

1 **1800**
2 CATHERINE CORTEZ-MASTO
3 Attorney General
4 ERIC NICKEL
5 Senior Deputy Attorney General
6 Nevada State Bar No. 5439
7 5420 Kietzke Lane, Suite 202
8 Reno, Nevada 89511
9 Telephone: (775) 688-1818
10 Attorney for Plaintiff

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12
13 IN THE SECOND JUDICIAL DISTRICT COURT
14 IN AND FOR WASHOE COUNTY, STATE OF NEVADA

15 THE STATE OF NEVADA,)
16)
17 Plaintiff,)
18)
19 vs.)
20)
21 JACK ALBERT SCHWARTZ,)
22)
23 Defendant.)

Case No. CR12-1565
Dept. No. 4

24 **CRIMINAL INFORMATION**

25 CATHERINE CORTEZ-MASTO, Attorney General of the State of Nevada, and
26 ERIC NICKEL, Senior Deputy Attorney General, in the name and by the authority of the
27 State of Nevada, inform the above-entitled court that JACK ALBERT SCHWARTZ,
28 contrary to the form, force and effect of statutes in such cases made and provided and
against the peace and dignity of the State of Nevada, has committed the following offense:

29 **COUNT I**

30 **THEFT**

31 a category B felony in violation of NRS 205.0832(1)(b) and/or NRS 205.0832(1)(c) and
32 NRS 205.0835(4)

33 That the defendant, JACK ALBERT SCHWARTZ, did willfully, unlawfully, and
34 knowingly, within Reno, Washoe County, Nevada, control the property of another
35 person with the intent to deprive that person of the property and/or did make a material
36 misrepresentation and obtained the personal property of another with the intent to

1 deprive that person of his property in an amount in excess of \$2,500.00, in the following
2 manner: that on or about November 23, 2005, an investment in the amount of \$30,000,
3 made by Steve Brazelton, was deposited into the account of Sierra High Technology
4 Ventures, LLC, (hereinafter "SHTV"), a limited liability company controlled by
5 SCHWARTZ, for the sole purpose of making investments on Brazelton's behalf; further,
6 that on or about January 18, 2006 and February 6, 2006, investments of \$50,000 and
7 \$100,000, made by Warner Griswold, were deposited into SCHWARTZ's SHTV
8 account, for the sole purpose of making investments on Griswold's behalf; further, that
9 on or about June 12, 2006 and June 23, 2006, investments of \$25,000 and \$50,000,
10 made by Ravi Bhola, were deposited into SCHWARTZ's SHTV account for the sole
11 purpose of making investments on Bhola's behalf; further, that on or about May 15,
12 2006 and October 10, 2006, investments of \$25,000 and \$75,000, made by Peter
13 Chambers, were deposited into SCHWARTZ's SHTV account for the sole purpose of
14 making investments on Chambers' behalf; further, that on or about February 13, 2007,
15 February 22, 2007, and May 24, 2007, investments of \$20,000, \$180,000 and
16 \$200,000, made by Katherine Viragh, were deposited into SCHWARTZ's SHTV account
17 and the account of Tahoe Venture Partners, LLC (hereinafter "TVP"), another limited
18 liability company controlled by SCHWARTZ, for the sole purpose of making investments
19 on Viragh's behalf; further, that on or about June 1, 2007, an investment of \$100,000,
20 made by Hossein Khoddami, was deposited into SCHWARTZ's TVP account for the
21 sole purpose of making investments on Khoddami's behalf; further, that on or about
22 September 24, 2007, an investment of \$100,000, made by Jim Francis, was deposited
23 into SCHWARTZ's TVP account for the sole purpose of making investments on Francis'
24 behalf; further, that on or about June 16, 2008, an investment of \$50,000, made by
25 Marilyn Rappaport, was deposited into SCHWARTZ's TVP account for the sole purpose
26 of making investments on Rappaport's behalf; and subsequently, SCHWARTZ
27 converted all of the funds delineated above to his own use, in a total amount of
28 \$1,005,000.

1 All of which constitutes the crime of THEFT, a violation of NRS 205.0832(1)(b)
2 and/or NRS 205.0832(1)(c) and NRS 205.0835(4).

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

5 **AFFIRMATION PURSUANT TO NRS 239B.030**

6 The undersigned does hereby affirm that the preceding document does not
7 contain the social security number of any person.

8 DATED this 25th day of September, 2012.

9 CATHERINE CORTEZ MASTO
10 Attorney General

11 By


12 ERIC NICKEL

13 Senior Deputy Attorney General
14 NV State Bar No. 5439
15 5420 Kietzke Lane, Suite 202
16 Reno, Nevada 89511
17 (775) 850-4110
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WITNESS LIST

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2 The following list contains the names and addresses of all witnesses to the
3 matters specified above known to the Office of the Attorney General of the State of
4 Nevada at the time the accompanying criminal information was filed:

5 David R. Evans, Criminal Investigator III
6 Nevada Secretary of State, Securities Division
7 1755 E. Plumb Lane, Suite 231
8 Reno, Nevada 89502

9 Katherine Viragh
10 241 Ridge Street, Suite 400
11 Reno, Nevada 89501

12 Marilyn Rappaport
13 3356 Nambe Drive
14 Reno, Nevada 89511

15 Warner Griswold
16 3395 Skyline Boulevard
17 Reno, Nevada 89509

18 Steven Brazelton
19 4705 Sommerville Way
20 Reno, Nevada 89519

21 Ravi Bhola
22 700 W. E Street #1006
23 San Diego, California 92101

24 Pete Chambers
25 11552 Holly Briar Lane
26 Great Falls, Virginia 22066

27 Robert Shaw
28 336 Bon Air Center #407
Greenbrae, California 94904

John Bartlett
12848 SE Suzanne Drive
Hobe Sound, Florida 33455

Ted Sortwell
103 Gleneagles
St. Simons Island, GA 31522

Norman Stephens
12910 Welcome Way
Reno, Nevada 89511

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Ken Atchity
518 S. Fairfax Avenue
Los Angeles California 90036

AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 25 day of September, 2012.

CATHERINE CORTEZ MASTO
Attorney General

By: 
ERIC NICKEL
Senior Deputy Attorney General

Office of the Attorney General
5420 Kietzke Lane, Suite 202
Reno, NV 89511

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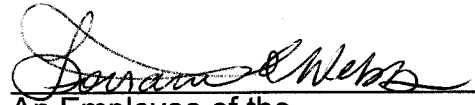
CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 25th day of September, 2012, I have caused a copy of the foregoing CRIMINAL INFORMATION to be served, by electronic filing, to the following:

James Leslie
Washoe County Public Defender's Office
jleslie@washoecounty.us

Joseph Goodnight
Washoe County Public Defender's Office
jgoodnight@washoecounty.us

DATED this 25th day of September, 2012.



An Employee of the
Office of the Attorney General