  
CLERK OF THE COURT

1 IND  
2 CATHERINE CORTEZ MASTO  
3 Attorney General  
4 SAMUEL R. KERN  
5 Senior Deputy Attorney General  
6 Nevada Bar Number 10638  
7 skern@ag.nv.gov  
8 RAYA M. SWIFT  
9 Deputy Attorney General  
10 Nevada Bar Number 11108  
11 rswift@ag.nv.gov  
12 Office of the Attorney General  
13 555 East Washington Ave., Ste. 3900  
14 Las Vegas, Nevada 89101  
15 P: (702) 486-3396  
16 F: (702) 486-0660  
17 Attorneys for State of Nevada

DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

13 THE STATE OF NEVADA, )  
14 )  
15 Plaintiff, )  
16 )  
17 vs. )  
18 )  
19 MARK EDWARD SHELTON a.k.a. )  
20 CHRISTOPHER HALL )  
21 )  
22 Defendant. )

Case No.: C-14-298978-1

Dept. No.: XXI

INDICTMENT

22 Defendant, Mark Edward Shelton a.k.a. Christopher Hall ("SHELTON"), above named, is  
23 accused by the grand jury of the County of Clark of two (2) counts of THEFT BY MATERIAL  
24 MISREPRESENTATION IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony, in  
25 violation of NRS 205.0832; two (2) counts of THEFT IN THE AMOUNT OF \$650.00 OR MORE,  
26 a category "C" felony, in violation of NRS 205.0832; one (1) count of MULTIPLE  
27 TRANSACTIONS INVOLVING FRAUD AND DECEIT IN THE COURSE OF ENTERPRISE OR  
28 OCCUPATION, a category "B" felony in violation of NRS 205.377; and five (5) counts of

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

1 UNLAWFUL RECEIPT OF MONEY TO OBTAIN A LOAN FOR ANOTHER, a category "D" felony  
2 in violation of NRS 205.950.

3 All of the acts alleged herein have been committed on or between November 2012 and  
4 February 2013, by the above-named Defendant, within the County of Clark, State of Nevada, in  
5 the following manner:

6 COUNT I

7 THEFT IN THE AMOUNT OF \$3,500 OR MORE

8 CATEGORY "B" felony - NRS 205.0832(1)

9 That the Defendant, SHELTON, in the County of Clark, State of Nevada without lawful  
10 authority, did knowingly: control property of another person with the intent to deprive that person  
11 of the property; and/or convert, make an unauthorized transfer of an interest in, or without  
12 authorization control property of another person, or used the services or property of another  
13 person entrusted to him or placed in his possession for a limited, authorized period of  
14 determined or prescribed duration or for a limited use; and/or obtain property or services of  
15 another person by a material misrepresentation with intent to deprive that person of the property  
16 or services; and/or control property of another person knowing or having reason to know that the  
17 property was stolen, and the value of said property was \$3,500 or more, to wit:

18 That on or about December 12, 2012 and/or January 24, 2013, SHELTON knowingly, and  
19 with the intent to deprive ALAN BERZOW ("BERZOW") of his property, misrepresented that  
20 SHELTON would help BERZOW obtain a business loan in exchange for a fee. Relying upon this  
21 misrepresentation, BERZOW entrusted SHELTON with approximately Seven Thousand Four  
22 Hundred Ninety-Five Dollars (\$7,495). SHELTON did not help BERZOW obtain a business loan  
23 as promised, and did not return BERZOW's money.

24 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR MORE, a  
25 category "B" felony in violation of NRS 205.0832(1).

26 ///

27 ///

28 ///

1 COUNT II

2 THEFT IN THE AMOUNT OF \$650 OR MORE

3 CATEGORY "C" felony - NRS 205.0832(1)

4 That the Defendant, SHELTON, in the County of Clark, State of Nevada without lawful  
5 authority, did knowingly: control property of another person with the intent to deprive that person  
6 of the property; and/or convert, make an unauthorized transfer of an interest in, or without  
7 authorization control property of another person, or used the services or property of another  
8 person entrusted to him or placed in his possession for a limited, authorized period of  
9 determined or prescribed duration or for a limited use; and/or obtain property or services of  
10 another person by a material misrepresentation with intent to deprive that person of the property  
11 or services; and/or control property of another person knowing or having reason to know that the  
12 property was stolen, and the value of said property was \$650 or more, to wit:

13 That on or about December 17, 2012 and/or February 8, 2013, SHELTON knowingly, and  
14 with the intent to deprive BRIAN CAIN ("CAIN") of his property, misrepresented that SHELTON  
15 would help CAIN obtain a business loan in exchange for a fee. Relying upon this  
16 misrepresentation, CAIN entrusted SHELTON with approximately Three Thousand Dollars  
17 (\$3,000). SHELTON did not help CAIN obtain a business loan as promised, and did not return  
18 CAIN's money.

19 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650.00 OR MORE, a  
20 category "C" felony in violation of NRS 205.0832(1).

21 COUNT III

22 THEFT IN THE AMOUNT OF \$3,500 OR MORE

23 CATEGORY "B" felony - NRS 205.0832(1)

24 That the Defendant, SHELTON, in the County of Clark, State of Nevada without lawful  
25 authority, did knowingly: control property of another person with the intent to deprive that person  
26 of the property; and/or convert, make an unauthorized transfer of an interest in, or without  
27 authorization control property of another person, or used the services or property of another  
28 person entrusted to him or placed in his possession for a limited, authorized period of

1 determined or prescribed duration or for a limited use; and/or obtain property or services of  
2 another person by a material misrepresentation with intent to deprive that person of the property  
3 or services; and/or control property of another person knowing or having reason to know that the  
4 property was stolen, and the value of said property was \$3,500 or more, to wit:

5 That on or about December 18, 2012 and/or February 14, 2013, SHELTON knowingly,  
6 and with the intent to deprive BROOKS MCCLAIN ("MCCLAIN") of his property, misrepresented  
7 that SHELTON would help MCCLAIN obtain a business loan in exchange for a fee. Relying upon  
8 this misrepresentation, MCCLAIN entrusted SHELTON with approximately Three Thousand Nine  
9 Hundred and Ninety-Five Dollars (\$3,995). SHELTON did not help MCCLAIN obtain a business  
10 loan as promised, and did not return MCCLAIN's money.

11 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR MORE, a  
12 category "B" felony in violation of NRS 205.0832(1)(c).

13 COUNT IV

14 THEFT IN THE AMOUNT OF \$650 OR MORE

15 CATEGORY "C" felony - NRS 205.0832(1)

16 That the Defendant, SHELTON, in the County of Clark, State of Nevada without lawful  
17 authority, did knowingly: control property of another person with the intent to deprive that person  
18 of the property; and/or convert, make an unauthorized transfer of an interest in, or without  
19 authorization control property of another person, or used the services or property of another  
20 person entrusted to him or placed in his possession for a limited, authorized period of  
21 determined or prescribed duration or for a limited use; and/or obtain property or services of  
22 another person by a material misrepresentation with intent to deprive that person of the property  
23 or services; and/or control property of another person knowing or having reason to know that the  
24 property was stolen, and the value of said property was \$650 or more, to wit:

25 That on or about November 6, 2012 and/or December 12, 2012, SHELTON knowingly,  
26 and with the intent to deprive FREDERICK MOORE ("MOORE") of his property, misrepresented  
27 that SHELTON would help MOORE obtain a business loan in exchange for a fee. Relying upon  
28 this misrepresentation, MOORE entrusted SHELTON with approximately Three Thousand, Four

1 Hundred Ninety-Five Dollars (\$3,495). SHELTON did not help MOORE obtain a business loan  
2 as promised, and did not return MOORE's money.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650.00 OR MORE, a  
4 category "C" felony in violation of NRS 205.0832(1)(c).

5 COUNT V

6 MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF  
7 ENTERPRISE OR OCCUPATION

8 CATEGORY "B" FELONY – NRS 205.377

9 That the Defendant, SHELTON, in the County of Clark, State of Nevada in the course of  
10 an enterprise or occupation, knowingly and with the intent to defraud, engaged in an act, practice  
11 or course of business, or employed a device scheme or artifice which operated or would have  
12 operated as a fraud or deceit upon a person by means of a false representation or omission of a  
13 material fact that: he knew to be false or omitted; that he intended another to rely on; and which  
14 resulted in a loss to a person who relied on the false representation or omission, in at least two  
15 transactions having the same or similar pattern, intents, results, accomplices, victims or methods  
16 of commission, or which were otherwise interrelated by distinguishing characteristics and were  
17 not isolated incidents within 4 years and in which the aggregate loss or intended loss was more  
18 than \$650, to wit:

19 As set forth in Counts I through IV, which are hereby incorporated by reference as though  
20 fully set forth herein, Defendant knowingly and intentionally defrauded individuals in two or more  
21 transactions as set forth more fully in those counts from between about November 2012 to  
22 February 14, 2013. Defendant, in the course of an enterprise or occupation, solicited money  
23 from victims for the purported purpose of obtaining loans on their behalves. The purposes,  
24 results and methods of commission in all five instances were the same or similar.

25 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD  
26 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in  
27 violation of NRS 205.377.

28 ///

1 COUNT VI

2 UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT OF \$1,000 OR MORE

3 TO OBTAIN A LOAN FOR ANOTHER

4 CATEGORY "D" FELONY - NRS 205.950

5 That the Defendant, SHELTON, in the County of Clark, State of Nevada, did receive an  
6 advance fee, salary, deposit or money of \$1,000 or more to obtain a loan for another person  
7 without placing the advance fee, salary, deposit or money in escrow pending completion of the  
8 loan or a commitment for the loan, to wit:

9 As set forth in Count I, which is hereby incorporated by reference, on or about December  
10 12, 2012 and/or January 24, 2013, SHELTON received checks totaling approximately Seven  
11 Thousand Four Hundred and Ninety-Five Dollars (\$7,495) from BERZOW in a Bank of America  
12 account, an account which SHELTON controlled, and which was not an escrow account. This  
13 money was a fee for a loan SHELTON had agreed to obtain for BERZOW. The loan was not  
14 funded and SHELTON kept the fee for his own use.

15 All of which constitutes the crime of UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT  
16 OF \$1,000 OR MORE TO OBTAIN LOAN FOR ANOTHER, a category "D" felony, in violation of  
17 NRS 205.950.

18 COUNT VII

19 UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT OF \$1,000 OR MORE

20 TO OBTAIN A LOAN FOR ANOTHER

21 CATEGORY "D" FELONY - NRS 205.950

22 That the Defendant, SHELTON, in the County of Clark, State of Nevada, did receive an  
23 advance fee, salary, deposit or money of \$1,000 or more to obtain a loan for another person  
24 without placing the advance fee, salary, deposit or money in escrow pending completion of the  
25 loan or a commitment for the loan, to wit:

26 As set forth in Count II, which is hereby incorporated by reference, on or about December  
27 17, 2012 and/or February 8, 2013, SHELTON received checks totaling approximately Three  
28 Thousand Dollars (\$3,000) from CAIN in a Bank of America account, an account which

1 SHELTON controlled, and which was not an escrow account. This money was a fee for a loan  
2 SHELTON had agreed to obtain for CAIN. The loan was not funded and SHELTON kept the fee  
3 for his own use.

4 All of which constitutes the crime of UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT  
5 OF \$1,000 OR MORE TO OBTAIN LOAN FOR ANOTHER, a category "D" felony, in violation of  
6 NRS 205.950.

7 COUNT VIII

8 UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT OF \$1,000 OR MORE

9 TO OBTAIN A LOAN FOR ANOTHER

10 CATEGORY "D" FELONY - NRS 205.950

11 That the Defendant, SHELTON, in the County of Clark, State of Nevada, did receive an  
12 advance fee, salary, deposit or money of \$1,000 or more to obtain a loan for another person  
13 without placing the advance fee, salary, deposit or money in escrow pending completion of the  
14 loan or a commitment for the loan, to wit:

15 As set forth in Count III, which is hereby incorporated by reference, on or about December  
16 18, 2012 and/or February 14, 2013, SHELTON received checks totaling Three Thousand Nine  
17 Hundred Ninety-Five Dollars (\$3,995) from MCCLAIN in a Bank of America account, an account  
18 which SHELTON controlled, and which was not an escrow account. This money was a fee for a  
19 loan SHELTON had agreed to obtain for MCCLAIN. The loan was not funded and SHELTON  
20 kept the fee for his own use.

21 All of which constitutes the crime of UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT  
22 OF \$1,000 OR MORE TO OBTAIN LOAN FOR ANOTHER, a category "D" felony, in violation of  
23 NRS 205.950.

24 ///

25 ///

26 ///

27 ///

28 ///

1 COUNT IX

2 UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT OF \$1,000 OR MORE

3 TO OBTAIN A LOAN FOR ANOTHER

4 CATEGORY "D" FELONY - NRS 205.950

5 That the Defendant, SHELTON, in the County of Clark, State of Nevada, did receive an  
6 advance fee, salary, deposit or money of \$1,000 or more to obtain a loan for another person  
7 without placing the advance fee, salary, deposit or money in escrow pending completion of the  
8 loan or a commitment for the loan, to wit:

9 As set forth in Count IV, which is hereby incorporated, on or about November 6, 2012  
10 and/or December 12, 2012, SHELTON received checks totaling \$3,495 from MOORE in a Bank  
11 of America account, an account which SHELTON controlled, and which was not an escrow  
12 account. This money was a fee for a loan SHELTON had agreed to obtain for MOORE. The loan  
13 was not funded and SHELTON kept the fee for his own use.

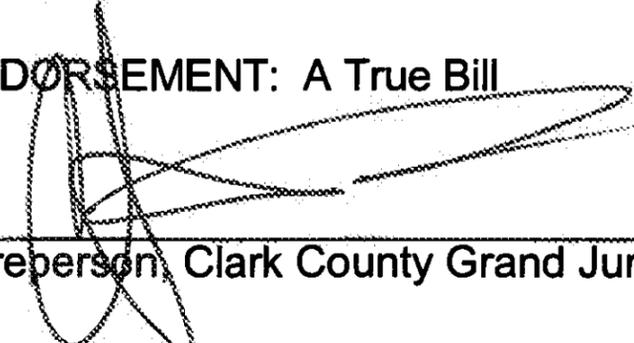
14 All of which constitutes the crime of UNLAWFUL RECEIPT OF MONEY IN THE AMOUNT  
15 OF \$1,000 OR MORE TO OBTAIN LOAN FOR ANOTHER, a category "D" felony, in violation of  
16 NRS 205.950.

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

17  
18 SUBMITTED BY  
CATHERINE CORTEZ MASTO  
Attorney General

19  
20 By:   
21 SAMUEL R. KERN  
Senior Deputy Attorney General  
22 RAYA M. SWIFT  
Deputy Attorney General  
Attorneys for State of Nevada

23  
24 ENDORSEMENT: A True Bill

25 By:   
26 Foreperson, Clark County Grand Jury