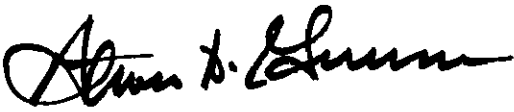


INFO

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CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Case No.: C-13-290539-1

Plaintiff,

Dept. No.: II

vs.

JAMAL ELJWAIDI a.k.a. JEAN MARC, an
individual,

Defendant.

INFORMATION

CATHERINE CORTEZ MASTO, Attorney General, through SAMUEL R. KERN, Senior Deputy Attorney General, informs this Honorable Court that JAMAL ELJWAIDI a.k.a. JEAN MARC, has committed the offenses of two (2) Counts of **FORGERY**, a category "D" Felony in violation of NRS 205.095; (1) Count of **SECURITIES FRAUD**, a category "B" Felony in violation of NRS 90.570; and one (1) Count of **IDENTITY THEFT**, a category "B" Felony in violation of NRS 205.463, in Clark County, State of Nevada as follows:

COUNT I

FORGERY

Category "D" Felony – NRS 205.095

That the Defendant, **JAMAL ELJWAIDI, a.k.a. JEAN MARC ELJWAIDI ("ELJWAIDI")**, in the County of Clark, State of Nevada, without lawful authority, and with the intent to injure or defraud, forged a letter or written communication or copy or purported copy thereof, or sent or

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1 delivered, or connived at the sending or delivery of a false or fictitious telegraph message or
2 copy or purported copy thereof, whereby or wherein the sentiments, opinions, conduct,
3 character, purpose, property, interests or rights of any person were misrepresented or may be
4 injuriously affected, or knowing such a letter, communication or message or any copy or
5 purported copy thereof to be false, uttered or published the same or any copy or purported copy
6 thereof as true, to wit:

7 On or about March 12, 2013, **ELJWAIDI** met with [REDACTED] in Las Vegas,
8 Nevada. When he met with [REDACTED], **ELJWAIDI** had in his possession a forged communication or
9 a copy of a forged communication dated March 12, 2013, (the "Letter"). The Letter appeared to
10 be from, and signed by, [REDACTED] directed to
11 [REDACTED]. The Letter was [REDACTED]
12 [REDACTED] stated that it was "VIA FAX VERY CONFIDENTIAL," and
13 referred to [REDACTED] (**ELJWAIDI**)." Additionally, the body of the Letter
14 contained untrue statements of fact. No such communication had been made or signed by
15 [REDACTED]

16 Knowing the Letter to be forged and with the intent to injure or defraud, **ELJWAIDI**
17 showed [REDACTED] the Letter and represented that it was true. **ELJWAIDI** represented to [REDACTED] that
18 the Letter supported **ELJWAIDI's** claim that he could not access his bank account. **ELJWAIDI**
19 did this with the intent to forestall [REDACTED] from taking action to collect on a debt from **ELJWAIDI**.

20 All of which constitutes the crime of **FORGERY**, a category "D" felony in violation of NRS
21 205.095.

22 **COUNT II**

23 **FORGERY**

24 **Category "D" Felony – NRS 205.095**

25 That the Defendant, **JAMAL ELJWAIDI, a.k.a. JEAN MARC ELJWAIDI ("ELJWAIDI")**, in
26 the County of Clark, State of Nevada, without lawful authority, and with the intent to injure or
27 defraud, forged a letter or written communication or copy or purported copy thereof, or sent or
28 delivered, or connived at the sending or delivery of a false or fictitious telegraph message or

1 copy or purported copy thereof, whereby or wherein the sentiments, opinions, conduct,
2 character, purpose, property, interests or rights of any person were misrepresented or may be
3 injuriously affected, or knowing such a letter, communication or message or any copy or
4 purported copy thereof to be false, uttered or published the same or any copy or purported copy
5 thereof as true, to wit:

6 On or about March 12, 2013, **ELJWAIDI** met with [REDACTED]
7 ([REDACTED] in Las Vegas, Nevada. At that meeting, **ELJWAIDI** had in his possession a forged
8 communication or a copy of a forged communication dated March 12, 2013, (the "Letter"). The
9 Letter appeared to be from, and signed by, [REDACTED]
10 [REDACTED] directed to [REDACTED]. The
11 Letter was printed on [REDACTED] stated that it was "VIA FAX VERY
12 CONFIDENTIAL," referred to "[REDACTED] (ELJWAIDI)." Additionally, the
13 body of the Letter contained untrue statements of fact. No such communication had been made
14 or signed by [REDACTED]

15 Knowing the Letter to be forged and with the intent to injure or defraud, **ELJWAIDI**
16 showed [REDACTED] the Letter and represented that it was true. **ELJWAIDI** represented to
17 [REDACTED] that the Letter supported **ELJWAIDI's** claim that he could not access his bank
18 account. **ELJWAIDI** did this with the intent to forestall [REDACTED] from taking action to collect on
19 a debt from **ELJWAIDI**.

20 All of which constitutes the crime of **FORGERY**, a category "D" felony in violation of NRS
21 205.095.

22 **COUNT III**

23 **SECURITIES FRAUD**

24 **Category "B" Felony – NRS 90.570**

25 That the Defendant, **JAMAL ELJWAIDI, a.k.a. JEAN MARC ELJWAIDI ("ELJWAIDI")**, in
26 the County of Clark, State of Nevada, did feloniously and unlawfully, in connection with the offer
27 to sell, sale, offer to purchase or purchase of a security, directly or indirectly: employ a device,
28 scheme or artifice to defraud; and/or made an untrue statement of a material fact or omitted to

1 state a material fact necessary in order to make the statements made not misleading in the light
2 of the circumstances under which they are made; and/or engaged in an act, practice, or course
3 of business which operates or would operate as a fraud or deceit upon a person, to wit:

4 That on or about November 28, 2012, **ELJWAIDI**, directly or indirectly, offered to
5 purchase and/or purchased 51% ownership of [REDACTED]

6 [REDACTED] In offering to make and/or making this purchase **ELJWAIDI**
7 utilized one or more of the following misrepresentations, omissions, and/or acts or practices
8 which were fraudulent or deceitful:

9 MATERIAL MISREPRESENTATIONS:

- 10 • **ELJWAIDI** misrepresented to [REDACTED] that [REDACTED] would pay her
11 \$1,000,000 (the "Investment") in exchange for 51% ownership of [REDACTED]
- 12 • **ELJWAIDI** misrepresented to [REDACTED] that two checks he provided her as partial
13 payment of the Investment, both dated December 6, 2012, and in the amount of
14 \$250,000 each (the "Checks"), could be cashed and would be honored.

15 MATERIAL OMISSIONS:

- 16 • **ELJWAIDI** did not disclose to [REDACTED] that T [REDACTED] did not have
17 sufficient funds to make the Investment;
- 18 • **ELJWAIDI** did not disclose to [REDACTED] that the account to which the Checks were to be
19 drawn from did not contain sufficient funds to honor the checks;
- 20 • **ELJWAIDI** did not disclose to [REDACTED] that he had pled guilty to the crime of Wire Fraud
21 in violation of Title 18, United States Code, Section 1343 on August 24, 2012;
- 22 • **ELJWAIDI** did not disclose to [REDACTED] that he had admitted to fraudulently enticing
23 people to invest money with him when he entered his plea.

24 Furthermore, in connection with the offer to purchase the investment contract, **ELJWAIDI**
25 fraudulently represented to [REDACTED] that the money needed to make the Investment was held in
26 a trust account in Europe, and that he needed money up front in order to have the trust money
27 released. Based upon **ELJWAIDI's** representations, [REDACTED] acted as an intermediary in
28 assisting **ELJWAIDI** to solicit and receive money from [REDACTED] and [REDACTED]

1 **ELJWAIDI** did not use the money provided by these individuals to facilitate making the
2 Investment.

3 All of which constitutes the crime of **SECURITIES FRAUD**, a category "B" felony, in
4 violation of NRS 90.570 and NRS 90.650.

5 **COUNT IV**

6 **IDENTITY THEFT**

7 **Category "B" Felony – NRS 205.463**

8 That the Defendant, **JAMAL ELJWAIDI, a.k.a. JEAN MARC ELJWAIDI ("ELJWAIDI")**, in
9 the County of Clark, State of Nevada, did knowingly obtain personal identifying information of
10 another person and use that personal identifying information to avoid or delay being prosecuted
11 for an unlawful act, to wit:

12 On or about March 12, 2013, **ELJWAIDI** obtained [REDACTED]
13 [REDACTED] name, his title, his work address, and his employer's name and used this information by
14 presenting it to [REDACTED] on a letter dated March 12, 2013, to convince [REDACTED] not to
15 report him to the authorities and to thereby avoid or delay prosecution for Theft of \$3,500 or
16 more, a category "B" felony.

17 All of which constitutes the crime of **IDENTITY THEFT**, a category "B" felony, in violation
18 of NRS 205.463.

19 All of which is contrary to the form of the statute in such cases made and provided, and
20 against the peace and dignity of the State of Nevada. Furthermore, complainant makes this
21 declaration subject to the penalty of perjury.

22 Dated this 19th day of June, 2013.

24 CATHERINE CORTEZ MASTO
25 Attorney General

26 By: /s/ Samuel R. Kern

27 SAMUEL R. KERN
28 Senior Deputy Attorney General