

# GRAND JURY REFERRAL



**The State of Texas vs. SARAH HANCOCK**  
DOB: 9/23/1959      Sex: Female      Race: White

203rd

GJ Witness: READ-IN

Offense	Agency
MISAPP FIDUC/FINAN PROP >=\$300K	TX057015A

**INDICTMENT NO.: F2100005**

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

The Grand Jury of Dallas County, State of Texas, duly organized at the July Term, A.D., 2020 of the Criminal District Court No. 2 for said County, upon its oath do present in and to said Court at said term,

That **SARAH HANCOCK**, hereinafter called Defendant, **on or about and between the 21st day of April, 2010 and the 26th day of January, 2016**, in the County of Dallas, State of Texas, did then and there, pursuant to one scheme and continuing course of conduct, intentionally, knowingly, and recklessly misapply property, namely Money, of the aggregate value of \$300,000 or more, that the defendant held as a fiduciary or as a person acting in a fiduciary capacity, but not as a commercial bailee, contrary to an agreement under which the defendant held the property, and in a manner that involved substantial risk of loss of the property to Andrew Smith, Betty Smith, Pomeroy Smith, Elizabeth Spurr Smith, Pomeroy Smith II, Reid Smith, Trip Smith, Timothy Smith, Jolyn Crim, Max Crim, Nancy Crim, Smith Children 76 Trust, Pomeroy Smith Lifetime Family, Lizbeth Trust of 1982, The Spurr Trust, Smith Community Property Rev Trust, Pomeroy Smith II Rev Trust, Reid & Trip Smith, IRRV Trust, Jolyn Almand Crim Family Ltd/Partnership, Max Brant Family Ltd/Partnership, and Crim Family Limited Partnership, the owners of the property, and the person for whose benefit the property was held, by taking unauthorized fees from said owner's investment accounts and by using said property for defendant's personal expenses,

And further, at the time of the offense, Pomeroy Smith, Betty Smith, and Nancy Crim were elderly individuals,

Against the peace and dignity of the State.

*Nadia Adeyanju*  
DEPUTY  
DALLAS CO., TEXAS  
DISTRICT CLERK  
FELICIA PITRE

2021 JAN 20 PM 2:06

*[Signature]*  
Foreman of the Grand Jury

**FILED**  
Page 1 of 1

GRAND JURY REFERRAL



The State of Texas vs. SARAH HANCOCK  
DOB: 9/23/1959 Sex: Female Race: White

203rd

GJ Witness: READ-IN

Offense	Agency
FRAUD SELL SECURITIES >=\$100K	TX057015A

INDICTMENT NO.: F2100006

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

The Grand Jury of Dallas County, State of Texas, duly organized at the July Term, A.D., 2020 of the Criminal District Court No. 2 for said County, upon its oath do present in and to said Court at said term,

That SARAH HANCOCK, hereinafter called Defendant, on or about and between the 21st day of April, 2010 and the 26th day of January, 2016, in the County of Dallas, State of Texas, did did then and there, pursuant to one scheme and continuing course of conduct, render services as an investment adviser or an investment adviser representative to Andrew Smith, Betty Smith, Pomeroy Smith, Elizabeth Spurr Smith, Pomeroy Smith II, Reid Smith, Trip Smith, Timothy Smith, Jolyn Crim, Max Crim, Nancy Crim, Smith Children 76 Trust, Pomeroy Smith Lifetime Family, Lizbeth Trust of 1982, The Spurr Trust, Smith Community Property Rev Trust, Pomeroy Smith II Rev Trust, Reid & Trip Smith, IRRV Trust, Jolyn Almand Crim Family Ltd/Partnership, Max Brant Family Ltd/Partnership, and Crim Family Limited Partnership, hereinafter referred to as clients, and defendant engaged in fraud in connection with said services by:

intentionally failing to disclose defendant took unauthorized fees from client accounts, said information being a material fact; and

intentionally failing to disclose account statements created and provided by defendant to clients were false, said information being a material fact; and

intentionally failing to disclose money returned to client accounts in the form of "fee reversals" was money from other client accounts, said information being a material fact; and

intentionally failing to disclose that defendant used money contributed by clients to pay defendant's personal expenses, said information being a material fact; and

Against the peace and dignity of the State.

2021 JAN 20 PM 2:06

Nadia Adeyanju  
FELICIA PITRE  
DALLAS DISTRICT CLERK  
Foreman of the Grand Jury

FILED

**GRAND JURY REFERRAL**



knowingly and intentionally representing money taken by defendant from client accounts were fees earned by the defendant, said information being a misrepresentation of a relevant fact; and

knowingly and intentionally representing client accounts contained more money than they actually did, said information being a misrepresentation of a relevant fact; and

knowingly and intentionally representing money returned to client accounts were "fee reversals," said information being a misrepresentation of a relevant fact;

And the aggregate amount obtained was \$100,000 or more,

**FILED**

**2021 JAN 20 PM 2:06**

**FELICIA PITRE  
DISTRICT CLERK  
DALLAS CO., TEXAS  
Nadia Adeyanju DEPUTY**

Against the peace and dignity of the State.

Foreman of the Grand Jury