

Texans For Public Justice

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April 6, 2015

Mr. Greg Willis
Collin County District Attorney
Collin County District Attorney's Office
2100 Bloomdale Rd., Suite 100
McKinney, TX 75071

Complaint re: Kenneth Warren Paxton, Jr.

Dear Mr. Willis,

The enclosed complaint seeks an investigation and potential prosecution of Kenneth Warren Paxton, Jr. for criminal felony offenses related to his activities as an investment advisor representative for Mowery Capital Management, LLC. The apparent criminal activities appear to have been committed within Collin County.

The public record appears to make unambiguously clear that Mr. Paxton violated provisions of the Texas Securities Act in 2004, 2005 and 2012 by failing to register as an investment advisor representative of Mowery Capital Management as the law requires. On its face, such conduct by Mr. Paxton rises to a criminal felony offense. Mr. Paxton's conduct demands a thorough and independent investigation.

We further believe that as a friend and business associate of Mr. Paxton that you should recuse yourself from this matter. To ensure independent and impartial judgment, you should forward our complaint to the proper judicial authority to appoint an independent special prosecutor to investigate Mr. Paxton's conduct.

Respectfully,

Craig McDonald
Director, Texans for Public Justice