

1 **GPA**
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13 *Attorneys for the State of Nevada*

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

NOV 03 2014

BY: 
TERI BERKSHIRE, DEPUTY

8 **DISTRICT COURT**
9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 ALEX SORIA, ID #1961240, d/b/a
14 BIOGREEN TECK, LLC and SONIA RODIS,
15 ID# 2836927, d/b/a BIOGREEN TECK, LLC

16 Defendant.

Case No.: C-12-280271-1

Dept. No.: X

17
18 **GUILTY PLEA AGREEMENT**

19 The State of Nevada, by and through Attorney General CATHERINE CORTEZ MASTO
20 and Senior Deputy Attorney General Raya Swift, and Defendant SONIA RODIS (hereinafter
21 "Defendant RODIS"), represented by Mitchell Posin, Esq., hereby enter into and file this Guilty
22 Plea Agreement.

23 I, Defendant RODIS, agree to plead guilty pursuant to Alford to one (1) count of
24 PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of NRS
25 205.372 within the County of Clark, State of Nevada, as more fully alleged in the First
26 Amended Indictment on file herein.
27

28 ///

1 My decision to plead guilty is based upon the following plea agreement:

2 1. I, Defendant RODIS, agree to plead guilty pursuant to Alford to one (1) count of
3 PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of NRS
4 205.372, as more fully alleged in the First Amended Indictment (attached hereto as Exhibit
5 "1"), which is incorporated by reference.

6 2. I, Defendant RODIS, agree to waive all objections as to form and content of the
7 First Amended Indictment;

8 3. I, Defendant RODIS, and the State have agreed that the State will forego
9 prosecution against me on all other counts currently pending in Case C-12-280271-2.
10

11 4. I, Defendant RODIS, and the State have agreed that the State shall make no
12 opposition to probation so long as no additional facts arise to indicate that I have been
13 engaging in criminal activity since the filing of the original indictment in this case.

14 5. I, Defendant RODIS, agree to submit to any and all terms and conditions
15 imposed by the Division of Parole and Probation, if granted parole or probation.
16

17 6. I, Defendant RODIS, and the State have agreed that if the Court grants me
18 probation, the State will not oppose me amending my plea to a gross misdemeanor after I
19 complete that term of probation. However, I understand that the State reserves the
20 unqualified right to object and argue if an independent magistrate, by affidavit review, confirms
21 probable cause against me for new criminal charges, excluding minor traffic violations.
22

23 7. I, Defendant RODIS, agree to have no involvement, directly or indirectly, with
24 any work for income in the mortgage ^{lending} industry. ~~I agree this prohibits me from collecting any~~
25 ~~This provision does not preclude her from lawfully selling~~
26 ~~income, directly or indirectly, for any work involving real property liens, loan modifications,~~
27 ~~homes, as long as she is properly licensed as required by local~~
28 ~~foreclosures, and short sales. I further agree to have no involvement, directly or indirectly,~~
~~and state laws and operating under a licensed broker.~~
with presenting or producing any seminars. I agree that in this context, the term "seminar" is
defined as any conference, symposium, meeting, convention, forum, summit, discussion,

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MP
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1 consultation, workshop, tutorial, class, lesson or webinar in which a topic is presented to or
2 discussed with viewers. This does not prohibit me from attending any seminars as an
3 observer.

4 8. I, Defendant RODIS, agree to pay, and shall be jointly and severally liable with
5 any and all co-defendants herein, for restitution for named and unnamed victims in the amount
6 of \$61,611.00. This sum is to be distributed as follows:
7

| | | | | |
|----|----|--------------------------------|-------|--------------|
| 8 | 1 | ██████████ | | \$ 4,357.00 |
| 9 | 2 | ██████████ | | \$ 1,960.00 |
| 10 | 3 | ██████████████████ | | \$ 2,265.00 |
| 11 | 4 | ██████████████████ | | \$ 2,365.00 |
| 12 | 5 | ██████████ | | \$ 1,110.00 |
| 13 | 6 | ██████████████████ | | \$ 5,001.00 |
| 14 | 7 | ██████████ | | \$ 2,100.00 |
| 15 | 8 | ██████████████████ | | \$ 2,065.00 |
| 16 | 9 | ██████████████████ | | \$ 1,565.00 |
| 17 | 10 | ██████████ | | \$ 3,000.00 |
| 18 | 11 | ██████████████████████████████ | | \$ 6,800.00 |
| 19 | 12 | ██████████ | | \$ 6,000.00 |
| 20 | 13 | ██████████ | | \$ 1,043.00 |
| 21 | 14 | ██████████████████ | | \$ 1,250.00 |
| 22 | 15 | ██████████████████ | | \$ 2,665.00 |
| 23 | 16 | ██████████ | | \$ 1,065.00 |
| 24 | 17 | ██████████████████ | | \$ 2,065.00 |
| 25 | 18 | ██████████ | | \$ 1,065.00 |
| 26 | 19 | ██████████████████ | | \$ 1,990.00 |
| 27 | 20 | ██████████████████ | | \$ 1,065.00 |
| 28 | 21 | ██████████ | | \$ 10,815.00 |

26 I further agree to cooperate with all lawful efforts to collect restitution, including providing
27 truthful and complete information about the whereabouts of assets of my own or of entities
28 under my control or for my benefit. The willful failure to pay restitution as ordered may be

1 grounds for a revocation of parole or probation. "Willful failure" means the failure to pay
2 despite having the financial resources to do so. I shall also sign civil confessions of judgment
3 to the benefit of each victim for any amounts not paid as of the date of sentencing.

4 9. I, Defendant RODIS, agree to pay a fine in the amount of \$50,000.00.

5 10. I, Defendant RODIS, agree to pay to the Nevada Office of the Attorney General,
6 the amount of \$2,000.00 to reimburse the costs of investigation. The willful failure to pay this
7 amount may be grounds for a revocation of parole or probation. "Willful failure" means the
8 failure to pay despite having the financial resources to do so.

9 11. I, Defendant RODIS, agree to pay all other fees and costs imposed by the Court.

10 12. I, Defendant RODIS understand that if the State of Nevada has agreed to
11 recommend or stipulate to a particular sentence or has agreed not to present argument
12 regarding the sentence, or agreed not to oppose a particular sentence, any such agreement
13 by the State is contingent upon my appearance in court on the initial sentencing date and any
14 subsequent date if the sentencing is continued.

15 13. I, Defendant RODIS agree that if I fail to appear for any hearings or court dates
16 prior to sentencing or if an independent magistrate, by affidavit review, confirms probable
17 cause against me for new criminal charges, excluding minor traffic violations, the State will
18 have the unqualified right to argue for any legal sentence in this matter, including the use of
19 any prior convictions I may have to increase my sentence as a habitual criminal.

20 14. I, Defendant RODIS, acknowledge that I have entered into these negotiations
21 and have signed this document of my own free will without threat or promise on the part of
22 anyone other than expressed herein.

23
24 **CONSEQUENCES OF THE PLEA**

25 I understand that by pleading GUILTY pursuant to Alford I admit that if this case
26 proceeded to trial the State would be able to present sufficient evidence to prove guilt beyond
27 a reasonable doubt as to the charged offenses and I further believe that this negotiated guilty
28 plea agreement is in my best interests.

1 I understand that as a consequence of my plea, I may be incarcerated for a period of
2 not less than three (3) years and a maximum term of not more than twenty (20) years, and
3 may be further punished by a fine of up to Fifty-Thousand Dollars (\$50,000.00).

4 I understand that the law requires me to pay an Administrative Assessment Fee of
5 Twenty-Five Dollars (\$25.00).

6 I understand that, if appropriate, I may be ordered to make restitution to the victim of
7 the offense(s) to which I am pleading guilty and to the victim of any related offense which is
8 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to
9 reimburse the State of Nevada for any expenses related to my extradition, if any.
10

11 I understand that pursuant to NRS 176.015(3), victims so desiring will be allowed to
12 make Impact Statements.

13 I understand that I am eligible for probation for the offense to which I am a pleading
14 guilty. I further understand that, except as otherwise provided by statute, the question of
15 whether I receive probation is in the sole discretion of the sentencing judge.
16

17 I understand that I have not been promised or guaranteed any particular sentence by
18 anyone. I know that my sentence is to be determined by the court within the limits prescribed
19 by statute. I understand that if my attorney or the State of Nevada or both recommend any
20 specific punishment to the court, the court is not obligated to accept the recommendation.

21 I also understand that information regarding charges not filed, dismissed charges, or
22 charges to be dismissed pursuant to this agreement may be considered by the judge at
23 sentencing.

24 I understand that if more than one sentence of imprisonment is imposed and I am
25 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order
26 the sentences served concurrently or consecutively.
27
28

1 I understand if the offense to which I am pleading guilty to was committed while I was
2 incarcerated on another charge or while I was on probation or parole that I am not eligible for
3 credit for time served toward the instant offenses.

4 I understand that I must submit to blood and/or saliva tests under the Direction of the
5 Division of Parole and Probation to determine genetic markers and/or secretor status.

6 I understand that if I am not a United States citizen, any criminal conviction will likely
7 result in serious negative immigration consequences including but not limited to: (1) The
8 removal from the United States through deportation; (2) An inability to reenter the United
9 States; (3) The inability to gain United States citizenship or legal residency; (4) An inability to
10 renew and/or retain any legal residency status; and/or (5) An indeterminate term of
11 confinement with the United States Federal Government based on my conviction and
12 immigration status. Regardless of what I have been told by any attorney, no one can promise
13 me that this conviction will not result in negative immigration consequences and/or impact my
14 ability to become a United States citizen and/or a legal resident.
15

16 I understand that the Division of Parole and Probation will prepare a report for the
17 sentencing judge prior to sentencing. This report will include matters relevant to the issue of
18 sentencing, including my criminal history. This report may contain hearsay information
19 regarding my background and criminal history.
20

21 I understand the Attorney General's Office shall not be bound by any oral negotiations
22 preceding the actual execution of this Agreement until such time as this Agreement has been
23 actually executed, that is, signed by the prosecutor representing the State of Nevada and the
24 Attorney General's Office and I have entered my plea before the court.
25

26 Furthermore, I understand that if I fail to appear at any subsequent hearings in this
27 case or if an independent magistrate, by affidavit review, confirms probable cause against me
28 for any new criminal charges including but not limited to reckless driving or DUI, but excluding

VOLUNTARINESS OF PLEA

1
2 I have discussed the elements of all of the original charges against me with my attorney
3 and I understand the nature of the charges against me.

4 I understand that the State would have to prove each element of the charges against
5 me at trial.

6 I have discussed with my attorney any possible defenses, defense strategies and
7 circumstances which might be in my favor.

8 All of the foregoing elements, consequences, rights, and waiver of rights have been
9 thoroughly explained to me by my attorney.
10

11 I believe that pleading guilty and accepting this plea bargain is in my best interest, and
12 that a trial would be contrary to my best interest.

13 I am signing this agreement voluntarily, after consultation with my attorney, and I am
14 not acting under duress or coercion or by virtue of any promises of leniency, except for those
15 set forth in this agreement.
16

17 I am not now under the influence of any intoxicating liquor, a controlled substance or
18 other drug which would in any manner impair my ability to comprehend or understand this
19 agreement or the proceedings surrounding my entry of this plea.

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1 My attorney has answered all my questions regarding this guilty plea agreement and its
2 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

3
4 DATED this 3rd day of November, 2014.

5
6 

7 SONIA RODIS
8 Defendant

9 AGREED TO BY:
10 CATHERINE CORTEZ MASTO
11 Attorney General

12  #11108

13 Jeff H. Segal, Esq.
14 Chief Deputy Attorney General
15 Raya M. Swift, Esq.
16 Senior Deputy Attorney General
17 Office of the Attorney General
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19 Las Vegas, Nevada 89101
20 (702) 486-3396 – office
21 (702) 486-0606 – fax
22 Attorneys for the State of Nevada
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CERTIFICATE OF COUNSEL:

I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court hereby certify that:

1. I have fully explained to the Defendant the allegations contained in the charge(s) to which guilty pleas are being entered.

2. I have advised the Defendant of the penalties for each charge and the restitution that the Defendant may be ordered to pay.

3. All pleas of guilty offered by the Defendant pursuant to this agreement are consistent with the facts known to me and are made with my advice to the Defendant.

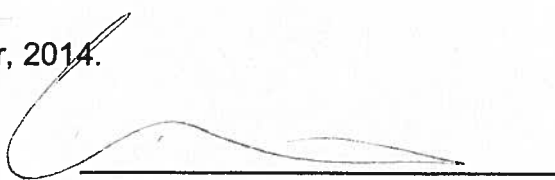
4. To the best of my knowledge and belief, the Defendant:

a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement.

b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily.

c. Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the defendant as certified in paragraphs 1 and 2 above.

DATED this 3 day of November, 2014.



MITCHELL POSIN, ESQ.
ATTORNEY FOR DEFENDANT

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1 **AIND**
2 CATHERINE CORTEZ MASTO
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5 Senior Deputy Attorney General
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12 Attorneys for Plaintiff, State of Nevada

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

NOV 03 2014

BY: 
TERI BERKSHIRE, DEPUTY

9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,

12 Plaintiff,

13 vs.

14 ALEX SORIA, ID #1961240
15 d/b/a BIOGREEN TECK, LLC and
16 **SONIA RODIS, ID# 2836927**
17 d/b/a BIOGREEN TECK, LLC and

18 Defendants.

CASE NO. : C-12-280271-2
DEPT. NO. : X

19 **FIRST AMENDED INDICTMENT**

20 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and
21 through her deputies, JEFFREY H. SEGAL, informs this Honorable Court that ALEX SORIA
22 and SONIA RODIS, the above named Defendants have committed the crimes of PATTERN
23 OF MORTGAGE LENDING FRAUD, a Category "B" Felony in violation of NRS 205.372,
24 within the County of Clark, State of Nevada, as follows:
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COUNT I
PATTERN OF MORTGAGE LENDING FRAUD
CATEGORY "B" FELONY - NRS 205.372(2)

From on or about November of 2009 to May of 2010, within the County of Clark, State of Nevada, ALEX SORIA and SONIA RODIS, either by virtue of their own actions or by the actions of their conspirators, agents or employees, knowingly and unlawfully committed mortgage lending fraud in two or more mortgage lending transactions having the same or similar purposes, results, accomplices, victims or methods of commission, or having other interrelated distinguishing characteristics; to wit:

SORIA and RODIS charged their clients substantial up-front fees for what they called a "Zero Mortgage Program" ("program") by representing to their clients the program would eliminate their mortgage obligation(s). The program involved filing with the county recorder's office certain documents, including an "Affidavit of Fact" and "Deed of Full Reconveyance" containing false statements. SORIA and RODIS assured their clients the program was based upon sound legal principles and had worked for themselves and other clients. In truth and fact, SORIA and RODIS knew full well these and other representations they made to entice their clients to purchase the program were false and that the program was ineffective.

The Defendants committed mortgage lending fraud as described herein in two or more mortgage lending transactions having the same or similar purposes, results, accomplices, victims or methods of commission, or having other interrelated distinguishing characteristics, including, without limitation, as follows:

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| Name of Victim | Amount of Loss | Date of Transaction |
|----------------|----------------|---------------------|
| [REDACTED] | \$1,565.00 | 7/8/11 |
| [REDACTED] | \$1,065.00 | 5/26/11 |
| [REDACTED] | \$2,065.00 | 2/9/11 |
| [REDACTED] | \$2,565.00 | 2/9/11 |
| [REDACTED] | \$2,565.00 | 5/28/10 |
| [REDACTED] | \$ 565.00 | 8/16/10 |
| [REDACTED] | \$ 565.00 | 6/30/11 |
| [REDACTED] | \$2,065.00 | 9/19/11 |

All of which constitutes the crime of Pattern of Mortgage Lending Fraud - a category "B" felony in violation of NRS 205.372.

All of which is contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Nevada. Furthermore, Complainant makes this declaration upon information and belief and subject to the penalty of perjury.

Dated this 3rd day of November, 2014.

SUBMITTED BY:

CATHERINE CORTEZ MASTO

Attorney General

By:



RAYA M. SWIFT
Senior Deputy Attorney General
Fraud Unit

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