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JUSTICE COURT
LAS VEGAS NEVADA
BY DEPUTY
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8 **IN THE JUSTICE COURT LAS VEGAS TOWNSHIP**

9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 TEALDO, FIORELLA SOPHIA

14 Defendant.

Case No.: 14F10800X

Dept. No.: 6

15 **CRIMINAL COMPLAINT**

17 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and
18 through her deputy, SARAH E. OVERLY, complains and charges that the above named
19 Defendant has committed the following offenses:

20 FIORELLA SOPHIA TEALDO, (hereinafter TEALDO) has committed the crimes of one
21 (1) count of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF
22 \$3,500.00 OR MORE, a category "B" felony, in violation of NRS 205.0832, NRS 205.0835(4);
23 two (2) counts of THEFT BY MATERIAL MISREPRESENTATION IN THE AMOUNT OF
24 \$650.00 OR MORE, a category "C" felony, in violation of NRS 205.0832(1)(c), NRS
25 205.0835(3); three (3) counts of MORTGAGE LENDING FRAUD, a category "C" felony in
26 violation of NRS 205.372 and NRS 645F.400; one (1) count of PATTERN OF MORTGAGE
27 LENDING FRAUD, a category "B" felony in violation of NRS 205.372; and one (1) count of
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1 MULTIPLE TRANSACTIONS INVOLVING FRAUD AND DECEIT IN THE COURSE OF
2 ENTERPRISE OR OCCUPATION, a category "B" felony in violation of NRS 205.377.

3 All of the acts alleged herein have been committed on or between June 2011 and
4 September 2012, by the above-named Defendant, within the County of Clark, State of
5 Nevada, in the following manner:

6 **COUNT I**

7 **THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$3500.00 OR**
8 **MORE**
9 **CATEGORY "B" felony - NRS 205.0832 and NRS 205.0835(4)**

10 That the Defendant, within the County of Clark, State of Nevada, did knowingly and
11 without lawful authority obtain the personal or intangible property of another person valued at
12 \$3,500.00 or more by material misrepresentation with intent to deprive that person of the
13 property, to wit: On or between February 2012 and September 2012, the Defendant obtained
14 \$4,210.00 in personal checks from JOSE M. BECERRA ("BECERRA"), by misrepresenting to
15 BECERRA that she would provide services resulting in BECERRA obtaining a loan
16 modification for his home.

17 All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION
18 IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony in violation of NRS
19 205.0832, NRS 205.0835(4).

20 **COUNT II**

21 **MORTGAGE LENDING FRAUD**
22 **CATEGORY "C" felony - NRS 205.372 and NRS 645F.400**

23 That the Defendant, within the County of Clark, State of Nevada, acting in the
24 performance of a covered service as defined by NRS 645F.310, willfully and unlawfully
25 violated one or more provisions of NRS 205.372 including, without limitation, to wit: On or
26 between February 2012 and September 2012, the Defendant misrepresented to BECERRA
27 that FST Enterprises, Inc. (hereinafter FST), would assist BECERRA in obtaining a loan
28 modification for his home and obtained fees totaling \$4,200.00 from BECERRA without
providing any services.

1 All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C"
2 felony in violation of NRS 205.372.

3 **COUNT III**

4 **THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$650.00 OR MORE**
5 **CATEGORY "C" felony - NRS 205.0832 and NRS 205.0835(3)**

6 That the Defendant, within the County of Clark, State of Nevada, did knowingly, and
7 without lawful authority obtain the personal or intangible property of another person valued at
8 \$650.00 or more by material misrepresentation with intent to deprive that person of the
9 property, to wit: On or between September 2011 and December 2011, the Defendant obtained
10 \$2,300.00 in personal checks from CARMEN CANCHOLA ("CANCHOLA") by misrepresenting
11 to CANCHOLA that she would provide services resulting in CANCHOLA obtaining a loan
12 modification for her home.

13 All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION
14 IN THE AMOUNT OF \$650.00 OR MORE, a category "C" felony in violation of NRS 205.0832
15 and NRS 205.0835(3).

16 **COUNT IV**

17 **MORTGAGE LENDING FRAUD**
18 **CATEGORY "C" felony - NRS 205.372 and NRS 645F.400**

19 That the Defendant, within the County of Clark, State of Nevada, acting in the
20 performance of a covered service as defined by NRS 645F.310, willfully and unlawfully
21 violated one or more provisions of NRS 645F.400 and NRS 205.372 including, without
22 limitation, to wit: On or between September 2011 and December 2011, the Defendant
23 misrepresented to CANCHOLA that FST Enterprises, Inc. (hereinafter FST), would assist
24 CANCHOLA in obtaining a loan modification for his home and obtained fees totaling
25 \$2,300.00 from CANCHOLA without providing any services.

26 All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C"
27 felony in violation of NRS 205.372 and NRS 645F.400.

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COUNT V

**THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$650.00 OR MORE
CATEGORY "C" felony - NRS 205.0832, NRS 205.0835(3)**

That the Defendant, within the County of Clark, State of Nevada, did knowingly, and without lawful authority obtain the personal or intangible property of another person valued at \$650.00 or more by material misrepresentation with intent to deprive that person of the property, to wit: On or between June 2011 and September 2011, the Defendant obtained \$1,800.00 in personal checks from FRANCISCO CABALLERO ("CABALLERO") by misrepresenting to CABALLERO that she would provide services resulting in CABALLERO obtaining a loan modification for his home, and that if she could not obtain a loan modification on CABALLERO'S home she would obtain a short sale of his home.

All of which constitutes the crime of THEFT BY A MATERIAL MISREPRESENTATION IN THE AMOUNT OF \$650.00 OR MORE, a category "C" felony in violation of NRS 205.0832, NRS 205.0835(3).

COUNT VI

**MORTGAGE LENDING FRAUD
CATEGORY "C" felony - NRS 205.372 and NRS 645F.400**

That the Defendant, within the County of Clark, State of Nevada, acting in the performance of a covered service as defined by NRS 645F.310, willfully and unlawfully violated one or more provisions of NRS 645F.400 and NRS 205.372 including, without limitation, to wit: On or between June 2011 and September 2011, the Defendant misrepresented to CABALLERO that FST Enterprises, Inc (hereinafter FST), would assist CABALLERO in obtaining a loan modification for his home; misrepresented to CABALLERO that FST would obtain a short sale on CABALLERO'S property in the event FST was unable to obtain a loan modification for CABALLERO; and obtained fees totaling \$2,700.00 from CABALLERO without providing any services.

All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony in violation of NRS 205.372 and NRS 645F.400.

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COUNT VII

MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION
CATEGORY "B" FELONY – NRS 205.377

That the Defendant, within the County of Clark, State of Nevada, knowingly and with the intent to defraud, engaged in an act, practice or course of business which operated as a fraud or deceit by means of a false representation or omission of a material fact; to wit:

On or between June 2011 and September 2012, as set forth in Counts II, IV, and VI, which are hereby incorporated by reference as though fully set forth herein, the Defendant knowingly and intentionally defrauded individuals in two or more transactions as set forth more fully in those counts. The purposes, results and methods of commission in all three instances were the same or similar.

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

COUNT XIII

PATTERN OF MORTGAGE LENDING FRAUD
CATEGORY "B" felony in violation of NRS 205.372(2)

That the Defendant, within the County of Clark, State of Nevada, 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:

On or between June 2011 and September 2012, as set forth in Counts II, IV, and VI, the Defendant has committed mortgage lending fraud in two or more mortgage lending transactions as set more fully in those counts. The purposes, results, and methods of commission in all three instances was the same or similar.

All of which constitutes the crime of PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of NRS 205.372(2).

Complainant knows said crime occurred and that the Defendant committed the same based upon the following: because the complainant is a Deputy Attorney General, and is in

1 possession of a prosecution referral from [REDACTED], a Compliance Investigator for the
2 Office of the Attorney General, Bureau of Criminal Justice, a copy of which is attached hereto
3 as Exhibit 1 and hereby incorporated by reference herein, for the limited purpose of securing a
4 warrant of arrest for the Defendant. Complainant makes this declaration subject to the penalty
5 of perjury

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

8 Dated this 9 day of July, 2014.

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10 CATHERINE CORTEZ MASTO
Attorney General

11
12 By: 
13 SARAH E. OVERLY
14 Deputy Attorney General
15 Fraud Unit
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