

CAUSE NO. D-1-GN-20-002155

JOSEPH LARSEN,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
TEXAS DEPARTMENT OF PUBLIC	§	
SAFETY,	§	
	§	
Defendant.	§	<u>459TH</u> JUDICIAL DISTRICT

**ORIGINAL PETITION FOR MANDAMUS**

COMES NOW Joseph Larsen, Plaintiff herein, and files this Original Petition for Mandamus under the Texas Public Information Act against the Texas Department of Public Safety (“DPS”) and would respectfully show the Court the following:

**I.**  
**DISCOVERY CONTROL PLAN**

Discovery in this matter is to be conducted under Level 2, pursuant to Rule 190.3 of the Texas Rules of Civil Procedure.

**II.**  
**INTRODUCTION AND BACKGROUND FACTS**

Joseph Larsen (“Larsen”) sent a Texas Public Information Act (“TPIA”) request on March 4, 2020 to DPS (the “Request”) for:

1. All communications regarding Natin “Nate” Paul, World Class Holdings, World Class Capital Group and/or affiliated companies; and
2. All communications regarding or referencing 7800 Cava Place, Austin, Texas 78735.

*Exhibit A.*



DPS requested clarification on Larsen's request on March 11, 2020, asking "Please provide a date range for the communications that you seek." *Exhibit B*. Larsen responded the following day that:

I deliberately did not include a date range because I did not expect the full universe of the communications responsive to my request to be voluminous. Simply do the same searches you otherwise would without any date restrictions.

*Exhibit C*.

Despite receiving no narrowing of the Request, DPS responded the very next day, March 13, 2020, requesting a ruling from the Attorney General to withhold all information responsive to the request relying upon TEX. GOV'T CODE § 552.108(a)(1) (the "Request for Ruling"). *Exhibit D*. The only factual assertions in DPS's sparsely written Request for Ruling to withhold all responsive information are that "[a]n investigation involving the above-referenced individual, entity and location is ongoing" and "[b]ecause this is an ongoing investigation, the release of potential evidence would interfere with the investigation and prosecution of this case." In addition, the Request for Ruling stated that it was sending a "representative sample" of the responsive information to the Attorney General indicating that the requested information was voluminous. TEX. GOV'T CODE 552.301(e)(1)(d).

On March 30, 2020, Larsen sent an email to DPS demanding prompt release of basic information. *Exhibit E*. DPS responded the same day that:

There was no basic information available for release in the responsive records located by the Department. The Department has followed the Public Information Act and submitted its brief to the OAG. We await the ruling and will follow the OAG's direction in terms of the release of records.

*Id.*

After further communications between Larsen and assistant general counsel for DPS failed to resolve the issue, Larsen sent DPS a demand letter on April 10, 2020 advising DPS that

unless it promptly released to him all basic information contained in the responsive information, he would immediately prepare and file a petition for mandamus against DPS. *Exhibit F.*

In response, on April 13, 2020, DPS sent Larsen an undated record titled “Supplemental Report” which was entirely redacted except for a paragraph in the synopsis section of its first page which reads:

On August 14, 2019, Texas Department of Public Safety (TXDPS) Criminal Investigation Division Special Agent Jason Ernst assign [sic] to the Federal Bureau of Investigation-Austin Resident Agency served a search warrant at the residence of Natin Paul, founder and Chief Executive Officer of World Class Capital Group, LLC, [REDACTED]

*Exhibit G.*

From this limited release, it is immediately apparent that DPS flatly misrepresented to Larsen that there was no basic information in the information responsive to his request. Further, because the information is from a “Supplemental Report,” we can reasonably conclude there was also an initial report that probably preceded the serving of the search warrant referenced in the synopsis of the Supplemental Report. In addition, the Supplemental Report itself is four pages long but Larsen received only a single paragraph. The basic information released is limited to the name of one of the investigating officers, Criminal Investigation Division Special Agent Jason Ernst, and possibly the location of the supposed or presumptive “crime” – the 7800 Cava Place residence. There is no information regarding the identification and description of any complainant precipitating any law enforcement action; the time of occurrence of any incident that precipitated law enforcement action of a crime; and/or the specific property involved or a detailed description of the purported offense, all of which clearly would be included in the original and supplemental reports.

In addition, DPS’s thin factual allegations in its Request for Ruling are insufficient to support the application of the law enforcement exception. It is unclear which entity is conducting

the investigation, DPS or the FBI. There are no factual allegations to support a conclusion FBI has taken the lead. Nor has there been a supporting assertion from any representative of the FBI that this is the case. More telling, there is no reference at all to the FBI in DPS's claim it is entitled to withhold the information pursuant to the law enforcement exception.

Given Officer Ernst's role as being "assign" [*sic*] to the FBI, it is also clear that there is a great deal of information under Ernst's control, and therefore DPS's control, than has been acknowledged by DPS that is also responsive to the Request.

### **III. PARTIES**

Joseph Larsen is an attorney living and practicing in Houston, Harris County, Texas. Larsen is a "requestor" within the meaning of the Texas Public Information Act. TEX. GOV'T CODE § 552.003(6).

Defendant Texas Department of Public Safety (DPS) is a state agency headquartered at 5805 N. Lamar Blvd., Austin, Travis County, Texas 78752. DPS may be served through the Office of the Attorney, General Deputy Attorney General for Civil Litigation Darren McCarthy, Price Daniel, Sr. Building, 8th Floor, 209 W. 14th Street, Austin, Texas 78701.

### **IV. JURISDICTION AND VENUE**

Larsen files this petition in intervention pursuant to TEX. GOV'T CODE § 552.321. Venue is proper in Travis County based upon TEX. CIV. PRAC. & REM. CODE § 15.014; *University of Texas v. Booker*, 282 S.W.2d 740 (Tex. Civ. App.—Texarkana 1955, n.w.h.).

**V.**  
**AUTHORITIES**

Larsen brings this suit under the Texas Public Information Act, TEX. GOV'T CODE § 552.001, *et seq.*, for the release of public information requested in possession and/or control of DPS.

DPS's assistant general counsel represented to Larsen that even basic information can be withheld if "the context of the basic information would" reveal investigative facts, and that the Office of Attorney General (OAG) had approved this approach. However, in *City of Carrollton v. Paxton*, 490 S.W.3d 187 (Tex. App.—Austin 2016, pet. denied), probably the leading case on the issue, no such doctrine is referenced. The *Carrollton* case concerns the release of basic information from the City's Computer-Aided Dispatch (CAD) system, certainly a source of information where the "context" argument could be made. The court held simply:

[T]hat to the extent information contained in the CAD notes must be provided in order to provide "basic information ... about [the] crime," they are subject to disclosure under Subsection (c).

*Id.* at 202 (emphasis added). Rather than a "context" argument for withholding, the opinion holds squarely that the basic information must be released regardless of where it is located in the responsive information.

Here, the basic information DPS released is only the name of one of the investigating officers, Criminal Investigation Division Officer Jason Ernst, and possibly the location of the purported crime(s) – the [REDACTED]. There is no information regarding the identification and description of the complainant; the time of occurrence of the purported crime; the property allegedly involved (e.g., money, drugs, securities); nor any detailed description of the alleged offense(s) that we would expect to find in the two separate reports.

Aside from the issue of release of basic information, in order to establish the applicability of section 552.108(a)(1), a law enforcement agency must explain how and why releasing the information would interfere with law enforcement. DPS's barebones factual assertion that "[a]n investigation involving the above-referenced individual, entity and location is ongoing" fails to show how release of the requested information would allegedly interfere with law enforcement. *Thomas v. Cornyn*, 71 S.W.3d 473, 486-90 (Tex. App.—Austin 2002, no pet.) (finding law enforcement exception inapplicable when governmental entity offered no evidence other than its assertion that the exception applied; "the sheriff failed to explain how disclosure of the information would interfere with law enforcement"); Tex. Att'y Gen. ORD-409 (1984) (law enforcement agency did not prove exception because it had "not indicated how release of the name of a burglary victim would, in a particular instance, unduly interfere with law enforcement or crime prevention").

#### **COUNT ONE: MANDAMUS**

Larsen seeks the remedy of a petition for mandamus for DPS's refusal to produce the requested public information as required by the Texas Public Information Act. TEX. GOV'T CODE § 552.321(a); *Kallinen v. City of Houston*, 462 S.W.3d 25 (Tex. 2015). Therefore, Larsen respectfully requests accelerated discovery, an accelerated hearing, and an order granting mandamus requiring DPS to produce the requested information.

#### **COUNT TWO: COSTS AND ATTORNEYS' FEES**

Larsen seeks an award of costs and reasonable attorneys' fees incurred pursuant to the express authority granted in the Texas Public Information Act, TEX. GOV'T CODE § 552.323.

WHEREFORE, PREMISES CONSIDERED, Larsen respectfully requests that the Court set the foregoing matters for a full and final hearing on an accelerated basis at the earliest possible date, and, upon final hearing, grant the following relief:

- (1) entry of a judgment for mandamus compelling DPS to produce the information requested;
- (2) entry of order finding Larsen has substantially prevailed against DPS in this action;
- (3) an award granting judgment of and from DPS for reasonable attorneys' fees incurred, court costs, and costs of litigation; and
- (4) such other and further relief, whether at law or in equity, as Larsen may be entitled to receive.

Respectfully submitted,

/s/ Joseph R. Larsen

Joseph R. Larsen  
State Bar No. 11955425  
**GREGOR | WYNNE | ARNEY, PLLC**  
Bank of America Center  
700 Louisiana, Suite 3950  
Houston, Texas 77002  
jlarsen@gcfirm.com

**ATTORNEYS FOR JOSEPH LARSEN**

# EXHIBIT A



**From:** Joseph Larsen <jlarsen@gcfirm.com>  
**Sent:** Tuesday, March 3, 2020 11:54 PM  
**To:** OGC Webmaster  
**Subject:** Public Information Act Request

Pursuant to the Texas Public Information Act, I hereby request the following information:

All communications regarding Natin "Nate Paul, World Class Holdings, World Class Capital Group and/or affiliated companies.

All communications regarding or referencing [REDACTED]

Please contact me promptly if you feel this request needs clarification.

Regards,

Joseph R. Larsen  
GREGOR | WYNNE | ARNEY, PLLC  
Bank of America Center  
700 Louisiana, Suite 3950  
Houston, Texas 77002  
(713) 306-1937 – Direct  
(832) 390-2644 – Office  
(832) 390-2655 – Fax  
jlarsen@gcfirm.com  
www.gcfirm.com

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# EXHIBIT B

# TEXAS DEPARTMENT OF PUBLIC SAFETY

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512/424-2000

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DALE WAINWRIGHT

March 11, 2020

## Via Email

Joseph Larsen  
Gregor Wynne Arney PLLC  
jlarsen@gcfirm.com

RE: Public Information Request for communications regarding Natin "Nate" Paul, World Class Holdings, World Class Capital Group and those regarding [REDACTED] (PIR # 20-0983)

Mr. Larsen:

The Department received your above-referenced request on March 4, 2020. Please provide a date range for the communications that you seek.

Please clarify what information you are seeking and we will proceed with your request accordingly. In accordance with Government Code section 552.222(d), if we do not receive a written response from you by the 61st day after the date of this letter, your request will be considered to have been withdrawn. You may submit the response in writing via email to [OGC.Webmaster@dps.texas.gov](mailto:OGC.Webmaster@dps.texas.gov), via mail to the address in the letterhead, or in person at our offices at 5805 N. Lamar Blvd. in Austin.

If you have any questions regarding this request, please submit them in writing via facsimile to (512) 424-5716, via email to [OGC.Webmaster@dps.texas.gov](mailto:OGC.Webmaster@dps.texas.gov), via mail to the address in the letterhead, or in person at our offices at 5805 N. Lamar Blvd. in Austin. Thank you.

Cordially,

A handwritten signature in black ink that reads 'ML Calcote'.

ML Calcote  
Assistant General Counsel

\\hqogcs001\ORA\2020 requests\20-0983\20-0983 (20-03-11) letter to requestor

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OAG\_SUB-00022039

HBOM00209631

EX. 039.011

# EXHIBIT C

**From:** [Joseph Larsen](#)  
**To:** [OGC Webmaster](#)  
**Subject:** RE: Public Information Request (20-0983)  
**Date:** Thursday, March 12, 2020 3:06:00 PM

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Mr. Chalcote-

I deliberately did not include a date range because I did not expect the full universe of the communications responsive to my request to be voluminous. Simply do the same searches you otherwise would without any date restrictions.

You also ask me to "please clarify" what information I am seeking, but you don't indicate that the term "communications" or "regarding" or any other term in my request is ambiguous, and of course it isn't. I am looking for all communications. There should be no issue, but interpret "regarding" broadly to mean "including any reference to."

I do not believe you should reset the clock on my PIA request for such a thin request on your part for clarification.

Joseph R. Larsen  
GREGOR | WYNNE| ARNEY, P.L.L.C  
Direct: (713) 306-1937  
[jlarsen@gcfirm.com](mailto:jlarsen@gcfirm.com)

-----Original Message-----

From: OGC Webmaster  
Sent: Wednesday, March 11, 2020 11:41 AM  
To: Joseph Larsen <[jlarsen@gcfirm.com](mailto:jlarsen@gcfirm.com)>  
Subject: Public Information Request (20-0983)

Please see attached.

ML Calcote  
Assistant General Counsel  
Texas Dept. of Public Safety  
Office of General Counsel  
(512) 424-2890

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# EXHIBIT D

# TEXAS DEPARTMENT OF PUBLIC SAFETY

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STEVE H. STODGHILL  
DALE WAINWRIGHT

March 13, 2020

Via Email

Joseph Larsen  
Gregor Wynne Arney PLLC  
jlarsen@gcfirm.com

RE: Public Information Request for communications regarding Natin "Nate" Paul, World Class Holdings, World Class Capital Group and those regarding [REDACTED] (PIR # 20-0983)

Mr. Larsen:

The Department received your above-referenced request on March 4, 2020 and requested clarification of that request on March 11, 2020. Based on your clarification received on March 12, 2020, the Department has located records responsive to your request; however, we believe some or all of the records may be excepted from required public disclosure at this time. We are seeking a ruling from the attorney general's office with respect to disclosure of these records, and a copy of our request letter is enclosed. You will be notified directly by the attorney general's office when a ruling is issued.

If you have any questions regarding this request, please submit them in writing via facsimile to (512) 424-5716, via email to [OGC.Webmaster@dps.texas.gov](mailto:OGC.Webmaster@dps.texas.gov), via mail to the address in the letterhead, or in person at our offices at 5805 N. Lamar Blvd. in Austin. Thank you.

Cordially,

ML Calcote  
Assistant General Counsel

cc: Attorney General of Texas  
Open Records Division  
209 West 14th Street, 6th Floor  
Austin, Texas 78701

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HBOM00209635

EX. 039.015



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DALE WAINWRIGHT

March 13, 2020

## Via Hand Delivery

Attorney General of Texas  
Open Records Division  
209 West 14th Street, 6th Floor  
Austin, Texas 78701

RE: Public Information Request for communications regarding Natin "Nate" Paul, World Class Holdings, World Class Capital Group and those regarding [REDACTED] (PIR # 20-0983)

**DATE REQUEST FOR INFORMATION RECEIVED:**

**3/4/2020**

**DATE REQUEST FOR RULING SUBMITTED TO ATTORNEY GENERAL:**

**3/13/2020**

Dear Open Records Division:

The Department of Public Safety received the above-referenced request for information from Joseph Larsen on March 4, 2020 and the clarification of that request on March 12, 2020. We believe some or all of the requested information is excepted from required public disclosure pursuant to section 552.108 of the Government Code. Accordingly, we are requesting a ruling regarding the release of these records.

An investigation involving the above-referenced individual, entity and location is ongoing. Thus, the Department believes the requested information is excepted from required public disclosure pursuant to section 552.108(a)(1) of the Government Code, which states:

- (a) Information held by a law enforcement agency or prosecutor that deals with the detection, investigation, or prosecution of crime is excepted from the requirements of Section 552.021 if:
  - (1) release of the information would interfere with the detection, investigation, or prosecution of crime.

Because this is an ongoing investigation, the release of potential evidence would interfere with the investigation and prosecution of this case. *See Houston Chronicle Publ'g Co. v. City of Houston*, 531 S.W.2d 177, 184-85 (Tex. Civ. App.—Houston [14th Dist.] 1975), *writ ref'd n.r.e.*, 536 S.W.2d 559 (Tex. 1976) (per curiam). Consequently, the Department believes these responsive records are excepted from required public disclosure at least until the investigation is complete.

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HBOM00209636

EX. 039.016



Please find enclosed the request from Joseph Larsen, the notice of our request for a ruling sent to the requestor, and a representative sample of the records we wish to except from required disclosure. Please feel free to contact me at (512) 424-2890 if you have any questions.

Sincerely,



ML Calcote  
Assistant General Counsel

Enclosure(s)

cc: Joseph Larsen  
Gregor Wynne Arney PLLC  
700 Louisiana, Suite 3950  
Houston, TX 77002  
jlarsen@gcfirm.com

\\hqogcs001\ORA\2020 requests\20-0983\20-0983 (20-03-13).letter to AG

# EXHIBIT E

From: [OGC Webmaster](#)  
To: [Joseph Larsen](#)  
Subject: FW: Public Information Request (20-0983)  
Date: Monday, March 30, 2020 4:49:15 PM

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Mr. Larsen:

There was no basic information available for release in the responsive records located by the Department. The Department has followed the Public Information Act and submitted its brief to the OAG. We await the ruling and will follow the OAG's direction in terms of the release of records.

ML Calcote

-----Original Message-----

From: Joseph Larsen <[jlarsen@gcfirm.com](mailto:jlarsen@gcfirm.com)>  
Sent: Monday, March 30, 2020 4:35 PM  
To: OGC Webmaster <[OGC.Webmaster@dps.texas.gov](mailto:OGC.Webmaster@dps.texas.gov)>  
Subject: RE: Public Information Request (20-0983)

Ms. Calcote--

I write to follow up on your request for attorney general letter ruling to ask when DPS will release to me the basic information not covered by the law enforcement exception. As you no doubt know, basic information does not have to be need to be on the "front page" of an arrest report, but "the PIA looks to the content of information rather than form or location in determining whether it is public information subject to disclosure." *City of Carrollton v. Paxton*, 490 S.W.3d 187, 200 (Tex. App.-Austin 2016, pet. denied). Further, there does not need to have been an arrest, only a determination that a crime has occurred. *Id.* at 202.

Thank you for your attention to this matter.

Joseph R. Larsen  
GREGOR | WYNNE | ARNEY, PLLC  
Direct: (713) 306-1937  
[jlarsen@gcfirm.com](mailto:jlarsen@gcfirm.com)

-----Original Message-----

From: OGC Webmaster  
Sent: Friday, March 13, 2020 11:55 AM  
To: Joseph Larsen <[jlarsen@gcfirm.com](mailto:jlarsen@gcfirm.com)>  
Subject: Public Information Request (20-0983)

Please see attached.

ML Calcote  
Assistant General Counsel  
Texas Dept. of Public Safety  
Office of General Counsel  
(512) 424-2890

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# EXHIBIT F

# GREGOR | WYNNE | ARNEY, PLLC

JOSEPH R. LARSEN  
DIRECT LINE: (713) 306-1937  
E-MAIL: [JLARSEN@GRFIRM.COM](mailto:JLARSEN@GRFIRM.COM)

April 10, 2020

ML Calcote  
Assistant General Counsel  
Texas Dept. of Public Safety  
Office of General Counsel

Re: My Public Information Act request of March 3, 2020.

Ms. Calcote—

I write to again demand of DPS that it promptly release to me all basic information responsive to my request for communications regarding Nate Paul, World Class Holdings, World Class Capital Group and regarding or referencing [REDACTED]

Thank you for speaking with me about this matter of phone. It is true you are under no obligation to do so. However, it is the interest of both the requestor and the governmental body to attempt to resolve any disputes about whether a governmental body may withhold information. Although you state that there is no basic information, as I said during our call, I am concerned because the attorney general will probably include the standard language in his ruling that “the law enforcement exception does not include basic information which must be released,” which basically puts it on the honor system for the governmental body to release basic information. You agreed this is true, and said it is basically your judgment call.

You then stated that even basic information can be withheld if “the context of the basic information would” reveal investigative facts, and that the AG had approved this approach. I am unaware of any such holding by the AG, and a holding in this regard would conflict with holdings of the courts which the AG is bound to follow. In *City of Carrollton v. Paxton*, 490 S.W.3d 187 (Tex. App.—Austin 2016, pet. denied), probably the leading case on the issue, no such doctrine is referenced. The *Carrollton* case regards release of basic information from the City’s Computer-Aided Dispatch (CAD) system, certainly a source of information where the context argument could be made. The court held simply:

that to the extent information contained in the CAD notes *must be provided in order to provide “basic information ... about [the] crime,”* they are subject to disclosure under Subsection (c).

*Id.* at 202 (emphasis added). Rather than a “context” argument for withholding, the opinion holds the information *must* be released. This appears to me to undercut the breadth of the “judgment call” DPS is permitted to make.

The responsive information surely has basic information regarding the location of the crime; the identification and description of the complainant; the time of occurrence of the crime; the property involved, if any; a detailed description of the offense; and the names of investigating officers.

Please be advised that I will file a petition for mandamus in Travis County District Court against DPS for this information if it is not released promptly. As you know, I do not need to wait for an attorney general ruling before instituting suit, and, indeed, given the AG’s legal inability to resolve factual disputes, this is clearly the proper forum for resolving this dispute.

Thank you for your attention to this matter.

Sincerely,

*Joseph R. Larsen*

Joseph R. Larsen

# EXHIBIT G



TEXAS DEPARTMENT OF PUBLIC SAFETY  
CRIMINAL INVESTIGATIONS DIVISION

**SYNOPSIS**

On August 14, 2019, Texas Department of Public Safety (TXDPS) Criminal Investigation Division Special Agent [REDACTED] assign to the Federal Bureau of Investigation-Austin Resident Agency served a search warrant at the residence of Natin Paul, founder and Chief Executive Officer of World Class Capital Group, LLC, [REDACTED].