

1 **INFM**  
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10 **DISTRICT COURT**  
11 **CLARK COUNTY, NEVADA**

12 STATE OF NEVADA,

13 Plaintiff,

14 v.

15 RODNEY DEAN BUCKLE, ID #1301483,

16 Defendant.

Case No.: C-20-352491-1

Dept. No.: XXIII

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18 **INFORMATION**

19 AARON D. FORD, Attorney General for the State of Nevada, in the name and by the authority of  
20 the State of Nevada, informs the Court that the above-named Defendant, RODNEY DEAN BUCKLE, has  
21 committed the crimes of one (1) count of SECURITIES FRAUD, a Category “B” felony offense, in  
22 violation of NRS 90.650.1 [NOC 51879] and one (1) count of MULTIPLE TRANSACTIONS  
23 INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a Category  
24 “B” felony offense in violation of NRS 205.377 [NOC 55110].

25 All of the acts alleged herein were committed or completed on or between February 1, 2014 and  
26 April 30, 2017, by the above-named Defendant, within Clark County, Nevada, in the following manner:

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1 **COUNT 1**  
2 **SECURITIES FRAUD**  
3 **Category "B" Felony - NRS 90.650(1)(b)**

4 That the Defendant did willfully and unlawfully in connection with the offer to sell, sale, offer to  
5 purchase or purchase of a security, either directly or indirectly, made an untrue statement of a material fact  
6 or omitted to state a material fact necessary in order to make the statements made not misleading in the  
7 light of the circumstances under which they were made, to wit: Defendant made an untrue statement of  
8 material fact by telling David and Donna Rodriguez, and/or Dustin and Cara Heil, and/or Bruno and Lorna  
9 Sodupe, and/or Walt and Celine Rothenhoefer that they would receive a 100% rate of return on their  
10 investment in his business, when in fact, the statement was untrue, with said individuals relying on the  
misrepresentation, resulting in a substantial financial loss.

11 **COUNT 2**  
12 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF**  
13 **ENTERPRISE OR OCCUPATION**  
14 **Category "B" Felony – NRS 205.377**

15 That the Defendant did, in the course of an enterprise or occupation, knowingly and with the intent  
16 to defraud, engaged in an act, practice or course of business or employed a device, scheme or artifice  
17 which operated or would have operated as a fraud or deceit upon a person by means of false representation  
18 or omission of a material fact that: (a) the person knew to be false or omitted; (b) the person intended  
19 another to rely on; and (c) resulting in a loss to any person who relied on the false representation or  
20 omission, in at least two transactions that had the same or similar pattern, intents, results, accomplices,  
21 victims or methods of commission, or were otherwise interrelated by distinguishing characteristics and we  
22 not isolated incidents within 4 years and in which the aggregate loss or intended loss was more than  
\$1,200.00, to wit:

23 In the course of the operation of his business(es), RoddOne, Inc., Rodd United, LLC, Rodd U,  
24 LLC, and acting as a personal financial adviser, the Defendant, knowingly and with the intent to defraud,  
25 engaged in a practice of making material misrepresentations to purported investors in order to induce them  
26 to invest with him and/or entities solely controlled by him, including but not limited to David and Donna  
27 Rodriguez, and/or, Dustin or Cara Heil, and/or Bruno and Lorna Sodupe, and/or Walt and Celine  
28 Rothenhoefer by means of falsely informing said individuals that he could guarantee them a large return

1 on investment, knowing that said individuals would not profit from said investment(s), and intending that  
2 said individuals detrimentally rely upon said misrepresentations, resulting in a loss or more than  
3 \$1,200.00.

4 All of which is contrary to the form, force and effect of the statutes in such cases made and  
5 provided, and against the peace and dignity of the state of Nevada.

6 DATED this 2nd day of November, 2023.

8 SUBMITTED BY

9 AARON D. FORD  
10 Attorney General

11 By: /s/ Jason R. Margolis  
12 JASON R. MARGOLIS -Bar No. 12439  
13 Deputy Attorney General  
14 MATTHEW J. RASHBROOK-Bar No. 12477  
15 Special Prosecutor  
16 *Attorneys for the State of Nevada*  
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