	\$20,000
04/21/2012	Robert Pierce	\$5,000
	TOTAL	\$195,000

and said defendant committed fraud in connection with the sales and offers for sale of said securities by:

PARAGRAPH ONE

intentionally failing to disclose that on or about July 26, 2004, the defendant was the subject of a judgment in Case No. SC81C0014118, styled Shawna Bland-Tregre DDS vs. Everett Craig Williams in the Justice Court, Precinct 8, Place 1, in Harris County, Texas, in the amount of \$10,134.60, said information being a material fact; and

PARAGRAPH TWO

intentionally failing to disclose that on or about August 30, 2004, the defendant was the subject of a default judgment in Cause No. 04-61311-1, styled Basilio Bachor vs. Dykeswill, LTD. and Everret C. Williams in the County Court at Law No. 1 in Nueces County, Texas, in the amount of \$1,725,000.00 plus \$3,500 for attorney fees, said information being a material fact; and

PARAGRAPH THREE

intentionally failing to disclose that on or about March 7, 2005, the defendant was the subject of a final judgment in Cause No. 04-06561-A, styled Blackburne & Brown Mortgage Fund I vs. J&C Williams, LLC, and Everett C. Williams in the 28th District Court in Nueces County, Texas, in the amount of \$362,296.10 plus \$115,050 for attorney fees, said information being a material fact; and

PARAGRAPH FOUR

intentionally failing to disclose that on or about January 25, 2006, the defendant was the subject of a judgment in Cause No. 04-60172-1, styled First National Bank v. Everett C. Williams in the County Court at Law No. 1 in Nueces County, Texas, in the amount of \$6,923.66 plus \$4,467.69 for attorney fees, said information being a material fact; and

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PARAGRAPH FIVE

intentionally failing to disclose that on or about July 17, 2006, the defendant was the subject of a judgment in Case No. 05-21396-C-7, Adversary No. 06-02019, styled Michael B. Schmidt, Trustee v. Everett C. "Chuck" Williams and Wife, Claudia L. Dykes Williams, et al in the United States Bankruptcy Court for the Southern District of Texas, Corpus Christi Division, in the amount of \$352,277.57, said information being a material fact; and

PARAGRAPH SIX

intentionally failing to disclose that on or about August 28, 2007, a Notice of Federal Tax Lien was filed by the Internal Revenue Service in the records of the Nueces County clerk's office, against Everett C. Williams in the amount of \$216,744.20 for tax periods ending 12/31/2002, 12/31/2005 and 12/31/2006, said information being a material fact; and

PARAGRAPH SEVEN

Intentionally failing to disclose that on or about January 31, 2008, the defendant was the subject of a final judgment in Cause No. 07-02176-00-0-C styled Gina Colvin vs. Everett C. Williams in the 94th District Court in Nueces County, Texas, in the amount of \$176,500 plus \$15,000 for attorney fees, said information being a material fact; and

PARAGRAPH EIGHT

intentionally failing to disclose that on or about July 25, 2008, the defendant was the subject of a judgment in Cause No. 330460 styled The Frost National Bank vs. Everett Craig Williams and Karen-Eubanks parks in the County Court at Law No. 7, in Bexar County, Texas, in the amount of \$55,302.40, said information being a material fact; and

PARAGRAPH NINE

I ntentionally failing to disclose that on or about February 27, 2009, the defendant was the subject of a judgment in Adversary No. 06-02023 styled Samimah Aziz vs. Everett C. Williams in United States Bankruptcy Court for the Southern District of Texas, Corpus Christi Division, in the amount of \$284,571.01 as actual damages, plus

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\$1,500,000.00 as exemplary damages, plus \$719,193.86 attorney's fees plus interest, said information being a material fact; and

PARAGRAPH TEN

intentionally failing to disclose that on or about June 30, 2009, a Notice of Child Support Lien was filed by the Office of the Attorney General in the records of the Nueces County clerk's office, against Everett Williams on behalf of Obligee, Wonda Jo Thomas, in the amount of \$15,033.20 as the result of a child support order entered on 3/25/2008, said information being a material fact; and

PARAGRAPH ELEVEN

intentionally failing to disclose that on or about September 9, 2010, a Forcible Entry & Detainer judgment in Cause No. JC-100742 (10-1458-CC4) was entered against Today's Solutions, in a case styled Texas Capitol Investors vs. Today's Solutions, in the Justice of the Peace Court, Precint 1 in Williamson County, Texas, in the amount of \$7,005.00, said information being a material fact; and

PARAGRAPH TWELVE

intentionally failing to disclose investor funds were used to pay the personal expenses of the defendant, said information being a material fact; and

PARAGRAPH THIRTEEN

intentionally failing to disclose that prior investment programs sold by the defendant, had not performed as promised and that clients who were sold interests in such programs had experienced significant losses of their investments, said information being a material fact; and

PARAGRAPH FOURTEEN

intentionally failing to disclose that investor funds would be used for purposes other than those intended, said information being a material fact; and

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PARAGRAPH FIFTEEN

intentionally failing to disclose the true financial condition of Favor Ministries and other companies that defendant was affiliated with, and the personal financial condition of Everett Craig Williams, said information being a material fact; and

All of said amounts were obtained pursuant to one scheme and continuing course of conduct, and the aggregate amount obtained was \$100,000.00 or more;

against the peace and dignity of the State.

Jaime Nadause
FOREMAN OF THE GRAND JURY

CLERK OF COUNTY &
DISTRICT COURTS
NUECES COUNTY, TEXAS
BY _____ DPTY
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