COMPLAINT

TO THE DISTRICT ATTORNEY OF SAID COUNTY:

NOW COMES the undersigned complainant and, pursuant to article 2.04 and article

2.05 of the Texas Code of Criminal Procedure, hereby makes the following complaint:

My name is Craig L. McDonald, my date of birth is March 15, 1950, and my address is 1102 Live Oak Ridge, Austin, Texas, 78746, United States of America. I am of sound mind and capable of making this declaration. I have good reason to believe, and do believe, that:

Kenneth Warren Paxton, Jr. Attorney General of the State of Texas,

at times between 2004 and 2012 A.D., in the County of Collin and State of Texas, committed one or more offenses in violation of Section 12.B of The Texas Securities Act and against the peace and dignity of the State.

I have reason to believe, and do believe, that at times between 2004 and 2012 in the aforesaid county and state, the aforesaid Kenneth Warren Paxton, Jr. violated Section 12.B of the Texas Securities Act by acting as an investment advisor representative of Mowery Capital Management, LLC, a registered investment advisor located in Texas. While acting as an investment advisor representative for Mowery Capital Management as defined by Section 4.P of the Texas Securities Act, Kenneth Warren Paxton, Jr. was not registered as an investment adviser representative of Mowery Capital Management with the Securities Commission as required by law.

The basis of my belief that Kenneth Warren Paxton, Jr. violated the Texas Securities Act is embodied in Disciplinary Order No. IC14-CAF-03 entered by the Securities Commissioner on May 2, 2014. The findings of fact detailed in the order support the conclusion that on more than one occasion Mr. Paxton solicited potential clients for Mowery Capital and was compensated by Mowery Capital for a percentage of the management fees collected from each client successfully solicited by Mr. Paxton. The disciplinary order agreed to and signed by Mr. Paxton is a clear admission that he violated Section 12.B of the Securities Act.

Section 29.1 of the Texas Securities Act provides as follows:

"Penal Provisions. Any person who shall:...1. Render services as an investment adviser representative without being registered as required by this Act shall be deemed guilty of a felony of the third degree."

The foregoing facts and law establish that Paxton has admitted to behavior that constitutes a crime under Texas law, specifically, a third degree felony.

I hereby declare under penalty of perjury that the foregoing is true and correct.

EXECUTED IN Travis County, State of Texas, on this, the 2nd, day of April, A.D. 2015.

Complainant	