

**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 January Term, A.D. 2014 of the 264th Judicial District Court for said County, upon their oaths present in and to said court at said term that

**ANDREW JOSEPH LONGORIA**

**72606**

hereinafter styled Defendant, between on or about the 12th day of January A.D. 2007, and on or about the 21st day of April A.D. 2009, and before the presentment of this Indictment, in the County and State aforesaid,

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 Appropriated</u>	<u>Amount Appropriation</u>
Juanita Krueger	January 12, 2007	\$6,000.00
Tracy Kennepp and Aaron Parkin	March 13, 2007	\$6,000.00
Scott and Colleen Stegman	March 15, 2007	\$10,000.00
Scott and Colleen Stegman	April 26, 2007	\$4,000.00
Scott and Colleen Stegman	May 3, 2007	\$2,000.00
Scott and Colleen Stegman	May 29, 2007	\$2,000.00
Tiffany Dean	August 14, 2007	\$6,000.00
Tiffany Dean	August 14, 2007	\$8,000.00
Tiffany Dean	November 10, 2007	\$10,000.00
Mark and Kelly Goetz	March 15, 2008	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 29, 2008	\$15,000.00
Elizabeth R. Stoinski	September 29, 2008	\$4,768.22
Elizabeth R. Stoinski	October 1, 2008	\$2,609.00
Richard Sweeney	October 16, 2008	\$20,688.97

*Sheila Norman*  
SHEILA NORMAN  
DISTRICT COURT  
BELL COUNTY, TX

2014 APR 16 PM 12: 11

**FILED**

Richard Graham and Kareen Barrett-Graham	November 3, 2008	\$2,000.00
Richard Graham and Kareen Barrett-Graham	November 13, 2008	\$2,000.00
Jeff and Jean Kneisler	January 12, 2009	\$10,000.00
Richard Graham and Kareen Barrett-Graham	January 16, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	January 27, 2009	\$1,000.00
Patricia Aitken	February 4, 2009	\$12,000.00
Richard Graham and Kareen Barrett-Graham	February 24, 2009	\$1,000.00
Kenneth and Kim Wilson	April 6, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 21, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 21, 2009	\$3,000.00

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

- a. 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 the defendant did not believe to be true; and
- b. 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 said defendant did not at the time believe to be true; and
- c. 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 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 made recovery of said property by 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 \$100,000.00 or more but less than \$200,000.00;

against the peace and dignity of the State.

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District Attorney 27th Judicial District of Texas

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*Charlotte Douglass*  
Foreman of the Grand Jury



**THE STATE OF TEXAS  
COUNTY OF BELL**

I, \_\_\_\_\_

of the \_\_\_\_\_ District Court of Bell County, Texas, do hereby certify that the within and foregoing is a true and correct copy of the original Bill of Indictment, filed in said Court on the \_\_\_\_\_ day of \_\_\_\_\_ A.D., 20\_\_\_\_\_, in cause No. \_\_\_\_\_, styled The State of Texas, vs. \_\_\_\_\_

Given under my hand and the seal of said Court, at office in \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ A.D., 20\_\_\_\_

\_\_\_\_\_  
Clerk  
By \_\_\_\_\_ Deputy

NAMES OF WITNESSES:

No. 72606

THE STATE OF TEXAS

vs.

ANDREW JOSEPH LONGORIA

**INDICTMENT**

**OFFENSE**

**THEFT OVER \$100,00 BUT LESS THAN \$200,000**

Henry Garza, District Attorney

A TRUE BILL

*Charlotte Douglas*

Foreman of the Grand Jury

Filed \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

District Clerk

By \_\_\_\_\_ Deputy

Amount of Bail, \$ \_\_\_\_\_

**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 January Term, A.D. 2014 of the 264th Judicial District Court for said County, upon their oaths present in and to said court at said term that

**ANDREW JOSEPH LONGORIA**

72607

hereinafter styled Defendant, between on or about the 12th day of January A.D. 2007, and on or about the 21st day of April A.D. 2009, and before the presentment of this Indictment, in the County and State aforesaid,

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 one hundred thousand dollars (\$100,000.00) or more but less than two hundred thousand dollars (\$200,000.00), and said proceeds were generated from the commission of the offense of Theft in the amount of one hundred thousand dollars (\$100,000.00) or more but less than two hundred thousand dollars (\$200,000.00), a felony under the laws of the State of Texas;

*Sheila Norman*  
SHEILA NORMAN  
DISTRICT COURT  
BELL COUNTY, TX  
BELL COUNTY CLERK

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FILED

against the peace and dignity of the State.

District Attorney 27th Judicial District of Texas

*Charlotte Douglass*  
Foreman of the Grand Jury



THE STATE OF TEXAS  
COUNTY OF BELL

I, \_\_\_\_\_

of the \_\_\_\_\_ District Court of Bell County, Texas, do hereby certify that the within and foregoing is a true and correct copy of the original Bill of Indictment, filed in said Court on the \_\_\_\_\_ day of \_\_\_\_\_ A.D., 20\_\_\_\_\_, in cause No. \_\_\_\_\_, styled The State of Texas, vs. \_\_\_\_\_.

Given under my hand and the seal of said Court, at office in \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ A.D., 20\_\_\_\_\_

\_\_\_\_\_  
Clerk  
By \_\_\_\_\_ Deputy

NAMES OF WITNESSES:

No. 72607

THE STATE OF TEXAS

VS.

ANDREW JOSEPH LONGORIA

**INDICTMENT**

**OFFENSE**

MONEY LAUNDERING OVER \$100,000 BUT  
LESS THAN \$200,000

Henry Garza, District Attorney

A TRUE BILL

*Charles H. Douglas*

Foreman of the Grand Jury

Filed \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

\_\_\_\_\_  
District Clerk

By \_\_\_\_\_ Deputy

Amount of Bail, \$ \_\_\_\_\_

**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 January Term, A.D. 2014 of the 264th Judicial District Court for said County, upon their oaths present in and to said court at said term that

**ANDREW JOSEPH LONGORIA**

72608

hereinafter styled Defendant, between on or about the 12th day of January A.D. 2007, and on or about the 21st day of April A.D. 2009, and before the presentment of this Indictment, in the County and State aforesaid, did then and there offer for sale and sell investments in notes, mutual funds, and real estate projects through LRS Investments (hereinafter collectively referred to as "LRS Investments"), being securities, to wit: stocks, investment contracts, evidences of indebtedness, and notes to each of the persons listed below, and in the following amounts:

<u>Owner</u>	<u>Date of Appropriated</u>	<u>Amount Appropriation</u>
Juanita Krueger	January 12, 2007	\$6,000.00
Tracy Kennepp and Aaron Parkin	March 13, 2007	\$6,000.00
Scott and Colleen Stegman	March 15, 2007	\$10,000.00
Scott and Colleen Stegman	April 26, 2007	\$4,000.00
Scott and Colleen Stegman	May 3, 2007	\$2,000.00
Scott and Colleen Stegman	May 29, 2007	\$2,000.00
Tiffany Dean	August 14, 2007	\$6,000.00
Tiffany Dean	August 14, 2007	\$8,000.00
Tiffany Dean	November 10, 2007	\$10,000.00
Mark and Kelly Goetz	March 15, 2008	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 29, 2008	\$15,000.00
Elizabeth R. Stoinski	September 29, 2008	\$4,768.22
Elizabeth R. Stoinski	October 1, 2008	\$2,609.00

SHELLIA NORMAN  
DISTRICT COURT  
BELL COUNTY, TX  
R. Elizabeth Longoria

2014 APR 16 PM 12: 11

FILED

Richard Sweeney	October 16, 2008	\$20,688.97
Richard Graham and Kareen Barrett-Graham	November 3, 2008	\$2,000.00
Richard Graham and Kareen Barrett-Graham	November 13, 2008	\$2,000.00
Jeff and Jean Kneisler	January 12, 2009	\$10,000.00
Richard Graham and Kareen Barrett-Graham	January 16, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	January 27, 2009	\$1,000.00
Patricia Aitken	February 4, 2009	\$12,000.00
Richard Graham and Kareen Barrett-Graham	February 24, 2009	\$1,000.00
Kenneth and Kim Wilson	April 6, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 21, 2009	\$5,000.00
Richard Graham and Kareen Barrett-Graham	April 21, 2009	\$3,000.00

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

**PARAGRAPH ONE**

intentionally failing to disclose that funds invested by previous investors in LRS Investments were used to pay the personal expenses of defendant, said information being a material fact; and

**PARAGRAPH TWO**

intentionally failing to disclose that funds invested by previous investors in LRS Investments were used to make payments to other investors, said information being a material fact; and

**PARAGRAPH THREE**

knowingly and intentionally representing that funds invested by investors were being put into actual investments, said information being a misrepresentation of a relevant 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;

against the peace and dignity of the State.

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District Attorney 27th Judicial District of Texas

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*Charlotte Douglass*  
Foreman of the Grand Jury



**THE STATE OF TEXAS  
COUNTY OF BELL**

I, \_\_\_\_\_

of the \_\_\_\_\_ District Court of Bell County, Texas, do hereby certify that the  
within and foregoing is a true and correct copy of the original Bill of Indictment, filed in said Court on the \_\_\_\_\_  
day of \_\_\_\_\_ A.D., 20\_\_\_\_\_, in cause No. \_\_\_\_\_, styled The State of Texas, vs.  
\_\_\_\_\_.

Given under my hand and the seal of said Court, at office in \_\_\_\_\_ this  
\_\_\_\_\_ day of \_\_\_\_\_ A.D., 20\_\_\_\_\_

\_\_\_\_\_  
Clerk  
By \_\_\_\_\_ Deputy

NAMES OF WITNESSES:

No. 72608

THE STATE OF TEXAS

vs.

ANDREW JOSEPH LONGORIA

**INDICTMENT**

**OFFENSE**

SECURITIES FRAUD OVER \$100,000

Henry Garza, District Attorney

A TRUE BILL

*Charlotte Douglas*  
Foreman of the Grand Jury

Filed \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

District Clerk

By \_\_\_\_\_ Deputy

Amount of Bail, \$ \_\_\_\_\_