Defendant: REYNALDO PERALEZ

JN #:

1680705-1

STATE'S COPY

Address: 343 SPAATZ, SAN ANTONIO, TX 78228

Complainant: Gilberto Ramirez

CoDefendants:

Offense Code/Charge: 269985 - SECUR EXEC DOC BY DECEPT \$20K -

\$100K

GJ: 608272

PH Court:

MAG NO:

Court #: 187 SID #:359104

Cause #:

Witness: State's Attorney

2016-GR 11165

FILED

O'CLOCK_

DEC 0 5 2016 DONNA KAY MEKINNEY

DISTRICT CLERK BEXAR COUNTY, TEXAS

TRUE BILL OF INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS, the Grand Jury of Bexar County, State of Texas, duly organized, empanelled and sworn as such at the November term, A.D., 2016, of the Judicial District Court of said County, in said Court, at said term, do present in and to said Court that in the County and State aforesaid, and anterior to the presentment of this indictment:

on or about the 27th day of May, 2009, through on or about the 14th day of January, 2010, REYNALDO PERALEZ, hereinafter referred to as defendant, with intent to defraud or harm Gilberto Ramirez, by deception, to-wit: by materially misrepresenting an investment opportunity in that the investment company did not exist and failing to inform Gilberto Ramirez that the funds used were for the personal benefit of the defendant and Sophia Palacios and not Gilberto Ramirez, did cause Gilberto Ramirez to sign or execute documents, affecting PECUNIARY INTEREST of Gilberto Ramirez, having an aggregate value of Twenty Thousand Dollars (\$20,000.00) or more but less than One Hundred Thousand Dollars (\$100,000.00), and the documents are checks described as follows:

- 1. Bank of America, Account Number 005860864708, Check No. 1176, dated May 27th, 2009, payable to Visual Netware Design, in the amount of \$9,000.00, and
- 2. Bank of America, Account Number 005860864708, Check No. 1177, dated June 3rd, 2009, payable to Visual Netware Design, in the amount of \$9,000.00, and
- 3. Bank of America, Account Number 005860864708, Check No. 1178, dated June 9th, 2009, payable to Visual Netware Design, in the amount of \$9,000.00, and
- 4. Bank of America, Account Number 005860864708, Check No. 1179, dated June 15th, 2009, payable to Visual Netware Design, in the amount of \$2,000.00, and
- 5. Bank of America, Account Number 005860864708, Check No. 1201, dated January 14th, 2010, payable to Sophia Palacios, in the amount of \$10,000.00,

And all amount were obtained pursuant to one scheme or continuing course of conduct;

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AGAINST THE PEACE AND DIGNITY OF THE STATE.

Foreman of the Grand Jury