

Dear Mr. Horowitz,

I am writing to you regarding a matter that was referred to, investigated by my office and subsequently withdrawn by the Travis County District Attorney's Office alleging misconduct by employees of the State Securities Board, the Federal Bureau of Investigations, the Department of Public Safety, the United States Attorney's Office for the Western District of Texas, and a federal magistrate. Due to the original complaint being withdrawn my office no longer has jurisdiction over the matter in question despite our office uncovering what we believe to be substantial evidence warranting investigation. Below is a summary of the complaint.

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 in question.

The agents involved in executing the search include [REDACTED] and [REDACTED]. These three agents were part of a group of approximately 75 agents that were present at the searches of 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 the U.S. 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, 814 Lavaca Street, 303-307 W. 9th Street, Austin, Texas 78701; (2) World Class Holdings Server Room, 320-322 Congress Avenue, Austin, Texas, 78701; (3) Nate Paul's residence, [REDACTED]

Nate Paul was personally present at location 3 (his residence), [REDACTED]. The agents raided his residence at approximately 9:00 am on August 14, 2019. Despite over ten requests to see the search warrant, Agent [REDACTED] repeatedly denied Nate access to seeing the search warrant. Additionally, Agent [REDACTED] and the other agents cut the wi-fi lines to his home and destroyed his security camera system after entering his home. The security camera system was destroyed at approximately 9:17 am. Despite Nate's requests he was detained in his home and not allowed to use the restroom for approximately 2 hours after the agents arrived. Additionally, Agent [REDACTED] refused to let Nate call an attorney until approximately 11:00 am, two hours after the agents had arrived. Agent [REDACTED] confiscated Nate's phone from his pocket when agents entered Nate's residence at 9:00 am. When Nate was allowed to call his attorney he was forced to make the call from Agent [REDACTED] cell phone. Nate's attorney informed him the agents were not allowed to detain him and that it was against his rights for them to have detained him and not allowed Nate to call counsel for the two hours the agents had been inside his residence. Nate requested that his counsel tell Agent [REDACTED] that Nate was free to leave, and that the agents were not to detain him any longer. Agent [REDACTED] acknowledged this on the phone with Nate's attorney. After Agent [REDACTED] hung up the phone call Nate attempted to stand up since he had been told he was free to leave. Agent [REDACTED]



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ordered Nate to sit back down and told Nate he was not free to leave “until he said so.” They proceeded to keep Nate detained for another 1.5 hours until 12:30 pm.

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 Nate’s attorney via email from AUSA Alan Buie. The first relating to Nate’s residence was received by Nate’s attorney in an email from Alan Buie at 5:59 pm on August 14, 2019. The search warrant relating to the office and the server room were sent on August 15, 2019 and August 16, 2019 respectively.

AUSA Alan Buie assured Nate’s attorney that there were only 3 search warrants. Nate later learned an additional search and seizure took place at an off-site, third-party file storage facility that held documents belonging to World Class. On a September 5, 2019 phone call, Chuck Meadows and Gerry Morris, as co-Counsels for Nate 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 Contigo, 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 he felt he did not need to disclose it to Nate or his attorneys. On September 6, 2019, Mr. Buie emailed a search warrant for the file-storage location that claims Mr. Buie was authorized by Judge Mark Lane for the search of that location.

In February 2020, Nate’s attorney, Michael Wynne, and Nate 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 Nate and his attorneys with the actual records filed in the case. The documents they were given do not match the documents they learned about in the case. Additionally, the other “new” search warrants were never provided to them.

This complaint is being filed because of a strong belief that the named parties have tampered with the government records relating to the aforementioned search warrants. That they obtained these warrants based on false information and inaccurate affidavits, and intentionally mistreated, detained and violated the rights of Nate Paul and his company, World Class.

Many of the items seized in the search were not within the scope of the search warrant they later provided would have allowed. Taking pictures of Nate Paul’s children, videos of the birth of his 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) INSERT FEDERAL CLAIMS HERE, (ii) Tampering with Government Records under Texas Penal Code § 37.10, and (iii) Official Oppression under Texas Penal Code § 39.03.

As you can see from the summarized complaint, my office has credible reason to believe that the actors previously mentioned have engaged in criminal and civil misconduct ranging from the deliberate infringement of a fellow citizen's constitutional rights to corruption and abuse of power. I have personally raised my concerns about these actions on multiple occasions directly to a previous United States District Attorney for the Western District of Texas, as well as the head of Internal Affairs at the Federal Bureau of Investigations (or was it DOJ?). (Insert additional information here). The United States is a country founded on rule of law, not rule by law, and law enforcement must be held accountable to the letter of the law just as we expect of the citizens of this country. I am therefore requesting that your agency conduct the review of this complaint.

Thank you for your attention to this matter.

Sincerely,

Ken Paxton

Attorney General for the State of Texas

Office of the Texas Attorney General