

THE STATE OF TEXAS

Scott Carpenter
581-29 (C) (1) (c)
26990120

VS

MEJDI MAHMOUD ABOUSAOUI

D.O.B.: 01/09/1984	DA CONTROL NO: 19-011953
FELONY CHARGE: FRAUD SELL SECURITIES >=\$100K/ F*	ARREST DATE: Not arrested on this charge
CAUSE NO:	OFFENSE DATE: March 01, 2015-April 30, 2018
DISTRICT COURT NO:	AGENCY/AGENCY NO: FORT BEND COUNTY SHERIFF'S OFFICE/ 190041841
BAIL AMOUNT:	PRIOR CAUSE NO:
RELATED CASES: MONEY LAUNDERING >=\$200K; MISAPP FIDUC/FINAN PROP>=\$200K; THEFT PROP>=\$200K	CO-DEF:

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

Before me, the undersigned Assistant District Attorney of Fort Bend County, Texas, this day appeared the undersigned affiant, who under oath says he has good reason to believe and does believe that in Fort Bend County, Texas, MEJDI MAHMOUD ABOUSAOUI, hereafter styled the Defendant, heretofore, On or about and between March 01, 2015, and April 30, 2018, pursuant to one scheme and continuing course of conduct, did, unlawfully, then and there, directly and indirectly, and through his company Abousaoui Financial, LLC, sell and offer for sale investments in the Abousaoui Financial investment program (hereinafter referred to as the Program), being securities, namely: stocks, shares, notes, bonds, investment contracts, and evidences of indebtedness, to each of the persons listed below and in the following amounts:

Person	Date	Amount
Paul Shinneman	March 30, 2015	\$1,000.00
Paul Shinneman	April 2, 2015	\$1,000.00
Paul Shinneman	April 6, 2015	\$2,000.00
Clarissa Bass	April 20, 2015	\$1,000.00
Christopher Caldwell	May 8, 2015	\$ 500.00
John Taylor Swanson	May 19, 2015	\$3,000.00
Stephen H. Declue	May 26, 2015	\$5,000.00
Stephen H. Declue	May 26, 2015	\$5,000.00
John Taylor Swanson	May 26, 2015	\$1,000.00
Ayman Aboshihata	June 12, 2015	\$5,000.00
Timothy J. Swanson	July 3, 2015	\$5,000.00
Laura E. Swanson	July 3, 2015	\$5,000.00
Ione Swanson	July 13, 2015	\$1,000.00

Rudolph and Nancy Cantu	July 20, 2015	\$5,000.00
Rudolph and Nancy Cantu	July 24, 2015	\$5,000.00
H. Rick Fernandez	August 4, 2015	\$5,000.00
H. Rick Fernandez	August 10, 2015	\$5,000.00
Marvin Omar Martinez	August 24, 2015	\$10,000.00
H. Rick Fernandez	September 8, 2015	\$5,000.00
Ayman Aboshihata	September 15, 2015	\$ 500.00
Marvin Omar Martinez	September 21, 2015	\$10,000.00
Marvin Omar Martinez	October 13, 2015	\$10,000.00
Kayla Swanson	November 3, 2015	\$2,000.00
Marvin Omar Martinez	November 24, 2015	\$10,000.00
Richard W Fernandez	December 7, 2015	\$10,000.00
Marvin Omar Martinez	December 11, 2015	\$20,000.00
Marvin Omar Martinez	December 18, 2015	\$40,000.00
Ashlynn McClure	December 29, 2015	\$10,000.00
Iris S. Torres	January 11, 2016	\$10,000.00
Richard W Fernandez	January 26, 2016	\$10,000.00
Ayman Aboshihata	January 27, 2016	\$10,000.00
Ayman Aboshihata	February 16, 2016	\$5,000.00
Amir M. Taherivand	March 1, 2016	\$5,000.00
John Taylor Swanson	March 21, 2016	\$10,000.00
Timothy J. Swanson	March 25, 2016	\$5,000.00
Laura E. Swanson	March 25, 2016	\$5,000.00
Ayman Aboshihata	March 28, 2016	\$5,000.00
Freddy A. Rodriguez	March 29, 2016	\$30,000.00
Robert Landis	March 31, 2016	\$2,499.00
Robert Landis	April 7, 2016	\$2,500.00
Iris S. Torres	May 2, 2016	\$10,000.00
Freddy A. Rodriguez	May 2, 2016	\$18,000.00
Seyed Naini	May 3, 2016	\$2,000.00
Jeremy C. Daniels	May 27, 2016	\$2,000.00
Amir M. Taherivand	June 7, 2016	\$14,750.00
H. Rick Fernandez	June 17, 2016	\$5,000.00
John Taylor Swanson	June 23, 2016	\$9,500.00
Vivek Medapalli	June 27, 2016	\$2,000.00
Vivek Medapalli	June 28, 2016	\$3,000.00
Kevin S. Chap	June 28, 2016	\$2,500.00
Maribel Gonzalez	July 15, 2016	\$5,000.00
Richard W Fernandez	July 25, 2016	\$30,000.00
Marvin Omar Martinez	July 26, 2016	\$20,000.00
Vivek Medapalli	July 27, 2016	\$1,500.00
Kevin S. Chap	July 27, 2016	\$2,500.00
Robert Landis	July 29, 2016	\$1,000.00
Carlos and Carolina Rosa	August 12, 2016	\$10,000.00
Kevin S. Chap	August 16, 2016	\$20,000.00
Ahad F. Ahmed	August 22, 2016	\$25,000.00
Maribel Gonzalez	August 26, 2016	\$11,000.00
Iffat Gillani	September 7, 2016	\$100,000.00
Ahad F. Ahmed	September 19, 2016	\$25,000.00

Franklyn Edosomwan	September 19, 2016	\$10,000.00
Kevin S. Chap	October 11, 2016	\$9,985.00
Timothy J. Swanson	October 12, 2016	\$5,000.00
Vivek Medapalli	October 14, 2016	\$2,500.00
Kevin S. Chap	October 14, 2016	\$20,000.00
Ahad F. Ahmed	October 17, 2016	\$7,500.00
Nancy Melissa Toro Rivera	October 17, 2016	\$5,000.00
Richard W Fernandez	October 17, 2016	\$44,000.00
Vivek Medapalli	October 17, 2016	\$1,000.00
Kevin S. Chap	October 20, 2016	\$10,000.00
David S. Stewart	November 7, 2016	\$5,700.00
Marvin Omar Martinez	November 14, 2016	\$20,000.00
Timothy J. Swanson	November 17, 2016	\$15,000.00
Simon J. Fuenmayor	November 30, 2016	\$6,000.00
H. Rick Fernandez	December 5, 2016	\$5,000.00
Marina Rabelo	December 6, 2016	\$20,000.00
Nancy Melissa Toro Rivera	December 6, 2016	\$5,000.00
Kevin S. Chap	December 7, 2016	\$50,000.00
Robert Landis	December 9, 2016	\$1,000.00
Rodney Butcher	December 12, 2016	\$5,000.00
Zhad Ahmed	December 12, 2016	\$13,000.00
Luis A. Pizarro	December 12, 2016	\$10,000.00
Iveth Lopez	December 13, 2016	\$170,000.00
Ahad F. Ahmed	December 27, 2016	\$10,000.00
Timothy J. Swanson	December 28, 2016	\$5,000.00
Franklyn Edosomwan	January 3, 2017	\$5,000.00
Jeremy C. Daniels	January 3, 2017	\$1,000.00
Leon O. Binitie-Cassidy	January 3, 2017	\$5,000.00
Ione Swanson	January 4, 2017	\$8,021.00
Luis A. Pizarro	January 9, 2017	\$60,000.00
Dennis D. Rincon	January 23, 2017	\$20,000.00
Maria Nunez	January 23, 2017	\$10,000.00
Leon O. Binitie-Cassidy	January 26, 2017	\$5,000.00
Freddy S. Rodriguez	February 2, 2017	\$25,000.00
Leon O. Binitie-Cassidy	February 7, 2017	\$10,000.00
Migvia Vidal	February 10, 2017	\$40,000.00
Luis A. Pizarro	February 10, 2017	\$50,000.00
Migvia Vidal	February 16, 2017	\$20,000.00
Vivek Medapalli	February 24, 2017	\$2,000.00
Vivek Medapalli	February 27, 2017	\$2,000.00
Vivek Medapalli	February 28, 2017	\$1,000.00
Kevin S. Chap	March 3, 2017	\$25,000.00
Leon O. Binitie-Cassidy	March 7, 2017	\$19,000.00
Franklyn Edosomwan	March 8, 2017	\$6,000.00
Leon O. Binitie-Cassidy	March 9, 2017	\$1,000.00
Luis A. Pizarro	March 13, 2017	\$60,000.00
Elida D. Kohomban	March 16, 2017	\$20,000.00
Ahad F. Ahmed	March 20, 2017	\$11,000.00
Steven Raymond	March 29, 2017	\$30,000.00

Fady and Ana Chaban	March 30, 2017	\$10,000.00
Luis A. Pizarro	April 5, 2017	\$10,000.00
Migvia Vidal	April 5, 2017	\$10,000.00
Kevin S. Chap	April 11, 2017	\$100,000.00
Iffat Gillani	April 13, 2017	\$15,000.00
Carlos and Carolina Rosa	April 18, 2017	\$5,143.00
Hiten Bhatia	April 18, 2017	\$30,000.00
Steven Raymond	April 19, 2017	\$20,000.00
Brandon Foss	April 27, 2017	\$25,000.00
Carlos and Carolina Rosa	April 27, 2017	\$10,000.00
Zhad Ahmed	April 27, 2017	\$7,750.00
Simon J. Fuenmayor	May 3, 2017	\$3,000.00
Brandon Foss	May 15, 2017	\$75,000.00
Franklyn Edosomwan	May 16, 2017	\$9,000.00
Iffat Gillani	May 23, 2017	\$15,000.00
H. Rick Fernandez	May 24, 2017	\$5,000.00
Naini Seyed	June 5, 2017	\$7,000.00
Leon O. Binitie-Cassidy	June 6, 2017	\$25,000.00
Ione Swanson	June 6, 2017	\$17,700.00
Ione Swanson	June 6, 2017	\$2,700.00
Marvin Omar Martinez	June 14, 2017	\$40,000.00
Brandon Foss	June 15, 2017	\$200,000.00
Naini Seyed	June 15, 2017	\$8,000.00
Ahad F. Ahmed	June 20, 2017	\$5,110.00
Joel Keith Hermann	June 21, 2017	\$30,000.00
Carl Kleimann	June 22, 2017	\$50,000.00
Luis A. Pizarro	June 23, 2017	\$50,000.00
Joshua Griffin	July 14, 2017	\$10,000.00
Ahad F. Ahmed	July 19, 2017	\$10,000.00
Clinton J. Stewart	July 21, 2017	\$1,000.00
H. Rick Fernandez	July 25, 2017	\$5,000.00
Richard W. and Ashley W. Fernandez	July 25, 2017	\$10,000.00
Veronica Alvarez	July 25, 2017	\$30,000.00
Fady and Ana Chaban	July 31, 2017	\$10,000.00
Franklyn Edosomwan	August 1, 2017	\$8,000.00
Brandon Foss	August 8, 2017	\$50,000.00
Rodney Butcher	August 8, 2017	\$5,000.00
V Squared Properties / Christopher Vicoli	August 11, 2017	\$8,000.00
Vivek Medapalli	August 15, 2017	\$2,500.00
Vivek Medapalli	August 16, 2017	\$2,500.00
Rudolph Cantu	August 23, 2017	\$72,222.00
Mahmoud & Sun Ae Abousaoui	August 23, 2017	\$36,000.00
Veronica Alvarez	August 24, 2017	\$10,000.00
Ayman Aboshihata	August 30, 2017	\$ 700.00
Berta and David Rosales	September 5, 2017	\$20,000.00
Glenda Smith	September 5, 2017	\$45,000.00
Naini Seyed	September 5, 2017	\$5,000.00
Carl Kleimann	September 20, 2017	\$50,000.00
Carlos and Carolina Rosa	September 27, 2017	\$5,000.00

Naini Seyed	September 27, 2017	\$4,000.00
Navdeep Nijjar	September 27, 2017	\$20,000.00
Franklyn Edosomwan	October 2, 2017	\$8,000.00
Berta and David Rosales	October 4, 2017	\$10,000.00
Vivek Medapalli	October 4, 2017	\$20,000.00
H. Rick Fernandez	October 5, 2017	\$20,000.00
Ahad F. Ahmed	October 19, 2017	\$10,000.00
Jose Rabelo	October 23, 2017	\$40,000.00
Steven Raymond	October 23, 2017	\$39,000.00
Elizabeth K. Morrison	October 24, 2017	\$5,000.00
Ione Swanson	October 24, 2017	\$10,000.00
Carlos and Carolina Rosa	October 25, 2017	\$5,000.00
Steven Raymond	October 25, 2017	\$1,000.00
Brandon Foss	October 27, 2017	\$175,000.00
Richard W. and Ashley W. Fernandez	October 27, 2017	\$20,000.00
Franklyn Edosomwan	November 9, 2017	\$8,000.00
Luis A. Pizarro	November 15, 2017	\$40,000.00
Gholnesa LLC / Dina Vicoli	November 20, 2017	\$25,000.00
V Squared Properties / Christopher Vicoli	November 20, 2017	\$4,000.00
Navdeep Nijjar	November 27, 2017	\$20,000.00
Vivek Medapalli	November 27, 2017	\$20,000.00
Ashley Wilson Fernandez	November 29, 2017	\$100,000.00
Brandon Foss	December 1, 2017	\$100,000.00
Henry Rodriguez	December 1, 2017	\$30,000.00
Dennis D. Rincon	December 4, 2017	\$10,000.00
Stephen D. Walker	December 4, 2017	\$10,000.00
Ione Swanson	December 11, 2017	\$100,000.00
Zulene Chavez	December 11, 2017	\$15,000.00
Aldenago Nunez	December 12, 2017	\$20,000.00
Hector Emilio Alvarez Reyes	December 20, 2017	\$10,000.00
Marina Rabelo	December 20, 2017	\$20,000.00
Phillip Vicoli / PVSR50 LLC	December 27, 2017	\$30,000.00
Jackie M. Howard	December 29, 2017	\$21,500.00
Migvia Vidal	December 29, 2017	\$10,000.00
Ione Swanson	January 3, 2018	\$200,000.00
Rodney Butcher	January 3, 2018	\$10,000.00
Franklyn Edosomwan	January 8, 2018	\$7,000.00
Brandon Foss	January 12, 2018	\$60,000.00
Stephen H. DeClue	January 12, 2018	\$10,000.00
Glenda Smith	January 17, 2018	\$ 500.00
Carlos and Carolina Rosa	January 18, 2018	\$40,000.00
V Squared Properties / Christopher Vicoli	January 18, 2018	\$4,500.00
Richard W. and Ashley W. Fernandez	January 23, 2018	\$10,000.00
Elida D. Kohomban	January 26, 2018	\$7,000.00
Marvin Omar Martinez	January 29, 2018	\$50,000.00
Ruby D. Carney-Flippin	January 30, 2018	\$12,000.00
Beverly Harding	January 30, 2018	\$5,000.00
Simon J. Fuenmayor	January 30, 2018	\$7,000.00
Alec Haisley	January 31, 2018	\$10,000.00

H Rick Fernandez	January 31, 2018	\$10,000.00
Freddy S. Rodriguez	February 5, 2018	\$25,000.00
Leon O. Binitie-Cassidy	February 13, 2018	\$30,000.00
Glenda Smith	February 13, 2018	\$ 500.00
Steven Raymond	February 13, 2018	\$50,000.00
Vivek Medapalli	February 13, 2018	\$15,000.00
Marvin Omar Martinez	February 14, 2018	\$23,000.00
Luis A. Pizarro	February 16, 2018	\$20,000.00
Migvia Vidal	February 16, 2018	\$10,000.00
Carlos and Carolina Rosa	February 26, 2018	\$40,000.00
Marvin Omar Martinez	February 26, 2018	\$50,000.00
V Squared Properties / Christopher Vicoli	February 26, 2018	\$5,000.00
Daniel A. Rojas	February 28, 2018	\$6,000.00
Sehrish Zehra	February 28, 2018	\$8,000.00
Steve Solomon	February 28, 2018	\$5,000.00
Gholnesa LLC / Dina Vicoli	March 5, 2018	\$20,000.00
Franklyn Edosomwan	March 8, 2018	\$9,000.00
Hiten Bhatia	March 8, 2018	\$30,000.00
Chris Vicoli / V Squared Properties, LLC	March 13, 2018	\$2,500.00
Fady and Ana Chaban	March 14, 2018	\$20,000.00
Franklyn Edosomwan	March 14, 2018	\$10,000.00
Jonathan Joseph Lyons	March 16, 2018	\$ 500.00
Glenda Smith	March 19, 2018	\$ 500.00
Clinton J. Stewart	March 21, 2018	\$1,000.00
Joel Keith Hermann	March 23, 2018	\$10,000.00
Ahad F. Ahmed	March 26, 2018	\$25,000.00
Ahad F. Ahmed	March 27, 2018	\$5,000.00
Sehrish Zehra	March 27, 2018	\$2,499.00
Sehrish Zehra	March 27, 2018	\$ 500.01
Holly Havard	March 29, 2018	\$13,000.00
Steve Solomon	April 5, 2018	\$ 500.00
Glenda Smith	April 9, 2018	\$1,500.00
Elizabeth K. Morrison	April 13, 2018	\$1,000.00

and the Defendant engaged in fraud in connection with the sale and offer for sale of the securities by:

- Knowingly and intentionally representing that the funds invested in the Program would be used for the purchase of investment vehicles such as equities, bonds, ETFs, mutual funds, and options, a misrepresentation of a relevant fact; and or
- Intentionally failing to disclose that the funds invested in the Program would be used for purposes other than the purchase of investment vehicles, such as equities, bonds, ETFs, mutual funds, and options, a material fact; and or

- Intentionally failing to disclose that previous investors funds were used to pay distributions to other investors, a material fact; and or
- Intentionally failing to disclose that the profit and principal payments made to investors were not generated from revenue and profits earned, but instead, paid with funds received from other investors, a material fact; and or
- Intentionally failing to disclose that funds invested by previous investors were commingled with those of other investors and, with the Defendant's personal accounts, a material fact; and or
- Intentionally failing to disclose that funds paid by previous investors were used to pay the Defendant's personal expenses and the personal expenses of the Defendant s family, a material fact; and or
- Intentionally failing to disclose that the Program was not earning sufficient profits to pay interest owed to investors, a material fact; and or
- Knowingly and intentionally representing that the Program was generating sufficient profit from the buying and selling of securities to meet the monthly interest payments represented in the investors notes in the Program, a misrepresentation of a relevant fact; and or
- Knowingly and intentionally representing that Defendant was paying interest payments to investors based on Program profits, a misrepresentation of a relevant fact; and or
- Knowingly and intentionally representing that the Defendant would not receive compensation unless the Program earned 5% returns per month and, thereafter, the Defendant would only be compensated the excess income above 5% for services in connection with said offering, a misrepresentation of a relevant fact; and or
- Knowingly and intentionally representing that Defendant would invest funds as per the regulations set forth by the United States Securities and Exchange Commission, a misrepresentation of a relevant fact, and or
- Intentionally failing to disclose that the Defendant was not registered with any securities regulatory agency and that the Defendant did not follow regulations set forth by the United States Securities and Exchange Commission to claim an exemption from registration, a material fact; and or

- Intentionally failing to disclose that neither the Defendant, the Program, nor any of its employees, were registered to sell securities or render investment advice, a material fact;

and the aggregate value of the amount involved was \$100,000.00 or more;

AGAINST THE PEACE AND DIGNITY OF THE STATE.

SWORN TO AND SUBSCRIBED BEFORE ME ON

AFFIANT

ASSISTANT DISTRICT ATTORNEY
FORT BEND COUNTY, TEXAS

FELONY COMPLAINT (ORIGINAL/DA/AGENCY)