

THE STATE OF TEXAS  
VS.  
DANIEL CHRISTOPHER WALSH  
12335 KINGSRIDE LANE  
HOUSTON, TX 77024

SPN: 03907990  
DATE PREPARED: 7/15/2019

D.A. LOG NUMBER: 2552107  
CJIS TRACKING NO.:  
BY: SD DA NO: 2498093  
AGENCY: DAO  
O/R NO: 1938098CF  
ARREST DATE: TO BE

NCIC CODE: 2300 78

RELATED CASES:

FELONY CHARGE: THEFT - AGGREGATE

CAUSE NO: 1639145  
HARRIS COUNTY DISTRICT COURT NO: 232  
FIRST SETTING DATE:

BAIL: TO BE SET AT MAGISTRATION  
PRIOR CAUSE NO:  
CHARGE SEQ NUM:

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

The duly organized Grand Jury of Harris County, Texas, presents in the District Court of Harris County, Texas, that in Harris County, Texas, DANIEL CHRISTOPHER WALSH, hereafter styled the Defendant, heretofore on or about the dates listed below, 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>Date of Appropriation</u>	<u>Owner</u>	<u>Amount Appropriated</u>
July 25, 2013	Paul Mueller	\$10,738.00
September 17, 2013	William Miller and/or Charles Turner	\$7,243.03
September 27, 2013	William Miller and/or Charles Turner	\$6,887.07
November 12, 2013	William Miller and/or Charles Turner	\$28,260.06
March 31, 2014	Stefan Konasiewicz	\$57,405.00
April 1, 2014	Stefan Konasiewicz	\$75,500.00
June 2, 2014	Stefan Konasiewicz	\$51,500.00 and/ or
August 4, 2014	Paul Mueller	\$3,470.00

**FILED**  
Marilyn Burgess  
District Clerk  
JUL 17 2019  
Time: 12:20  
By: [Signature]  
Deputy  
Harris County, Texas

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/or

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/or

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 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

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Document Number: 2015206

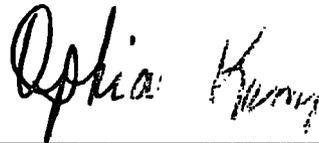
1639145/232

in a manner that made recovery of said property by said owners unlikely; and all of said amounts were obtained pursuant to one scheme and continuing course of conduct, and the aggregate value of the property so appropriated was \$200,000.00 or more.

Certified Document Number: 86215260 - Page 2 of 2

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Asst. Foreman



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FOREMAN OF THE GRAND JURY

INDICTMENT



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this August 23, 2019

Certified Document Number: 86215260 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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THE STATE OF TEXAS  
VS.  
DANIEL CHRISTOPHER WALSH  
12335 KINGSRIDE LANE  
HOUSTON, TX 77024

SPN: 03907990  
DATE PREPARED: 7/12/2019

D.A. LOG NUMBER: 2552107  
CJIS TRACKING NO.:  
BY: SD DA NO: 2498093  
AGENCY: DAO  
O/R NO: 1938098CF  
ARREST DATE: TO BE

NCIC CODE: 2699 06

RELATED CASES: TWO OTHER FELONIES

FELONY CHARGE: SECURITIES FRAUD

CAUSE NO: 1639143  
HARRIS COUNTY DISTRICT COURT NO: 232  
FIRST SETTING DATE:

BAIL: TO BE SET AT MAGISTRATION  
PRIOR CAUSE NO:  
CHARGE SEQ NUM:

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

The duly organized Grand Jury of Harris County, Texas, presents in the District Court of Harris County, Texas, that in Harris County, Texas, **DANIEL CHRISTOPHER WALSH**, hereafter styled the Defendant, heretofore on or about the dates listed below, did then and there unlawfully, directly and through agents, sell and offer for sale interests in the Sun Fee #1 well, the Sun Fee #2 well, the Borroum #1 well, the Garza #2 well, and the Salinas #2 well, all of which being securities, to wit: interests in or under an oil, gas, or mining lease, fee or title, and investment contracts, to each of the persons listed below, and in the following amounts:

Date	Person	Amount	Well
December 13, 2007	Jere Lowe	\$11,900.00	Sun Fee #1
December 18, 2007	Marcus Mickan & Gordon Mickan	\$23,800.00	Sun Fee #1
December 31, 2007	Hans Deller & Ruth Deller	\$11,900.00	Sun Fee #1
April 10, 2008	Gary Pugh	\$42,460.00	Sun Fee #1
April 10, 2008	Gary Pugh	\$39,500.00	Sun Fee #2
April 21, 2008	Robert Remington	\$84,920.00	Sun Fee #1
April 21, 2008	Robert Remington	\$79,000.00	Sun Fee #2
June 27, 2008	Craig Nicolopulos	\$21,230.00	Sun Fee #1
June 27, 2008	Craig Nicolopulos	\$19,750.00	Sun Fee #2
March 26, 2009	Lars Gravaas	\$25,625.00	Sun Fee #1
March 26, 2009	Lars Gravaas	\$22,800.00	Sun Fee #2
July 19, 2013	Paul Mueller	\$10,738.00	Borroum #1
November 5, 2013	William Miller & Charles Turner	\$28,260.06	Garza #2
March 22, 2014	Stefan Konasiewicz	\$65,500.00	Salinas #2
March 27, 2014	Stefan Konasiewicz	\$57,405.00	Borroum #1
May 28, 2014	Stefan Konasiewicz	\$39,500.00	Salinas #2
August 4, 2014	Paul Mueller	\$3,470.00	Salinas #2

**FILED**  
Marilyn Burgess  
District Clerk  
JUL 17 2019  
Time: \_\_\_\_\_  
By: \_\_\_\_\_  
Deputy

and said Defendant committed fraud in connection with the sales and offers for sale of said securities by:

- intentionally and knowingly representing funds invested by investors in the Sun Fee #1 well would be used for the purpose of acquiring and drilling the Sun Fee #1 well, said information being a misrepresentation of a relevant fact; and/or
- intentionally and knowingly representing funds invested by investors in the Sun Fee #2 well would be used for the purpose of acquiring and drilling the Sun Fee #2 well, said information being a misrepresentation of a relevant fact; and/or
- intentionally and knowingly representing funds invested by investors in the Borroum #1 well would be used for the purpose of acquiring and drilling the Borroum #1 well, said information being a misrepresentation of a relevant fact; and/or
- intentionally and knowingly representing funds invested by investors in the Garza #2 well would be used for the purpose of acquiring and drilling the Garza #2 well, said information being a misrepresentation of a relevant fact; and/or
- intentionally and knowingly representing funds invested by investors in the Salinas #2 well would be used for the purpose of acquiring, drilling, and reworking the Salinas #2 well, said information being a misrepresentation of a relevant fact; and/or
- intentionally and knowingly representing investors' funds would be used for the purpose of acquiring, drilling, and reworking oil and gas wells, said information being a misrepresentation of a relevant fact; and/or
- intentionally failing to disclose previous investors' funds were used for purposes other than the expenses of the particular wells in which the investors had invested, said information being a material fact; and/or
- intentionally failing to disclose previous investors' funds were used to pay the personal expenses of the Defendant, said information being a material fact; and/or

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- intentionally failing to disclose previous investors' funds were used to pay expenses for wells in which those investors did not own an interest, said information being a material fact; and/or
- intentionally failing to disclose Defendant was charged by indictment in Wichita County, Texas, with the crime of Securing Execution of a Document by Deception in Cause Number 53173-A on or about April 3, 2013, a first-degree felony, said information being a material fact; and/or
- intentionally failing to disclose Defendant was charged by indictment in Wichita County, Texas, with the crime of Money Laundering in Cause Number 53174-A on or about April 3, 2013, a first-degree felony, said information being a material fact; and/or
- intentionally failing to disclose Defendant was charged by indictment in Wichita County, Texas, with the crime of Theft in Cause Number 53175-A on or about April 3, 2013, a first-degree felony, said information being a material fact; and/or
- intentionally failing to disclose Defendant was arrested on or about May 29, 2013, on criminal charges of Securing Execution of a Document by Deception, Money Laundering, and Theft and was on bond awaiting trial for such charges from on or about June 24, 2013, through at least February 12, 2019, said information being a material fact; and

all of said amounts were obtained pursuant to one scheme and continuing course of conduct, and the aggregate amount that was obtained was \$100,000.00 or more.

Certified Document Number: 86215259 - Page 2 of 2

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Asst. Foreman

174th

  
FOREMAN OF THE GRAND JURY

INDICTMENT



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this August 23, 2019

Certified Document Number: 86215259 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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THE STATE OF TEXAS  
VS.  
DANIEL CHRISTOPHER WALSH  
12335 KINGSRIDE LANE  
HOUSTON, TX 77024

SPN: 03MA7990  
DATE PREPARED: 7/12/2019

D.A. LOG NUMBER: 2552107  
CJIS TRACKING NO.:  
BY: SD DA NO: 2498093  
AGENCY: DAO  
O/R NO: 1938098CF  
ARREST DATE: TO BE

NCIC CODE: 2620 10 F1

RELATED CASES: TWO OTHER FEL.

FELONY CHARGE: Money Laundering

CAUSE NO: 1639142  
HARRIS COUNTY DISTRICT COURT NO: 232  
FIRST SETTING DATE:

BAIL: TO BE SET AT MAGISTRATION  
PRIOR CAUSE NO:  
CHARGE SEQ NUM:

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

The duly organized Grand Jury of Harris County, Texas, presents in the District Court of Harris County, Texas, that in Harris County, Texas, DANIEL CHRISTOPHER WALSH, hereafter styled the Defendant, heretofore on or about various dates between July 25, 2013 and September 30, 2014, did then and there unlawfully, knowingly pursuant to one scheme and continuing course of conduct, acquire, maintain an interest in, possess, and transfer the proceeds of criminal activity, to wit: current money of the United States of America, in the aggregated amount of \$200,000.00 or more; and said proceeds were generated from the commission of the offense of Aggregate Theft of property in the amount of \$200,000.00 or more, a felony under the laws of the State of Texas, and/or the commission of the offense of Securities Fraud in the amount of \$100,000.00 or more, a felony under the laws of the State of Texas.

**FILED**  
Marilyn Burgess  
District Clerk

JUL 17 2019

Time: \_\_\_\_\_  
Harris County, Texas  
By: \_\_\_\_\_  
Deputy

Certified Document Number: 86215224 - Page 1 of 1

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

Asst. Foreman

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*Opelia Kemp*  
FOREMAN OF THE GRAND JURY

**INDICTMENT**



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this August 23, 2019

Certified Document Number: 86215224 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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