

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(1)**  
**2<sup>nd</sup> Degree Felony**  
**TPC 31.03(a), (b)(1)**

VS.

**JAMES CHRISTOPHER URANGA**  
**(WM) (DOB: 10-09-1967)**  
**SSN**  
**TEXAS DL**  
**3504 HAMLET COVE**  
**ROUND ROCK, TEXAS 78664**

---

**INDICTMENT**

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **JAMES CHRISTOPHER URANGA**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER DOUGLAS, CARLOS LUQUIS, BOBBY JOE GREER, AND CYBERENSICS CORPORATION**, commit the felony offense of Theft, and in furtherance of said combination, said DEFENDANT, heretofore on or about and between January 12, 2004 and April 19, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$20,000 or more but less than \$100,000, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work done by "Ross Boulton," and "Ross Boulton" performed no work for ERCOT,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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

WITNESSES: Assistant Attorney Generals John Neal, David Glickler,  
Ralph Guerrero and Harry White  
Margaret Pemberton  
Bobby Joe Greer

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TPC 71.02(a)(1)  
2<sup>nd</sup> Degree Felony  
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**(WM) (DOB: 10-09-1967)**  
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**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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

WITNESSES:      Assistant Attorney Generals John Neal, David Glickler,  
                         Ralph Guerrero and Harry White  
                         Margaret Pemberton  
                         Bobby Joe Greer

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THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**1<sup>st</sup> Degree Felony**  
**MISAPPLICATION OF**  
**FIDUCIARY PROPERTY**  
**TPC 32.45(b)**

VS.

**JAMES CHRISTOPHER URANGA**  
**(WM) (DOB: 10-09-1967)**  
**SSN**  
**TEXAS DL**  
**3504 HAMLET COVE**  
**ROUND ROCK, TEXAS 78664**

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## INDICTMENT

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

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**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Bobby Joe Greer  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

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**OFFENSE**  
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**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**1<sup>st</sup> Degree Felony**  
**MISAPPLICATION OF**  
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**JAMES CHRISTOPHER URANGA**  
**(WM) (DOB: 10-09-1967)**  
**SSN**  
**TEXAS DL**  
**3504 HAMLET COVE**  
**ROUND ROCK, TEXAS 78664**

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**INDICTMENT**

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **JAMES CHRISTOPHER URANGA**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER ALLEN DOUGLAS, CARLOS LUQUIS, MATTHEW D. NELSON, AND ECT GLOBAL SOLUTIONS, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 25, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract and amendments to said contract between the ERCOT and ECT Global Solutions, Inc., and by signing and approving invoices from ECT Global Solutions, Inc. to the ERCOT and by receiving monies paid by the ERCOT to ECT Global Solutions, Inc.

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Diane Gallatin  
Brian Vajdos - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

JAMES CHRISTOPHER URANGA  
(WM) (DOB: 10-09-1967)  
SSN  
TEXAS DL  
3504 HAMLET COVE  
ROUND ROCK, TEXAS 78664

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
TPC 71.02(a)(8)  
1<sup>st</sup> Degree Felony  
**MISAPPLICATION OF**  
**FIDUCIARY PROPERTY**  
TPC 32.45(b)

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **JAMES CHRISTOPHER URANGA**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER ALLEN DOUGLAS, CARLOS LUQUIS, JOHN BENITO CAVAZOS, AND TRI FORCE SECURITY, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said DEFENDANT, heretofore on or about and between July 28, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract between ERCOT and Tri Force Security, Inc., and by signing and approving invoices from Tri Force Security, Inc. to ERCOT and by receiving monies paid by ERCOT to Tri Force Security, Inc.,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
John Benito Cavazos  
Don Clendennen - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

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THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(1)**  
**2<sup>nd</sup> Degree Felony**  
**TPC 31.03(a), (b)(1)**

VS.

**CHRISTOPHER DOUGLAS**  
**(BM) (DOB: 4-12-1958)**  
SSN  
**TEXAS DL**  
**9903 TREE BEND COVE**  
**AUSTIN, TEXAS 78750**

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**INDICTMENT**

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **CHRISTOPHER DOUGLAS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CARLOS LUQUIS, BOBBY JOE GREER, AND CYBERENSICS CORPORATION**, commit the felony offense of Theft, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between January 12, 2004 and April 19, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$20,000 or more but less than \$100,000, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work done by "Ross Boulton," and "Ross Boulton" performed no work for ERCOT,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

WITNESSES: Assistant Attorney Generals John Neal, David Glickler,  
Ralph Guerrero and Harry White  
Margaret Pemberton  
Bobby Joe Greer

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FOREMAN OF THE GRAND JURY

WITNESSES: Assistant Attorney Generals John Neal, David Glickler,  
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**1<sup>st</sup> Degree Felony**  
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**(BM) (DOB: 4-12-1958)**  
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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Bobby Joe Greer  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

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THE STATE OF TEXAS

VS.

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(BM) (DOB: 4-12-1958)  
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9903 TREE BEND COVE  
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AGAINST THE PEACE AND DIGNITY OF THE STATE.

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Diane Gallatin  
Brian Vajdos - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

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**(BM) (DOB: 4-12-1958)**  
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**TEXAS DL**  
**9903 TREE BEND COVE**  
**AUSTIN, TEXAS 78750**

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## INDICTMENT

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THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **CHRISTOPHER DOUGLAS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CARLOS LUQUIS, MATTHEW D. NELSON, AND ECT GLOBAL SOLUTIONS, INC.**, commit the felony offense of Theft, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 27, 2003 and April 26, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by *acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$100,000 or more, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work and services done by ECT Global Solutions, Inc, and ECT Global Solutions, Inc., never performed the work or services billed for,*

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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FOREMAN OF THE GRAND JURY

WITNESSES:      Assistant Attorneys General John Neal, David Glickler,  
                         Ralph Guerrero and Harry White  
                         Diane Gallatin  
                         Margaret Pemberton  
                         DPS Sgt. Brian Vajdos

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OFFENSE  
**ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**1<sup>st</sup> Degree Felony**  
**MISAPPLICATION OF  
FIDUCIARY PROPERTY**  
**TPC 32.45(b)**

VS.

**CHRISTOPHER ALLEN DOUGLAS**  
**(BM) (DOB: 4-12-1958)**  
**SSN**  
**TEXAS DL**  
**9903 TREE BEND COVE**  
**AUSTIN, TEXAS 78750**

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**INDICTMENT**

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **CHRISTOPHER ALLEN DOUGLAS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CARLOS LUQUIS, JOHN BENITO CAVAZOS, AND TRI FORCE SECURITY, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said DEFENDANT, heretofore on or about and between July 28, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract between ERCOT and Tri Force Security, Inc., and by signing and approving invoices from Tri Force Security, Inc. to ERCOT, and by receiving monies paid by ERCOT to Tri Force Security, Inc.,

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**FOREMAN OF THE GRAND JURY**

Grand Jury Witnesses:  
Margaret Pemberton  
John Benito Cavazos  
Don Clendennen - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
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CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

OFFENSE  
**ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY**  
TPC 71.02(a)(1)  
2<sup>nd</sup> Degree Felony  
TPC 31.03(a), (b)(1)

VS.

**CARLOS LUQUIS**  
(WM) (DOB: 10-31-1967)  
SSN  
TEXAS DL  
90 KOCLAS  
NETCONG, NEW JERSEY 07857

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CHRISTOPHER DOUGLAS, BOBBY JOE GREER, AND CYBERENSICS CORPORATION**, commit the felony offense of Theft, and in furtherance of said combination, said DEFENDANT, heretofore on or about and between January 12, 2004 and April 19, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$20,000 or more but less than \$100,000, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work done by "Ross Boulton," and "Ross Boulton" performed no work for ERCOT,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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FOREMAN OF THE GRAND JURY

WITNESSES: Assistant Attorney Generals John Neal, David Glickler,  
Ralph Guerrero and Harry White  
Margaret Pemberton  
Bobby Joe Greer

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CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(1)**  
**2<sup>nd</sup> Degree Felony**  
**TPC 31.03(a), (b)(1)**

VS.

**CARLOS LUQUIS**  
**(WM) (DOB: 10-31-1967)**  
**SSN**  
**TEXAS DL**  
**90 KOCLAS**  
**NETCONG, NEW JERSEY 07857**

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## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CHRISTOPHER DOUGLAS, BOBBY JOE GREER, AND CYBERENSICS CORPORATION**, commit the felony offense of Theft, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 8, 2004 and May 12, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$20,000 or more but less than \$100,000, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work done by "Shelly Dees," and "Shelly Dees" performed no work for ERCOT,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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

WITNESSES: Assistant Attorney Generals John Neal, David Glickler.  
Ralph Guerrero and Harry White  
Margaret Pemberton  
Bobby Joe Greer

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**1<sup>st</sup> Degree Felony**  
**MISAPPLICATION OF**  
**FIDUCIARY PROPERTY**  
**TPC 32.45(b)**

VS.

**CARLOS LUQUIS**  
**(WM) (DOB: 10-31-1967)**  
**SSN**  
**NEW JERSEY DL**  
**2232 HAMLET CIRCLE**  
**ROUND ROCK, TEXAS 78664**

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER ALLEN DOUGLAS, JAMES CHRISTOPHER URANGA, BOBBY JOE GREER, AND CYBERENSICS CORPORATION**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between May 16, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract and amendments to said contract between ERCOT and Cyberensics Corporation, and by signing and approving invoices from Cyberensics Corporation to ERCOT, and by receiving monies paid by ERCOT to Cyberensics Corporation,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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

Grand Jury Witnesses:  
Margaret Pemberton  
Bobby Joe Greer  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**1<sup>st</sup> Degree Felony**  
**MISAPPLICATION OF**  
**FIDUCIARY PROPERTY**  
**TPC 32.45(b)**

VS.

**CARLOS LUQUIS**  
**(WM) (DOB: 10-31-1967)**  
**SSN**  
**NEW JERSEY DL**  
**2232 HAMLET CIRCLE**  
**ROUND ROCK, TEXAS 78664**

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## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER ALLEN DOUGLAS, JAMES CHRISTOPHER URANGA, MATTHEW D. NELSON, AND ECT GLOBAL SOLUTIONS, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 25, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract and amendments to said contract between ERCOT and ECT Global Solutions, Inc., and by signing and approving invoices from ECT Global Solutions, Inc. to ERCOT, and by receiving monies paid by ERCOT to ECT Global Solutions, Inc.,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Diane Gallatin  
Brian Vajdos - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(1)**  
**1<sup>st</sup> Degree Felony**  
**TPC 31.03(a), (b)(1)**

VS.

**CARLOS LUQUIS**  
**(WM) (DOB: 10-31-1967)**  
**SSN**  
**TEXAS DL**  
**90 KOCLAS**  
**NETCONG, NEW JERSEY 07857**

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CHRISTOPHER DOUGLAS, MATTHEW D. NELSON, AND ECT GLOBAL SOLUTIONS, INC.**, commit the felony offense of Theft, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 27, 2003 and April 26, 2004, pursuant to one scheme and continuing course of conduct, did then and there *unlawfully appropriate*, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$100,000 or more, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work and services done by ECT Global Solutions, Inc, and ECT Global Solutions, Inc., never performed the work or services billed for,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

WITNESSES: Assistant Attorneys General John Neal, David Glickler,  
Ralph Guerrero and Harry White  
Diane Gallatin  
Margaret Pemberton  
DPS Sgt. Brian Vajdos

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

CARLOS LUQUIS  
(WM) (DOB: 10-31-1967)  
SSN  
NEW JERSEY DL  
2232 HAMLET CIRCLE  
ROUND ROCK, TEXAS 78664

OFFENSE  
ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY  
TPC 71.02(a)(8)  
1<sup>st</sup> Degree Felony  
MISAPPLICATION OF  
FIDUCIARY PROPERTY  
TPC 32.45(b)

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **CARLOS LUQUIS**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CHRISTOPHER ALLEN DOUGLAS, JOHN BENITO CAVAZOS, AND TRI FORCE SECURITY, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between July 28, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract between ERCOT and Tri Force Security, Inc., and by signing and approving invoices from Tri Force Security, Inc. to ERCOT, and by receiving monies paid by ERCOT to Tri Force Security, Inc.,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
John Benito Cavazos  
Don Clendennen - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry B. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

JOHN BENITO CAVAZOS  
(WM) (DOB: 1-3-1972)  
SSN  
TEXAS DL  
17210 SONOMA SPRINGS  
SAN ANTONIO, TEXAS 78232

OFFENSE  
ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY  
TPC 71.02(a)(8)  
1<sup>st</sup> Degree Felony  
MISAPPLICATION OF  
FIDUCIARY PROPERTY  
TPC 32.45(b)

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## INDICTMENT

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **JOHN BENITO CAVAZOS**, hereafter styled the *Defendant*, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, JAMES CHRISTOPHER URANGA, CHRISTOPHER ALLEN DOUGLAS, CARLOS LUQUIS, AND TRI FORCE SECURITY, INC.**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between July 28, 2003 and May 21, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract between ERCOT and Tri Force Security, Inc., and by signing and approving invoices from Tri Force Security, Inc. to ERCOT, and by receiving monies paid by ERCOT to Tri Force Security, Inc.,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
John Benito Cavazos  
Don Clendennen - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

KENNETH SHOQUIST  
(WM) (DOB: 6-09-1952)  
SSN  
TEXAS DL  
2122 HILTON HEAD  
ROUND ROCK, TEXAS 78664

OFFENSE  
ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY  
TPC 71.02(a)(8)  
3<sup>rd</sup> Degree Felony  
COMMERCIAL BRIBERY  
TPC 32.43 (b)

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**INDICTMENT**

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **KENNETH SHOQUIST**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, STEPHEN C. WALLACE AND DSS GROUP**, commit the felony offense of Commercial Bribery, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 13, 2003 and April 1, 2004, pursuant to one scheme and continuing course of conduct, did then and there, while he was a fiduciary, without the effective consent of the Electric Reliability Council of Texas (ERCOT), the Defendant's beneficiary, intentionally and knowingly accept a benefit, to-wit: money, from Stephen C. Wallace, on agreement or understanding that the benefit would influence the conduct of the defendant in relation to the affairs of ERCOT, to-wit: on behalf of ERCOT, Defendant signed and approved contracts with DSS Group that allowed DSS Group to receive monies from ERCOT.

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:  
Margaret Pemberton  
Errin O'Connor  
Ralph Disher  
Mike Stanford - Sergeant DPS Special Crimes  
John Neal - Assistant Attorney General  
David Glickler - Assistant Attorney General  
Raphael Guerrero - Assistant Attorney General  
Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

**THE STATE OF TEXAS**

VS.

**KENNETH SHOQUIST  
(WM) (DOB: 6-09-1952)  
SSN  
TEXAS DL  
2122 HILTON HEAD  
ROUND ROCK, TEXAS 78664**

**OFFENSE  
Ct. 1: ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY  
TPC 71.02(8)  
1<sup>ST</sup> Degree Felony  
MISAPPLICATION OF FIDUCIARY  
PROPERTY  
TPC 32.45(b)  
Ct. 2: CRIMINAL CONSPIRACY  
TPC 15.02(a)  
2<sup>nd</sup> Degree Felony  
MISAPPLICATION OF  
FIDUCIARY PROPERTY  
TPC 32.45(b)**

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## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment:

### COUNT I

in Williamson County, Texas, **KENNETH SHOQUIST**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, STEPHEN C. WALLACE AND DSS GROUP**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between February 15, 2003 and May 31, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing and approving a contract and amendments to said contract between ERCOT and DSS GROUP, and by signing and approving invoices from DSS GROUP,

**COUNT II**

The Grand Jury further presents that on or about and between February 15, 2003 and May 31, 2004, in Williamson County, Texas, **KENNETH SHOQUIST**, hereafter styled the Defendant, did then and there, with the intent that Misapplication of Fiduciary Property, a felony, be committed, agree with **STEPHEN C. WALLACE AND DSS GROUP** that one of them would engage in conduct that would constitute said offense, to-wit: intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$200,000 or more, that said Defendant held as a fiduciary, or as a person acting in a fiduciary capacity, contrary to an agreement under which the said Defendant held the property, in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas, ("ERCOT"), the owner of said property, and the person for whose benefit the property was held, and the said defendant performed an overt act in pursuance of said agreement, to-wit: signing or having someone sign a contract and amendments to said contract between ERCOT and DSS Group, and by signing and approving invoices from DSS Group to ERCOT, and by receiving monies paid by ERCOT to DSS Group,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

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FOREMAN OF THE GRAND JURY

WITNESSES:      Assistant Attorney Generals John Neal, David Glickler,  
                         Ralph Guerrero and Harry White  
                         Margaret Pemberton  
                         Errin O'Connor  
                         DPS Special Crimes Sgt. Mike Stanford  
                         Ralph Disher

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

STEPHEN C. WALLACE  
(WM) (DOB: 6-30-1960)  
SSN  
TEXAS DL  
1512 PALOMINO RIDGE DR.  
AUSTIN, TEXAS 78733

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(8)**  
**3<sup>rd</sup> Degree Felony**  
**COMMERCIAL BRIBERY**  
**TPC 32.43 (c)**

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## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that in Williamson County, Texas, **STEPHEN C. WALLACE**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, KENNETH SHOQUIST AND DSS GROUP**, commit the felony offense of Commercial Bribery, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 13, 2003 and April 1, 2004, pursuant to one scheme and continuing course of conduct, did then and there, without the effective consent of the Electric Reliability Council of Texas (ERCOT), intentionally and knowingly confer and agree to confer a benefit, to-wit: money, to Kenneth Shoquist, a fiduciary of ERCOT, with the agreement or understanding that the benefit would influence the conduct of the Kenneth Shoquist in relation to the affairs of his beneficiary, ERCOT, to-wit: on behalf of ERCOT, Kenneth Shoquist signed and approved contracts with DSS Group that allowed DSS Group to receive monies from ERCOT,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

---

FOREMAN OF THE GRAND JURY

Grand Jury Witnesses:

Margaret Pemberton

Errin O'Connor

Ralph Disher

Mike Stanford - Sergeant DPS Special Crimes

John Neal - Assistant Attorney General

David Glickler - Assistant Attorney General

Raphael Guerrero - Assistant Attorney General

Harry E. White - Assistant Attorney General

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

VS.

STEPHEN C. WALLACE  
(WM) (DOB: 6-30-1960)  
SSN  
TEXAS DL  
1512 PALOMINO RIDGE DRIVE  
AUSTIN, TEXAS 78733

OFFENSE  
Ct. 1: ENGAGING IN ORGANIZED  
CRIMINAL ACTIVITY  
TPC 71.02(8)  
1<sup>ST</sup> Degree Felony  
MISAPPLICATION OF FIDUCIARY  
PROPERTY  
TPC 32.45(b)  
Ct. 2: CRIMINAL CONSPIRACY  
TPC 15.02(a)  
2<sup>nd</sup> Degree Felony  
MISAPPLICATION OF  
FIDUCIARY PROPERTY  
TPC 32.45(b)

---

## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment:

### COUNT I

in Williamson County, Texas, **STEPHEN C. WALLACE**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, KENNETH SHOQUIST, AND DSS GROUP**, commit the felony offense of Misapplication of Fiduciary Property, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between February 15, 2003 and May 31, 2004, pursuant to one scheme and continuing course of conduct, did then and there intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$100,000 or more, that said defendant held as a fiduciary or as a person acting in a fiduciary capacity contrary to an agreement under which the person holds the property in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas (ERCOT), the owner of said property, and the person for whose benefit the property was held, by signing or having someone sign and approving a contract and amendments to said contract between ERCOT and DSS GROUP, and by signing and approving invoices from DSS GROUP, to ERCOT, and by receiving monies paid by ERCOT to DSS GROUP,

## COUNT II

The Grand Jury further presents that on or about and between February 15, 2003 and May 31, 2004, in Williamson County, Texas, heretofore on or about and between February 15, 2003 and May 31, 2004, **STEPHEN C. WALLACE**, hereafter styled the Defendant, did then and there, with the intent that Misapplication of Fiduciary Property, a felony, be committed, agree with **KENNETH SHOQUIST AND DSS GROUP** that one of them would engage in conduct that would constitute said offense, to-wit: intentionally, knowingly and recklessly misapply property, to-wit: money, of a value of \$200,000 or more, that said Defendant held as a fiduciary, or as a person acting in a fiduciary capacity, contrary to an agreement under which the said Defendant held the property, in a manner that involved substantial risk of loss of the property to the Electric Reliability Council of Texas, ("ERCOT"), the owner of said property, and the person for whose benefit the property was held, and the said defendant performed an overt act in pursuance of said agreement, to-wit: signing or having someone sign a contract and amendments to said contract between ERCOT and DSS GROUP, and by signing and approving invoices from DSS GROUP to ERCOT, and by receiving monies paid by ERCOT to DSS GROUP,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

---

FOREMAN OF THE GRAND JURY

WITNESSES:      Assistant Attorney Generals John Neal, David Glickler,  
                         Ralph Guerrero and Harry White  
                         Margaret Pemberton  
                         Errin O'Connor  
                         DPS Special Crimes Sgt. Mike Stanford  
                         Ralph Disher

DATE OF INDICTMENT  
January 28, 2005

CAUSE NO. \_\_\_\_\_

**THE STATE OF TEXAS**

**OFFENSE**  
**ENGAGING IN ORGANIZED**  
**CRIMINAL ACTIVITY**  
**TPC 71.02(a)(1)**  
**1<sup>st</sup> Degree Felony**  
**TPC 31.03(a), (b)(1)**

VS.

**JAMES CHRISTOPHER URANGA**  
**(WM) (DOB: 10-09-1967)**  
**SSN**  
**TEXAS DL**  
**3504 HAMLET COVE**  
**ROUND ROCK, TEXAS 78664**

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## INDICTMENT

---

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

THE GRAND JURORS for Williamson County, Texas, duly organized as such at the July Term, A.D., 2004, of the 395<sup>th</sup> District Court of Williamson County, Texas, upon oath in said Court present that before the presentment of this indictment in Williamson County, Texas, **JAMES CHRISTOPHER URANGA**, hereafter styled the Defendant, did unlawfully with intent to establish, maintain, and participate in a combination and in the profits of a combination, said combination consisting of the **DEFENDANT, CHRISTOPHER DOUGLAS, CARLOS LUQUIS, MATTHEW D. NELSON, AND ECT GLOBAL SOLUTIONS, INC.**, commit the felony offense of Theft, and in furtherance of said combination, said **DEFENDANT**, heretofore on or about and between March 27, 2003 and April 26, 2004, pursuant to one scheme and continuing course of conduct, did then and there unlawfully appropriate, by acquiring and otherwise exercising control over property, namely, money, and the total value of property so obtained was \$100,000 or more, owned by the Electric Reliability Council of Texas, hereafter styled "ERCOT", with intent to deprive ERCOT of the property without ERCOT's effective consent, by billing ERCOT for work and services done by ECT Global Solutions, Inc, and ECT Global Solutions, Inc., never performed the work or services billed for,

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

---

FOREMAN OF THE GRAND JURY

WITNESSES: Assistant Attorneys General John Neal, David Glickler,  
Ralph Guerrero and Harry White  
Diane Gallatin  
Margaret Pemberton  
DPS Special Crimes Sgt. Brian Vajdos