

* vnoapp

DEFENDANT Shelley Noel Carter CHARGE Money Laundering >\$300K
Person ID: 1818526, 2018-13938 § 34.02

ADDRESS LKA: 4285 Cedar Bluff Lane, Frisco, Texas 75033 CAUSE# 296-83872-2018

DESCRIPTION W/F; AGENCY# State Securities Board

ARREST INFORMATION GJR Witness: USSS Special Agent

C/C Bobby Eugene Guess: Cause Nos. 296-83755-2016; 296-83756-2016; 296-83757-2016 and 296-83758-2016;
Richard Tilford: Cause Nos. 296-81936-2018; 296-81937-2018; and 296-81938-2018; Phillip Michael Carter

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., 2018 of the 380th

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

SHELLEY NOEL CARTER, hereinafter "defendant"

on or about and between the dates of July 1, 2015 and November 6, 2018, and before the presentment of this indictment, in Collin County, Texas, did then and there

knowingly acquire and maintain an interest in, possess, transfer, conduct, supervise, and facilitate transactions involving the proceeds of criminal activity, to wit: current money of the United States of America, in the aggregated amount of \$300,000 or more; and said proceeds were generated from the commission of the offense of Theft of Property in the aggregated amount of \$300,000 or more, 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 the aggregated amount of \$100,000 or more, a felony under the laws of the State of Texas; and the commission of Misapplication of Fiduciary Property in the aggregated amount of \$300,000 or more, a felony under the laws of the State of Texas; and the commission of offering for sale and selling securities without being a registered dealer and/or agent or registered as an investment advisor or investment advisor representative, authorized to sell securities in the State of Texas, by the Securities Commissioner of the State of Texas, a felony under the laws of the State of Texas; and the commission of offering for sale and selling securities

issued after September 6, 1955, without having said security duly registered or granted a permit by the Securities Commissioner of the State of Texas, a felony under the laws of the State of Texas;

against the peace and dignity of the State.

Charmel Q. Christensen
FOREPERSON OF THE GRAND JURY

FILED

2018 NOV -6 PM 2: 18

LYNNE FINLEY
DISTRICT CLERK
COILIN COUNTY TX
BY: *[Signature]* DEPUTY

**unapp*

DEFENDANT Shelly Noel Carter CHARGE Misapp. of Fid. Property
Person ID: 1818526, 2018-13937 >\$300K § 32.45

ADDRESS LKA: 4285 Cedar Bluff Lane, Frisco, Texas 75033 CAUSE# 296-83871-2018

DESCRIPTION W/F; AGENCY# State Securities Board

ARREST INFORMATION GJR Witness: USSS Special Agent

C/C Bobby Eugene Guess: Cause Nos. 296-83755-2016; 296-83756-2016; 296-83757-2016 and 296-83758-2016;
Richard Tilford: Cause Nos. 296-81936-2018; 296-81937-2018; and 296-81938-2018; Phillip Michael Carter

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., 2018 of the 380th

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

SHELLEY NOEL CARTER, hereinafter "defendant"

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, did then and there, and pursuant to one scheme or continuing course of conduct, intentionally, knowingly, or recklessly misapply property, to wit: United States Currency, from the following owners and in the following amounts:

DATE OF APPROPRIATION	OWNER	AMOUNT OF APPROPRIATION
01/12/16	THOMAS AND HEATHER BUCKLEY LIVING TRUST	\$ 100,000.00
01/13/16	THOMAS D. HALL	\$ 37,500.00
01/13/16	HUGH S. LEE	\$ 48,000.00
01/13/16	HUGH S. LEE	\$ 64,000.00
01/13/16	MARY F. LEE	\$ 163,000.00
01/15/16	MARY F. LEE	\$ 25,000.00
01/20/16	LARRY W. KLOPFENSTEIN	\$ 170,500.00
01/20/16	EILEEN SEYMOUR	\$ 27,000.00
01/26/16	STEVEN FOWLER	\$ 10,500.00
01/29/16	THOMAS BUCKLEY	\$ 100,000.00
02/01/16	DENA OR DENNI MERCER	\$ 12,500.00
02/01/16	RUDY MEYERS	\$ 25,000.00
02/01/16	PATRICIA A. WILSON	\$ 130,000.00
02/16/16	ANGELYN KAY JONES	\$ 50,000.00

02/16/16	JACK G. OR MARIELLE D. PARKER	\$ 50,000.00
02/16/16	ALRIC B. SIMON	\$ 50,000.00
02/18/16	BOUNNIE T. RICH	\$ 100,000.00
02/19/16	GERRY BRADFORD	\$ 152,500.00
02/19/16	RICHARD J. RANSOPHER	\$ 87,000.00
02/22/16	MOON JA MCLEAN	\$ 89,000.00
02/22/16	RONALD J. SMITH	\$ 49,500.00
02/22/16	PATRICIA WILSON	\$ 116,000.00
02/23/16	FRANK K. PALMER	\$ 96,000.00
02/23/16	MARY R. RANSOPHER	\$ 23,000.00
02/23/16	KENNETH G. SCOTT	\$ 50,000.00
02/23/16	DAVID F. WETER	\$ 50,000.00
02/24/16	TERRY BLANKS	\$ 200,000.00
02/24/16	NAOMI KINCER	\$ 104,500.00
02/26/16	RON ANDERSON	\$ 100,000.00
02/26/16	WILLIAM J. BETHEL	\$ 82,500.00
02/26/16	LAWENCE OR VIVIAN DUENOW	\$ 18,000.00
02/26/16	JASON C. FARWELL	\$ 50,000.00
02/26/16	DANA R. KAYS	\$ 43,455.63
02/26/16	BERNADINE OR DURWOOD K. LASSITER	\$ 150,000.00
02/26/16	RED RIVER RUSTIC / DAVID WRIGHT	\$ 700,000.00
02/26/16	WENDY PAMELA RICKS	\$ 50,000.00
03/01/16	RONNIE DUNGAN	\$ 78,000.00
03/01/16	DAVID DURBON	\$ 35,000.00
03/01/16	WALLACE C. SCHMIDT	\$ 100,000.00
03/03/16	LARRY W. KLOPFENSTEIN	\$ 109,500.00
03/11/16	BERNARD & BEVERLY ADAMS	\$ 100,000.00
03/11/16	MARY JANE GRAY	\$ 75,000.00
03/11/16	ELYSE N. GREENSPAN	\$ 50,000.00
03/11/16	MARY CASANDRA MITTEN	\$ 50,000.00
03/11/16	WALTER PADON	\$ 100,000.00
03/11/16	JERRY G. OR JUDITH SHIDAL	\$ 160,000.00
03/11/16	JERRY SHIDAL	\$ 40,000.00
03/11/16	TIM TRAMMELL	\$ 50,000.00
03/14/16	ROYCE DAVID GRAY	\$ 88,500.00
03/15/16	DONALD J. TJERNLUND	\$ 50,000.00
03/16/16	WILLIAM FRANK RAUSCHUBER	\$ 200,500.00
03/17/16	SARAH C. HUGGINS	\$ 50,000.00
03/17/16	WILLIAM S. HUGGINS	\$ 50,000.00
03/17/16	WILLIAM S. HUGGINS	\$ 50,000.00
03/17/16	WILLIAM S. HUGGINS	\$ 50,000.00
03/17/16	AROON KALAKUNJA	\$ 52,500.00
03/18/16	WAYNE EDGERTON	\$ 100,000.00
03/21/16	LAWRENCE DUENOW	\$ 20,000.00
03/21/16	CAROL OR W. DANIEL HOWARD	\$ 50,000.00

03/21/16	DANA R. KAYS	\$ 82,000.00
03/21/16	DONALD LYDIA OR KENNETH L. MAC	\$ 75,000.00
03/21/16	DONALD LYDIA OR KENNETH L. MAC	\$ 25,000.00
03/21/16	MONTGOMERY GRANTOR TRUST MARTHA J AND RYAN DUKE MONTGOMERY TRUSTEES	\$ 50,000.00
03/22/16	ANTHONY RODRIQUEZ	\$ 116,000.00
03/22/16	LOURDES RODRIQUEZ	\$ 69,000.00
03/23/16	TIMOTHY W. MCDONALD	\$ 160,000.00
03/24/16	LEON GAYLOR	\$ 150,000.00
03/29/16	STEVEN JONES	\$ 120,000.00
03/30/16	LENA DOBBS	\$ 85,000.00
03/31/16	SHARON L. THORPE	\$ 44,000.00
03/31/16	SHARON L. THORPE	\$ 71,500.00
04/01/16	DIANE GRAY	\$ 92,000.00
04/01/16	GALE GRAY	\$ 44,500.00
04/01/16	WESLEY A. THORPE	\$ 25,000.00
04/01/16	WESLEY A. THORPE	\$ 45,000.00
04/05/16	LIONEL & JANICE STEYN	\$ 50,000.00
04/05/16	HEATHER HUONG BUI WHITLATCH	\$ 75,000.00
04/06/16	TERRY OR CAROL BAUMANN	\$ 50,000.00
04/06/16	DAVID EDGEWORTH	\$ 50,000.00
04/06/16	ROY G. FOX	\$ 100,000.00
04/06/16	JERRY E. LUCKY	\$ 100,000.00
04/06/16	KEN OR GLORIA MARTIN	\$ 200,000.00
04/06/16	J. P. OR LINDA STILWELL	\$ 100,000.00
04/06/16	CRAIG OR SANDY WILLIAMS	\$ 100,000.00
04/08/16	SHEENA L. SNOW	\$ 75,000.00
04/12/16	JANICE BERARDINELLI	\$ 54,500.00
04/12/16	KEVIN L. HILL	\$ 55,000.00
04/12/16	JOSEPH P. STILWELL	\$ 245,500.00
04/13/16	ROBERT B. BUTLER	\$ 100,000.00
04/13/16	TOM COKER	\$ 50,000.00
04/13/16	EVERETT O. STOKES	\$ 370,680.82
04/14/16	THOMAS M. HOGUE II	\$ 55,000.00
04/20/16	DAVID B. JONES	\$ 69,500.00
04/20/16	DAWN JONES	\$ 17,000.00
04/21/16	A. KEITH HUNDLEY	\$ 15,000.00
04/21/16	DAVID B. JONES	\$ 14,500.00
04/21/16	DAWN M. JONES	\$ 14,000.00
04/21/16	SIDNEY E. RAMSEY	\$ 145,232.09
04/21/16	I. A. OR WILLIAM L. SCOTT	\$ 100,000.00
04/21/16	RAMONA OR LAURA L. MARSH SPONHOWER	\$ 200,000.00

and said Defendant held said property as a fiduciary and as a person acting in a fiduciary capacity, but not as a commercial bailee, and said Defendant misapplied said property by dealing with said property contrary to an agreement under which the property was to be held, to wit: an agreement whereby each of the aforementioned persons' funds would be invested in an investment opportunity and proceeds from said investment opportunity would be distributed to each of the aforementioned persons a profit,

and said Defendant misapplied said property by dealing with said property contrary to the aforementioned agreement, to wit: for the use or benefit of said Defendant by paying Defendant's personal tax lien, in a manner that involved substantial risk of loss to the owners of said property,


and the aggregate value of the property misapplied was \$300,000 or more,

against the peace and dignity of the State.


FOREPERSON OF THE GRAND JURY

FILED

2010 NOV -6 PM 2:18

LYNNE FINLEY
DISTRICT CLERK
COLLIN COUNTY, TX
BY  DEPUTY