

# GRAND JURY REFERRAL



## The State of Texas vs. WILSON ALEJANDRO MONTOYA

CDC2

DOB: 12/18/1972      Sex: Male      Race: White

GJ Witness: Read In

Offense	Agency
MONEY LAUNDERING >=\$300K	TX057015A

---

**INDICTMENT NO.: F1900781**

---

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

The Grand Jury of Dallas County, State of Texas, duly organized at the July Term, A.D., 2019 of the 194th Judicial District Court for said County, upon its oath do present in and to said Court at said term,

That **WILSON ALEJANDRO MONTOYA**, hereinafter called Defendant, **on or about and between the 1st day of May, 2017 and the 1st day of February, 2019**, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, knowingly acquire or maintain an interest in, conceal, possess, transfer, and transport the proceeds of criminal activity, to-wit: Securities Fraud, and the aggregate value of said funds was \$300,000.00 or more,

**FILED**  
2019 DEC 18 AM 10:16  
FELICIA PIIRE  
DISTRICT CLERK  
DALLAS CO., TEXAS  
DEPUTY

Against the peace and dignity of the State.

Foreman of the Grand Jury

GRAND JURY REFERRAL



The State of Texas vs. WILSON ALEJANDRO MONTOYA

CDC2

DOB: 12/18/1972 Sex: Male Race: White

GJ Witness: Read In

Offense	Agency
THEFT PROP >=\$300K	TX057015A

INDICTMENT NO.: F1900780

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

The Grand Jury of Dallas County, State of Texas, duly organized at the July Term, A.D., 2019 of the 194th Judicial District Court for said County, upon its oath do present in and to said Court at said term,

That WILSON ALEJANDRO MONTOYA, hereinafter called Defendant, on or about and between the 1st day of May, 2017 and the 1st day of February, 2019, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, unlawfully appropriate property, by acquiring or otherwise exercising control over property, to wit: money, of the aggregate value of \$300,000.00 or more, from the following owners, Kevin Cochran, Gloria Day, Shannon L Day, Antonio Escobar, Jose A Flores, Lorena B Flores, Jose Garcia, Alain Vaquero Gonzalez, Jimmy Jean-Louis, Bianey Lachica, Marbel Lachica, Laura Millan, Marcelino Morales, Yasmin Morales, Santa Judith Okonji, Eugene Orico, Gerson Prada, Mirtha N. Rios, Mercedes P Rojas, Jose de Jesus Salazar, John Sanchez, Jaime Torres, Claudia Mayela Torres-Cruz, Salvador Garcia, and Veronica Zaleta Arias, and without the effective consent of said owners, namely, by deception, with intent to deprive the owners of the property,

FILED  
 2019 DEC 18 AM 10:16  
 FELICIA PIKE  
 DISTRICT CLERK  
 DALLAS CO., TEXAS  
 MWZ DEPUTY

Against the peace and dignity of the State.

Foreman of the Grand Jury

GRAND JURY REFERRAL



The State of Texas vs. WILSON ALEJANDRO MONTOYA

CDC2

DOB: 12/18/1972 Sex: Male Race: White

GJ Witness: Read IN

Offense	Agency
FRAUD SELL SECURITIES >=\$100K	TX057015A

INDICTMENT NO.: F1900779

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

The Grand Jury of Dallas County, State of Texas, duly organized at the July Term, A.D., 2019 of the 194th Judicial District Court for said County, upon its oath do present in and to said Court at said term,

That WILSON ALEJANDRO MONTOYA, hereinafter called Defendant, on or about and between the 1st day of May, 2017 and the 1st day of February, 2019, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, sell and offer for sale securities in the form of evidences of indebtedness and investment contracts, issued by Wilson Montoya dba All In One Inv & Repairs, LLC, to Kevin Cochran, Gloria Day, Shannon L Day, Antonio Escobar, Jose A Flores, Lorena B Flores, Jose Garcia, Alain Vaquero Gonzalez, Jimmy Jean-Louis, Bianey Lachica, Marbel Lachica, Laura Millan, Marcelino Morales, Yasmin Morales, Santa Judith Okonji, Eugene Orico, Gerson Prada, Mirtha N. Rios, Mercedes P Rojas, Jose de Jesus Salazar, John Sanchez, Jaime Torres, Claudia Mayela Torres-Cruz, Salvador Garcia, and Veronica Zaleta Arias, hereinafter referred to as "purchasers," and defendant engaged in fraud in connection with the offer for sale and sale of said securities by:

Intentionally failing to disclose money contributed by purchasers would be used to pay interest payments to other purchasers, said information being a material fact;

Intentionally failing to disclose that defendant used money contributed by purchasers to pay for his and his family's personal expenses, said information being a material fact;

Intentionally failing to disclose that defendant and All In One Inv & Repairs, LLC, did not earn significant interest interest and income from the operations of All in One Inv & Repairs, LLC to pay purchasers the interest, revenues, and income owed to them, said information being a material fact;

Against the peace and dignity of the State.

FELICIA PITRE DISTRICT CLERK

2019 DEC 18 AM 10:15

Handwritten signature of the Foreman

Foreman of the Grand Jury

FILED

# GRAND JURY REFERRAL



Intentionally and knowingly misrepresenting that money contributed by purchasers would be placed into real estate related investments, said information being a relevant fact;

Intentionally and knowingly misrepresenting that the defendant and All in One Inv & Repairs, LLC had the ability to pay 10% to 15% monthly interest due to purchasers, said information being a relevant fact;

Intentionally and knowingly misrepresenting that money contributed by purchasers would be safe and secure; said information being a relevant fact;

Intentionally and knowingly misrepresenting that money contributed by purchasers would be secured by post-dated checks provided by defendant at the time of investment; said information being a relevant fact;

And the aggregate amount obtained was \$100,000.00 or more,

DEPUTY ~~MD~~  
Against the peace and dignity of the State.  
FELICIA PITRE  
DISTRICT CLERK  
COMENAS CO., TEXAS

2019 DEC 18 AM 10:16

FILED

Foreman of the Grand Jury