



CLERK OF THE COURT

1 **IND**  
2 CATHERINE CORTEZ MASTO  
3 Attorney General  
4 Nevada Bar Number 3926  
5 Office of the Attorney General  
6 555 E Washington Ave, Ste 3900  
7 Las Vegas, NV 89101-1608  
8 P: (702) 486-3799  
9 F: (702) 486-0660  
10 AHerr@ag.nv.gov  
11 Attorneys for Plaintiff

7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 THE STATE OF NEVADA, )  
10 )  
11 Plaintiff, )  
12 vs. )  
13 ANA CAROLINA OJEDA aka ANA CAROLINA )  
14 VALADEZ dba DMV VIP SERVICES, DMV )  
15 CERVICIO EXPRESS, and/or DMV SERVICES )  
16 EXPRESS, )  
17 Defendant. )

CASE NO.: C-13-294778-1  
DEPT NO.: 17

Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

17 **INDICTMENT**

18 Defendant, ANA CAROLINA OJEDA aka ANA CAROLINA VALADEZ dba DMV VIP  
19 SERVICES, DMV CERVICIO EXPRESS, and/or DMV SERVICES EXPRESS is accused by  
20 the Grand Jury of the County of Clark, of the crimes of nine (9) counts of FORGERY, class D  
21 felonies in violation of NRS 205.090; two (2) counts of UNLAWFUL POSSESSION OF  
22 PROPERTY OF A NOTARY PUBLIC, gross misdemeanors in violation of NRS 240.143;  
23 three (3) counts of OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,  
24 category C felonies in violation of NRS 239.330; two (2) counts of OBTAINING AND USING  
25 PERSONAL IDENTIFYING INFORMATION OF ANOTHER FOR AN UNLAWFUL  
26 PURPOSE, category B felonies in violation of NRS 205.463; and three (3) counts of  
27 ESTABLISHING OR POSSESSING A FINANCIAL FORGERY LABORATORY, category B  
28 felonies in violation of NRS 205.46513.

1 All acts alleged herein were committed on or between March 2013 and November  
2 2013, within Clark County, State of Nevada.

3 That at all times relevant herein, the Defendant is alleged to be acting as a principal as  
4 defined in NRS 195.020, as whether the person directly commits the act constituting the  
5 offense, or aids or abets in its commission, and whether present or absent; and every person  
6 who, directly or indirectly, counsels, encourages, hires, commands, induces or otherwise  
7 procures another to commit a felony is a principal.

8 **COUNT ONE**

9 **FORGERY**

10 **(Category "D" Felony - NRS 205.090)**

11 On or about April 2013, within the County of Clark, State of Nevada, Defendant either  
12 by virtue of her own actions, or by the actions of her agents or employees, did knowingly  
13 make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of  
14 exchange, or any order, or process lawfully issued by a public officer, or any document or  
15 paper recorded or filed with any public office; or, counterfeited or forged the seal or  
16 handwriting of another, with the intent to damage or defraud any person; or, uttered,  
17 published, passed or attempted to pass as true and genuine, any altered, forged or  
18 counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to  
19 prejudice, damage or defraud any person, to wit:

20 Defendant by virtue of her own actions or by the actions of her agents or employees  
21 forged the signature of Pedro Perez-Daniel on an *Application for Duplicate Certificate of Title*  
22 concerning vehicle identification number 1FALP5352TG144296, or knowing the same to be  
23 altered or forged caused said document to be filed with the Nevada Department of Motor  
24 Vehicles.

25 ///

26 ///

27 ///

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COUNT TWO**

**FORGERY**

**(Category "D" Felony - NRS 205.090)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public officer, or any document or paper recorded or filed with any public office; or, counterfeited or forged the seal or handwriting of another, with the intent to damage or defraud any person; or, uttered, published, passed or attempted to pass as true and genuine, any altered, forged or counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to prejudice, damage or defraud any person, to wit:

Defendant by virtue of her own actions or by the actions of her agents or employees forged the signature of DMV technician Andrea Gasper on an *Application for Duplicate Certificate of Title* concerning vehicle identification number 1FALP5352TG144296, or knowing the same to be altered or forged caused said document to be filed with the Nevada Department of Motor Vehicles.

**COUNT THREE**

**FORGERY**

**(Category "D" Felony - NRS 205.090)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public officer, or any document or paper recorded or filed with any public office; or, counterfeited or forged the seal or handwriting of another, with the intent to damage or defraud any person; or, uttered, published, passed or attempted to pass as true and genuine, any altered, forged or

1 counterfeit matter knowing it to be false, altered, forged or counterfeited with the intent to  
2 prejudice, damage or defraud any person, to wit:

3 Defendant by virtue of her own actions or by the actions of her agents or employees  
4 forged the signature of Pedro Perez-Daniel on an *Application for Duplicate Certificate of Title*  
5 concerning vehicle identification number 1FMZU24E4XUA89437, or knowing the same to be  
6 altered or forged caused said document to be filed with the Nevada Department of Motor  
7 Vehicles.

8 **COUNT FOUR**

9 **FORGERY**

10 **(Category "D" Felony - NRS 205.090)**

11 On or about April 2013, within the County of Clark, State of Nevada, Defendant either  
12 by virtue of her own actions, or by the actions of her agents or employees, did knowingly  
13 make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of  
14 exchange, or any order, or process lawfully issued by a public officer, or any document or  
15 paper recorded or filed with any public office; or, counterfeited or forged the seal or  
16 handwriting of another, with the intent to damage or defraud any person; or, uttered,  
17 published, passed or attempted to pass as true and genuine, any altered, forged or  
18 counterfeit matter knowing it to be false, altered, forged or counterfeited with the intent to  
19 prejudice, damage or defraud any person, to wit:

20 Defendant by virtue of her own actions or by the actions of her agents or employees  
21 forged the signature of Notary Carolyn Washington on an *Application for Duplicate Certificate*  
22 *of Title* concerning vehicle identification number 1FMZU24E4XUA89437, or knowing the same  
23 to be altered or forged caused said document to be filed with the Nevada Department of Motor  
24 Vehicles.

25 ///

26 ///

27 ///

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COUNT FIVE**

**FORGERY**

**(Category "D" Felony - NRS 205.090)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public officer, or any document or paper recorded or filed with any public office; or, counterfeited or forged the seal or handwriting of another, with the intent to damage or defraud any person; or, uttered, published, passed or attempted to pass as true and genuine, any altered, forged or counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to prejudice, damage or defraud any person, to wit:

Defendant by virtue of her own actions or by the actions of her agents or employees forged the signature of Pedro Perez-Daniel on a *Bill of Sale* concerning vehicle identification number 1FMZU24E4XUA89437, or knowing the same to be altered or forged caused said document to be filed with the Nevada Department of Motor Vehicles.

**COUNT SIX**

**UNLAWFUL POSSESSION OF PROPERTY OF A NOTARY PUBLIC**

**(Gross Misdemeanor – NRS 240.143)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant was in possession of the official stamp, journal or certificate of appointment of a notary public without lawful authority, to withhold the same from its rightful owner, to wit:

Defendant was in possession of the official notary stamp of Carolyn Ann Washington without Carolyn Ann Washington's knowledge or permission, and withheld this stamp from Carolyn Ann Washington.

///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COUNT SEVEN**

**OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**

**(Category "C" Felony – NRS 239.330)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant did knowingly procure or offer a false or forged instrument for filing or recording in a public office, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada. To wit:

Defendant by virtue of her own actions or by the actions of her agents or employees offered or caused to be offered for filing or recording at the Henderson branch office of the Nevada Department of Motor Vehicles, a false, altered, forged or counterfeited *Application for Duplicate Nevada Certificate of Title* concerning vehicle identification number 1FALP5352TG144296.

**COUNT EIGHT**

**OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**

**(Category "C" Felony – NRS 239.330)**

On or about April 2013, within the County of Clark, State of Nevada, Defendant did knowingly procure or offer a false or forged instrument for filing or recording in a public office, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada. To wit:

Defendant by virtue of her own actions or by the actions of her agents or employees offered or caused to be offered for filing or recording at the Henderson branch office of the Nevada Department of Motor Vehicles, a false, altered, forged or counterfeited *Application for Duplicate Nevada Certificate of Title and Bill of Sale* concerning vehicle identification number 1FMZU24E4XUA89437.

///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COUNT NINE

**OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER FOR  
AN UNLAWFUL PURPOSE**

**(Category B Felony – NRS 205.463)**

On or about April 2013, within The County of Clark, State of Nevada, Defendant did knowingly obtain personal identifying information of another person with the intent of committing an unlawful act; and, did use the personal identifying information to harm the other person, to obtain access to activities or transactions of that other person without the prior express consent of the other person, or for any other unlawful purpose. To wit:

Defendant obtained the legal name, driver's license number and date of birth of Pedro Daniel-Perez, and used the information to unlawfully obtain a duplicate certificate of automobile title to transfer ownership to a third party in return for a fee, without the knowledge or express consent of Pedro Daniel-Perez.

COUNT TEN

**FORGERY**

**(Category "D" Felony - NRS 205.090)**

On or between September 1, 2013 and October 15, 2013, within the County of Clark, State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public officer, or any document or paper recorded or filed with any public office; or, counterfeited or forged the seal or handwriting of another, with the intent to damage or defraud any person; or, uttered, published, passed or attempted to pass as true and genuine, any altered, forged or counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to prejudice, damage or defraud any person, to wit:

Defendant by virtue of her own actions or by the actions of her agents or employees forged the signature of Antonio Hite on an *Application for Duplicate Certificate of Title* concerning vehicle identification number 1GCGC24R4TZ213883, or knowing the same to be

1 altered or forged caused said document to be filed with the Nevada Department of Motor  
2 Vehicles.

3 **COUNT ELEVEN**

4 **FORGERY**

5 **(Category "D" Felony - NRS 205.090)**

6 On or between September 1, 2013 and October 15, 2013, within the County of Clark,  
7 State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents  
8 or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic  
9 matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public  
10 officer, or any document or paper recorded or filed with any public office; or, counterfeited or  
11 forged the seal or handwriting of another, with the intent to damage or defraud any person; or,  
12 uttered, published, passed or attempted to pass as true and genuine, any altered, forged or  
13 counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to  
14 prejudice, damage or defraud any person, to wit:

15 Defendant by virtue of her own actions or by the actions of her agents or employees  
16 forged the signature of Notary Norma Valdez on an *Application for Duplicate Certificate of*  
17 *Title* concerning vehicle identification number 1GCGC24R4TZ213883, or knowing the same to  
18 be altered or forged caused said document to be filed with the Nevada Department of Motor  
19 Vehicles.

20 **COUNT TWELVE**

21 **FORGERY**

22 **(Category "D" Felony - NRS 205.090)**

23 On or between September 1, 2013 and October 15, 2013, within the County of Clark,  
24 State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents  
25 or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic  
26 matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public  
27 officer, or any document or paper recorded or filed with any public office; or, counterfeited or  
28 forged the seal or handwriting of another, with the intent to damage or defraud any person; or,

1 uttered, published, passed or attempted to pass as true and genuine, any altered, forged or  
2 counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to  
3 prejudice, damage or defraud any person, to wit:

4 Defendant by virtue of her own actions or by the actions of her agents or employees  
5 forged the signature of Marco Vargas on a *Bill of Sale* between Marco Vargas and Antonio  
6 Hite concerning vehicle identification number 1GCGC24R4TZ213883, or knowing the same to  
7 be altered or forged caused said document to be filed with the Nevada Department of Motor  
8 Vehicles.

9 **COUNT THIRTEEN**

10 **FORGERY**

11 **(Category "D" Felony - NRS 205.090)**

12 On or between September 1, 2013 and October 15, 2013, within the County of Clark,  
13 State of Nevada, Defendant either by virtue of her own actions, or by the actions of her agents  
14 or employees, did knowingly make, alter, forge or counterfeit any record, or other authentic  
15 matter of a public nature, bill of exchange, or any order, or process lawfully issued by a public  
16 officer, or any document or paper recorded or filed with any public office; or, counterfeited or  
17 forged the seal or handwriting of another, with the intent to damage or defraud any person; or,  
18 uttered, published, passed or attempted to pass as true and genuine, any altered, forged or  
19 counterfeited matter knowing it to be false, altered, forged or counterfeited with the intent to  
20 prejudice, damage or defraud any person, to wit:

21 Defendant by virtue of her own actions or by the actions of her agents or employees  
22 forged the signature of Antonio Hite on a *Bill of Sale* between Marco Vargas and Antonio Hite  
23 concerning vehicle identification number 1GCGC24R4TZ213883, or knowing the same to be  
24 altered or forged caused said document to be filed with the Nevada Department of Motor  
25 Vehicles.

26 ///

27 ///

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COUNT FOURTEEN**

**UNLAWFUL POSSESSION OF PROPERTY OF A NOTARY PUBLIC**

**(Gross Misdemeanor – NRS 240.143)**

On or between September 1, 2013 and October 15, 2013, within The County of Clark, State of Nevada, Defendant was in possession of the official stamp, journal or certificate of appointment of a notary public without lawful authority, to withhold the same from its rightful owner, to wit:

Defendant was in possession of the official notary stamp of Norma Valdez without Norma Valdez's knowledge or permission, and withheld this stamp from Norma Valdez.

**COUNT FIFTEEN**

**OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**

**(Category "C" Felony – NRS 239.330)**

On or between September 1, 2013 and October 15, 2013, within The County of Clark, State of Nevada, Defendant did knowingly procure or offer a false or forged instrument for filing or recording in a public office, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of the State of Nevada. To wit:

Defendant by virtue of her own actions or by the actions of her agents or employees offered for filing or recording at a Las Vegas branch office of the Nevada Department of Motor Vehicles, a false, altered, forged or counterfeited *Application for Duplicate Nevada Certificate of Title and Bill of Sale* concerning vehicle identification number 1GCGC24R4TZ213883.

**COUNT SIXTEEN**

**OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER FOR**

**AN UNLAWFUL PURPOSE**

**(Category B Felony – NRS 205.463)**

On or between September 1, 2013 and October 15, 2013, within The County of Clark, State of Nevada, Defendant did knowingly obtain personal identifying information of another person with the intent of committing an unlawful act; and, did use the personal identifying information to harm the other person, to obtain access to activities or transactions of that other

1 person without the prior express consent of the other person, or for any other unlawful  
2 purpose. To wit:

3 Defendant obtained the legal name, driver's license number, title number, and address  
4 of Antonio Hite, and used the information to unlawfully obtain a duplicate certificate of  
5 automobile title to transfer ownership to a third party in return for a fee, without the knowledge  
6 or express consent of Antonio Hite.

7 **COUNT SEVENTEEN**

8 **ESTABLISHING OR POSSESSING A FINANCIAL FORGERY LABORATORY**

9 **(Category B Felony – NRS 205.46513)**

10 On or about October 24, 2013, within the County of Clark, State of Nevada, Defendant  
11 did unlawfully establish or possess a financial forgery laboratory as defined by NRS  
12 205.46513(4)(b), to wit:

13 Defendant as an owner or agent of a DMV services business located at 235 N Eastern  
14 Ave, #108, Las Vegas, NV was in possession of computers as defined by NRS 205.4735,  
15 printing devices, numerous templates for department of motor vehicle documents, and a  
16 notary stamp, which in combination could be used to manufacture forged or fraudulent DMV  
17 documents.

18 **COUNT EIGHTEEN**

19 **ESTABLISHING OR POSSESSING A FINANCIAL FORGERY LABORATORY**

20 **(Category B Felony – NRS 205.46513)**

21 On or about October 24, 2013, within the County of Clark, State of Nevada, Defendant  
22 did unlawfully establish or possess a financial forgery laboratory as defined by NRS  
23 205.46513(4)(b), to wit:

24 Defendant as an owner or agent of a DMV services business located at 3605 Vegas  
25 Dr, Las Vegas, NV was in possession of computers as defined by NRS 205.4735, printing  
26 devices, numerous templates for department of motor vehicle documents, notary stamps, and  
27 a DMV Field Services Validation Stamp which in combination could be used to manufacture  
28 forged or fraudulent DMV documents.

COUNT NINETEEN

ESTABLISHING OR POSSESSING A FINANCIAL FORGERY LABORATORY

(Category B Felony – NRS 205.46513)

On or about October 24, 2013, within the County of Clark, State of Nevada, Defendant did unlawfully establish or possess a financial forgery laboratory as defined by NRS 205.46513(4)(b), to wit:

Defendant as an owner or agent of a DMV services business located at 1940 E. Sahara #B, Las Vegas, NV was in possession of computers as defined by NRS 205.4735, printing devices, numerous templates for department of motor vehicle documents, notary stamps, which in combination could be used to manufacture forged or fraudulent DMV documents.

DATED this 17<sup>th</sup> day of December 2013.

SUBMITTED BY:

CATHERINE CORTEZ MASTO  
Attorney General

By:   
her deputies

ENDORSEMENT: A True Bill

By:   
Foreperson, Clark County Grand Jury

Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

WITNESSES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Senior Investigator Chester Clagett  
8250 W Flamingo Rd  
Las Vegas NV 89147

Detective Joseph Herbert  
400 S Martin Luther King Blvd  
Las Vegas NV 89106

Isabel Saenz  
c/o Nevada Attorney General  
555 E Washington Ave, Ste 3900  
Las Vegas NV 89101

Technician Andrea Gasper  
1780 E Basin Rd  
Pahrump NV 89060

Compliance Investigator Carolyn Washington  
2501 E Sahara Ave  
Las Vegas NV 89104

Technician Jennifer Zimmerman  
1399 American Pacific Dr  
Henderson NV 89074

Technician Nancy Kaufman  
1399 American Pacific Dr  
Henderson NV 89074

Technician Barbara Kropp  
1399 American Pacific Dr  
Henderson NV 89074

Detective Aaron Fink  
400 S Martin Luther King Blvd  
Las Vegas NV 89106

Antonio Hite  
8321 Lavender Jade Ct  
Las Vegas NV 89139

Marco Vargas  
3921 Counter Way  
North Las Vegas NV 89032

Detective Mike Fairweather  
400 S Martin Luther King Blvd  
Las Vegas NV 89106

13AGJ083X