

DEFENDANT SANTOS, DAVID A.

Person ID 1576913 2015-1346

CHARGE Money Laundering > \$200K, TPC 34.02, F1

**UNAPP*

ADDRESS 640 NEW HOPE ROAD E., MCKINNEY, TEXAS, 75071

CAUSE# 401-83716-2015

DESCRIPTION W/M; DOB: 12/06/1966; [REDACTED]

AGENCY# State Securities Board

ARREST INFORMATION GJR

C/C Charles M. Frase

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

DAVID A. SANTOS, hereinafter referred to as "defendant"

on or about and between the dates of October 1, 2010, and June 30, 2013, 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 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 under the laws of the State of Texas;

Against the peace and dignity of the State.

Darrell Mitchell
For person of the Grand Jury

FILED

2015 DEC 10 PM 2:57

Yoon Kim
ANDREA STROH THOMPSON
CLERK
COLLIN COUNTY, TEXAS
BY *B. P. [Signature]* DEPUTY

DEFENDANT SANTOS, DAVID A. Person ID 1576913
 2015-13147 CHARGE Securities Fraud > \$100K F1 **ALWAYS**
 ADDRESS 640 NEW HOPE ROAD E., MCKINNEY, TEXAS, 75071 CAUSE# 401-83717-2015
 DESCRIPTION W/M, DOB: 12/06/1966 AGENCY# State Securities Board
 ARREST INFORMATION GJR

C/C Charles M. Frase

Witness: Joseph P. Orfan
 2015 DEC 10 PM 5:56
 ANDREA STRONG
 DISTRICT CLERK
 COLLIN COUNTY, TEXAS
 BY *[Signature]*

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

DAVID A. SANTOS, 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 in the form of interests in and under oil and/or gas leases and investment contracts to each of the persons listed below, and in the following amounts:

Person	Date	Amount	Security
Dr. Jerjis T. Alajaji	October 28, 2010	\$125,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	December 13, 2010	\$12,500.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	December 14, 2010	\$50,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	July 11, 2011	\$45,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	November 14, 2011	\$137,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	November 22, 2011	\$68,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas

Person	Date	Amount	Security
Dr. Jerjis T. Alajaji	September 25, 2012	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	January 14, 2013	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	January 23, 2013	\$25,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	January 23, 2013	\$40,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	March 28, 2013	\$85,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	May 31, 2013	\$100,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	November 22, 2013	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	November 26, 2013	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana

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 a portion of the funds invested by Dr. Jerjis T. Alajaji for the interests in Downtown Endeavors, LLC ventures Downtown Endeavors, LLC were used to pay Dr. Jerjis T. Alajaji a profit on his investment, said information being material fact ; and

PARAGRAPH TWO

Intentionally failing to disclose that funds invested by Dr. Jerjis T. Alajaji for interests in the Bakken Prospect in Daniels County, Montana and the West Texas Prospect in Castro and Lamb Counties, Texas, were used to make payments to investors who purchased interests in the Delatin SW #1 Joint Venture and in Downtown Endeavors, LLC car wash ventures, said information being materials 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.

FILED

2015 DEC 10 PM 2: 57

Yours truly
ANDREA STROH THOMPSON
DISTRICT CLERK

INDICTMENT/DAVID A. SANFOS/PAGE 2

BY B. Brader DEPUTY

Daniel Mitchell
FOREPERSON OF THE GRAND JURY

State v. David A. Santos Indictment-Cause No. 401-83717-2045

Person	Date	Amount	Security
Dr. Jerjis T. Alajaji	10/28/10	\$125,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	12/13/10	\$12,500.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	12/14/10	\$50,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	07/11/11	\$45,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	11/14/11	\$137,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	11/22/11	\$68,000.00	carried working interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana and in the West Texas Prospect in Castro and Lamb Counties, Texas
Dr. Jerjis T. Alajaji	09/25/12	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	01/14/13	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	01/23/13	\$25,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	01/23/13	\$40,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	03/28/13	\$85,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	05/31/13	\$100,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	11/22/13	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
Dr. Jerjis T. Alajaji	11/26/13	\$75,000.00	overriding royalty interest in the EnQuest Oil & Gas, LLC Bakken Prospect, Daniels County, Montana
total:		\$987,500.00	

DEFENDANT SANTOS, DAVID A. *Person ID: 1576913*
2015-13149 CHARGE Theft > \$200K TPC 31.03 F1 *ALIN 1/10*
 ADDRESS 640 NEW HOPE ROAD E., MCKINNEY, TEXAS, 75071 CAUSE# 401-83718-2015
 DESCRIPTION W/M, DOB: 12/06/1966; [REDACTED] AGENCY# State Securities Board

ARREST INFORMATION GJR

C/C Charles M. Frase

Witness: Joseph Thompson
 2015 DEC 10 PM 2:56
 ANDREAS YOUNG
 DISTRICT CLERK
 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

DAVID A. SANTOS, hereinafter referred to as "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>
Dr. Jerjis T. Alajaji	October 28, 2010	\$125,000.00
Dr. Jerjis T. Alajaji	December 13, 2010	\$12,500.00
Dr. Jerjis T. Alajaji	December 14, 2010	\$50,000.00
Dr. Jerjis T. Alajaji	July 11, 2011	\$45,000.00
Dr. Jerjis T. Alajaji	November 14, 2011	\$137,000.00
Dr. Jerjis T. Alajaji	November 22, 2011	\$68,000.00
Dr. Jerjis T. Alajaji	September 25, 2012	\$75,000.00
Dr. Jerjis T. Alajaji	January 14, 2013	\$75,000.00
Dr. Jerjis T. Alajaji	January 23, 2013	\$25,000.00
Dr. Jerjis T. Alajaji	January 23, 2013	\$40,000.00
Dr. Jerjis T. Alajaji	March 28, 2013	\$85,000.00

Dr. Jerjis T. Alajaji	May 31, 2013	\$100,000.00
Dr. Jerjis T. Alajaji	November 22, 2013	\$75,000.00
Dr. Jerjis T. Alajaji	November 26,	\$75,000.00

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.

David Mitchell
 FOREPERSON OF THE GRAND JURY

FILED
 2015 DEC 10 PM 2: 56
 YOON KIM
 ANDREA STROH THOMPSON
 DISTRICT CLERK
 COLLIN COUNTY, TEXAS
 BY *B. Plunk* DEPUTY