

STATE OF MAINE

YORK, ss.

SUPERIOR COURT
CRIMINAL ACTION
DOCKET NO. CR-06-1419

<p>STATE OF MAINE</p> <p>v.</p> <p>ANDREW S. CONSTANTINOU A/K/A ANTHONY POLIVION DOB: 4/29/1956 W/M, BRN Hair/ BRN Eyes, 5', 10", 200lbs. Address: 2 Serra Drive Unionville, CT 06085-1103 Dept: Office of Securities Officer: Jacqueline Drouin Prosecutor: L. Nomani/ AG's Office</p>	<p>} CRIMINAL INDICTMENT FOR } UNLICENSED SALE OF SECURITIES } (COUNTS I & III) (32 M.R.S.A. §10301) } SALE OF UNREGISTERED SECURITIES } (COUNTS II & IV) (32 M.R.S.A. §10401)</p>
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THE GRAND JURY CHARGES THAT:

COUNT ONE
(UNLICENSED SALE OF SECURITIES)
(CLASS C)

From on or about April 1, 2001 to on or about May 30, 2001 in Waterboro, County of York and State of Maine, and pursuant to one scheme or course of conduct, Andrew S. Constantinou, acting intentionally or knowingly, did transact business in the State of Maine as a broker-dealer or sales representative by offering to sell or selling what was in fact a security, namely one or more investment contracts issued by Alpha Telcom Inc., to Marie Anne Chabot and Donald Chabot, without being licensed to do so under the Revised Maine Securities Act, all being in violation of 32 M.R.S.A. § 10301 (1) and 32 M.R.S.A. § § 10604 (1)(A), (6) and (7) (1999).

COUNT TWO
(SALE OF UNREGISTERED SECURITIES)
(CLASS C)

From on or about April 1, 2001 through on or about May 30, 2001, in Waterboro, County of York and State of Maine, and pursuant to one scheme or course of conduct, Andrew S. Constantinou, acting intentionally or knowingly, did offer to sell or sell what were, in fact, securities, namely one or more investment contracts issued by Alpha Telcom Inc., to Marie

Anne Chabot and Donald Chabot when such securities were not, in fact, registered under the Revised Maine Securities Act, all in violation of 32 M.R.S.A. §§ 10401 & 10604(1)(A) (1999)

COUNT THREE
(UNLICENSED SALE OF SECURITIES)
(CLASS C)

From on or about April 1, 2001 to on or about May 30, 2001 in Waterboro, County of York and State of Maine, and pursuant to one scheme or course of conduct, Andrew S. Constantinou, acting intentionally or knowingly, did transact business in the State of Maine as a broker-dealer or sales representative by offering to sell or selling what was in fact a security, namely one or more viatical settlement contracts issued by Mutual Benefits Corporation., to Marie Anne Chabot and Donald Chabot, without being licensed to do so under the Revised Maine Securities Act, all being in violation of 32 M.R.S.A. § § 10301 (1) and 32 M.R.S.A. § § 10604 (1)(A), (6) and (7) (1999).

COUNT FOUR
(SALE OF UNREGISTERED SECURITIES)
(CLASS C)

From on or about April 1, 2001 through on or about May 30, 2001, in Waterboro, County of York and State of Maine, and pursuant to one scheme or course of conduct, Andrew S. Constantinou, acting intentionally or knowingly, did offer to sell or sell what were, in fact, securities, namely one or more viatical settlement agreement issued by Mutual Benefits Corporation, to Marie Anne Chabot and Donald Chabot when such securities were not, in fact, registered under the Revised Maine Securities Act, all in violation of 32 M.R.S.A. §§ 10401 & 10604(1)(A) (1999)

A True Bill.

Date:

Foreperson