

**unapp*

DEFENDANT Richard Gregory Tilford

CHARGE Sale of Unregistered Securities Article 581 Sec. 29B Texas Securities Act

Person ID: 1825051, 2018-13940

ADDRESS LKA: 4024 Woodland Park Blvd., Apt #206, Arlington, Texas 76013-8077

CAUSE# 296-83875-2018

DESCRIPTION W/M; AGENCY# State Securities Board

ARREST INFORMATION GJR Witness: USSS Special Agent

C/C Bobby Eugene Guess; Cause #s 296-83755-2016; 296-83756-2016; 296-83757-2016 and 296-83758-2016; Phillip Michael Carter; Shelley Noel 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 _____

RICHARD GREGORY TILFORD, hereinafter "defendant"

on or about 12/1/2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Stephen Dodge an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWO

on or about 12/23/2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Eileen Seymour an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and

evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT THREE

on or about 12/31/2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Glenda Bradstock an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FOUR

on or about 2/16/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Jerry Shidal an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FIVE

on or about 2/19/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Gerry Bradford an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the

“N40 Investment Program”), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SIX

on or about 2/24/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Terry Blanks an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the “N40 Investment Program”), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SEVEN

on or about 3/1/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale David Durbon an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the “N40 Investment Program”), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT EIGHT

on or about 3/11/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Elyse Greenspan an investment in Texas Cash Cow, LLC, Texas Cash Cow

Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT NINE

on or about 3/11/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Mary Casandra Mitten an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TEN

on or about 3/21/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Carol or Daniel Howard an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT ELEVEN

on or about 3/23/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Timothy McDonald an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWELVE

on or about 4/6/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale J.P. or Linda Stillwell an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT THIRTEEN

on or about 4/13/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Robert Butler an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FOURTEEN

on or about 4/13/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Tom and Mary Coker an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FIFTEEN

on or about 7/1/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Thomas Buie an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SIXTEEN

on or about 10/4/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Patricia Wilson an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955,

without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SEVENTEEN

on or about 11/14/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Zane Wright an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT EIGHTEEN

on or about 12/14/2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale William and Syla Benefield an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT NINETEEN

on or about 1/31/2017, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale James Brace an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and

evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWENTY


on or about 1/31/2017, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale Danna or Robert Lisot an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and evidences of indebtedness; and defendant offered for sale and sold said security issued after September 6, 1955, without having said security being duly registered or granted a permit by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided,

against the peace and dignity of the State.


FOREPERSON OF THE GRAND JURY

FILED

2018 NOV -6 PM 2:18

LYNNE FINLEY
DISTRICT CLERK
COLLIN COUNTY, TX
BY  DEPUTY

*uapp

DEFENDANT Richard Gregory Tilford

CHARGE Securities Fraud >\$100K
Article 581 Sec. 29C Texas
Securities Act

Person ID: 1825051, 2018-13941

ADDRESS LKA: 4024 Woodland Park Blvd., Apt #206, Arlington,
Texas 76013-8077

CAUSE# 296-83873-2018

DESCRIPTION W/M; ARREST INFORMATION GJR AGENCY# State Securities Board

Witness: USSS Special Agent

C/C Bobby Eugene Guess; Cause #s 296-83755-2016; 296-83756-2016; 296-83757-2016 and 296-83758-2016;
Phillip Michael Carter; Shelley Noel 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 _____

RICHARD GREGORY TILFORD; hereinafter "defendant"

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, did then and there, directly and through agents, sell and offer for sale investments in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investments being securities, to wit: notes, investments contracts, and evidences of indebtedness, to each of the persons listed below, and in the following amounts:

DATE OF INVESTMENT	PERSON	AMOUNT OF INVESTMENT
07/16/15	Kathy or Brack Nall	\$ 100,000.00
09/01/15	Linda Adams	\$ 50,000.00
09/03/15	Stephen Dodge and Joyce Lasich	\$ 50,000.00
09/03/15	Robert Jennings	\$ 70,000.00
09/03/15	Jerry Shidal	\$ 240,000.00
09/25/15	Stephen Dodge	\$ 85,000.00
09/25/15	Bradley Plitt	\$ 50,000.00
10/27/15	David Durbon	\$ 50,000.00
10/29/15	Michael Coffey	\$ 600,000.00
12/01/15	Stephen Dodge	\$ 43,576.00

12/15/15	Stephen Dodge and Joyce Lasich	\$ 140,000.00
12/15/15	Stephen Dodge and Joyce Lasich	\$ 10,000.00
12/23/15	Lou or Penny Dinardo	\$ 100,000.00
12/23/15	Eileen Seymour	\$ 23,000.00
12/31/15	Glenda Bradstock	\$ 40,000.00
12/31/15	Glenda Bradstock	\$ 120,000.00
12/31/15	Glenda Bradstock	\$ 340,000.00
01/20/16	Eileen Seymour	\$ 27,000.00
02/16/16	Jerry Shidal	\$ 60,000.00
02/19/16	Gerry Bradford	\$ 152,500.00
02/24/16	Terry Blanks	\$ 200,000.00
03/01/16	David Durbon	\$ 35,000.00
03/11/16	Bernard and Beverly Adams	\$ 100,000.00
03/11/16	Elyse Greenspan	\$ 50,000.00
03/11/16	Mary Casandra Mitten	\$ 50,000.00
03/11/16	Jerry Shidal	\$ 160,000.00
03/11/16	Jerry Shidal	\$ 40,000.00
03/21/16	Carol or Daniel Howard	\$ 50,000.00
03/21/16	Lydia or Kenneth MacDonald	\$ 75,000.00
03/21/16	Lydia or Kenneth MacDonald	\$ 25,000.00
03/23/16	Timothy McDonald	\$ 160,000.00
03/29/16	Steven Jones	\$ 120,000.00
04/06/16	J.P. or Linda Stillwell	\$ 100,000.00
04/08/16	Sheena Snow	\$ 75,000.00
04/12/16	J.P. or Linda Stillwell	\$ 245,500.00
04/13/16	Robert Butler	\$ 100,000.00
04/13/16	Tom and Mary Coker	\$ 50,000.00
05/05/16	J.P. or Linda Stillwell	\$ 40,000.00
05/09/16	Scott Nichols	\$ 50,000.00
07/01/16	Thomas Buie	\$ 200,000.00
07/01/16	David Burns	\$ 56,500.00
07/01/16	Wade or Christina Watson	\$ 60,000.00
07/07/16	Alan Barnett	\$ 118,000.00
07/15/16	Thomas or Connie Von Lone	\$ 50,000.00
08/02/16	Lynette Wallace	\$ 50,000.00
09/27/16	Tom and Mary Coker	\$ 50,000.00
10/04/16	Patricial Wislon	\$ 50,000.00
10/27/16	Stephen Dodge	\$ 22,350.00
11/08/16	Elyse Greenspan	\$ 50,000.00
11/14/16	Zane Wright	\$ 903,448.59
12/14/16	William and Sylia Benefield	\$ 50,000.00
01/31/17	James Brace	\$ 52,000.00
01/31/17	Robert Butler	\$ 100,500.00
01/31/17	Danna or Robert Lisot	\$ 26,134.00
01/31/17	Jerry Shidal	\$ 137,096.16

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 on or about October 26, 2012, the defendant pleaded guilty in the United States District Court for the Northern District of Texas, Fort Worth Division, in Case Number 4:12-CR-058-BJ(01) to one count of Failure to File Tax Return in violation of 26 U.S.C. 7203 and was sentenced to twelve (12) months confinement in federal prison; said information being material fact; and

PARAGRAPH TWO

intentionally failing to disclose that on or about February 1, 2016, Bobby Eugene Guess, defendant's employer, was served with a target letter from the United States Attorney's Office for the Eastern District of Texas informing Bobby Eugene Guess he was the subject of a federal investigation being conducted by the United States Secret Service for alleged violations of 18 U.S.C. Section 1956 (money laundering), 18 U.S.C. Section 1341 (mail fraud), 18 U.S.C. Section 1014 (loan fraud), and 18 U.S.C. 1348 (securities fraud); said information being material fact; and

PARAGRAPH THREE


intentionally failing to disclose that for the period from July 1, 2011, through the present, that neither the defendant nor his employer Bobby Eugene Guess were registered as a dealer or agent authorized to sell securities in the State of Texas, nor as an investment adviser or investment adviser representative, by the Securities Commissioner for the State of Texas; said information being material fact;

And all of said amounts were obtained pursuant to 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

2018 NOV -6 PM 2: 18

LYNNE FINLEY
DISTRICT CLERK
COLLIN COUNTY, TX
BY  DEPUTY


FOREPERSON OF THE GRAND JURY

#unapp

DEFENDANT Richard Gregory Tilford

CHARGE Sale of Securities by Unregistered Agent or Dealer Article 581 Sec. 29A Texas Securities Act

Person ID: 1825051, 2018-13939

ADDRESS LKA: 4024 Woodland Park Blvd., Apt #206, Arlington, Texas 76013-8077

CAUSE# 296-83874-2018

DESCRIPTION W/M; AGENCY/# State Securities Board

ARREST INFORMATION GJR Witness: USSS Special Agent

C/C Bobby Eugene Guess; Cause #s 296-83755-2016; 296-83756-2016; 296-83757-2016 and 296-83758-2016; Phillip Michael Carter; Shelley Noel 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 _____

RICHARD GREGORY TILFORD, hereinafter "defendant"

on or about December 1, 2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Stephen Dodge an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWO

on or about December 23, 2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Eileen Seymour an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment

contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT THREE

on or about December 31, 2015, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Glenda Bradstock an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FOUR

on or about February 16, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Jerry Shidal an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FIVE

on or about February 19, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Gerry Bradford an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment

contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SIX

on or about February 24, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Terry Blanks an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SEVEN

on or about March 1, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to David Durbon an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT EIGHT

on or about March 11, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Elyse Greenspan an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an

evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT NINE

on or about March 11, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Mary Casandra Mitten an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TEN

on or about March 21, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Carol or Daniel Howard an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT ELEVEN

on or about March 23, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Timothy McDonald an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment

contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWELVE

on or about April 6, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to J.P. or Linda Stillwell an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT THIRTEEN

on or about April 13, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Robert Butler an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FOURTEEN

on or about April 13, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Tom and Mary Coker an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment

contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT FIFTEEN

on or about July 1, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Thomas Buie an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SIXTEEN

on or about October 4, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Patricia Wilson an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT SEVENTEEN

on or about November 14, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Zane Wright an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an

evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT EIGHTEEN

on or about December 14, 2016, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to William and Syla Benefield an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT NINETEEN

on or about January 31, 2017, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to James Brace an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided; and

COUNT TWENTY

on or about January 31, 2017, and before the presentment of this indictment, in Collin County, Texas, did then and there, knowingly sell and offer for sale to Danna or Robert Lisot an investment in Texas Cash Cow, LLC, Texas Cash Cow Investments, LLC, North Forty Development, LLC, North Forty Development Capital Account (hereafter the "N40 Investment Program"), said investment being a security, to wit: a note, an investment

contract, and an evidence of indebtedness, and defendant offered for sale and sold said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of Texas, as in The Securities Act of the State of Texas provided;

against the peace and dignity of the State.

Charmel B. Christensen
FOREPERSON OF THE GRAND JURY

FILED

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