



1 material misrepresentation with intent to deprive that person of the property or services;  
2 and/or controlled property of another person knowing or having reason to know that the  
3 property was stolen, to wit: That during December 2012 the defendant, an employee of the  
4 University of Nevada, Las Vegas (UNLV) engaged in unauthorized transactions involving the  
5 financial accounts of UNLV, whereby goods were ordered using funds and/or associated  
6 purchase accounts belonging to UNLV but never delivered to the possession of UNLV, and  
7 instead were diverted for the use of the defendant or third parties for sale or private use,  
8 and/or simply were never received by UNLV.

9 Forty-Eight such fraudulent transactions during the month of December 2012  
10 amounted to more than \$3500.00, totaling approximately \$60,498.73.

11 Furthermore, LINA KHACHEKIAN either directly committed the act charged, or aided  
12 or abetted MARISA NEUHAUS or unnamed third parties in its commission, and/or directly or  
13 indirectly, counseled, encouraged, hired, commanded, induced or otherwise procured  
14 MARISA NEUHAUS or unnamed third parties to commit the act charged, to wit: that together  
15 or individually LINA KHACHEKIAN and MARISA NEUHAUS participated in a scheme of  
16 ordering consumer goods using the funds of UNLV, preparing false documentation to cover  
17 the true nature of the orders, then diverting said goods. False receipts for seemingly  
18 legitimate office equipment and supplies were created by LINA KHACHEKIAN and MARISA  
19 NEUHAUS and supplied to UNLV to conceal the theft

20 **COUNT TWO**

21 **THEFT – MORE THAN \$3500.00**

22 **(Category “B” Felony – NRS 205.0832, NRS 205.0835, NRS 195.020)**

23 That the defendant, LINA KHACHEKIAN, controlled any property of another person  
24 with the intent to deprive that person of the property; and/or converted, made an unauthorized  
25 transfer of an interest in, or without authorization controlled any property of another person;  
26 and/or obtained real, personal or intangible property or the services of another person by a  
27 material misrepresentation with intent to deprive that person of the property or services;  
28 and/or controlled property of another person knowing or having reason to know that the

1 property was stolen, to wit: That during January 2013, the defendant, an employee of the  
2 University of Nevada, Las Vegas (UNLV) engaged in unauthorized transactions involving the  
3 financial accounts of UNLV, whereby goods were ordered using funds and/or associated  
4 purchase accounts belonging to UNLV but never delivered to the possession of UNLV, and  
5 instead were diverted for the use of the defendants or third parties for sale or private use,  
6 and/or simply were never received by UNLV.

7 Thirty-Nine such fraudulent transactions during the month of January 2013 amounted  
8 to more than \$3500.00, totaling approximately \$37,633.15.

9 Furthermore, LINA KHACHEKIAN either directly committed the act charged, or aided  
10 or abetted MARISA NEUHAUS or unnamed third parties in its commission, and/or directly or  
11 indirectly, counseled, encouraged, hired, commanded, induced or otherwise procured  
12 MARISA NEUHAUS or unnamed third parties to commit the act charged, to wit: that together  
13 or individually LINA KHACHEKIAN and MARISA NEUHAUS participated in a scheme of  
14 ordering consumer goods using the funds of UNLV, preparing false documentation to cover  
15 the true nature of the orders, then diverting said goods. False receipts for seemingly  
16 legitimate office equipment and supplies were created by LINA KHACHEKIAN and MARISA  
17 NEUHAUS and supplied to UNLV to conceal the theft

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

20 DATED this 7<sup>th</sup> day of October, 2014.

21  
22 CATHERINE CORTEZ MASTO  
Attorney General

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24 By:           /s/ Adam L. Woodrum            
ADAM L. WOODRUM  
Deputy Attorney General

WITNESS LIST

The following list contains the names and addresses of all witnesses known to the Office of the Attorney General's Criminal Justice Division, Special Prosecutions Unit at the time accompanying the filing of this Criminal Information.

1. Eida Sidhu, General Counsel  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
2. David Heiser, Desktop and Field Manager  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
3. Michelle Read, Administrative Asst. III  
UNLV OIT  
4505 Maryland Pkwy  
Las Vegas, NV 89154
4. Lori Temple, Vice Provost for Information Technology  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
5. Gabriela Duarte, Student Asst.  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
6. Ryan Loyola, Public Service Intern 2  
UNLV OIT  
4505 Maryland Pkwy  
Las Vegas, NV 89154
7. Georgia Stergios, Supervisor HR, Financial Records  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
8. Michele Kraus, Director, IT Operations  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154
9. Derek Whitaker  
UNLV  
4505 Maryland Pkwy  
Las Vegas, NV 89154

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- 10. Todd Bishop, Forensic Computer Analyst  
Office of the Attorney General  
555 East Washington Ave., Ste. 3900  
Las Vegas, NV 89101
  
- 11. Tony Kotlarz, Supervising Criminal Investigator  
Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
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Las Vegas Justice Court Dept.  
Case # 14F01555AB