

**Information needed from you to begin an investigation may include the following,
please send as many of these documents as you have available:**

- 1) In the fact description, be very detailed about what specifically you are alleging (attach additional sheets as necessary.)
- 2) If checks, drafts or other bank items were used in the commission of the alleged offense include:
 - a) Copies of bank statements
 - b) Copies of the front and back of checks
 - c) Copies of wire orders
 - d) Checkbook registers, check stubs, accounting ledgers, and/or complete backup copies of QuickBooks or Peachtree accounting software (include version number). If you use another type of software, check with the assigned investigator prior to sending a backup file.
 - e) Identification of all of the victim's bank accounts.
- 3) If the victim is a business or association:
 - a) Copies of documents used for the legal formation of the business (partnership agreements, articles of incorporation, etc.)
 - b) Description of business, including type of operation, names of owners or partners, names of directors and contact information (include on a separate sheet).
 - c) The affiant's position within the business
- 4) If the party about which you are complaining is/was an employee:
 - a) Complete personnel file, including application, resume, IRS Forms W2 and W4, direct deposit information, copies of paychecks, list of all direct deposits, copies of reimbursements, time sheets, and relevant correspondence.
- 5) Promissory notes, security agreements, or loan agreements
- 6) All civil pleadings and orders related to the actions about which you are complaining.
- 7) Copies of any receipts or invoices involved
- 8) Copies of all contracts or written agreements between involved parties
- 9) Copies of any pertinent written or email correspondence between parties
- 10) A forensic audit

I. INFORMATION ABOUT THE PARTY OR FIRM COMPLAINED OF:

Rani A. Sabban

Financial Examiner at the Texas State Securities Board ("TSSB")

Austin, Texas
[REDACTED]

Thomas Preston Joy

FBI Special Agent

Austin, Texas
[REDACTED]

Jason Ernst

Texas Department of Public Safety

Austin, Texas
[REDACTED]

Alan Buie

Assistant United States Attorney

Office of the U.S. Attorney for the Western District of Texas, Austin Division.

Austin, Texas
[REDACTED]

Neeraj Gupta

Assistant United States Attorney

Office of the U.S. Attorney for the Western District of Texas, Austin Division.

Austin, Texas
[REDACTED]

Mark Patrick Lane

U.S. Magistrate Judge, WDTX, Austin Division

Austin, Texas
[REDACTED]

Veronica Sobrevilla-Dent

Courtroom Deputy to U.S. Magistrate Judge Mark Lane

Austin, Texas
[REDACTED]

II. COMPLAINING PARTY AND WITNESS:

Natin "Nate" Paul

[REDACTED]
Austin, Texas
[REDACTED]

Witness

III. INFORMATION ABOUT ALLEGED OFFENSE:

Date of Alleged Offense: August – September 2019

Where did the offense occur: Austin, Travis County, Texas

IV. FACT DESCRIPTION: *(attach additional pages as needed)*

Describe the exact nature of your complaint below and on additional sheets, if necessary. Please be complete. Include the name of the individual that you dealt with and dates. If possible, recite facts in the order in which they occurred. You must provide copies of all relevant documents (see attached list). **Keep all originals in a safe place in the event they are needed for court purposes.**

This complaint is regarding search warrants that were executed in August of 2019 in Austin, Travis County, Texas, and the conduct of the officers and agents authorizing and executing the search warrants. These searches were of properties owned/controlled by myself, Natin "Nate" Paul and/or my company, World Class Capital Group.

Agents involved in executing the search include Rani A. Sabban, Thomas Preston Joy, and Jason Ernst. These 3 agents were part of a group of approximately 75 agents that were present at the searches at 3 separate locations on August 14, 2019.

The AUSAs overseeing the matter were Alan Buie and Neeraj Gupta of the Department of Justice for the U.S. Attorney of the Western District of Texas.

The search warrants were supposedly authorized and signed by US Magistrate Judge Mark Patrick Lane. Judge Lane's Deputy Courtroom Clerk is Veronica Sobrevilla-Dent.

Search warrants were not presented to the individuals present at any of the 3 locations that were searched on August 14, 2019. These locations include (1) World Class Holdings Office, [REDACTED] Austin, Texas [REDACTED] (2) World Class Holdings Server Room, [REDACTED] [REDACTED] (3) Nate Paul's residence, [REDACTED] Austin, Texas [REDACTED]

I was personally present at location (3) my residence, [REDACTED] Austin, Texas [REDACTED]. The agents raided my residence at approximately 9:00am on August 14, 2019. Despite over ten requests to see the search warrant, Agent Rani Sabban repeatedly denied my access to seeing the search warrant. Additionally, Agent Rani Sabban and the other agents cut the wi-fi lines to my home and destroyed my security camera system after entering my home. The security camera system was destroyed at approximately 9:17am. Despite my requests, I was detained in my home and was not allowed to use the restroom for approximately 2 hours after the agents arrived. Additionally, Agent Sabban refused to let me call an attorney until approximately 11:00am, two hours after they arrived. Agent Sabban confiscated my phone from my pocket when they entered my residence. When I was finally allowed to call my attorney, I had to make the call from Agent Sabban's cell phone. My attorney informed me that they were not

allowed to detain me and that it was against my rights for them to have detained me and not allowed me to call counsel for the two hours they had been inside my residence. I asked my counsel to tell Agent Sabban that I was free to leave, and they were not to detain me any longer. Agent Sabban acknowledged this on the call with my counsel. After he hung up the phone call, I attempted to stand up since I was told I was free to leave. Agent Sabban ordered me to sit back down and I wasn't free to leave "until he said so." They proceeded to keep me detained for another 1.5 hours until 12:30pm.

Individuals requesting copies of the search warrant at the office and server room were similarly denied access to the search warrants when requested before, during, and after the searches took place.

Copies of the purported search warrants were received by my counsel via email from AUSA Alan Buie. The first relating to my residence was received by my counsel in an email from Alan Buie at 5:59pm on August 14, 2019. The search warrants relating to the office and the server room were sent on August 15, 2019 and August 16, 2019.

AUSA Alan Buie assured my counsel that there were only 3 search warrants. We later learned an additional search and seizure took place at an off-site, third-party file storage facility that held documents belonging to my company. On a September 5, 2019 phone call, Chuck Meadows and Gerry Morris, as co-counselors for myself and World Class, asked AUSAs Alan Buie and Neeraj Gupta to confirm that there were only 3 search warrants issued for the 3 respective locations. Mr. Buie and Mr. Gupta maintained their story that these were the only search warrants. When Mr. Meadows and Mr. Morris told Mr. Buie they were aware of the search and seizure of World Class' records from Contego, a third-party file storage vendor's offices, Mr. Buie simply responded, "Okay. You got me."

Mr. Buie then claimed that he did have a search warrant for the file-storage location but felt he didn't need to disclose it to Mr. Paul or his counsel. On September 6, 2019, Mr. Buie emailed a search warrant for this location that he claims was authorized by Judge Mark Lane for the search of this location.

In February 2020, my counsel, Michael Wynne, and I learned of at least 3 additional search warrants that Mr. Buie and Mr. Gupta obtained, that were signed and authorized by Judge Mark Lane, that were never previously disclosed. Mr. Buie stated that these search warrants were obtained "just in case we needed them." In October 2019, the court signed an order allowing access to judicial records to provide my counsel and I copies of the actual records that were filed in the case. The documents we were given do not match the documents we subsequently learned about in the case. These other "new" search warrants were never provided to us.

This complaint is being filed because of a strong belief that the named parties have tampered with the government records relating to these search warrants, they obtained these search warrants based on false information and inaccurate affidavits, and intentionally mistreated, detained, and violated my constitutional rights of Mr. Paul, and illegally searched and seized property belonging to myself, my family, and World Class.

Many items seized from my home were not within the scope of what the search warrant they later provided would have allowed. They took pictures of my children, childbirth videos of my two daughters, health records, attorney-client privileged files, and more.

The metadata of the documents provided as government records authorizing the search warrants show that they were edited after the searches started on August 14, 2019.

The bases for asserting claims include, but are not limited to, (i) Tampering with Government Records under Texas Penal Code § 37.10, and (ii) Official Oppression under Texas Penal Code § 39.03.