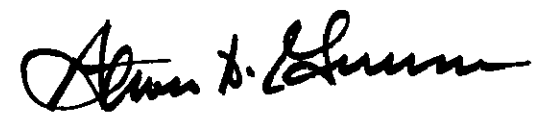


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CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

14 THE STATE OF NEVADA,

15 Plaintiff,

16 vs.

17 LYNDA K. FINCH-ESTRADA,  
18 ID # 0682162;  
19 WILLIAM CHRISSIKOPOULOS,  
20 ID # 0973690;  
21 ALAN DORNHUBER,  
22 ID# 1515308; and  
23 WILLIAM PATTERSON,

24 Defendants.

Case No.: C-13-289156-1  
Dept. No.: VIII

INDICTMENT

25 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and through  
26 her deputies, JEFFREY H. SEGAL and SARAH E. OVERLY, informs this Honorable Court that  
27 the above names Defendants have committed the following offenses:

28 LYNDA K. FINCH-ESTRADA, (hereinafter ESTRADA) has committed the crimes of four  
(4) counts of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00

1 OR MORE, a category "B" felony, in violation of NRS 205.0832, NRS 205.0835(4); two (2)  
2 counts of THEFT BY MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR  
3 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of  
4 NRS 205.0832(1)(c), NRS 205.0835(4), and NRS 193.167(2); four (4) counts of MORTGAGE  
5 LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400; one  
6 count of PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of  
7 NRS 205.372; one (1) count of MULTIPLE TRANSACTIONS INVOLVING FRAUD AND DECEIT  
8 IN THE COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in violation of  
9 NRS 205.377; and two (2) counts of PREVENTING OR DISSUADING VICTIM, PERSON  
10 ACTING ON BEHALF OF VICTIM, OR WITNESS FROM REPORTING CRIME, COMMENCING  
11 PROSECUTION OR CAUSING ARREST, a category "D" felony in violation of NRS 199.305.

12 WILLIAM CHRISSIKOPOULOS, (hereinafter CHRISSIKOPOULOS) has committed the  
13 crimes of four (4) counts of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT  
14 OF \$3,500.00 OR MORE, a category "B" felony, in violation of NRS 205.0832, NRS  
15 205.0835(4); two (2) counts of THEFT BY MATERIAL MISREPRESENTATION IN THE  
16 AMOUNT OF \$3,500.00 OR MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a  
17 category "B" felony in violation of NRS 205.0832(1)(c), NRS 205.0835(4), and NRS 193.167(2);  
18 four (4) counts of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS  
19 205.372 and NRS 645F.400; one (1) count of PATTERN OF MORTGAGE LENDING FRAUD, a  
20 category "B" felony in violation of NRS 205.372; one (1) count of MULTIPLE TRANSACTIONS  
21 INVOLVING FRAUD AND DECEIT IN THE COURSE OF ENTERPRISE OR OCCUPATION, a  
22 category "B" felony in violation of NRS 205.377; and two (2) counts of PREVENTING OR  
23 DISSUADING VICTIM, PERSON ACTING ON BEHALF OF VICTIM, OR WITNESS FROM  
24 REPORTING CRIME, COMMENCING PROSECUTION OR CAUSING ARREST, a category "D"  
25 felony in violation of NRS 199.305.

26 ALAN DORNHUBER, (hereinafter DORNHUBER) has committed the crimes of four (4)  
27 counts of THEFT BY MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR  
28 MORE, a category "B" felony, in violation of NRS 205.0832 and NRS 205.0835(4); two (2)

1 counts of THEFT BY MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR  
2 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of  
3 NRS 205.0832(1)(c), NRS 205.0835(4), and NRS 193.167(2); one (1) count of THEFT BY  
4 MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$650.00 OR MORE, a category "C"  
5 felony in violation of NRS 205.0832 and NRS 205.0835(4); four (4) counts of MORTGAGE  
6 LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400; one  
7 count of PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of  
8 NRS 205.372; one (1) count of MULTIPLE TRANSACTIONS INVOLVING FRAUD AND DECEIT  
9 IN THE COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in violation of  
10 NRS 205.377; and two (2) counts of PREVENTING OR DISSUADING VICTIM, PERSON  
11 ACTING ON BEHALF OF VICTIM, OR WITNESS FROM REPORTING CRIME, COMMENCING  
12 PROSECUTION OR CAUSING ARREST, a category "D" felony in violation of NRS 199.305.

13 WILLIAM PATTERSON, (hereinafter PATTERSON) has committed the crimes of two (2)  
14 counts of THEFT BY MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR  
15 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of  
16 NRS 205.0832, NRS 205.0835 and NRS 193.167(2); two (2) counts of MORTGAGE LENDING  
17 FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400; one (1) count of  
18 PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of NRS  
19 205.372; and one (1) count of MULTIPLE TRANSACTIONS INVOLVING FRAUD AND DECEIT  
20 IN THE COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in violation of  
21 NRS 205.377.

22 All of the acts alleged herein have been committed on or between July 29, 2010 and  
23 March 27, 2013, by the above-named Defendants, within the County of Clark, State of Nevada,  
24 in the following manner:  
25  
26  
27  
28

COUNT I

THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE  
CATEGORY "B" felony - NRS 205.0832(1)(c) and NRS 205.0835(4)

From on or about April 5, 2011 to October 5, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the others, either directly or through each other, their agents or employees, did knowingly and without lawful authority obtain the personal or intangible property of another person valued at \$3,500.00 or more by material misrepresentation with intent to deprive that person of the property, to wit:

Defendants obtained three cashier's checks from the WILLIAM MORTON and CYNTHIA PIERRE-MORTON (hereinafter "MORTONS") totaling \$7,495.00 by one or more material misrepresentations to the MORTONS, including, without limitation:

- Misrepresented the benefits, performance and efficacy of their services by falsely claiming that if a "forensic audit" of their mortgage uncovered one or more "RESPA" violations, the MORTONS would be entitled to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented to the MORTONS that they performed a "forensic audit" of their mortgage that uncovered numerous "RESPA" violations entitling the MORTONS to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented that they had arranged for attorneys to represent the MORTONS in a multi-plaintiff lawsuit led by the prominent attorney Kenneth Starr;
- Misrepresented to the MORTONS the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of multi-colored inks having legal significance would result in the MORTONS obtaining their home free and clear of their mortgage;
- Misrepresented to the MORTIONS the benefits, performance and efficacy of a scheme whereby the MORTONS could appoint themselves Power of Attorney for

1 their lender, servicer, or trustee, then deem their mortgage satisfied, and then deed  
2 the property back to themselves via the use of a fictitious trust;

- 3 • Misrepresented to the MORTONS that American Home Rescue was a legitimate  
4 not for profit organization;
- 5 • Misrepresented to the MORTONS the benefits, performance and efficacy of a  
6 scheme by falsely claiming the MORTONS would legally obtain their home free  
7 and clear of their mortgage by quitclaiming their home to American Home Rescue,  
8 paying rent to American Home Rescue for a period of time, and then having  
9 American Home Rescue deed the home back to the MORTONS;
- 10 • Misrepresented to the MORTIONS the benefits, performance and efficacy of their  
11 services by falsely claiming a 97% success rate;
- 12 • Misrepresented to the MORTONS that they would refund fees paid if the services  
13 did not achieve a balance reduction or title reconveyance within twelve (12)  
14 months;
- 15 • Misrepresented that they had the qualifications and expertise to perform the  
16 services they promised to perform;
- 17 • Misrepresented that they would pay refunds of all paid fees if their services did not  
18 result in a balance reduction or title re-conveyance when they knew full well that  
19 they did not maintain a reserve fund or make other good faith provisions for the  
20 payment of refunds and/or did not intend to honor their stated refund policy;
- 21 • Misrepresented their relationship to American Home Rescue by failing to disclose  
22 that Defendants owned or controlled American Home Rescue;
- 23 • Misrepresented that American Home Rescue operated as a not for profit  
24 organization;
- 25 • Misrepresented that attorneys would be performing services;
- 26
- 27
- 28

- Misrepresented the legality and efficacy of filing documents with a county recorder containing false statements or omissions of material fact.

All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony in violation of NRS 205.0832(1)(c) and NRS 205.0835(4).

## COUNT II

### MORTGAGE LENDING FRAUD CATEGORY "C" felony – NRS 205.372 and NRS 645F.400

From on or about April 4, 2011 to November 15, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the others, in the performance of a covered service as defined by NRS 645F.310, willfully and unlawfully violated one or more provisions of NRS 645F.400 including, without limitation, to wit:

- On or about April 4, 2011, Defendants accepted a power of attorney from WILLIAM MORTON for a purpose other than to inspect documents as provided by law, in violation of NRS 645F.400(1)(e).
- On or about April 4, 2011, Defendants accepted a power of attorney from CYNTHIA PIERRE-MORTON for a purpose other than to inspect documents as provided by law, in violation of NRS 645F.400(1)(e).
- On or about April 5, 2012, Defendants misrepresented to the MORTONS the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of assorted colored inks having legal significance would result in the MORTONS obtaining their home free and clear of their mortgage, in violation of NRS 645F.400(1)(g).
- On or about April 5, 2012, Defendants made a representation, express or implied, about the benefits, performance or efficacy of a covered service, namely the

1           aforementioned "administrative process" when they did not possess and rely upon  
2           competent and reliable evidence which substantiates that the representation is  
3           true, in violation of NRS 645F.400(1)(i).

- 4           • On May 26, 2011, Defendants accepted a power of attorney from WILLIAM  
5           MORTON and CYNTHIA PIERRE-MORTON for a purpose other than to inspect  
6           documents as provided by law, in violation of NRS 645F.400(1)(e).
- 7           • On or between May 31, 2012 to July 16, 2012, Defendants misrepresented to the  
8           MORTONS the benefits, performance and efficacy of their program by falsely  
9           claiming that recording various documents with the Clark County Recorder's Office  
10          would result in the MORTONS owning their home free and clear of their mortgage,  
11          in violation of NRS 645F.400(1)(g).
- 12          • On or about May 31, 2012 to July 16, 2012, Defendants made a representation,  
13          express or implied, to the MORTONS about the benefits, performance or efficacy  
14          of a covered service, namely that filing certain documents with the Clark County  
15          Recorder's Office would result in the MORTONS owning their home free and clear  
16          of their mortgage, when they did not possess and rely upon competent and reliable  
17          evidence which substantiates that the representation is true, in violation of NRS  
18          645F.400(1)(i).
- 19          • On or about August 1, 2012, Defendants obtained a Promissory Note from the  
20          MORTONS in the amount of \$32,000.00 without fully disclosing the identity or  
21          purposeful role of Shapiro Green, LLC, in violation of NRS 645F.400(1)(b).
- 22          • On or about October 5, 2012, Defendants demanded, charged, collected, and  
23          received money in the amount of \$1,500.00 from the MORTONS as an application  
24          fee to participate in the purported American Home Rescue Foundation's non-profit  
25          home donation program without fully disclosing to the MORTON'S the true nature  
26          of the program.



1 of American Home Rescue Foundation, namely that it was owned and controlled  
2 by Defendants and did not operate as a not for profit organization, in violation of  
3 NRS 645F.400(1)(b).

- 4 • On November 15, 2012, Defendants misrepresented to the MORTONS the  
5 benefits, performance and efficacy of a covered service by falsely claiming the  
6 MORTONS would legally obtain their home free and clear of their mortgage by  
7 quitclaiming their home to American Home Rescue, paying rent to American Home  
8 Rescue for a period of time, and then having American Home Rescue deed the  
9 home back to the MORTONS, in violation of NRS 645F.400(1)(g).
- 10 • On or about November 15, 2012, Defendants made a representation, express or  
11 implied, about the benefits, performance or efficacy of a covered service, namely  
12 the alleged American Home Rescue Foundation non-profit home donation  
13 program, by claiming that the participation in the program would result in the  
14 MORTONS owning their home free and clear of their mortgage when they did not  
15 possess and rely upon competent and reliable evidence which substantiates that  
16 the representation is true, in violation of NRS 645F.400(1)(i).

17 All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C"  
18  
19 felony in violation of NRS 205.372 and NRS 645F.400.

20  
21 COUNT III

22 THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$650.00 OR MORE  
23 CATEGORY "C" felony - NRS 205.0832(1)(c) and NRS 205.0835(3)

24 From on or about July 26, 2010 to August 31, 2010, within the County of Clark, State of  
25 Nevada, DORNHUBER did knowingly, and without lawful authority obtain the personal or  
26 intangible property of another person valued at \$650.00 or more by material misrepresentation  
27 with intent to deprive that person of the property, to wit:  
28



1 DORNHUBER obtained two checks from the TINA and JOHN PIMENTEL  
2 ("PIMENTELS") money totaling \$1,000.00 by material misrepresentation, namely that he would  
3 provide loan modification services to the PIMENTELS when in truth and fact he provided no  
4 such services.

5 All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN  
6 THE AMOUNT OF \$650.00 OR MORE, a category "C" felony in violation of NRS 205.0832.

7 COUNT IV

8 THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE  
9 CATEGORY "B" felony - NRS 205.0832(1)(c) and NRS 205.0835(4)

10 From on or about May 5, 2011 to November, 2012, within the County of Clark, State of  
11 Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the  
12 others, either directly or through each other, their agents or employees, did knowingly, and  
13 without lawful authority obtain the personal or intangible property of another person valued at  
14 \$3,500.00 or more by material misrepresentation with intent to deprive that person of the  
15 property, to wit:  
16

17 Defendants obtained from the TINA and JOHN PIMENTEL ("PIMENTELS") money  
18 totaling \$6,250.00 by one or more material misrepresentations to the PIMENTELS, including,  
19 without limitation:  
20

- 21 • Misrepresented the benefits, performance and efficacy of their services by falsely  
22 claiming that if a "forensic audit" of their mortgage uncovered one or more  
23 "RESPA" violations, the would be entitled to a legal remedy resulting in the  
24 elimination of their mortgage obligation;
- 25 • Misrepresented to the PIMENTELS that they performed a "forensic audit" of their  
26 mortgage that uncovered numerous "RESPA" violations entitling the PIMENTELS  
27 to a legal remedy resulting in the elimination of their mortgage obligation;  
28

- Misrepresented that they had arranged for attorneys to represent the PIMENTELS in a multi-plaintiff lawsuit;
- Misrepresented to the PIMENTELS the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of multi-colored inks having legal significance would result in the PIMENTELS obtaining their home free and clear of their mortgage;
- Misrepresented to the PIMENTELS that American Home Rescue was a legitimate not for profit organization;
- Misrepresented to the PIMENTELS the benefits, performance and efficacy of a scheme by falsely claiming the PIMENTELS would legally obtain their home free and clear of their mortgage by quitclaiming their home to American Home Rescue, paying rent to American Home Rescue for a period of time, and then having American Home Rescue deed the home back to the PIMENTELS;
- Misrepresented to the PIMENTELS the benefits, performance and efficacy of their services by falsely claiming a 97% success rate;
- Misrepresented to the PIMENTELS that they would refund fees paid if the services did not achieve a balance reduction or title reconveyance within twelve (12) months;
- Misrepresented that they had the qualifications and expertise to perform the services they promised to perform;
- Misrepresented that they would pay refunds of all paid fees if their services did not result in a balance reduction or title re-conveyance when they knew full well that they did not maintain a reserve fund or make other good faith provisions for the payment of refunds and/or did not intend to honor their stated refund policy;

- Misrepresented their relationship to American Home Rescue by failing to disclose that Defendants owned or controlled American Home Rescue;
- Misrepresented that American Home Rescue operated as a not for profit organization;
- Misrepresented that attorneys would be performing services;
- Misrepresented the legality and efficacy of filing documents with a county recorder containing false statements or omissions of material fact.

All of which constitutes the crime of BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony in violation of NRS 205.0832(1)(c) and NRS 205.0835(4).

#### COUNT V

#### MORTGAGE LENDING FRAUD

CATEGORY "C" felony – NRS 205.372 and NRS 645F.400

From on or about April 27, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the others, in the performance of a covered service as defined by NRS 645F.310, willfully violated one or more provisions of NRS 645F.400 including, without limitation, to wit:

- On or about April 27, 2012, Defendants misrepresented to the PIMENTELS the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of assorted colored inks having legal significance would result in the PIMENTELS owning their home free and clear of their mortgage, in violation of NRS 645F.400(1)(i).
- On or about April 27, 2012, Defendants made a representation, express or implied, to the PIMENTELS about the benefits, performance or efficacy of a covered service, namely their aforementioned "administrative process" when they did not

possess and rely upon competent and reliable evidence which substantiates that the representation is true.

All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400.

COUNT VI

THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3500.00  
OR MORE AGAINST A PERSON 60 YEARS OF AGE OR OLDER  
CATEGORY "B" felony - NRS 205.0832(1)(c), NRS 205.0835(4)  
and NRS 193.167(2)

From on or about March 11, 2011 to January 24, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER and PATTERSON, acting in concert and aiding the others, either directly or through each other, their agents or employees, did knowingly, and without lawful authority obtain the personal or intangible property of another person 60 years of age or older valued at \$3,500.00 or more by material misrepresentation with intent to deprive that person of the property, to wit:

Defendants obtained from ROBIN HERRERA and AL HERRERA ("HERRERAS"), both 60 years of age or older, totaling \$12,990.00 by one or more material misrepresentations to the HERRERAS, including, without limitation:

- Misrepresented the benefits, performance and efficacy of their services by falsely claiming that if a "forensic audit" of their mortgage uncovered one or more "RESPA" violations, they would be entitled to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented to the HERRERAS that they performed a "forensic audit" of their mortgage that uncovered numerous "RESPA" violations entitling the MORTONS to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented that they had arranged for attorneys to represent the MORTONS in a multi-plaintiff lawsuit;

- 1 • Misrepresented to the HERRERAS the benefits, performance and efficacy of their  
2 alleged "administrative process" by falsely claiming that sending documents to  
3 various entities signed and fingerprinted in accordance with specific instructions  
4 including the use of multi-colored inks having legal significance would result in the  
5 HERRERAS obtaining their home free and clear of their mortgage;
- 6 • Misrepresented to the HERRERAS that American Home Rescue was a legitimate  
7 not for profit organization;
- 8 • Misrepresented to the HERRERAS the benefits, performance and efficacy of a  
9 scheme by falsely claiming the HERRERAS would legally obtain their home free  
10 and clear of their mortgage by quitclaiming their home to American Home Rescue,  
11 paying rent to American Home Rescue for a period of time, and then having  
12 American Home Rescue deed the home back to the HERRERAS;
- 13 • Misrepresented to the HERRERAS the benefits, performance and efficacy of their  
14 services by falsely claiming a 97% success rate;
- 15 • Misrepresented to the HERRERAS that they would refund fees paid if the services  
16 did not achieve a balance reduction or title reconveyance within twelve (12)  
17 months;
- 18 • Misrepresented that they had the qualifications and expertise to perform the  
19 services they promised to perform;
- 20 • Misrepresented that they would pay refunds of all paid fees if their services did not  
21 result in a balance reduction or title re-conveyance when they knew full well that  
22 they did not maintain a reserve fund or make other good faith provisions for the  
23 payment of refunds and/or did not intend to honor their stated refund policy;
- 24 • Misrepresented their relationship to American Home Rescue by failing to disclose  
25 that Defendants owned or controlled American Home Rescue;
- 26
- 27
- 28

- Misrepresented that American Home Rescue operated as a not for profit organization;
- Misrepresented that attorneys would be performing services;
- Misrepresented the legality and efficacy of filing documents with a county recorder containing false statements or omissions of material fact.

All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony in violation of NRS 205.0832(1)(c), NRS 205.0835(4) and NRS 193.0167(2).

COUNT VII

MORTGAGE LENDING FRAUD  
CATEGORY "C" felony – NRS 205.372 and NRS 645F.400

From on or about March 3, 2011 to January 24, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER, and PATTERSON, acting in concert and aiding the others, in the performance of a covered service as defined by NRS 645F.310, willfully violated one or more provisions of NRS 645F.400 including, without limitation, to wit:

- On or about March 12, 2011, Defendants accepted a power of attorney from ALBERT HERRERA for a purpose other than to inspect documents as provided by law, in violation of NRS 645F.400(1)(e).
- In or about September 2012, Defendants misrepresented to the HERRERAS the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of multi-colored inks having legal significance would result in the HERRERAS obtaining their home free and clear of their mortgage, in violation of NRS 645F.400(1)(i).
- In or about September, 2012, Defendants made a representation to the HERRERAS, express or implied, about the benefits, performance or efficacy of a

covered service, namely their aforementioned "administrative process" when they did not possess and rely upon competent and reliable evidence which substantiates that the representation is true.

All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400.

COUNT VIII

THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3500.00  
OR MORE AGAINST A PERSON 60 YEARS OF AGE OR OLDER  
CATEGORY "B" felony - NRS 205.0832(1)(c), NRS 205.0835(4)  
and NRS 193.167(2)

From on or about August 2011 to March 2013, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER, and PATTERSON, acting in concert and aiding the others, either directly or through each other, their agents or employees, did knowingly, and without lawful authority obtain the personal or intangible property of another person 60 years of age or older valued at \$3,500.00 or more by material misrepresentation with intent to deprive that person of the property, to wit:

Defendants obtained money from ROBERT LAWRENCE ("LAWRENCE"), 60 years of age or older, totaling \$6,295.00 by one or more material misrepresentations to LAWRENCE, including, without limitation:

- Misrepresented the benefits, performance and efficacy of their services by falsely claiming that if a "forensic audit" of their mortgage uncovered one or more "RESPA" violations, they would be entitled to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented that they had arranged for attorneys to represent LAWRENCE in a multi-plaintiff lawsuit;
- Misrepresented to LAWRENCE the benefits, performance and efficacy of their services by falsely claiming a 97% success rate;



- Misrepresented to LAWRENCE that they would refund fees paid if the services did not achieve a balance reduction or title reconveyance within twelve (12) months;
- Misrepresented that they had the qualifications and expertise to perform the services they promised to perform;
- Misrepresented that attorneys would be performing services;
- Misrepresented that they would pay refunds of all paid fees if their services did not result in a balance reduction or title re-conveyance when they knew full well that they did not maintain a reserve fund or make other good faith provisions for the payment of refunds and/or did not intend to honor their stated refund policy;

All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony in violation of NRS 205.0832(1)(c), NRS 205.0835(4) and NRS 193.0167(2).

COUNT IX

MORTGAGE LENDING FRAUD  
CATEGORY "C" felony – NRS 205.372 and NRS 645F.400

From on or about March 2, 2012 to September 8, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER, and PATTERSON, acting in concert and aiding the others, in the performance of a covered service as defined by NRS 645F.310, willfully violated one or more provisions of NRS 645F.400 including, without limitation, to wit:

- On or about March 3, 2012, Defendants demanded money in the amount of \$6,495.00 from LAWRENCE by misrepresenting that the money would be used to conduct a Forensic Audit whereby RESPA violations would be uncovered warranting LAWRENCE to obtain his house free and clear of the mortgage, in violation of NRS 645F.400(1)(g).

- On or about March 3, 2012 Defendants demanded, charged, collected, and received money in the amount of \$6,495.00 from LAWRENCE without fully disclosing to LAWRENCE the purpose for which the money would be used by Defendants, in violation of NRS 645F.400(1)(b).
- On or about March 27, 2012, Defendants accepted a power of attorney from LAWRENCE for a purpose other than to inspect documents as provided by law, in violation of NRS 645F.400(1)(e).
- On or about March 27, 2012, Defendants made representations, express or implied, to LAWRENCE about the benefits, performance or efficacy of their services with regards to obtaining LAWRENCE'S house free and clear of the mortgage when they did not possess and rely upon competent and reliable evidence which substantiates that the representations were true, in violation of NRS 645F.400(1)(i).

All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400.

COUNT X

THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE  
CATEGORY "B" felony - NRS 205.0832(1)(c) and NRS 205.0835(4)

From on or about April 5, 2011 to October 5, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the others, either directly or through each other, their agents or employees, did knowingly, and without lawful authority obtain the personal or intangible property of another person valued at \$3500.00 or more by material misrepresentation with intent to deprive that person of the property, to wit:

Defendants obtained from TIMOTHY TIPP ("TIPP"), totaling \$9,459.00 by one or more material misrepresentations to TIPP, including, without limitation:

- Misrepresented the benefits, performance and efficacy of their services by falsely claiming that if a "forensic audit" of their mortgage uncovered one or more "RESPA" violations, they would be entitled to a legal remedy resulting in the elimination of their mortgage obligation;
- Misrepresented to TIPP that they performed a "forensic audit" of their mortgage that uncovered numerous "RESPA" violations entitling TIPP to a legal remedy resulting in the elimination of his mortgage obligation;
- Misrepresented that they had arranged for attorneys to represent TIPP in a multi-plaintiff lawsuit;
- Misrepresented to TIPP the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of multi-colored inks having legal significance would result in TIPP obtaining his home free and clear of their mortgage;
- Misrepresented to TIPP that American Home Rescue was a legitimate not for profit organization;
- Misrepresented to TIPP the benefits, performance and efficacy of a scheme by falsely claiming TIPP would legally obtain his home free and clear of their mortgage by quitclaiming their home to American Home Rescue, paying rent to American Home Rescue for a period of time, and then having American Home Rescue deed the home back to TIPP;
- Misrepresented to TIPP the benefits, performance and efficacy of their services by falsely claiming a 97% success rate;
- Misrepresented to TIPP that he would refund fees paid if the services did not achieve a balance reduction or title re-conveyance within twelve (12) months;

- 1 • Misrepresented that they had the qualifications and expertise to perform the  
2 services they promised to perform;
- 3 • Misrepresented that they would pay refunds of all paid fees if their services did not  
4 result in a balance reduction or title re-conveyance when they knew full well that  
5 they did not maintain a reserve fund or make other good faith provisions for the  
6 payment of refunds and/or did not intend to honor their stated refund policy;
- 7 • Misrepresented their relationship to American Home Rescue by failing to disclose  
8 that Defendants owned or controlled American Home Rescue;
- 9 • Misrepresented that American Home Rescue operated as a not for profit  
10 organization;
- 11 • Misrepresented that attorneys would be performing services;
- 12 • Misrepresented the legality and efficacy of filing documents with a county recorder  
13 containing false statements or omissions of material fact.

14 All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN  
15 THE AMOUNT OF \$3,500.00 OR MORE, category "B" felony in violation of NRS 205.0832(1)(c)  
16 and NRS 205.0835(4).  
17

18  
19 COUNT XI

20 MORTGAGE LENDING FRAUD  
21 CATEGORY "C" felony – NRS 205.372 and NRS 645F.400

22 From on or about May 4, 2011 to April 13, 2012, within the County of Clark, State of  
23 Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER, acting in concert and aiding the  
24 others, in the performance of a covered service as defined by NRS 645.310, willfully violated  
25 one or more provisions of NRS 645F.400 including, without limitation, to wit:

- 26 • On or about May 4, 2011, Defendants accepted a power of attorney from  
27 TIMOTHY TIPP for a purpose other than to accept documents as provided by law,  
28 in violation of NRS 645F.400(1)(e).

- On or about April 13, 2012, Defendants misrepresented to TIPP the benefits, performance and efficacy of their alleged "administrative process" by falsely claiming that sending documents to various entities signed and fingerprinted in accordance with specific instructions including the use of multi-colored inks having legal significance would result in TIPP owning his home free and clear of his mortgage, in violation of NRS 645F.400(1)(g).
- On or about April 13, 2012, Defendants made a representation, express or implied, to TIPP about the benefits, performance or efficacy of a covered service, namely their aforementioned "administrative process" when they did not possess and rely upon competent and reliable evidence which substantiates that the representation is true.

All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400.

#### COUNT XII

#### MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION CATEGORY "B" FELONY – NRS 205.377

From on or about July 29, 2010 to October 5, 2012, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER, and PATTERSON, acting in concert and aiding the others, either directly or through each other, their agents or employees, knowingly and with the intent to defraud, engaged in an act, practice or course of business which operated as a fraud or deceit by means of a false representation or omission of a material fact; to wit:

As set forth in Counts II, V, VII and IX - which are hereby incorporated by reference as though fully set forth herein, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER knowingly and intentionally defrauded individuals in two or more transactions as set forth more fully in those counts. The purposes, results and methods of commission in all four instances were the same or similar.

1 As set forth in Counts VII and IX - which are hereby incorporated by reference as though  
2 fully set forth herein, PATTERSON knowingly and intentionally defrauded individuals in two or  
3 more transactions as set forth more fully in those counts. The purposes, results and methods of  
4 commission in all four instances were the same or similar.

5 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD  
6 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in  
7 violation of NRS 205.377.

8 COUNT XIII

9 PATTERN OF MORTGAGE LENDING FRAUD  
10 CATEGORY "B" felony in violation of NRS 205.372(2)

11 From on or about March 3, 2011 to November 15, 2012, within the County of Clark, State  
12 of Nevada, ESTRADA, CHRISSIKOPOULOS, DORNHUBER, and PATTERSON, acting in  
13 concert and aiding the others, either by virtue of their own actions or by the actions of their  
14 conspirators, agents or employees, knowingly and unlawfully committed mortgage lending fraud  
15 in two or more mortgage lending transactions having the same or similar purposes, results,  
16 accomplices, victims or methods of commission, or having other interrelated distinguishing  
17 characteristics; to wit:

18  
19 As set forth in Counts II, V, VII, and IX, ESTRADA, CHRISSIKOPOULOS, and  
20 DORNHUBER have committed mortgage lending fraud in two or more mortgage lending  
21 transactions as set more fully in those counts. The purposes, results, and methods of  
22 commission in all four instances was the same or similar.

23  
24 As set forth in Counts VII and IX, PATTERSON has committed mortgage lending fraud in  
25 two or more mortgage lending transactions as set more fully in those counts. The purposes,  
26 results, and methods of commission in all four instances was the same or similar.

27 All of which constitutes the crime of PATTERN OF MORTGAGE LENDING FRAUD, a  
28 category "B" felony in violation of NRS 205.372(2).

COUNT XIV

PREVENTING OR DISSUADING VICTIM, PERSON ACTING ON BEHALF OF VICTIM,  
OR WITNESS FROM REPORTING CRIME, COMMENCING PROSECUTION OR CAUSING  
ARREST

CATEGORY "D" felony in violation of NRS 199.305

From on or about March 2013, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER attempted to intimidate and threaten another person, by preventing or dissuading a victim of a crime or a person acting on behalf of the victim or a witness from reporting a crime or possible crime to a Judge, Peace officer, Parole or Probation officer, Prosecuting attorney, Warden or other employee at an institution of the Department of Corrections, or Superintendent or other employee at a juvenile correctional institution and attempted to intimidate and threaten another person, prevent or dissuade a victim of a crime or a person acting on behalf of the victim or a witness from commencing a criminal prosecution or a proceeding for the revocation of a parole or probation, or seeking or assisting in such a prosecution or proceeding, or causing the arrest of a person in connection with a crime; to wit:

Defendants sent a letter to the HERRERAS along with a \$500.00 refund stating that the HERRERAS should not give their information out to "anyone or any place" as these people would use the HERRERAS information against them and "have seen them do it many times." In the context, it is clear that the Defendants are referring to the Nevada Attorney General's Office. The letter was sent to the HERRERAS subsequent to the Defendants becoming aware of the Nevada Attorney General's Office's criminal investigation into the Defendants conduct with regards to USFP.

All of which constitutes the crime of PREVENTING OR DISSUADING VICTIM, PERSON ACTING ON BEHALF OF VICTIM, OR WITNESS FROM REPORTING CRIME, COMMENCING PROSECUTION OR CAUSING ARREST, a category "D" felony in violation of NRS 199.305.

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COUNT XV

PREVENTING OR DISSUADING VICTIM, PERSON ACTING ON BEHALF OF VICTIM,  
OR WITNESS FROM REPORTING CRIME, COMMENCING PROSECUTION OR CAUSING  
ARREST

CATEGORY "D" felony in violation of NRS 199.305

From on or about March 2013, within the County of Clark, State of Nevada, ESTRADA, CHRISSIKOPOULOS, and DORNHUBER attempted to intimidate and threaten another person, by preventing or dissuading a victim of a crime or a person acting on behalf of the victim or a witness from reporting a crime or possible crime to a Judge, Peace officer, Parole or Probation officer, Prosecuting attorney, Warden or other employee at an institution of the Department of Corrections, or Superintendent or other employee at a juvenile correctional institution and attempted to intimidate and threaten another person, prevent or dissuade a victim of a crime or a person acting on behalf of the victim or a witness from commencing a criminal prosecution or a proceeding for the revocation of a parole or probation, or seeking or assisting in such a prosecution or proceeding, or causing the arrest of a person in connection with a crime; to wit:

Defendants sent a letter to LAWRENCE along with a \$200.00 refund stating that LAWRENCE should not give his information out to "anyone or any place" as these people would use LAWRENCE'S information against him and "have seen them do it many times." In the context, it is clear that the Defendants are referring to the Nevada Attorney General's Office. The letter was sent to LAWRENCE subsequent to the Defendants becoming aware of the Nevada Attorney General's Office's criminal investigation into the Defendants conduct with regards to USFP.

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1 All of which constitutes the crime of PREVENTING OR DISSUADING VICTIM, PERSON  
2 ACTING ON BEHALF OF VICTIM, OR WITNESS FROM REPORTING CRIME, COMMENCING  
3 PROSECUTION OR CAUSING ARREST, a category "D" felony in violation of NRS 199.305.  
4  
5  
6

7 SUBMITTED BY  
8 CATHERINE CORTEZ MASTO  
9 Attorney General

10 By: 

11 JEFFREY H. SEGAL  
12 Senior Deputy Attorney General  
13 SARAH E. OVERLY  
14 Deputy Attorney General  
15 Fraud Unit  
16

17 ENDORSEMENT: A True Bill

18 By: 

19 Foreperson, Clark County Grand Jury  
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22  
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