

APR-07-2008 15:12 From: DIST CLERK

2549335199

To: 5123258310

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

THE GRAND JURY, for the County of Bell, State of Texas, duly selected, empaneled, sworn, charged, and organized as such at the April Term, A.D. 2008 of the 27th Judicial District Court for said County, upon their oaths present in and to said court at said term that

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**GEORGE NEIL ELLIOTT**

hereinafter styled Defendant, between on or about the 4th day of April A.D. 2005, and on the 12th day of December, 2005, and before the presentment of this Indictment, in the County and State aforesaid

**PARAGRAPH ONE**

did then and there intentionally and knowingly acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH TWO**

did then and there intentionally and knowingly on or about April 7, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Management Group, LLC; and

**PARAGRAPH THREE**

did then and there intentionally and knowingly on or about April 8, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH FOUR**

did then and there intentionally and knowingly on or about April 12, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Management Group, LLC; and

**PARAGRAPH FIVE**

did then and there intentionally and knowingly on or about April 15, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Leland Patin; and



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**PARAGRAPH SIX**

did then and there intentionally and knowingly on or about April 20, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to LaCoco Enterprises; and

**PARAGRAPH SEVEN**

did then and there intentionally and knowingly on or about April 20, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH EIGHT**

did then and there intentionally and knowingly on or about April 25, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Management Group, LLC; and

**PARAGRAPH NINE**

did then and there intentionally and knowingly on or about May 5, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Leland Patin; and

**PARAGRAPH TEN**

did then and there intentionally and knowingly on or about May 10, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH ELEVEN**

did then and there intentionally and knowingly on or about May 12, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Management Group, LLC; and

**PARAGRAPH TWELVE**

did then and there intentionally and knowingly on or about May 18, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Frank Harrison; and

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**PARAGRAPH THIRTEEN**

did then and there intentionally and knowingly on or about May 27, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH FOURTEEN**

did then and there intentionally and knowingly on or about May 31, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH FIFTEEN**

did then and there intentionally and knowingly on or about June 4, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Leland Patin; and

**PARAGRAPH SIXTEEN**

did then and there intentionally and knowingly on or about June 6, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH SEVENTEEN**

did then and there intentionally and knowingly on or about June 9 and 10, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH EIGHTEEN**

did then and there intentionally and knowingly on or about June 11, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Frank Harrison; and

**PARAGRAPH NINETEEN**

did then and there intentionally and knowingly on or about June 11, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Retirement Protection Group; and

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**PARAGRAPH TWENTY**

did then and there intentionally and knowingly on or about October 11, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH TWENTY-ONE**

did then and there intentionally and knowingly on or about October 14, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH TWENTY-TWO**

did then and there intentionally and knowingly on or about October 17, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH TWENTY-THREE**

did then and there intentionally and knowingly on or about October 18, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH TWENTY-FOUR**

did then and there intentionally and knowingly on or about October 19, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Frank Harrison; and

**PARAGRAPH TWENTY-FIVE**

did then and there intentionally and knowingly on or about October 21, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

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**PARAGRAPH TWENTY-SIX**

did then and there intentionally and knowingly on or about October 31, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH TWENTY-SEVEN**

did then and there intentionally and knowingly on or about November 1, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH TWENTY-EIGHT**

did then and there intentionally and knowingly on or about November 4, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Leland Patin; and

**PARAGRAPH TWENTY-NINE**

did then and there intentionally and knowingly on or about November 10, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

**PARAGRAPH THIRTY**

did then and there intentionally and knowingly on or about November 14, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH THIRTY-ONE**

did then and there intentionally and knowingly on or about November 14, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Frank Harrison; and

**PARAGRAPH THIRTY-TWO**

did then and there intentionally and knowingly on or about December 5, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by depositing the proceeds into First Texas Bank account number 1202860; and

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**PARAGRAPH THIRTY-THREE**

did then and there intentionally and knowingly on or about December 6, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing the proceeds to be transferred to TMT Equipment, LLC; and

**PARAGRAPH THIRTY-FOUR**

did then and there intentionally and knowingly on or about December 7, 2005, acquire, maintain an interest in, receive, possess, and transfer the proceeds of criminal activity, to wit: Sale of Unregistered Securities; and said Defendant did conduct, supervise, or facilitate a transaction involving the proceeds of said criminal activity; and said Defendant did invest, expend, or receive, or offer to invest, expend or receive, the proceeds of said criminal activity, by causing a check to be written to Frank Harrison;

And it is further presented that the proceeds of criminal activity were related to one scheme or continuing course of conduct, and the value thereof was \$200,000 or more;

against the peace and dignity of the State.

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District Attorney 27th Judicial District of Texas  
Foreman of the Grand Jury