

DEFENDANT Martin Delaine Lewis

2015-13142

☆UNAPP

Person ID: 581965

CHARGE EOCA PC 71.02(a) (1) & (10)
F1

ADDRESS 14771 Alstone Drive, Frisco, Texas 75035

CAUSE# 401-83712-2015

DESCRIPTION B/M/DOB: 01/03/1967; [REDACTED]

AGENCY# State Securities Board

ARREST INFORMATION GJR

C/C Linville C. Lewis; Melaina N. Frederick; Arthur P. Wilson; Eli B. Carrasquillo Witness: Joseph P. Oman

TRUE BILL OF INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS: The Grand Jury of Collin County, State of Texas, duly organized at the July Term, A.D., 2015 of the 296th

District Court of said county, in said court at said term, do present that

LINVILLE C. LEWIS, hereinafter "defendant"

on or about and between the dates of February 1, 2008, and July 31, 2014, in Collin County, Texas, and elsewhere, with the intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the defendant; Linville C. Lewis; Melaina N. Frederick; Arthur P. Wilson; Jarvous W. Willis; Eli B. Carrasquillo; Charles M. Frase; David A. Santos and others, who collaborated in carrying on the hereinafter-described criminal activity, did then and there commit the offenses of Theft of Property, pursuant to one scheme and continuing course of conduct, which, in the aggregate, involved criminal proceeds in the amount of \$200,000.00 or more; and Money Laundering, pursuant to one scheme and continuing course of conduct, which, in the aggregate, involved criminal proceeds in the amount of \$200,000.00 or more;

Against the peace and dignity of the State.

Daniel Mitchell
FOREPERSON OF THE GRAND JURY

FILED

2015 DEC 10 PM 2: 58

Yoon Kim
ANDREA STRON THOMPSON
DISTRICT CLERK
COLLIN COUNTY, TEXAS
BY B. Plunk DEPUTY

DEFENDANT Martin Delaine Lewis
Person ID: 581965 2015-13143
CHARGE Money Laundering > \$200K, TPC 34.02, F1 **ALINAPP**
ADDRESS 14771 Alstone Drive, Frisco, Texas
CAUSE# 401-83713-2015
DESCRIPTION B/M; DOB: 01/03/1967; [REDACTED]
AGENCY# State Securities Board
ARREST INFORMATION GJR
C/C Linville Lewis; Melaina N. Frederick; Arthur P. Wilson; Eli B. Carrasquillo Witness: Joseph P. Oman

TRUE BILL OF INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS: The Grand Jury of Collin County, State of Texas, duly organized at the July Term, A.D., 2015 of the 296th

District Court of said county, in said court at said term, do present that

MARTIN DELAINE LEWIS, hereinafter referred to as "defendant"

on or about and between the dates of February 1, 2008, and July 31, 2014, and before the presentment of this indictment, in Collin County, Texas, and elsewhere, did then and there:

knowingly acquire an interest in and possess the proceeds of criminal activity, to wit: current money of the United States of America, in the aggregated amount of two hundred thousand dollars (\$200,000.00) or more, and said proceeds were generated from the commission of the offenses of theft of property of the value of \$200,000.00 or more in violation of Section 31.03 of the Texas Penal Code, a felony of the first degree under the laws of the State of Texas, and the commission of fraud in connection with the sale and offer for sale of securities in an amount of \$100,000.00 or more in violation of Section 29C of the Texas Securities Act, a felony of the first degree under the laws of the State of Texas, the commission of the sale of securities by an unregistered dealer or agent in violation of Section 29A of the Texas Securities Act, a felony of the third degree under the laws of the State of Texas, and the commission of the sale of unregistered securities in violation of Section 29B of the Texas Securities Act, a felony of the third degree under the laws of the State of Texas;

Against the peace and dignity of the State.

Darryl Mitchell
Foreperson of the Grand Jury

FILED

2015 DEC 10 PM 2: 58

Yoon Kim
ANDREA STRON THOMPSON

DISTRICT CLERK
COLLIN COUNTY, TEXAS

BY B. P. [Signature] DEPUTY

DEFENDANT Martin Delaine Lewis Person ID 581965 2015-13144 CHARGE Securities Fraud > \$100K F1 **ARUNAP**

ADDRESS 14771 Alstone Drive, Frisco, Texas 75035 CAUSE# 401-83714-2015

DESCRIPTION B/M; DOB: 01/03/1967; [REDACTED] AGENCY/# State Securities Board

ARREST INFORMATION GJR

C/C Linville Lewis; Melaina Frederick; Arthur P. Wilson; Eli B. Carrasquillo Witness: Joseph [REDACTED]

2015 DEC 11 PM 2:55
ANTHONY [REDACTED]
DIS. COLLIN COUNTY, TEXAS
BY [REDACTED] DEPUTY

TRUE BILL OF INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS: The Grand Jury of Collin County, State of Texas, duly organized at the July Term, A.D., 2015 of the 296th

District Court of said county, in said court at said term, do present that

MARTIN DELAINE LEWIS, hereinafter "defendant"

On or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, did then and there sell and offer for sale the below listed securities, to wit: limited partnership interests, interests in and under oil and/or gas leases, investment contracts, and shares of stock, to each of the persons listed below, and in the following amounts:

Person	Date	Amount	Security
BlackRock Petroleum, LLC	January 29, 2008	\$28,000.00	Working interest in Hoagland Wells #4 & #5
BlackRock Petroleum, LLC	February 12, 2008	\$29,582.72	Working interest in Hoagland Wells #4 & #5
Lawrence A. Peterson	February 26, 2008	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
D. Alan Bowlby	February 29, 2008	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
Daniel V. Yost	March 10, 2008	\$82,261.00	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	March 13, 2008	\$57,582.72	4% working interest in Hoagland Wells #4 & #5
Marjorie H. Fahrney	April 10, 2008	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
Robert L. Thesken	April 14, 2008	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	August 4, 2008	\$115,165.44	8% working interest in Hoagland Wells #4 & #5
Timothy & Ramona Giddings	September 18, 2008	\$17,000.00	limited partner interest in Sabine Partnership #3, Ltd.
Carl A. Haaland	November 14, 2008	\$82,261.00	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	March 16, 2009	\$14,526.39	Interest in salt water disposal well
BlackRock Petroleum, LLC	August 12, 2009	\$43,187.04	3% interest in the Sabine #3
Duane S. Woebbeking	December 31, 2009	\$36,000.00	Interests in the Benchmark Operating Company, L.L.C. Delatin SWD #1
EnQuest, LLC.	January 7, 2009	\$11,465.78	interest in J. Hoagland #1 Well
EnQuest, LLC.	January 7, 2009	\$22,442.72	Interest in the J. Hoagland #3 Well
Eric Weidner	December 7, 2009	\$24,000.00	2% working interest in Delatin #1 Salt Water Well
Roy E. Brown	December 7, 2009	\$36,000.00	3% interest in the Delatin #1 Salt Water Well
BlackRock Petroleum, LLC	February 18, 2010	\$150,000.00	15% interest in Delatin #1 Salt Water Well

Person	Date	Amount	Security
Floyd J. LeBlanc, Jr. and Deborah P. LeBlanc	March 4, 2010	\$25,000.00	2 units of interest in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	March 24, 2010	\$87,500.00	8.75% interest in Delatin SW #1
BlackRock Petroleum, LLC	April 1, 2010	\$12,500.00	1.25% interest in Delatin SW #1
BlackRock Petroleum, LLC	April 28, 2010	\$121,700.00	12.7% interest in Delatin SW #1
Andre' D. White	April 29, 2010	\$7,000.00	14/25ths of one unit of interest in Benchmark Operating Company, L.L.C.
Lorraine T. White	May 5, 2010	\$5,000.00	2/5ths of one unit of interest in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	May 10, 2010	\$38,000.00	3.8% interest in Delatin SW #1
BlackRock Petroleum, LLC	June 8, 2010	\$57,082.72	4% working interest in Hoagland Wells #4 & #5
Albert P. Stephens, Jr.	August 20, 2010	\$70,000.00	Five and three-fifths (5 3/5th) units in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	October 1, 2010	\$14,395.68	1% working interest in Hoagland Wells #4 & #5
BlackRock Petroleum, LLC	November 1, 2010	\$28,791.36	2% interest in Sabine #3
Michael B. Webb	November 12, 2010	\$41,250.00	limited partner interest in Sabine Partnership #4, Ltd.
Warren L. Jacobs d/b/a Tarragon Energy, LLC	December 20, 2010	\$18,295.32	1.75% working interest in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Roy E. Brown	February 11, 2011	\$20,000.00	interest in R.H. Evans Well
Warren L. Jacobs d/b/a Tarragon Energy, LLC	March 1, 2011	\$190,794.08	working interests in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Warren L. Jacobs d/b/a Tarragon Energy, LLC	March 22, 2011	\$52,272.35	Working interests in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Arnold McClatchey	April 11, 2011	\$85,500.00	limited partner interest in Sabine Partnership #4, Ltd.
Gerald D. Evenson	May 6, 2011	\$20,625.00	limited partner interest in Sabine Partnership #4, Ltd.
Arnold McClatchey	August 19, 2011	\$20,000.00	working interests in the Benchmark Operating Company, L.L.C. Saratoga/R.H. Evans #1 Well
Arnold McClatchey	September 16, 2011	\$91,448.00	working interests in the Benchmark Operating Company, L.L.C. Saratoga/R.H. Evans #1 Well
Arnold McClatchey	August 10, 2012	\$25,000.00	Lewis II Holdings, LLC promissory note
Gerald D. Evenson	October 31, 2012	\$25,000.00	working interests in Benchmark Operating Company, L.L.C. Hoagland #1 Well and the Hoagland #3 Well
Carl A. Haaland	June 24, 2013	\$10,000.00	Lewis II Holdings, LLC promissory note
Gerald D. Evenson	April 1, 2014	\$4,800	Shares of Insignia Energy, Inc. stock
Arnold McClatchey	April 24, 2014	\$8,000.00	Shares of Insignia Energy, Inc. stock
Duane S. Woebeking	June 12, 2014	\$10,000.00	Shares of Insignia Energy, Inc. stock
Duane S. Woebeking	June 27, 2014	\$9,000.00	Shares of Insignia Energy, Inc. stock

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 funds invested for the purchase of limited partnership interest in the Sabine Partnership #3, Ltd. for drilling the Hoagland #4 and Hoagland #5 oil and gas wells in Sabine Parish, Louisiana had been used for purposes other than drilling the two wells, including paying expenses for other oil and gas well

projects and paying the personal expenses of the defendant and other officers and employees of Insignia Energy Group, Inc. and Benchmark Operating Company, L.L.C.; said information being material fact; and

PARAGRAHP TWO

Intentionally failing to disclose that funds invested for the purchase of limited partnership interests in the Sabine Partnership #4, Ltd., for drilling the Hoagland #6 and Hoagland #7 oil and gas wells in Sabine Parish, Louisiana had been used for purposes other than drilling the two wells, including paying expenses for other oil and gas well projects and paying the personal expenses of the defendant and other officers and employees of Insignia Energy Group, Inc. and Benchmark Operating Company, L.L.C.; said information being material fact; and

PARAGRAPH THREE

Intentionally failing to disclose that the Hoagland #5 Well was not drilled for the Sabine Partnership #3, Ltd., and that the Hoagland #6 Well nor the Hoagland #7 Well was drilled for the Sabine Partnership #4, Ltd.; said information being material fact; and

PARAGRAPH FOUR

Intentionally failing to disclose that the Texas Securities Commissioner issued an Emergency Cease and Desist Order against Insignia Energy Group, Inc., IEG Permian Basin, L.L.C., Martin D. Lewis, and J.W. Willis on May 13, 2011, in Order No. ENF-11-CDO-1702, in which the Commissioner found the defendant and other respondents had engaged in fraud in connection with the offers for sale of securities, and the Commissioner ordered the respondents to cease and desist from engaging in fraud in connection with the sales of securities; said information being material fact; and

PRAGRAPH FIVE

Intentionally failing to disclose that the defendant was a controlling principal of Benchmark Operating Company, L.L.C., the named operator for the Hoagland #4, Hoagland #5, Hoagland #6, and Hoagland #7 wells in Sabine Parish, Louisiana; said information being material fact; and

PARAGRAPH SIX

Intentionally failing to disclose that on or about May 2012, the defendant received a report of the Fort Jessup Field in Sabine Parish, Louisiana prepared by Coerte A. Voorhies, Jr., a consulting geologist, in which Coerte A. Voorhies, Jr. stated it was his opinion that no recoverable oil and/or gas reserves existed in the Saratoga formation under the leases owned or formerly owned by Benchmark Operating Company; said information being material fact; and

PARAGRAPH SEVEN

Intentionally failing to disclose that the Texas Secretary of State forfeited Insignia Energy Group, Inc.'s charter under Section 171.309 of the Texas Tax Code on July 27, 2012, and on February 27, 2013, the Texas Secretary of State revoked the reinstatement of Insignia Energy Group, Inc.'s charter after the credit card issuer refused the credit card used to pay the reinstatement fees and franchise taxes assessed against Insignia Energy Group, Inc.; said information being material fact;

And all of said amounts were obtained under 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.

David Mitchell
FOREPERSON OF THE GRAND JURY

FILED

2015 DEC 10 PM 2:57

ANGUS A. STROTT, FRODO BAGGINS
DIST. CLERK
COLLIN COUNTY, TEXAS
BY *B. Brink* DEPUTY

State v. Martin Delaine Lewis Indictment-Cause No. 401-83714-2015

Person	Date	Amount	Security
BlackRock Petroleum, LLC	01/29/08	\$28,000.00	Working interest in Hoagland Wells #4 & #5
BlackRock Petroleum, LLC	02/12/08	\$29,582.72	Working interest in Hoagland Wells #4 & #5
Lawrence A. Peterson	02/26/08	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
D. Alan Bowlby	02/29/08	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
Daniel V. Yost	03/10/08	\$82,261.00	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	03/13/08	\$57,582.72	4% working interest in Hoagland Wells #4 & #5
Marjorie H. Fahrney	04/10/08	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
Robert L. Thesken	04/14/08	\$20,565.25	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	08/04/08	\$115,165.44	8% working interest in Hoagland Wells #4 & #5
Timothy & Ramona Giddings	09/18/08	\$17,000.00	limited partner interest in Sabine Partnership #3, Ltd.
Carl A. Haaland	11/14/08	\$82,261.00	limited partner interest in Sabine Partnership #3, Ltd.
BlackRock Petroleum, LLC	03/16/09	\$14,526.39	Interest in salt water disposal well
BlackRock Petroleum, LLC	08/12/09	\$43,187.04	3% interest in the Sabine #3
Duane S. Woebbeking	12/31/09	\$36,000.00	Interests in the Benchmark Operating Company, L.L.C. Delatin SWD #1
EnQuest, LLC.	01/07/09	\$11,465.78	interest in J. Hoagland #1 Well
EnQuest, LLC.	01/07/09	\$22,442.72	Interest in the J. Hoagland #3 Well
Eric Weidner	12/07/09	\$24,000.00	2% working interest in Delatin #1 Salt Water Well
Roy E. Brown	12/07/09	\$36,000.00	3% interest in the Delatin #1 Salt Water Well
BlackRock Petroleum, LLC	02/18/10	\$150,000.00	15% interest in Delatin #1 Salt Water Well
Floyd J. LeBlanc, Jr. and Deborah P. LeBlanc	03/04/10	\$25,000.00	2 units of interest in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	03/24/10	\$87,500.00	8.75% interest in Delatin SW #1
BlackRock Petroleum, LLC	04/01/10	\$12,500.00	1.25% interest in Delatin SW #1
BlackRock Petroleum, LLC	04/28/10	\$121,700.00	12.7% interest in Delatin SW #1
Andre' D. White	04/29/10	\$7,000.00	14/25ths of one unit of interest in Benchmark Operating Company, L.L.C.
Lorraine T. White	05/05/10	\$5,000.00	2/5ths of one unit of interest in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	05/10/10	\$38,000.00	3.8% interest in Delatin SW #1
BlackRock Petroleum, LLC	06/08/10	\$57,082.72	4% working interest in Hoagland Wells #4 & #5
Albert P. Stephens, Jr.	08/20/10	\$70,000.00	Five and three-fifths (5 3/5th) units in Benchmark Operating Company, L.L.C.
BlackRock Petroleum, LLC	10/01/10	\$14,395.68	1% working interest in Hoagland Wells #4 & #5
BlackRock Petroleum, LLC	11/01/10	\$28,791.36	2% interest in Sabine #3
Michael B. Webb	11/12/10	\$41,250.00	limited partner interest in Sabine Partnership #4, Ltd.
Warren L. Jacobs d/b/a Tarragon Energy, LLC	12/20/10	\$18,295.32	1.75% working interest in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Roy E. Brown	02/11/11	\$20,000.00	interest in R.H. Evans Well
Warren L. Jacobs d/b/a Tarragon Energy, LLC	03/01/11	\$190,794.08	working interests in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Warren L. Jacobs d/b/a Tarragon Energy, LLC	03/22/11	\$52,272.35	Working interests in the Hoagland #6 and Hoagland #7 Wells, Sabine Parish, Louisiana
Arnold McClatchey	04/11/11	\$85,500.00	limited partner interest in Sabine Partnership #4, Ltd.
Gerald D. Evenson	05/06/11	\$20,625.00	limited partner interest in Sabine Partnership #4, Ltd.
Arnold McClatchey	08/19/11	\$20,000.00	working interests in the Benchmark Operating Company, L.L.C. Saratoga/R.H. Evans #1 Well

Person	Date	Amount	Security
Arnold McClatchey	09/16/11	\$91,448.00	working interests in the Benchmark Operating Company, L.L.C. Saratoga/R.H. Evans #1 Well
Arnold McClatchey	08/10/12	\$25,000.00	Lewis II Holdings, LLC promissory note
Gerald D. Evenson	10/31/12	\$25,000.00	working interests in Benchmark Operating Company, L.L.C. Hoagland #1 Well and the Hoagland #3 Well
Carl A. Haaland	06/24/13	\$10,000.00	Lewis II Holdings, LLC promissory note
Gerald D. Evenson	04/01/14	\$4,800	Shares of Insignia Energy, Inc. stock
Arnold McClatchey	04/24/14	\$8,000.00	Shares of Insignia Energy, Inc. stock
Duane S. Woebbeking	06/12/14	\$10,000.00	Shares of Insignia Energy, Inc. stock
Duane S. Woebbeking	06/27/14	\$9,000.00	Shares of Insignia Energy, Inc. stock
total		\$1,930,690.32	

DEFENDANT Martin Delaine Lewis
Person ID 581965 2015-13145

CHARGE Theft > \$200K, TPC 31.03, F1 **UNAPP**

ADDRESS 14771 Alstone Drive, Frisco, Texas 75035

CAUSE# 401-83715-2015

DESCRIPTION B/M; DOB: 01/03/1967; [REDACTED]

AGENCY# State Securities Board

ARREST INFORMATION GJR

C/C Linville Lewis; Melaina Frederick; Arthur P. Wilson; Eli B. Carrasquillo

Witness: Joseph [REDACTED]
2015 DEC 10 P 2:57
Collin County, Texas
BY [Signature] DEPUTY

TRUE BILL OF INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS: The Grand Jury of Collin County, State of Texas, duly organized at the July Term, A.D., 2015 of the 296th

District Court of said county, in said court at said term, do present that

MARTIN DELAINE LEWIS, hereinafter "defendant"

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, did then and there unlawfully appropriate, to wit: acquire and exercise control over property, other than real property, to wit: current money of the United States of America, from the following owners, and in the following amounts:

<u>Owner</u>	<u>Date of Appropriation</u>	<u>Amount of Appropriation</u>
BlackRock Petroleum, LLC	January 29, 2008	\$28,000.00
BlackRock Petroleum, LLC	February 12, 2008	\$29,582.72
Lawrence A. Peterson	February 26, 2008	\$20,565.25
D. Alan Bowlby	February 29, 2008	\$20,565.25
Daniel V. Yost	March 10, 2008	\$82,261.00
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Marjorie H. Fahrney	April 10, 2008	\$20,565.25
Robert L. Thesken	April 14, 2008	\$20,565.25
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Carl A. Haaland	November 14, 2008	\$82,261.00
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Duane S. Woebeking	December 31, 2009	\$36,000.00
EnQuest, LLC.	January 7, 2009	\$11,465.78

EnQuest, LLC.	January 7, 2009	\$22,442.72
Eric Weidner	December 7, 2009	\$24,000.00
Roy E. Brown	December 7, 2009	\$36,000.00
BlackRock Petroleum, LLC	February 18, 2010	\$150,000.00
Deborah P. LeBlanc	March 4, 2010	\$25,000.00
BlackRock Petroleum, LLC	March 24, 2010	\$87,500.00
BlackRock Petroleum, LLC	April 1, 2010	\$12,500.00
BlackRock Petroleum, LLC	April 28, 2010	\$121,700.00
Andre' D. White	April 29, 2010	\$7,000.00
Lorraine T. White	May 5, 2010	\$5,000.00
BlackRock Petroleum, LLC	May 10, 2010	\$38,000.00
BlackRock Petroleum, LLC	June 8, 2010	\$57,082.72
Albert P. Stephens, Jr.	August 20, 2010	\$70,000.00
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Roy E. Brown	February 11, 2011	\$20,000.00
Warren L. Jacobs d/b/a Tarragon Energy, LLC	March 1, 2011	\$190,794.08
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Arnold McClatchey	April 11, 2011	\$85,500.00
Gerald D. Evenson	May 6, 2011	\$20,625.00
Arnold McClatchey	August 19, 2011	\$20,000.00
Arnold McClatchey	September 16, 2011	\$91,448.00
Arnold McClatchey	August 10, 2012	\$25,000.00
Gerald D. Evenson	October 31, 2012	\$25,000.00
Carl A. Haaland	June 24, 2013	\$10,000.00
Gerald D. Evenson	April 1, 2014	\$4,800.00
Arnold McClatchey	April 24, 2014	\$8,000.00
Duane S. Woebeking	June 12, 2014	\$10,000.00

Duane S. Woebeking

June 27, 2014

\$9,000.00

And said appropriations were without the effective consent of said owners in that consent was induced by deception, to wit: said 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 the defendant did not believe to be true; and said defendant failed to correct false impressions of fact that were likely to affect the judgment of said owners in the transactions, that said defendant previously created and confirmed by words and conduct, and that said defendant did not at the time believe to be true; and said defendant promised performance that affected the judgment of said owners in said transactions that said defendant did not intend to perform and knew would not be performed;

And said 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 \$200,000.00 or more;

Against the peace and dignity of the State.


FOREPERSON OF THE GRAND JURY

FILED

2015 DEC 10 PM 2: 57

Yoon Kim
ANDREA STROH THOMPSON

DISTRICT CLERK
COLLIN COUNTY, TEXAS

INDICTMENT/MARTIN DELAINE LEWIS/PAGE 3
BY *M. Delaine* DEPUTY