

ORIGINAL

CAUSE NO. F-2010-0991-D	FILED	TRN: NONE
BOND: \$ 50,000.00	10 MAY -6 PM 4: 01	
DEFENDANT: PATRICIA NOBLE	SHERRI ADELSTEIN <small>DISTRICT CLERK DENTON CO. TX</small>	NONE W/F 05-21-60
CHARGE: SECURITIES FRAUD (COUNTS I & II)	DEPUTY	
ART: NONE	SEC: 29A (Count I) & 29C (Count II)	CODE: TEXAS SECURITIES ACT
CO-DEFENDANT: NONE		WARRANT NO: NONE
WITNESS: R.VANCE		

TRUE BILL OF INDICTMENT
IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS
COUNT I

THE GRAND JURORS, in and for the County of Denton, State of Texas, duly organized, impaneled, and sworn as such, at the January Term, A.D., 2010, of the District Court of the 16th Judicial District in and for said county and state, upon their oaths, present in and to said Court that PATRICIA NOBLE, who is hereinafter styled defendant, on or about following dates and anterior to the presentment of this Indictment, in the county and state aforesaid, directly, offered for sale and sold securities in the form of stocks, stock options, investment contracts and evidences of indebtedness, to the following persons in the following amounts;

Kathy Falcon, a \$1,000 payment on or about October 16, 2008 to defendant for the account of Kathy Falcon No. FN-0025-A/B/C/D:D-1, D-2 at Noble Funds Asset Management, for the purchase of stocks described as Common Stocks Diversified, and \$3,400 of consideration received by defendant on or about May 1, 2009, for the account of Kathy Falcon and Cheryl Falcon to purchase a 30 day Domestic Shares Short Term Option paying a yield of \$5,576;

And Adrienne P. Smith, a \$4,000 payment on or about November 7, 2008, a \$4,000 payment on or about December 1, 2008, and an \$8,000 payment on or about December 4, 2008 to defendant for the account for Adrienne P. Smith, No. FN0027 at Noble Funds Asset Management, for the purchase of stocks described as Common Stocks Diversified;

And Harold Chesnut, a payment of \$20,000 on or about January 29, 2009 to defendant for the account of Harold and Susie Chesnut at Noble Funds Asset Management to purchase a 90 day Domestic Shares Short Term Option for PG shares paying a 1.69% return on investment and a yield of \$33,800.00;

And Steve Kruzich, the following payments to Defendant for the account of Steve Kruzich No. FN-0020 at Noble Funds Asset Management:

DEFENDANT: NOBLE

PAGE 2

1. A payment of \$15,000 on or about January 29, 2009 to purchase a six month Short Term Domestic Shares Option paying a 1.64 % return on investment and a yield of \$24,600 and;
2. A payment of \$22,000 on or about February 3, 2009 to purchase a Short Term Domestic Shares Option paying a 1.68% return on investment and a yield of \$36,960 and;
3. A payment of \$5,000 on or about April 9, 2009 to purchase a Domestic Shares Short Term Option for YUM shares paying a 1.64 % return on investment and a yield of \$8,200 and;
4. A payment of \$30,000 on or about April 15, 2009 for a one month Domestic Shares Short Term Option for Yum shares paying a 1.67% return on investment and yield of \$50,100 and;

And Chip Wood, a payment of \$10,000 on or about February 27, 2009 to defendant for the account of Chip Wood No. FN-0019 at Noble Funds Asset Management for the purchase of a six month Domestic Shares Short Term Option for YUM shares paying a 1.58% return on investment and a yield of \$15,800, and a payment of \$3,000 on or about June 5, 2009 to defendant for the account of Chip Wood No. FN-0119 at Noble Funds Asset Management for the purchase of a three month Domestic Shares Short Term Option for WMT shares paying a 1.65% return of investment and a yield of \$4,950;

And Shelia K. Thompson, a payment of \$5,000 on or about March 5, 2009 to defendant for the account of Shelia Thompson at Noble Funds Asset Management for the purchase of a six month Domestic Shares Short Term Option paying a 1.66% return on investment and a yield of \$8,300, and two payments totaling \$3,000 on or about May 19, 2009 to defendant for the account of Shelia Thompson at Noble Funds Asset Management for a 30 day Domestic Shares Short Term Option paying a 1.68% return on investment and a yield of \$5,040;

And Holly Long, a payment of \$500 on or about April 8, 2009 to defendant for the account of Holly Long No. FN-0012 at Noble Funds Asset Management for the purchase of a three month Domestic Shares Short Term Option for YUM shares paying a 1.64% rate of return and a yield of \$1,640;

And Adam Popplewell, a payment of \$3,000 on or about May 29, 2009 to defendant for the account of Amy and Adam Popplewell No. FN-0028 at Noble Funds Asset Management for the purchase of a 30 day Domestic Shares Short Term Option for MCD shares paying 1.69% return on investment and a yield of \$5,070, and a payment of \$5,000 on or about June 23, 2009 to defendant for the account of Adam and Amy Popplewell No. FN-0028 at Noble Funds Asset Management for the purchase of a 90 day Domestic Shares Short Term Option for PG shares paying a 1.69% return on investment and a yield of \$8,450;

DEFENDANT: NOBLE

PAGE 3

And Damon J. Santa Maria, two payments totaling \$12,000 on or about June 2, 2009 to defendant for the account of Damon Santa Maria at Noble Funds Asset Management for the purchase of a 30 day Domestic Shares Short Term Option paying a 1.69% return on investment and a yield of \$20,280;

And Mary C. Mohr, a \$928 payment on or about June 10, 2009, and two payments totaling \$5,400 on or about July 20, 2009 and other consideration to defendant for the account of Mary Mohr at Noble Funds Asset Management for the purchase of a \$10,000 90 day Domestic Shares Short Term Option for WMT shares paying a 1.68% return on investment and a yield of \$16,800;

And Robert L. Stephenson, a payment of \$12,000 on or about June 17, 2009 to defendant for the account of Rob Stephenson at Noble Funds Asset Management for the purchase of a three month Domestic Shares Short Term Option in WMT shares paying a 1.64% return on investment and a yield of \$19,680;

And the said defendant offered for sale and sold the said securities without having been duly registered as a securities dealer or agent by and with the Securities Commissioner of State of Texas as is provided by law in such cases, and defendant was then and there not a duly registered securities dealer or agent duly registered as such by and with the Securities Commissioner of the State of Texas;

COUNT II

And the Grand Jurors aforesaid, duly selected, impaneled, sworn and charged at said term of said court as aforesaid, upon their oaths further present in and to said court that PATRICIA NOBLE, who is hereinafter styled defendant, on or about following dates and anterior to the presentment of this Indictment, in the county and state aforesaid, directly, offered for sale and sold securities in the form of stocks, stock options, investment contracts and evidences of indebtedness, to the following persons in the following amounts;

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DEFENDANT: NOBLE

PAGE 4

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And Harold Chesnut, a payment of \$20,000 on or about January 29, 2009 to defendant for the account of Harold and Susie Chesnut at Noble Funds Asset Management to purchase a 90 day Domestic Shares Short Term Option for PG shares paying a 1.69% return on investment and a yield of \$33,800.00;

And Steve Kruzich, the following payments to Defendant for the account of Steve Kruzich No. FN-0020 at Noble Funds Asset Management:

1. A payment of \$15,000 on or about January 29, 2009 to purchase a six month Short Term Domestic Shares Option paying a 1.64 % return on investment and a yield of \$24,500 and;
2. A payment of \$22,000 on or about February 3, 2009 to purchase a Short Term Domestic Shares Option paying a 1.68% return on investment and a yield of \$36,960 and;
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DEFENDANT: NOBLE

PAGE 5

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

Intentionally and knowingly misrepresenting that the investors' funds would be used to purchase domestic shares, short term options and/or shares of stock, said information was a misrepresentation of a relevant fact and;

Intentionally failing to disclose that the investors' funds contributed for the purchase of domestic shares, short term options and/or shares of stock would be used by defendant for unrelated purposes and;

Intentionally failing to disclose that funds contributed by previous investors for the purchase of domestic shares, short term options and/or shares of stock had been used by defendant to pay personal expenses and make payments to other investors;

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;

against the peace and dignity of the State.

PAUL JOHNSON
CRIMINAL DISTRICT ATTORNEY OF
DENTON COUNTY, TEXAS


Foreman of the Grand Jury