

GRAND JURY REFERRAL



The State of Texas vs. JUAN MIGUEL LOPEZ

195th

DOB: 9/28/1964 Sex: Male Race: White

SID No.
AIS No.

GJ Witness: Read In

C	Offense	LD	Statute	Agency	TRN	TRS	NCIC Code
1	FRAUD SELL SECURITIES >=\$100K	F1	VCS 581-29(C)(1)(c)	TX057015A			26990120

INDICTMENT NO.: F1700358

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

The Grand Jury of Dallas County, State of Texas, duly organized at the January Term, A.D., 2017 of the Criminal District Court No. 2 for said County, upon its oath do present in and to said Court at said term,

That **JUAN MIGUEL LOPEZ**, hereinafter called Defendant, **on or about and between the 1st day of August, 2011 and the 31st day of January, 2016**, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, sell and offer for sale securities in the form of notes, evidences of indebtedness, and investment contracts issued by Mito Bank, Mito Capital, Mito Capital, LLC, Mito Financial, Mito Financial, LLC, and Mito Group, hereinafter referred to collectively as "Mito," to German Vivanco, Sandra Magallon, Enrique Enciso, Teresa Cisneros, Jesus Cisneros, Lisa Kenner, John Kenner, Dr. Guillermo Soto, Francisco Lomelin, LI Financiera, Jose Lomelin, Ricardo Lomelin, Francisco Tellez, Julia Tellez, Benito Borbolla, Maria Vargas, Roberto Moreno, Vicente Garcia, and Victor M. Natareno, hereinafter referred to as "purchasers," and defendant engaged in fraud in connection with the offer for sale and sale of said securities by:

Intentionally failing to disclose that defendant used money contributed by purchasers to pay interest payments to other purchasers, said information being a material fact; and

Intentionally failing to disclose that in October 2015 and November 2015, checks delivered by defendant for payment of interest and commissions due to purchasers were returned unpaid for insufficient funds, said information being a material fact; and

Intentionally failing to disclose that defendant used money contributed by purchasers to pay his and his family's personal expenses, said information being a material fact; and

Intentionally failing to disclose that "Mito" did not earn significant interest and income from the operations
Against the peace and dignity of the State.


Foreman of the Grand Jury

GRAND JURY REFERRAL



of Mito to pay purchasers the interest, revenues, and income owed to them, said information being a material fact; and

Knowingly and intentionally misrepresenting that "Mito" would use money from purchasers to finance small business loans, said information being a relevant fact; and

Knowingly and intentionally misrepresenting that "Mito" had the ability to pay 3% to 8% monthly interest due to purchasers, said information being a relevant fact;

And the aggregate amount obtained was \$100,000.00 or more,

Against the peace and dignity of the State.



Foreman of the Grand Jury

GRAND JURY REFERRAL



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195th

DOB: 9/28/1964 Sex: Male Race: White

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C	Offense	LD	Statute	Agency	TRN	TRS	NCIC Code
1	MONEY LAUNDERING >=\$300K	F1	PC 34.02(e)(4)	TX057015A			63000004

INDICTMENT NO.: F1700362

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

The Grand Jury of Dallas County, State of Texas, duly organized at the January Term, A.D., 2017 of the Criminal District Court No. 2 for said County, upon its oath do present in and to said Court at said term,

That **JUAN MIGUEL LOPEZ**, hereinafter called Defendant, **on or about and between the 1st day of August, 2011 and the 31st day of January, 2016**, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, knowingly acquire, maintain an interest in, conceal, possess, transfer, and transport the proceeds of criminal activity, to-wit: Securities Fraud, and the aggregate value of said funds was \$300,000.00 or more,

Against the peace and dignity of the State.



Foreman of the Grand Jury

GRAND JURY REFERRAL



The State of Texas vs. JUAN MIGUEL LOPEZ

195th

DOB: 9/28/1964 Sex: Male Race: White

SID No.
AIS No.

GJ Witness: Read In

C	Offense	LD	Statute	Agency	TRN	TRS	NCIC Code
1	THEFT PROP >=\$300K	F1	PC 31.03(e)(7)	TX057015A			23990203

INDICTMENT NO.: F1700360

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

The Grand Jury of Dallas County, State of Texas, duly organized at the January Term, A.D., 2017 of the Criminal District Court No. 2 for said County, upon its oath do present in and to said Court at said term,

That **JUAN MIGUEL LOPEZ**, hereinafter called Defendant, **on or about and between the 1st day of August, 2011 and the 31st day of January, 2016**, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, unlawfully appropriate property, by acquiring or otherwise exercising control over property, to wit: money, of the aggregate value of \$300,000.00 or more, from the following owners, German Vivanco, Sandra Magallon, Enrique Enciso, Teresa Cisneros, Jesus Cisneros, Lisa Kenner, John Kenner, Dr. Guillermo Soto, Francisco Lomelin, LI Financiera, Jose Lomelin, Ricardo Lomelin, Francisco Tellez, Julia Tellez, Benito Borbolla, Maria Vargas, Roberto Moreno, Vicente Garcia, and Victor M. Natareno, and without the effective consent of said owners, namely, by deception, with intent to deprive the owners of the property,

Against the peace and dignity of the State.



Foreman of the Grand Jury