April 2026 Grand Jury Session INDICTMENT GJ No: 200-A

State of Alabama
v.
Peter Tedwynn Falkner

STATE OF ALABAMA
CIRCUIT COURT OF
THIRTEENTH JUDICIAL
CIRCUIT
CC2026-1837

Circuit Court of Mobile County, April 2026

Count 1 CONSPIRACY TO COMMIT SECURITIES FRAUD

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, with intent that conduct constituting an offense be performed, did between in or about 2017 and in or about December 2021, agree with one or more persons, to wit: Carla Williams Falkner ("C. Falkner"), to willfully and unlawfully, directly or indirectly, in connection with the offer and sale of securities, to wit: investment contracts consisting of membership interests in InnoMed One, LLC, InnoMed Two, LLC and/or InnoMed Five, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading, in violation of § 8-6-17(a)(2), Code of Alabama 1975, and engage in one or more acts, practices, and courses of business that operated as a fraud or deceit upon any person, in violation of § 8-6-17(a)(3), Code of Alabama 1975, by representing to investors, among other things, that:

- the invested funds would be used to develop certain medical devices, while omitting to state the material fact that approximately half the funds raised were being used for the personal benefit of **P. Falkner** and C. Falkner;
- **P. Falkner** majored in biology at Auburn University and obtained a masters in clinical research at the University of Alabama at Birmingham, when in fact **P. Falkner** did not obtain an undergraduate or graduate degree from Auburn, UAB, or any other institution;
- **P. Falkner** had 30 years of extensive relevant experience, while failing to disclose that in August 2015 **P. Falkner** had filed for bankruptcy;
- C. Falkner had 20 years of business experience, while failing to disclose that in August 2011, C. Falkner had filed for bankruptcy,

and that **P. Falkner** and C. Falkner did overt acts to effect an objective of the agreement by soliciting and accepting funds from investors, in violation of § 13A-4-3(a), Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 2 SECURITIES FRAUD—ACTS, PRACTICES AND COURSES OF BUSINESS OPERATING AS A FRAUD OR DECEIT

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, did between in or about 2017 and in or about December 2021, directly or indirectly, in connection with the offer and sale of securities, to wit: investment contracts consisting of membership interests in InnoMed One, LLC, InnoMed Two, LLC and/or InnoMed Five, LLC, willfully and unlawfully engage in one or more acts, practices, and courses of business that operated as a fraud or deceit upon any person, by representing to investors, among other things, that:

- the invested funds would be used to develop certain medical devices, while omitting to state the material fact that approximately half the funds raised were being used for the personal benefit of **P. Falkner** and Carla Falkner ("C. Falkner");

- **P. Falkner** majored in biology at Auburn University and obtained a masters in clinical research at the University of Alabama at Birmingham, when in fact **P. Falkner** did not obtain an undergraduate or graduate degree from Auburn, UAB, or any other institution;

- **P. Falkner** had 30 years of extensive relevant experience, while failing to disclose that in August 2015 **P. Falkner** had filed for bankruptcy;

- C. Falkner had 20 years of business experience, while failing to disclose that in August 2011, C. Falkner had filed for bankruptcy,

in violation of § 8-6-17(a)(3), Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 3 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between on or about April 21, 2021 and on or about August 20, 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, investment contracts consisting of membership interests in InnoMed One, LLC and in InnoMed Five, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to an individual identified herein as "WD" that the Innomed management teams were not getting paid, when in fact **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P. Falkner** and C. Falkner, and that **P. Falkner** had received degrees from Auburn University and the University of Alabama at Birmingham and had attended Auburn School of Veterinary Medicine, when in fact he had not, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 4 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between on or about May 10, 2021 and on or about June 14, 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, an investment contract consisting of a membership interest in InnoMed One, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to an individual identified herein as "AP" that the invested funds were being used for business-related purposes without disclosing the material fact that **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P. Falkner** and C. Falkner, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 5 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between on or about May 10, 2021 and on or about June 17, 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, an investment contract consisting of a membership interest in InnoMed One, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to individuals identified herein as "JM" and "CM" that the invested funds were being used for business-related purposes without disclosing the material fact that **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P Falkner** and C. Falkner, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 6 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between on or about May 10, 2021 and on or about June 9, 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, an investment contract consisting of a membership interest in InnoMed One, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to an individual identified herein as "TM" that the invested funds were being used for business-related purposes without disclosing the material fact that **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P. Falkner** and C. Falkner, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 7 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between on or about August 19, 2021 and October 21, 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, an investment contract consisting of a membership interest in InnoMed One, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to individuals identified herein as "AB" and "LB" that the invested funds were being used for business-related purposes without disclosing the material fact that **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P. Falkner** and C. Falkner, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Count 8 SECURITIES FRAUD—FALSE STATEMENTS

Bond Amount: $6,000

The Grand Jury of said county charge that, before the filing of this indictment, **Peter Tedwynn Falkner ("P. Falkner")**, whose name is to the Grand Jury otherwise unknown, between in or about September 2021 and December 2021, did, directly or indirectly, in connection with the offer or sale of a security, to wit, an investment contract consisting of a membership interest in InnoMed One, LLC, make untrue statements of material fact or omit to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading by falsely representing to the principals of a limited liability company identified herein as "UV" that the invested funds were being used for business-related purposes without disclosing the material fact that **P. Falkner** and Carla Falkner ("C. Falkner") had been using and intended to and would continue to use approximately half the funds raised from investors for the personal benefit of **P. Falkner** and C. Falkner, in violation of Section 8-6-17(a)(2) of the Code of Alabama 1975, against the peace and dignity of the State of Alabama.

Andrew O. Schiff (SCH125)
Assistant Attorney General

No. 200-A

A TRUE BILL

The State of Alabama
Mobile County,

Foreperson of the Grand Jury

THE CIRCUIT COURT
OF THIRTEENTH
JUDICIAL CIRCUIT

Presented to the presiding Judge in open court by the foreman of the Grand Jury, in the presence of 17 Grand Jurors and filed in open court by order of the Court on this the 10th day of April, 2026.

Ashleigh S. Long Clerk,

THE STATE OF ALABAMA
v.
PETER TEDWYNN FALKNER

[redacted]

SID #

BAIL FIXED AT

$48,000 Dollars

Judge

INDICTMENT

I hereby certify that a true copy of this indictment has been served on the defendant herein this the

_____ day of _____ 2026.

Prosecutors
Andrew O. Schiff (SCH125)
Assistant Attorney General
Alabama Securities Commission
445 Dexter Avenue, Suite 12000
Montgomery, AL 36104

_____, **Sheriff**

By _____
Deputy Sheriff

Witness:
S.A. Adam Patterson, ASC

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA, *

VS. *

DEFENDANT. *

ORDER

It is hereby ORDERED,

1. The District Attorney shall produce or make available to the Defendant's attorney at arraignment the following:
   (a) A copy of the indictment against the Defendant;
   (b) All statements of the Defendant which are reduced to writing;
   (c) All statements of the Defendant which are electronically recorded or taped, and any transcripts hereof;
   (d) The substance of any oral statements made by the Defendant which are not included within (b) and (c) hereof or if the District Attorney knows of any statements or spontaneous remarks made while the Defendant is in the custody of the police or during the investigation;
   (e) Any and all evidence tending to exculpate the guilt of the Defendant;
   (f) The results of any scientific or expert tests, experiments, or examinations to be used by the Prosecution at trial;
   (g) All physical evidence or documentary evidence which the Prosecution will offer into evidence in its case in chief, including any search warrant and search affidavits upon which the Prosecution will rely on in its case in chief;
   (h) All physical evidence or documentary evidence seized from the Defendant by law enforcement officers, whether or not the same will be offered into evidence at trial;
   (i) In prosecutions under the Alabama Uniform Controlled Substances Act, the Defendant may procure the examination and testing of controlled substances or other prosecution evidence by his own expert, upon request to the District Attorney or his assistants. Such

examination and testing shall only take place in the presence of the District Attorney or his authorized representative, and the same shall be done at the Defendant's expense;

(j) The name and last known address of all confidential government informants who are eyewitnesses to the commission of the crime charged in the indictment, if the Defendant does not already have such information.

(k) Any video or audio recordings received from the District Attorney's Office may be reviewed with the Defendant, but may not be duplicated or published to any third party by the District Attorney's Office, the Defendant or Defense Counsel, absent specific authorization from the Court.

2. In all instances where physical or documentary evidence, tape recordings, and the like are to be inspected, examined or copied by the Defense Counsel, the parties shall ensure that such procedures are used as will safeguard and maintain the integrity of said evidence.

3. The District Attorney is under an obligation to disclose to Defense Counsel any evidence subject to this Order which he subsequently discovers to exist, and to do so within a reasonable time after its existence is discovered.

4. The District Attorney shall disclose to the Defendant and his attorney any prior convictions of the Defendant of which the District Attorney is aware.

5. Any disagreements with the parties concerning the scope, identify or existence of discoverable matter are to be submitted to the Court for resolution upon written motion of either party a reasonable time before trial. Any party who does not so submit any unresolved discovery issue to the Court will be precluded from raising the same at trial. If the Court finds that either party has failed to use good faith in complying with this Order, the Court may, in the case of the State, bar the State from using at trial any non-disclosed matter, and the Court may, in the case of the Defendant, hold any objections to the State's use of said matter at trial, based upon prior non-disclosure, to be waived.

6. If the prosecutor elects to make an offer of recommendation, the offer is to be made as soon as possible after arraignment unless special circumstances exist

(e.g., mental evaluation necessary, youthful offender report necessary, etc.) which inhibit a meaningful offer.

7. A conference shall be held with the District Attorney, the Defendant's attorney and the Defendant before the Status Hearing to be scheduled by the Court at arraignment.

8. At said conference:

   a. The District Attorney shall generally outline the evidence which he expects to produce at the trial; provided, however, that this requirement shall not apply to evidence used for impeachment purposes;

   b. The District Attorney shall advise the Defendant of all pending charges against the Defendant known to the State;

   c. Unless otherwise ordered, the Defendant shall have until the Status Hearing within which to accept or reject any recommendation of the State. No sentencing recommendation shall be entertained by the Court after the Status Hearing.

9. A strike list shall be compiled for any trial by jury and a copy of the strike list shall be given to each party. Upon selection of the jury, the strike list shall be made part of the Court record. Neither the Defendant or Victim shall retain a copy of the strike list and each counsel shall collect the extra copies of the list and submit them to the Court. No counsel or their client shall duplicate or publish to any third party the strike list absent specific authorization from the Court.

Done at Mobile, Alabama this the 12TH day of JUNE, 2026.

S. WESLEY PIPES
PRESIDING CIRCUIT JUDGE