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RENO JUSTICE COURT
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DEPUTY

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15 IN THE JUSTICE COURT OF RENO TOWNSHIP

16 IN AND FOR THE COUNTY OF WASHOE, STATE OF NEVADA

17 STATE OF NEVADA,
18 Plaintiff,

19 v.

20 GEORGE C. GEORGE,
21 Defendant.

RCR 2013 073511

Case No.

Dept. No. *U*

CRIMINAL COMPLAINT

The undersigned, Catherine Cortez Masto, Attorney General of the State of Nevada, by and through her deputies, Ronda R. Clifton and John R. McGlamery, within their knowledge, information and belief, complain and charge under penalty of perjury that Defendant, GEORGE C. GEORGE (hereinafter "GEORGE"), has committed the felony offenses of THEFT in violation of NRS 205.0832(1)(b); the felony offenses of THEFT in violation of NRS 205.0832(1)(c); the felony offenses of OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME in violation of NRS 205.380 as defined by NRS 205A.030, NRS 179.1217 and NRS 179.1219; and, the felony

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1 offenses of MORTGAGE FRAUD in violation of NRS 205.372(1), in the County of Washoe,
2 State of Nevada, as follows:

3 **COUNT 1: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
4 following, to wit:

5 1. Between July 13, 2011, and July 26, 2011, Defendant GEORGE, in the County of
6 Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully, knowingly, and
7 without authorization, converting, making an unauthorized transfer of an interest in,
8 controlling or using the property of KIRSTEN SORENSEN while said property was entrusted
9 or placed in GEORGE'S possession for a limited use. Furthermore, said property was
10 valued in an amount in excess of \$3,500.00, to wit:

11 GEORGE knowingly made false promises to purchase property owned by KIRSTEN
12 SORENSEN for \$3.5 million dollars on behalf of an Arab sheik. KIRSTEN
13 SORENSEN paid GEORGE over \$3,500.00 in upfront fees and taxes based on the
14 misrepresentation that money was needed to complete the sale with the sheik.
15 GEORGE did not possess a real estate or real estate broker's license for the state of
16 Nevada. GEORGE did not use the funds to purchase KIRSTEN SORENSEN'S
17 property or pay any taxes or costs on behalf of KIRSTEN SORENSEN. GEORGE
18 did not return or otherwise account for any monies paid by KIRSTEN SORENSEN.

19 2. All of which constitutes the crime of THEFT, a Category B felony, in violation of
20 NRS 205.0832(1)(b).

21 **COUNT 2: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
22 following, to wit:

23 3. Between July 13, 2011, and July 26, 2011, Defendant GEORGE, in the County of
24 Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully, knowingly, and
25 without authorization, obtaining the real, personal or intangible property or the services of
26 KIRSTEN SORENSEN, with intent to deprive that person thereof by making a material
27 misrepresentation in the form of promises, representations and/or statements that were
28 false, and which were instrumental in causing the wrongful transfer of property to GEORGE.

1 Furthermore, said property or services were valued in an amount in excess of \$3,500.00, to
2 wit:

3 GEORGE made false promises to purchase property owned by KIRSTEN
4 SORENSEN for \$3.5 million dollars on behalf of an Arab sheik. KIRSTEN
5 SORENSEN paid GEORGE over \$3,500.00 in upfront fees and taxes based on the
6 misrepresentation that money was needed to complete the sale. GEORGE did not
7 possess a real estate or real estate broker's license for the State of Nevada.
8 GEORGE did not use the funds to purchase KIRSTEN SORENSEN'S property or pay
9 any taxes or costs on behalf of KIRSTEN SORENSEN. GEORGE did not return or
10 otherwise account for any monies paid by KIRSTEN SORENSEN, for a total loss in
11 excess of \$3,500.00, all of which shows an intent to deprive KIRSTEN SORENSEN of
12 said funds.

13 4. All of which constitutes the crime of THEFT, a Category B felony, in violation of
14 NRS 205.0832(1)(c).

15 **COUNT 3: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
16 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
17 **NRS 179.1217, and NRS 179.1219,** a Category B felony, in the manner following, to wit:

18 5. Between July 13, 2011, and July 26, 2011, Defendant GEORGE, in the County of
19 Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS 179.1217 by
20 knowingly and designedly obtaining from KIRSTEN SORENSEN money or other valuable
21 things by a false pretense with the intent to cheat or defraud her in an amount in excess of
22 \$3,500.00, deriving that property partially through the use of telephones or computers which
23 represent components, devices, equipment, systems or networks that, alone or in
24 conjunction with any other component, device, equipment, system or network, were
25 designed or had the capability to transmit, receive, relay, record or reproduce any signal or
26 sound in a format that involves analog, digital, electronic, electromagnetic, magnetic or
27 optical technology, as defined by NRS 205A.030 and NRS 179.1217, and subject to the
28 forfeiture provisions of NRS 179.1219, to wit:

1 GEORGE made false promises to purchase property owned by KIRSTEN
2 SORENSEN for \$3.5 million dollars on behalf of an Arab sheik. GEORGE
3 communicated with KIRSTEN SORENSEN through the use of text messages which
4 were received by KIRSTEN SORENSEN by use of cellular telephone or computer.
5 Through the use of those text messages, GEORGE sent false or misleading
6 messages to encourage KIRSTEN SORENSEN to pay GEORGE a sum in excess of
7 \$3,500.00 for the payment of taxes and costs related to the sale of her property.
8 GEORGE did not use the funds to purchase KIRSTEN SORENSEN'S property or pay
9 any taxes or costs on behalf of KIRSTEN SORENSEN. GEORGE did not return or
10 otherwise account for any monies paid by KIRSTEN SORENSEN, for a loss in excess
11 of \$3,500.00, all of which shows an intent to cheat or defraud KIRSTEN SORENSEN
12 of said funds.

13 6. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
14 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
15 205.380 as defined by NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to
16 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219.

17 **COUNT 4: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
18 following, to wit:

19 7. Between October 28, 2011, and January 21, 2012, Defendant GEORGE, in the
20 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully,
21 knowingly, and without authorization, converting, making an unauthorized transfer of an
22 interest in, controlling or using the property of MARICRIS ESTORES, while said property
23 was entrusted or placed in GEORGE'S possession for a limited use. Furthermore, said
24 property was valued in an amount in excess of \$3,500.00. To wit:

25 GEORGE knowingly made false promises to MARICRIS ESTORES he would provide
26 services to qualify her for a \$135,000.00 home mortgage at 3.99 percent interest for
27 30 years. GEORGE did not possess a real estate, real estate broker or mortgage
28 lending license in the State of Nevada. MARICRIS ESTORES paid GEORGE upfront

1 fees and down payment in excess of \$3,500.00 GEORGE did not qualify her for a
2 home mortgage, and did not make any down payment for the purchase of property on
3 MARICRIS ESTORES'S behalf. GEORGE did not return or otherwise account for any
4 monies paid to him by MARICRIS ESTORES, for a total loss in excess of \$3,500.00.

5 8. All of which constitutes the crime of THEFT, a Category B felony in violation of
6 NRS 205.0832(1)(b).

7 **COUNT 5: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
8 following, to wit:

9 9. Between October 28, 2011, and January 21, 2012, Defendant GEORGE, in the
10 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully,
11 knowingly, and without authorization, obtaining the real, personal or intangible property or
12 the services of MARICRIS ESTORES with intent to deprive that person thereof by making of
13 a material misrepresentation in the form of promises, representations and/or statements that
14 were false, and which were instrumental in causing the wrongful transfer of property to
15 GEORGE. Furthermore, said property or services were valued in an amount in excess of
16 \$3,500.00. To wit:

17 GEORGE made false promises to MARICRIS ESTORES he would provide services to
18 qualify her for a \$135,000.00 home mortgage at 3.99 percent interest for 30 years.
19 GEORGE did not possess a real estate, real estate broker or mortgage lending license
20 in the State of Nevada. MARICRIS ESTORES paid GEORGE upfront fees and down
21 payment in excess of \$3,500.00 for his promised services. GEORGE did not qualify
22 her for a home mortgage, and did not make any down payment for the purchase of
23 property on MARICRIS ESTORES'S behalf. GEORGE did not return or otherwise
24 account for any monies paid to him by MARICRIS ESTORES, for a total loss in excess
25 of \$3,500.00, all of which shows an intent to deprive MARICRIS ESTORES of said
26 funds.

27 10. All of which constitutes the crime of THEFT, a Category B felony in violation of
28 NRS 205.0832(1)(c).

1 **COUNT 6: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
2 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
3 **NRS 179.1217, and NRS 179.1219,** a Category B felony, in the manner following, to wit:

4 11. Between October 28, 2011, and January 21, 2012, Defendant GEORGE, in the
5 County of Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS
6 179.1217 by knowingly and designedly obtaining from MARICRIS ESTORES money or other
7 valuable things by a false pretense with the intent to cheat or defraud her in an amount in
8 excess of \$3,500.00, deriving that property partially through the use of telephones or
9 computers which represent components, devices, equipment, systems or networks that,
10 alone or in conjunction with any other component, device, equipment, system or network,
11 were designed or had the capability to transmit, receive, relay, record or reproduce any
12 signal or sound in a format that involves analog, digital, electronic, electromagnetic,
13 magnetic or optical technology, as defined by NRS 205A.030 and NRS 179.1217, and
14 subject to the forfeiture provisions of NRS 179.1219, to wit:

15 GEORGE made false promises MARICRIS ESTORES that he would provide services
16 to qualify her for a \$135,000.00 home loan at 3.99 percent interest for 30 years.
17 GEORGE communicated with MARICRIS ESTORES through the use of computer or
18 cellular telephone generated text messages which were received by MARICRIS
19 ESTORES by use of cellular telephone or computer. Through the use of those text
20 messages, GEORGE sent false or misleading text messages by computer or cell
21 phone to encourage MARICRIS ESTORES to pay to GEORGE a sum in excess of
22 \$3,500.00. GEORGE did not qualify her for the purchase of a property, and did not
23 make any down payment for the purchase of property on MARICRIS ESTORES'S
24 behalf. GEORGE did not return or otherwise account for any monies paid to him by
25 MARICRIS ESTORES for a total loss in excess of \$3,500.00 all of which shows an
26 intent to cheat or defraud MARICRIS ESTORES of said funds.

27 12. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
28 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS

1 205.380, as defined in NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to
2 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219.

3 **COUNT 7: MORTGAGE FRAUD, a violation of NRS 205.372(1)**, a Category C felony, in
4 the manner following, to wit:

5 13. Between October 28, 2011, and January 21, 2012, Defendant GEORGE, in the
6 County of Washoe, State of Nevada, did violate NRS 205.372 by participating in a mortgage
7 lending transaction by knowingly making a false statement or misrepresentation concerning
8 a material fact, or knowingly concealing or failing to disclose a material fact and receiving the
9 proceeds or any other money in connection with a mortgage lending transaction that the
10 person knows resulted from a false statement or misrepresentation concerning a material
11 fact. To wit:

12 GEORGE made false promises to MARICRIS ESTORES that he would provide
13 services to qualify her for a \$135,000.00 home loan at 3.99 percent interest for 30
14 years knowing he would not provide promised services. GEORGE did not possess a
15 real estate, real estate broker or mortgage lending license in the State of Nevada.
16 MARICRIS ESTORES paid GEORGE upfront fees and down payment in excess of
17 \$3,500.00 for his promised services. GEORGE did not qualify her for the purchase of
18 a property and did not make any down payment for the purchase of property on
19 MARICRIS ESTORES'S behalf. GEORGE did not return or otherwise account for any
20 monies paid to him by MARICRIS ESTORES for a total loss in excess of \$3,500.00.

21 14. All of which constitutes the crime of Mortgage Fraud, a violation of NRS
22 205.372(1), a Category C felony.

23 **COUNT 8: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
24 following, to wit:

25 15. Between November 7, 2011, and April 27, 2012, Defendant GEORGE, in the
26 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully, knowingly,
27 and without authorization, converting, making an unauthorized transfer of an interest in,
28 controlling or using the property of CYNTHIA DANIELS while said property was

1 entrusted or placed in GEORGE'S possession for a limited use. Furthermore, said property
2 was valued in an amount in excess of \$3,500.00. To wit:

3 GEORGE knowingly made false promises to CYNTHIA DANIELS that he would
4 provide services to qualify CYNTHIA DANIELS for a mortgage so she may purchase
5 a house. GEORGE did not possess a real estate, real estate broker or mortgage
6 lending license in the State of Nevada. CYNTHIA DANIELS paid GEORGE in excess
7 \$3,500.00 for a down payment and other fees. GEORGE did not use the money paid
8 to him for the down payment on any house, and otherwise failed to account for or
9 return any monies paid by CYNTHIA DANIELS, for a total loss in excess of \$3,500.00.

10 16. All of which constitutes the crime of THEFT, a Category B felony in violation of
11 NRS 205.0832(1)(b).

12 **COUNT 9: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
13 following, to wit:

14 17. Between November 7, 2011, and April 27, 2012, Defendant GEORGE, in the County
15 of Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully, knowingly, and
16 without authorization, obtaining the real, personal or intangible property or the services of
17 CYNTHIA DANIELS with intent to deprive that person thereof by making of a material
18 misrepresentation in the form of promises, representations and/or statements that were false,
19 and which were instrumental in causing the wrongful transfer of property to GEORGE.
20 Furthermore, said property or services were valued in an amount in excess of \$3,500.00. To
21 wit:

22 GEORGE made false promises to CYNTHIA DANIELS that he would provide services
23 to qualify CYNTHIA DANIELS for a mortgage so she may purchase a house.
24 GEORGE did not possess a real estate, real estate broker or mortgage lending
25 license in the State of Nevada. CYNTHIA DANIELS paid GEORGE \$3,500.00 for a
26 down payment and other fees. GEORGE did not use the money paid to him for the
27 down payment on any house, and otherwise failed to account for or return any monies
28 paid by CYNTHIA DANIELS, for a total loss in excess of \$3,500.00, all of which

1 shows an intent to deprive CYNTHIA DANIELS of said funds.

2 18. All of which constitutes the crime of THEFT, a Category B felony in violation of
3 NRS 205.0832(1)(c).

4 **COUNT 10: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
5 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
6 **NRS 179.1217, and NRS 179.1219**, a Category B felony, in the manner following, to wit:

7 19. Between November 7, 2011, and April 27, 2012, Defendant GEORGE, in the
8 County of Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS
9 179.1217 by unlawfully, knowingly, and without authorization, obtaining the real, personal or
10 intangible property or the services of CYNTHIA DANIELS with intent to deprive that person
11 thereof by making of a material misrepresentation in the form of promises, representations
12 and/or statements that were false, and which were instrumental in causing the wrongful
13 transfer of property to GEORGE. Furthermore, said property or services were valued in an
14 amount in excess of \$3,500.00, to wit:

15 GEORGE made false promises to CYNTHIA DANIELS that he would provide services
16 to qualify CYNTHIA DANIELS for a mortgage so she may purchase a house.
17 GEORGE communicated with CYNTHIA DANIELS by computer and/or cellular
18 telephone. GEORGE did not possess a real estate, real estate broker or mortgage
19 lending license in the State of Nevada. CYNTHIA DANIELS paid GEORGE upfront
20 fees and down payment in excess of \$3,500.00 based on the misrepresentation that
21 she would be purchasing a home. GEORGE did not use the money paid to him for
22 the down payment on any house, and otherwise failed to account for or return any
23 monies paid by CYNTHIA DANIELS. GEORGE did not return or otherwise account
24 for any monies paid by CYNTHIA DANIELS, for a total loss in excess of \$3,500.00, all
25 of which shows an intent to cheat or defraud CYNTHIA DANIELS of said funds.

26 20. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
27 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
28 205.380 as defined by NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to

1 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219.

2 **COUNT 11: MORTGAGE FRAUD, a violation of NRS 205.372(1)**, a Category C felony, in
3 the manner following, to wit:

4 21. Between October 1, 2011, and December 31, 2011, Defendant GEORGE, in the
5 County of Washoe, State of Nevada, did violate NRS 205.372 by participating in a mortgage
6 lending transaction by knowingly making a false statement or misrepresentation concerning
7 a material fact, or knowingly concealing or failing to disclose a material fact and receiving the
8 proceeds or any other money in connection with a mortgage lending transaction that the
9 person knows resulted from a false statement or misrepresentation concerning a material
10 fact. To wit:

11 GEORGE made false promises to CYNTHIA DANIELS that he would provide services
12 to qualify her for a home loan. GEORGE did not possess a real estate, real estate
13 broker or mortgage lending license in the State of Nevada. CYNTHIA DANIELS paid
14 GEORGE upfront fees and down payment in excess of \$3,500.00 for his promised
15 services. GEORGE did not qualify her for a loan, and did not make any down
16 payment for the purchase of property on CYNTHIA DANIELS' behalf. GEORGE did
17 not return or otherwise account for any monies paid to him by CYNTHIA DANIELS for
18 a total loss in excess of \$3,500.00.

19 22. All of which constitutes the crime of Mortgage Fraud, a violation of NRS
20 205.372(1), a Category C felony.

21 **COUNT 12: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
22 following, to wit:

23 23. Between October 1, 2011, and March 12, 2012, Defendant GEORGE, in the
24 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully, knowingly,
25 and without authorization, converting, making an unauthorized transfer of an interest in,
26 controlling or using the property of GLEN "CODY" MCNEELY while said property was entrusted
27 or placed in GEORGE'S possession for a limited use. Furthermore, said property was valued
28 in an amount in excess of \$3,500.00. To wit:

1 GEORGE knowingly made false promises to GLEN "CODY" MCNEELY that he would
2 provide services to lower GLEN "CODY" MCNEELY'S mortgage loan with a loan
3 modification. GEORGE did not possess a required license to perform mortgage
4 modifications in Nevada. GLEN "CODY" MCNEELY paid GEORGE in excess of
5 \$3,500.00 upfront for the mortgage loan modification services promised by GEORGE.
6 GEORGE converted the funds to his own use. GEORGE did not return or otherwise
7 account for any monies paid by GLEN "CODY" MCNEELY for a total loss in excess of
8 \$3,500.00.

9 24. All of which constitutes the crime of THEFT, a Category B felony in violation of
10 NRS 205.0832(1)(b).

11 **COUNT 13: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
12 following, to wit:

13 25. Between October 1, 2011, and March 12, 2012, Defendant GEORGE, in the
14 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully,
15 knowingly, and without authorization, obtaining the real, personal or intangible property or
16 the services of GLEN "CODY" MCNEELY with intent to deprive that person thereof by
17 making of a material misrepresentation in the form of promises, representations and/or
18 statements that were false, and which were instrumental in causing the wrongful transfer of
19 property to GEORGE. Furthermore, said property or services were valued in an amount in
20 excess of \$3,500.00. To wit:

21 GEORGE made false promises to GLEN "CODY" MCNEELY that he would provide
22 services to lower GLEN "CODY" MCNEELY'S mortgage loan with a loan modification.
23 GEORGE did not possess a required license to perform mortgage modifications in
24 Nevada. GLEN "CODY" MCNEELY paid GEORGE in excess of \$3,500.00 upfront for
25 the loan modification. GEORGE did not qualify GLEN "CODY" MCNEELY for the
26 mortgage modification. GEORGE did not return or otherwise account for any monies
27 paid by GLEN "CODY" MCNEELY for a total loss in excess of \$3,500.00, all of which
28 shows an intent to deprive GLEN "CODY" MCNEELY of said funds.

1 26. All of which constitutes the crime of THEFT, a Category B felony, in violation of
2 NRS 205.0832(1)(c).

3 **COUNT 14: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
4 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
5 **NRS 179.1217, and NRS 179.1219,** a Category B felony, in the manner following, to wit:

6 27. Between October 1, 2011, and March 12, 2012, Defendant GEORGE, in the
7 County of Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS
8 179.1217 by unlawfully, knowingly, and without authorization, obtaining the real, personal or
9 intangible property or the services of GLEN "CODY" MCNEELY with intent to deprive that
10 person thereof by making of a material misrepresentation in the form of promises,
11 representations and/or statements that were false, and which were instrumental in causing
12 the wrongful transfer of property to GEORGE. Furthermore, said property or services were
13 valued in an amount in excess of \$3,500.00, to wit:

14 GEORGE made false promises to GLEN "CODY" MCNEELY that he would provide
15 services to lower GLEN "CODY" MCNEELY'S mortgage loan with a loan modification.
16 GEORGE did not possess a required license to perform mortgage modifications in
17 Nevada. GLEN "CODY" MCNEELY paid GEORGE in excess of \$3,500.00 upfront for
18 the loan modification. GEORGE communicated with GLEN "CODY" MCNEELY by
19 computer and/or cellular telephone. GEORGE did not qualify GLEN "CODY"
20 MCNEELY for the loan modification. GEORGE did not return or otherwise account for
21 any monies paid by GLEN "CODY" MCNEELY for a total loss in excess of \$3,500.00,
22 all of which shows an intent to deprive GLEN "CODY" MCNEELY of said funds, all of
23 which shows an intent to cheat or defraud GLEN "CODY" MCNEELY of said funds.

24 28. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
25 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
26 205.380 as defined by NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to
27 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219.

28 ///

1 **COUNT 15: MORTGAGE FRAUD, a violation of NRS 205.372(1)**, a Category C felony, in
2 the manner following, to wit:

3 29. Between October 1, 2011, and March 12, 2012, Defendant GEORGE, in the
4 County of Washoe, State of Nevada, did violate NRS 205.372 by participating in a mortgage
5 lending transaction by knowingly making a false statement or misrepresentation concerning
6 a material fact, or knowingly concealing or failing to disclose a material fact and receiving the
7 proceeds or any other money in connection with a mortgage lending transaction that the
8 person knows resulted from a false statement or misrepresentation concerning a material
9 fact. To wit:

10 GEORGE made false promises to GLEN "CODY" MCNEELY that he would provide
11 services to lower GLEN "CODY" MCNEELY'S mortgage loan with a loan modification.
12 This modification would be completed in 30-60 days. GEORGE did not possess a
13 required license to perform mortgage modifications in Nevada. GLEN "CODY"
14 MCNEELY paid GEORGE in excess of \$3,500.00 upfront for the loan modification
15 services promised by GEORGE. GEORGE did not lower GLEN "CODY" MCNEELY'S
16 mortgage loan. GEORGE did not return or otherwise account for any monies paid by
17 GLEN "CODY" MCNEELY for a total loss in excess of \$3,500.00.

18 30. All of which constitutes the crime of Mortgage Fraud, a violation of NRS
19 205.372(1), a Category C felony.

20 **COUNT 16: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
21 following, to wit:

22 31. Between November 20, 2011, and March 19, 2012, Defendant GEORGE, in the
23 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully,
24 knowingly, and without authorization, converting, making an unauthorized transfer of an
25 interest in, controlling or using the property of BETH LAU, while said property was entrusted
26 or placed in GEORGE'S possession for a limited use. Furthermore, said property was
27 valued in an amount in excess of \$3,500.00. To wit:

28 GEORGE knowingly made false promises to LAU that he would modify three

1 mortgage loans on three properties owned by LAU. GEORGE did not possess a
2 required license to perform mortgage modifications in Nevada. LAU paid GEORGE
3 in excess of \$3,500.00 upfront for three application fees to perform mortgage
4 modifications on each of LAU'S three mortgage loans. Later, GEORGE told LAU
5 that an additional \$6,700.00 was needed to complete the modifications. LAU paid
6 GEORGE \$6,700.00 to complete the loan modifications. GEORGE did not modify the
7 three mortgages and failed to make any monthly mortgage payments for the three
8 properties. GEORGE did not return or otherwise account for any monies paid by
9 LAU, for a total loss in excess of \$3,500.00.

10 32. All of which constitutes the crime of THEFT, a Category B felony, in violation of
11 NRS 205.0832(1)(b).

12 **COUNT 17: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
13 following, to wit:

14 33. Between November 20, 2011, and March 19, 2012, Defendant GEORGE, in the
15 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully,
16 knowingly, and without authorization, obtaining the real, personal or intangible property or
17 the services of BETH LAU, with intent to deprive that person thereof by making of a material
18 misrepresentation in the form of promises, representations and/or statements that were
19 false, and which were instrumental in causing the wrongful transfer of property to GEORGE.
20 Furthermore, said property or services were valued in an amount in excess of \$3,500.00. To
21 wit:

22 GEORGE made false promises to LAU that he would modify three mortgage loans
23 on three properties owned by LAU. GEORGE did not possess a required license to
24 perform mortgage modifications in Nevada. LAU paid GEORGE in excess of
25 \$3,500.00 upfront for three application fees to perform mortgage modifications on
26 each of LAU'S three mortgage loans. Later, GEORGE told LAU that an additional
27 \$6,700.00 was needed to complete the modifications. LAU paid GEORGE \$6,700.00
28 to complete the loan modifications. GEORGE did not modify the three mortgages

1 and failed to make any monthly mortgage payments for the three properties.
2 GEORGE did not return or otherwise account for any monies paid by LAU, for a total
3 loss in excess of \$3,500.00, all of which shows an intent to deprive BETH LAU of
4 said funds.

5 34. All of which constitutes the crime of THEFT, a Category B felony, in violation of
6 NRS 205.0832(1)(c).

7 **COUNT 18: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
8 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
9 **NRS 179.1217, and NRS 179.1219,** a Category B felony, in the manner following, to wit:

10 35. Between November 20, 2011, and March 19, 2012, Defendant GEORGE, in the
11 County of Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS
12 179.1217 by knowingly and designedly obtaining from BETH LAU money or other valuable
13 things by a false pretense with the intent to cheat or defraud him in an amount in excess of
14 \$3,500.00, deriving that property partially through the use of telephones or computers which
15 represent components, devices, equipment, systems or networks that, alone or in
16 conjunction with any other component, device, equipment, system or network, were
17 designed or had the capability to transmit, receive, relay, record or reproduce any signal or
18 sound in a format that involves analog, digital, electronic, electromagnetic, magnetic or
19 optical technology, as defined by NRS 205A.030 and NRS 179.1217, and subject to the
20 forfeiture provisions of NRS 179.1219, to wit:

21 GEORGE made false promises to BETH LAU that he would modify three mortgage
22 loans on three properties owned by BETH LAU. GEORGE communicated with BETH
23 LAU through the use of text messages which were received by BETH LAU by use of a
24 cellular telephone or computer. Through the use of those text messages, GEORGE
25 sent false or misleading messages to BETH LAU to pay to GEORGE a sum in excess
26 of \$3,500.00. GEORGE did not complete the purchase of a property and did not
27 make any down payment for the purchase of property on BETH LAU'S behalf.
28 George did not return or otherwise account for any monies paid to him by BETH LAU,

1 for a total loss in excess of \$3,500.00, all of which shows an intent to cheat or defraud
2 BETH LAU of said funds.

3 36. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
4 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
5 205.380 as defined by NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to
6 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219

7 **COUNT 19: MORTGAGE FRAUD, a violation of NRS 205.372(1)**, a Category C felony, in
8 the manner following, to wit:

9 37. Between October 1, 2011, and December 31, 2011, Defendant GEORGE, in the
10 County of Washoe, State of Nevada, did violate NRS 205.372 by participating in a mortgage
11 lending transaction by knowingly making a false statement or misrepresentation concerning
12 a material fact, or knowingly concealing or failing to disclose a material fact and receiving the
13 proceeds or any other money in connection with a mortgage lending
14 transaction that the person knows resulted from a false statement or misrepresentation
15 concerning a material fact. To wit:

16 GEORGE made false promises to BETH LAU that he would modify three
17 mortgage loans on three properties owned by BETH LAU. GEORGE sent false or
18 misleading messages to BETH LAU to pay to GEORGE a sum in excess of
19 \$3,500.00. GEORGE did not complete the loan modification on any of the
20 properties and did not make the mortgage payments or loan payoff payments on
21 BETH LAU'S behalf. George did not return or otherwise account for any monies
22 paid to him by BETH LAU, for a total loss in excess of \$3,500.00.

23 38. All of which constitutes the crime of Mortgage Fraud, a violation of NRS
24 205.372(1), a Category C felony.

25 **COUNT 20: THEFT, a violation of NRS 205.0832(1)(b)**, a Category B felony, in the manner
26 following, to wit:

27 39. Between December 1, 2011, and March 12, 2012, Defendant GEORGE, in the
28 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(b) by unlawfully,

1 knowingly, and without authorization, converting, making an unauthorized transfer of an
2 interest in, controlling or using the property of JAMES HENSLEY, while said property was
3 entrusted or placed in GEORGE'S possession for a limited use. Furthermore, said property
4 was valued in an amount in excess of \$3,500.00. To wit:

5 GEORGE knowingly made false promises to JAMES HENSLEY that he could help
6 JAMES HENSLEY obtain an affordable mortgage through a foreign bank for the
7 purchase of certain real property. JAMES HENSLEY paid GEORGE in excess of
8 \$3,500.00 for the purpose of a partial deposit on a home that GEORGE was buying
9 on JAMES HENSLEY'S behalf. JAMES HENSLEY paid GEORGE additional funds
10 for the purpose of the partial deposit on a home that GEORGE was buying on
11 JAMES HENSLEY'S behalf. Later JAMES HENSLEY paid GEORGE additional
12 funds in excess of \$3,500.00 for the purpose of full payment of the deposit on a
13 home that GEORGE was buying on JAMES HENSLEY'S behalf. GEORGE did not
14 arrange the mortgage nor made a down payment on any property on JAMES
15 HENSLEY'S behalf. GEORGE did not return or otherwise account for any monies
16 paid by JAMES HENSLEY for a total loss in excess of \$3,500.00.

17 40. All of which constitutes the crime of THEFT, a Category B felony, in violation of
18 NRS 205.0832(1)(b).

19 **COUNT 21: THEFT, a violation of NRS 205.0832(1)(c)**, a Category B felony, in the manner
20 following, to wit:

21 41. Between December 1, 2011, and March 12, 2012, Defendant GEORGE, in the
22 County of Washoe, State of Nevada, did violate NRS 205.0832(1)(c) by unlawfully, knowingly,
23 and without authorization, obtaining the real, personal or intangible property or the services of
24 JAMES HENSLEY, with intent to deprive that person thereof by making of a material
25 misrepresentation in the form of promises, representations and/or statements that were false
26 and which were instrumental in causing the wrongful transfer of property to GEORGE.
27 Furthermore, said property or services were valued in an amount in excess of \$3,500.00. To
28 wit:

1 GEORGE made false promises to JAMES HENSLEY that he could help JAMES
2 HENSLEY obtain an affordable mortgage through a foreign bank for the purchase of
3 certain real property. On or about December 8, 2011, JAMES HENSLEY paid
4 GEORGE an "earnest fee" for the purchase of a property. JAMES HENSLEY paid
5 GEORGE additional money for the purpose of a partial deposit on a home that
6 GEORGE was buying on JAMES HENSLEY'S behalf. JAMES HENSLEY paid
7 GEORGE additional money for the purpose of the partial deposit on a home that
8 GEORGE was buying on JAMES HENSLEY'S behalf. Later, JAMES HENSLEY paid
9 GEORGE additional funds for the purpose of full payment of the deposit on a home
10 that GEORGE was buying on JAMES HENSLEY'S behalf. GEORGE did not obtain a
11 mortgage for buying a house on JAMES HENSLEY'S behalf, nor made any down
12 payment on any property on JAMES HENSLEY'S behalf. GEORGE did not return or
13 otherwise account for any monies paid by JAMES HENSLEY, for a total loss in
14 excess of \$3,500.00, all of which shows an intent to deprive JAMES HENSLEY of
15 said funds.

16 42. All of which constitutes the crime of THEFT, a Category B felony, in violation of
17 NRS 205.0832(1)(c).

18 **COUNT 22: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
19 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, as defined by NRS 205A.030,**
20 **NRS 179.1217, and NRS 179.1219,** a Category B felony, in the manner following, to wit:

21 43. Between July 13, 2011, and March 12, 2012, Defendant GEORGE, in the
22 County of Washoe, State of Nevada, did violate NRS 205.380, NRS 205A.030 and NRS
23 179.1217 by knowingly and designedly obtaining from JAMES HENSLEY money or other
24 valuable things by a false pretense with the intent to cheat or defraud him in an amount in
25 excess of \$3,500.00, deriving that property partially through the use of telephones or
26 computers which represent components, devices, equipment, systems or networks that,
27 alone or in conjunction with any other component, device, equipment, system or network,
28 were designed or had the capability to transmit, receive, relay, record or reproduce any

1 signal or sound in a format that involves analog, digital, electronic, electromagnetic,
2 magnetic or optical technology, as defined by NRS 205A.030 and NRS 179.1217, and
3 subject to the forfeiture provisions of NRS 179.1219, to wit:

4 GEORGE made false promises to JAMES HENSLEY that he could help JAMES
5 HENSLEY obtain an affordable mortgage through a foreign bank for the purchase of
6 certain real property. GEORGE communicated with JAMES HENSLEY through the
7 use of text messages which were received by JAMES HENSLEY by use of cellular
8 telephone or computer. Through the use of those text messages, GEORGE sent
9 false or misleading messages to encourage JAMES HENSLEY to pay GEORGE a
10 sum in excess of \$3,500.00 for the purchase of certain real property. GEORGE did
11 not purchase or arrange for the purchase of certain real property on behalf of JAMES
12 HENSLEY. GEORGE did not return or otherwise account for any monies paid by
13 JAMES HENSLEY, for a total loss in excess of \$3,500.00, all of which shows an
14 intent to cheat or defraud JAMES HENSLEY of said funds.

15 44. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
16 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
17 205.380 as defined by NRS 205A.030 and NRS 179.1217, a Category B felony pursuant to
18 NRS 205.0835(4), and subject to the forfeiture provisions of NRS 179.1219.

19 **COUNT 23: MORTGAGE FRAUD, a violation of NRS 205.372(1)**, a Category C felony, in
20 the manner following, to wit:

21 45. Between July 13, 2011, and March 12, 2012, Defendant GEORGE, in the
22 County of Washoe, State of Nevada, did violate NRS 205.372 by participating in a mortgage
23 lending transaction by knowingly making a false statement or misrepresentation concerning
24 a material fact, or knowingly concealing or failing to disclose a material fact and receiving the
25 proceeds or any other money in connection with a mortgage lending transaction that the
26 person knows resulted from a false statement or misrepresentation concerning a material
27 fact. To wit:

28 GEORGE made false promises to JAMES HENSLEY that he could help JAMES

1 HENSLEY obtain an affordable mortgage through a foreign bank for the purchase of
2 certain real property. On or about December 8, 2011, JAMES HENSLEY paid
3 GEORGE an "earnest fee" for the purchase of a property. JAMES HENSLEY paid
4 GEORGE additional money for the purpose of a partial deposit on a home that
5 GEORGE was buying on JAMES HENSLEY'S behalf. JAMES HENSLEY paid
6 GEORGE more money for the purpose of the partial deposit on a home that
7 GEORGE was buying on JAMES HENSLEY'S behalf. Later, JAMES HENSLEY paid
8 GEORGE additional funds in excess of \$3,500.00 for the purpose of full payment of
9 the deposit on a home that GEORGE was buying on JAMES HENSLEY'S behalf.
10 GEORGE did not obtain a mortgage on JAMES HENSLEY'S behalf, nor made any
11 down payment on any property on JAMES HENSLEY'S behalf. GEORGE did not
12 return or otherwise account for any monies paid by JAMES HENSLEY, for a total
13 loss in excess of \$3,500.00.

14 46. All of which constitutes the crime of Mortgage Fraud, a violation of NRS
15 205.372(1), a Category C felony.

16 All of which is contrary to the form, force and effect of the statutes in such cases
17 made and provided and against the peace and dignity of the State of Nevada. Said
18 complainants make this declaration subject to the penalty of perjury.

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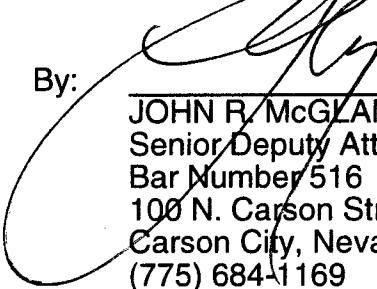
AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding document, CRIMINAL COMPLAINT, State of Nevada v. George C. George, filed in Reno Township Justice Court, does not contain the social security number of any person.

DATED this 30th day of July, 2013.

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