

DEFENDANT CHARLES SCOTT GOIST CHARGE THEFT, TPC 31.03 (a) & (e)(7) - F1

ADDRESS 2104 Winding Hollow Lane, Plano, Texas 75093 CAUSE# 429-81367-09

DESCRIPTION W/M/508/200/BRO/BRO/ 01/06/1951 / TX07587584 AGENCY/# GJR

ARREST INFORMATION N/A

C/C \_\_\_\_\_ Witness: Jeff Warsing

**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 JANUARY Term, A.D., 2009 of the 401st District Court of said county, in said court at said term, do present that \_\_\_\_\_

**CHARLES SCOTT GOIST, hereinafter "defendant,"**

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, and elsewhere, 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>Owner</u>	<u>Date of Appropriation</u>	<u>Amount of Appropriation</u>
Sylvia H. Herring	January 14, 2002	\$3,725.00
Sylvia H. Herring	January 22, 2002	\$3,725.00
Edward and Patricia Lord	January 23, 2002	\$9,800.00
Edward and Patricia Lord	January 25, 2002	\$8,500.00
Edward and Patricia Lord	February 1, 2002	\$5,500.00
Edward and Patricia Lord	February 4, 2002	\$5,500.00

Edward and Patricia Lord	February 5, 2002	\$5,800.00
Edward and Patricia Lord	February 11, 2002	\$4,500.00
Edward and Patricia Lord	February 13, 2002	\$7,100.00
Edward and Patricia Lord	February 19, 2002	\$7,500.00
Edward and Patricia Lord	February 20, 2002	\$7,000.00
Edward and Patricia Lord	February 25, 2002	\$6,000.00
Edward and Patricia Lord	February 28, 2002	\$7,000.00
Edward and Patricia Lord	March 5, 2002	\$7,500.00
Edward and Patricia Lord	March 12, 2002	\$6,500.00
Edward and Patricia Lord	March 14, 2002	\$5,200.00
Edward and Patricia Lord	March 21, 2002	\$6,000.00
Edward and Patricia Lord	March 27, 2002	\$6,500.00
Edward and Patricia Lord	April 2, 2002	\$6,500.00
Edward and Patricia Lord	April 5, 2002	\$7,700.00
Edward and Patricia Lord	April 26, 2002	\$12,000.00
Edward and Patricia Lord	April 30, 2002	\$12,000.00
Edward and Patricia Lord	May 7, 2002	\$6,600.00
Sylvia Herring	May 20, 2002	\$5,040.00
Edward and Patricia Lord	May 24, 2002	\$5,500.00
Edward and Patricia Lord	June 4, 2002	\$3,000.00
Sylvia Herring	June 17, 2002	\$4,500.00
Sylvia Herring	June 24, 2002	\$4,500.00
Sylvia Herring	July 8, 2002	\$5,035.00

Sylvia Herring	July 11, 2002	\$5,035.00
Sylvia Herring	July 17, 2002	\$7,200.00
Sylvia Herring	July 22, 2002	\$5,010.00
Sylvia Herring	July 29, 2002	\$7,500.00
Sylvia Herring	August 8, 2002	\$1,000.00
Sylvia Herring	August 8, 2002	\$4,500.00
William Brantman	August 23, 2002	\$7,000.00
Edward and Patricia Lord	August 28, 2002	\$9,000.00
Edward and Patricia Lord	September 3, 2002	\$9,000.00
Edward and Patricia Lord	September 6, 2002	\$6,000.00
Sylvia Herring	September 26, 2002	\$5,400.00
Sylvia Herring	October 2, 2002	\$5,600.00
Sylvia Herring	October 9, 2002	\$5,600.00
Sylvia Herring	October 21, 2002	\$5,600.00
Sylvia Herring	October 25, 2002	\$5,500.00
Sylvia Herring	October 31, 2002	\$5,200.00
Sylvia Herring	November 6, 2002	\$5,600.00
Sylvia Herring	November 12, 2002	\$5,600.00
Sylvia Herring	November 21, 2002	\$5,600.00
Sylvia Herring	November 29, 2002	\$5,600.00
Edward and Patricia Lord	December 11, 2002	\$8,700.00
Sylvia Herring	December 17, 2002	\$4,700.00

Sylvia Herring	January 10, 2003	\$5,000.00
Sylvia Herring	January 24, 2003	\$5,537.00
Sylvia Herring	January 29, 2003	\$5,537.00
Sylvia Herring	February 5, 2003	\$2,500.00
Sylvia Herring	February 18, 2003	\$6,800.00
William Brantman	February 18, 2003	\$1,600.00
Hollis and Nancy Walker	February 24, 2003	\$10,500.00
Hollis and Nancy Walker	March 3, 2003	\$8,250.00
Sylvia Herring	March 19, 2003	\$6,800.00
Hollis and Nancy Walker	March 25, 2003	\$4,250.00
William Brantman	April 7, 2003	\$5,300.00
Edward and Patricia Lord	April 18, 2003	\$6,000.00
Sylvia Herring	April 29, 2003	\$5,025.00
Sylvia Herring	May 7, 2003	\$5,025.00
Sylvia Herring	May 12, 2003	\$5,025.00
Sylvia Herring	May 20, 2003	\$5,025.00
Sylvia Herring	June 3, 2003	\$5,025.00
Sylvia Herring	June 10, 2003	\$5,025.00
Sylvia Herring	June 17, 2003	\$5,000.00
Sylvia Herring	June 23, 2003	\$5,000.00
Sylvia Herring	June 25, 2003	\$5,010.00
William Brantman	June 30, 2003	\$4,300.00
Sylvia Herring	July 10, 2003	\$5,025.00

Sylvia Herring	July 21, 2003	\$5,025.00
Sylvia Herring	July 28, 2003	\$5,025.00
Sylvia Herring	August 5, 2003	\$4,750.00
Sylvia Herring	August 11, 2003	\$4,750.00
Hollis and Nancy Walker	August 12, 2003	\$7,000.00
Sylvia Herring	August 20, 2003	\$5,025.00
Sylvia Herring	September 5, 2003	\$5,130.00
Sylvia Herring	September 12, 2003	\$5,130.00
Sylvia Herring	September 24, 2003	\$5,130.00
Sylvia Herring	October 2, 2003	\$5,130.00
Sylvia Herring	October 7, 2003	\$5,130.00
Sylvia Herring	October 22, 2003	\$11,003.00
Sylvia Herring	October 29, 2003	\$11,003.00
Sylvia Herring	November 5, 2003	\$11,003.00
Sylvia Herring	November 18, 2003	\$11,000.00
Sylvia Herring	December 3, 2003	\$11,000.00
Sylvia Herring	December 12, 2003	\$11,000.00
Sylvia Herring	December 19, 2003	\$11,000.00
Sylvia Herring	December 31, 2003	\$11,000.00
Sylvia Herring	January 9, 2004	\$9,000.00
Sylvia Herring	January 20, 2004	\$9,000.00
Sylvia Herring	January 26, 2004	\$9,000.00

Sylvia Herring	February 4, 2004	\$7,700.00
Sylvia Herring	February 11, 2004	\$7,700.00
Sylvia Herring	February 19, 2004	\$7,700.00
Sylvia Herring	March 1, 2004	\$7,700.00
Sylvia Herring	March 11, 2004	\$5,000.00
Sylvia Herring	April 1, 2004	\$5,000.00
William Brantman	April 2, 2004	\$2,000.00
Sylvia Herring	May 6, 2004	\$5,300.00
Sylvia Herring	June 4, 2004	\$2,200.00
Edward and Patricia Lord	June 14, 2004	\$11,600.00
Sylvia Herring	June 21, 2004	\$4,000.00
Sylvia Herring	June 21, 2004	\$5,000.00
William Brantman	June 21, 2004	\$905.00
William Brantman	June 23, 2004	\$5,100.00
William Brantman	July 7, 2004	\$4,800.00
William Brantman	July 21, 2004	\$4,500.00
William Brantman	August 2, 2004	\$3,750.00
Centre of Physical Rehabilitation, Inc.	September 2, 2004	\$27,000.00
Centre of Physical Rehabilitation, Inc.	October 14, 2004	\$13,500.00
William Brantman	February 16, 2005	\$4,800.00
Centre of Physical Rehabilitation, Inc.	March 9, 2005	\$28,000.00

Centre of Physical Rehabilitation, Inc.	April 5, 2005	\$28,000.00
Centre of Physical Rehabilitation, Inc.	May 12, 2005	\$1,700.00
William Brantman	May 12, 2005	\$3,500.00
Edward and Patricia Lord	May 27, 2005	\$14,000.00
William Hudson	July 20, 2005	\$25,000.00
Sylvia Herring	August 3, 2005	\$855.00
William Brantman	August 3, 2005	\$2,450.00
William Brantman	August 22, 2005	\$4,300.00
Sylvia Herring	August 29, 2005	\$4,600.00
Hollis and Nancy Walker	September 8, 2005	\$5,500.00
Hollis and Nancy Walker	September 15, 2005	\$5,200.00
Sylvia Herring	September 30, 2005	\$1,000.00
Sylvia Herring	September 30, 2005	\$2,500.00
William Brantman	September 30, 2005	\$3,650.00
William Brantman	October 13, 2005	\$2,650.00
William Hudson	October 13, 2005	\$2,600.00
Hollis and Nancy Walker	October 17, 2005	\$6,125.00
Centre of Physical Rehabilitation, Inc.	October 28, 2005	\$22,000.00
Sylvia Herring	November 2, 2005	\$4,800.00
Centre of Physical Rehabilitation, Inc.	November 17, 2005	\$5,000.00
William Brantman	November 23, 2005	\$15,000.00

William Brantman	December 7, 2005	\$1,000.00
William Brantman	December 7, 2005	\$14,000.00
William Brantman	December 20, 2005	\$12,000.00
William Brantman	January 11, 2006	\$15,250.00
William Brantman	January 26, 2006	\$15,250.00
William Brantman	February 10, 2006	\$15,250.00
William Brantman	February 22, 2006	\$15,250.00
William Brantman	March 2, 2006	\$6,000.00
Edward and Patricia Lord	March 14, 2006	\$9,000.00
William Brantman	March 22, 2006	\$8,700.00
William Brantman	March 23, 2006	\$6,125.00
William Brantman	March 31, 2006	\$6,250.00
William Brantman	March 31, 2006	\$2,400.00
William Brantman	April 13, 2006	\$9,000.00
Sylvia Herring	April 21, 2006	\$2,600.00
William Brantman	May 1, 2006	\$4,200.00
William Brantman	May 4, 2006	\$1,725.00
William Brantman	May 8, 2006	\$8,000.00
Sylvia Herring	May 15, 2006	\$4,512.00
William Brantman	May 17, 2006	\$2,750.00
William Brantman	May 30, 2006	\$5,700.00
Sylvia Herring	June 7, 2006	\$5,500.00

William Brantman	June 7, 2006	\$1,450.00
Centre of Physical Rehabilitation, Inc.	June 16, 2006	\$17,000.00
Centre of Physical Rehabilitation, Inc.	June 23, 2006	\$12,500.00
William Brantman	July 5, 2006	\$7,200.00
William Brantman	July 18, 2006	\$6,300.00
Sylvia Herring	July 27, 2006	\$5,010.00
Centre of Physical Rehabilitation, Inc.	August 14, 2006	\$8,800.00
William Brantman	August 16, 2006	\$4,200.00
Centre of Physical Rehabilitation, Inc.	August 22, 2006	\$8,800.00
Sylvia Herring	August 28, 2006	\$5,100.00
Sylvia Herring	September 6, 2006	\$5,100.00
Centre of Physical Rehabilitation, Inc.	September 8, 2006	\$4,800.00
Sylvia Herring	September 19, 2006	\$5,100.00
William Brantman	September 28, 2006	\$2,650.00
Centre of Physical Rehabilitation, Inc.	October 10, 2006	\$4,800.00
William Brantman	October 10, 2006	\$2,650.00
William Brantman	October 17, 2006	\$4,000.00
Centre of Physical Rehabilitation, Inc.	October 18, 2006	\$4,800.00
William Brantman	October 25, 2006	\$4,000.00

Centre of Physical Rehabilitation, Inc.	November 3, 2006	\$17,000.00
William Brantman	November 6, 2006	\$1,500.00
William Brantman	November 20, 2006	\$4,500.00
William Brantman	November 29, 2006	\$4,500.00
William Brantman	December 6, 2006	\$3,100.00
William Brantman	December 11, 2006	\$3,100.00
William Brantman	December 18, 2006	\$3,100.00
William Brantman	December 18, 2006	\$1,200.00
Edward and Patricia Lord	December 19, 2006	\$12,100.00
William Brantman	January 5, 2007	\$2,100.00
William Brantman	January 11, 2007	\$6,200.00
William Brantman	January 17, 2007	\$6,250.00
Centre of Physical Rehabilitation, Inc.	January 23, 2007	\$2,000.00
William Brantman	January 24, 2007	\$5,000.00
William Brantman	February 1, 2007	\$2,500.00
William Brantman	February 9, 2007	\$4,650.00
William Brantman	February 21, 2007	\$22,000.00
William Brantman	March 8, 2007	\$17,000.00
William Brantman	April 2, 2007	\$5,000.00
William Brantman	April 20, 2007	\$5,250.00
William Brantman	April 27, 2007	\$5,000.00
William Brantman	May 7, 2007	\$11,250.00

Sylvia Herring	May 21, 2007	\$3,300.00
William Brantman	May 24, 2007	\$875.00
Centre of Physical Rehabilitation, Inc.	May 30, 2007	\$7,100.00
William Brantman	June 19, 2007	\$9,200.00
Hollis and Nancy Walker	June 29, 2007	\$12,100.00
Hollis and Nancy Walker	July 11, 2007	\$5,800.00
William Brantman	July 23, 2007	\$5,200.00
William Brantman	July 30, 2007	\$5,250.00
Gordon and Leslie Roy	August 13, 2007	\$21,250.00
Gordon and Leslie Roy	August 31, 2007	\$21,250.00
Gordon and Leslie Roy	September 17, 2007	\$21,250.00
Gordon and Leslie Roy	October 2, 2007	\$21,250.00
Gordon and Leslie Roy	October 25, 2007	\$18,000.00
Gordon and Leslie Roy	November 2, 2007	\$18,000.00
Gordon and Leslie Roy	November 9, 2007	\$20,000.00
Gordon and Leslie Roy	November 21, 2007	\$20,000.00
Gordon and Leslie Roy	November 28, 2007	\$40,000.00
Gordon and Leslie Roy	December 10, 2007	\$16,500.00
Gordon and Leslie Roy	February 6, 2008	\$20,000.00
Gordon and Leslie Roy	February 29, 2008	\$20,000.00
Gordon and Leslie Roy	March 27, 2008	\$20,000.00
William Brantman	April 25, 2008	\$5,600.00

Gordon and Leslie Roy	May 6, 2008	\$9,000.00
William Brantman	November 13, 2008	\$2,200.00
William Brantman	November 13, 2008	\$1,800.00
William Brantman	March 19, 2009	\$540.00

and said appropriations were without the effective consent of said owners in that consent was induced by deception, to wit:

- a) 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 defendant did not believe to be true; and
- b) defendant failed to correct a false impressions of fact that were likely to affect the judgment of said owners in the transactions, that defendant previously created and confirmed by words and conduct, and that defendant did not at the time believe to be true; and
- c) defendant promised performance that affected the judgment of said owners in said transactions that defendant did not intend to perform and knew would not be performed;

and defendant acted with the 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 in a manner that makes recovery of said property to said owners unlikely;

and all of said amounts were obtained, as alleged, as part of one scheme and continuing course of conduct, and the aggregate value of the property so appropriated was \$200,000.00 or more;

and the Grand Jury further presents to said court that defendant, on or about September 2, 1982, was convicted and sentenced to four years confinement for violating Title 18, United States Code, Section 1341, to wit: Mail Fraud, in the United States District Court for the Northern District of Texas, in Case Number CR3-81-280-R, styled *United States of America v. Charles Scott Goist*;

Against the peace and dignity of the State.

*Robert Faircloth*

---

FOREMAN OF THE GRAND JURY

**FILED**  
09 JUN 18 PM 12:39

HANNAH KINKLE  
DISTRICT CLERK  
*[Handwritten signature]*

DEFENDANT CHARLES SCOTT GOIST CHARGE MONEY LAUNDERING, TPC 34.02 (a)(1) and (c)(4) - F1  
ADDRESS 2104 Winding Hollow Lane, Plano, Texas 75093 CAUSE# 429-81369-09  
DESCRIPTION W/M/508/200/BRO/BRO/ 01/06/1951 / TX07587584 AGENCY/# GJR  
ARREST INFORMATION N/A  
C/C \_\_\_\_\_ Witness: Jeff Warsing

**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 JANUARY Term, A.D., 2009 of the 401st District Court of said county, in said court at said term, do present that \_\_\_\_\_

**CHARLES SCOTT GOIST, hereinafter "defendant,"**

on or about and between the dates of September 1, 2005, and June 18, 2009, and before the presentment of this indictment, in Collin County, Texas, and elsewhere, did then and there knowingly acquire an interest in and possess the proceeds of criminal activity, to wit: current money of the United States of America, in the aggregated amount of two hundred thousand dollars (\$200,000.00) or more, and said proceeds were generated from the commission of the offense of Theft of property in the amount of two hundred thousand dollars (\$200,000.00) or more, a felony offense under the laws of the State of Texas;

and the Grand Jury further presents to said court that defendant, on or about September 2, 1982, was convicted and sentenced to four years confinement for violating Title 18, United States Code, Section 1341, to wit: Mail Fraud, in the United States District Court for the Northern District of Texas, in Case Number CR3-81-280-R, styled *United States of America v. Charles Scott Goist*;

Against the peace and dignity of the State.

**FILED**  
09 JUN 18 PM 12:39  
HANNAH KUNNLE  
DISTRICT CLERK  
COLLIN COUNTY, TEXAS  
*[Signature]*

*Robert Faircloth*

\_\_\_\_\_  
FOREMAN OF THE GRAND JURY

DEFENDANT CHARLES SCOTT GOIST

CHARGE SECURING EXECUTION OF  
DOCUMENT BY DECEPTION,  
TPC 32.46 (a)(1) and (c)(7) -F1

ADDRESS 2104 Winding Hollow Lane, Plano, Texas 75093

CAUSE# 429-81366-09

DESCRIPTION W/M/508/200/BRO/BRO/ 01/06/1951 / TX07587584

AGENCY/# GJR

ARREST INFORMATION N/A

C/C \_\_\_\_\_

Witness: Jeff Warsing

**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 JANUARY Term, A.D., 2009 of the 401st

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

**CHARLES SCOTT GOIST, hereinafter "defendant,"**

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, and elsewhere, did then and there, with the intent to defraud and harm the persons listed below, and by deception, to wit:

- a. by creating and confirming by words and conduct false impressions of fact that were likely to affect the judgment of said owners in the transactions and that defendant did not believe to be true; and
- b. by failing to correct false impressions of fact that were likely to affect the judgment of said owners in the transactions, that defendant previously created and confirmed by words and conduct, and that defendant did not at the time believe to be true; and
- c. by promising performance that affected the judgment of said owners in said transactions that defendant did not intend to perform and knew would not be performed;

cause the following persons to sign and execute documents, to wit: checks, which affected the property and pecuniary interest of said persons in the following amounts:

<u>Person</u>	<u>Date of Execution</u>	<u>Amount</u>
Edward and Patricia Lord	January 23, 2002	\$9,800.00
Edward and Patricia Lord	January 25, 2002	\$8,500.00
Edward and Patricia Lord	February 1, 2002	\$5,500.00
Edward and Patricia Lord	February 4, 2002	\$5,500.00
Edward and Patricia Lord	February 5, 2002	\$5,800.00
Edward and Patricia Lord	February 11, 2002	\$4,500.00
Edward and Patricia Lord	February 13, 2002	\$7,100.00
Edward and Patricia Lord	February 19, 2002	\$7,500.00
Edward and Patricia Lord	February 20, 2002	\$7,000.00
Edward and Patricia Lord	February 25, 2002	\$6,000.00
Edward and Patricia Lord	February 28, 2002	\$7,000.00
Edward and Patricia Lord	March 5, 2002	\$7,500.00
Edward and Patricia Lord	March 12, 2002	\$6,500.00
Edward and Patricia Lord	March 14, 2002	\$5,200.00
Edward and Patricia Lord	March 21, 2002	\$6,000.00
Edward and Patricia Lord	March 27, 2002	\$6,500.00
Edward and Patricia Lord	April 2, 2002	\$6,500.00
Edward and Patricia Lord	April 5, 2002	\$7,700.00
Edward and Patricia Lord	April 26, 2002	\$12,000.00
Edward and Patricia Lord	April 30, 2002	\$12,000.00
Edward and Patricia Lord	May 7, 2002	\$6,600.00
Edward and Patricia Lord	May 24, 2002	\$5,500.00
Edward and Patricia Lord	June 4, 2002	\$3,000.00

Edward and Patricia Lord	August 28, 2002	\$9,000.00
Edward and Patricia Lord	September 3, 2002	\$9,000.00
Edward and Patricia Lord	September 6, 2002	\$6,000.00
Edward and Patricia Lord	December 11, 2002	\$8,700.00
Edward and Patricia Lord	April 18, 2003	\$6,000.00
Edward and Patricia Lord	June 14, 2004	\$11,600.00
Serge Saithsoothane	September 2, 2004	\$27,000.00
Serge Saithsoothane	October 14, 2004	\$13,500.00
Serge Saithsoothane	March 9, 2005	\$28,000.00
Serge Saithsoothane	April 5, 2005	\$28,000.00
Serge Saithsoothane	May 12, 2005	\$1,700.00
Edward and Patricia Lord	May 27, 2005	\$14,000.00
William Hudson	July 20, 2005	\$25,000.00
William Hudson	October 13, 2005	\$2,600.00
Serge Saithsoothane	October 28, 2005	\$22,000.00
Serge Saithsoothane	November 17, 2005	\$5,000.00
Edward and Patricia Lord	March 14, 2006	\$9,000.00
Serge Saithsoothane	June 16, 2006	\$17,000.00
Serge Saithsoothane	June 23, 2006	\$12,500.00
Serge Saithsoothane	August 14, 2006	\$8,800.00
Serge Saithsoothane	August 22, 2006	\$8,800.00
Serge Saithsoothane	September 8, 2006	\$4,800.00
Serge Saithsoothane	October 10, 2006	\$4,800.00
Serge Saithsoothane	October 18, 2006	\$4,800.00

Serge Saithsoothane	November 3, 2006	\$17,000.00
Edward and Patricia Lord	December 19, 2006	\$12,100.00
Serge Saithsoothane	January 23, 2007	\$2,000.00
Serge Saithsoothane	May 30, 2007	\$7,100.00
Gordon and Leslie Roy	August 13, 2007	\$21,250.00
Gordon and Leslie Roy	August 31, 2007	\$21,250.00
Gordon and Leslie Roy	September 17, 2007	\$21,250.00
Gordon and Leslie Roy	October 2, 2007	\$21,250.00
Gordon and Leslie Roy	October 25, 2007	\$18,000.00
Gordon and Leslie Roy	November 2, 2007	\$18,000.00
Gordon and Leslie Roy	November 9, 2007	\$20,000.00
Gordon and Leslie Roy	November 21, 2007	\$20,000.00
Gordon and Leslie Roy	November 28, 2007	\$40,000.00
Gordon and Leslie Roy	December 10, 2007	\$16,500.00
Gordon and Leslie Roy	February 6, 2008	\$20,000.00
Gordon and Leslie Roy	February 29, 2008	\$20,000.00
Gordon and Leslie Roy	March 27, 2008	\$20,000.00
Gordon and Leslie Roy	May 6, 2008	\$9,000.00

and all of said amounts were obtained, as alleged, as part of one scheme and continuing course of conduct, and the aggregate value of the property and pecuniary interest so affected was \$200,000.00 or more;

and the Grand Jury further presents to said court that defendant, on or about September 2, 1982, was convicted and sentenced to four years confinement for violating Title 18, United States Code, Section 1341, to wit: Mail Fraud, in the United States District Court for the Northern District of Texas, in Case Number CR3-81-280-R, styled *United States of America v. Charles Scott Goist*;

Against the peace and dignity of the State.

*Robert Faircloth*

---

FOREMAN OF THE GRAND JURY

**FILED**

09 JUN 18 PM 12:40

HANNAH KUNKLE  
DISTRICT CLERK  
*Hannah Kunkle*

DEFENDANT CHARLES SCOTT GOIST CHARGE SECURITIES FRAUD, Texas Sec. Act, Art. 581, Section 29 C(1) - F1

ADDRESS 2104 Winding Hollow Lane, Plano, Texas 75093 CAUSE# 429-81368-09

DESCRIPTION W/M/508/200/BRO/BRO/ 01/06/1951 / TX07587584 AGENCY/# GJR

ARREST INFORMATION N/A

C/C \_\_\_\_\_ Witness: Jeff Warsing

**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 JANUARY Term, A.D., 2009 of the 401st

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

**CHARLES SCOTT GOIST, hereinafter "defendant,"**

on or about the dates listed below, and before the presentment of this indictment, in Collin County, Texas, and elsewhere, did then and there offer for sale and sell interests in the profits to be obtained from the purchase and sale of options to purchase and lease real property in Mexico, being a security, to wit: an investment contract and an evidence of indebtedness, to Gordon J. Roy in the following amounts:

<u>DATE</u>	<u>AMOUNT</u>
August 13, 2007	\$21,250.00
August 31, 2007	\$21,250.00
September 17, 2007	\$21,250.00
October 2, 2007	\$21,250.00
October 25, 2007	\$18,000.00
November 2, 2007	\$18,000.00
November 9, 2007	\$20,000.00
November 21, 2007	\$20,000.00
November 28, 2007	\$40,000.00
December 10, 2007	\$16,500.00

February 6, 2008	\$20,000.00
February 29, 2008	\$20,000.00
March 27, 2008	\$20,000.00
May 6, 2008	\$9,000.00

and defendant directly and indirectly engaged in fraud in connection with the sale and offer for sale of said securities by

**PARAGRAPH ONE**

intentionally failing to disclose that on or about September 2, 1982, Charles Scott Goist was convicted and sentenced to four years confinement for violating Title 18, United States Code, Section 1341, to wit: Mail Fraud, in the United States District Court for the Northern District of Texas, in Case Number CR3-81-280-R, styled *United States of America v. Charles Scott Goist*; said information being a material fact; and/or

**PARAGRAPH TWO**

intentionally failing to disclose that funds invested by investors with Bay Hills Properties and Development, Inc., for the purchase and sale of options to purchase and lease real property in Mexico would be used for purposes unrelated to the investment; said information being a material fact; and/or,

**PARAGRAPH THREE**

intentionally failing to disclose that funds invested by investors with Bay Hills Properties and Development, Inc., for the purchase and sale of options to purchase and lease real property in Mexico would be used for the benefit of and to pay the personal expenses of Charles Scott Goist, and members of his family; said information being a material fact; and/or,

**PARAGRAPH FOUR**

intentionally failing to disclose that previous investors with Bay Hills Properties and Development, Inc., who invested funds for the purchase and sale of options to purchase and lease real property in Mexico, had received no return on any of their investments with the defendant and Bay Hill Properties and Development, Inc.; said information being a material fact;

and all of said funds were obtained, as alleged, as part of one scheme and continuing course of conduct, and the aggregate amount of the funds so obtained was \$100,000.00 or more;

Against the peace and dignity of the State.

*Robert Faircloth*

---

FOREMAN OF THE GRAND JURY

**FILED**

09 JUN 18 PM 12:37

HANNAH KUNKLE  
DISTRICT CLERK  
COUNTY CLERK  
COUNTY CLERK

*Hannah Kunkle*