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JUSTICE COURT
LAS VEGAS NEVADA
BY: KR DEPUTY

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8 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP

9 CLARK COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 v.

13 DERRID EMANUEL DEAN,
14 aka DERRID EMANUEL DEAN, SR.
ID# 2638898

15 Defendant.

Case No.: 15F01497X

Dept. No.: 14

16 15F01497X
CRIM
Criminal Complaint
4721827



17
18 CRIMINAL COMPLAINT

19 ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through his
20 undersigned deputy, complains and charges the above-named defendant, DERRID
21 EMANUEL DEAN, with having committed the following offense(s) within Clark County,
22 Nevada:

23 COUNT 1
24 THEFT IN THE AMOUNT OF \$2,500 OR MORE FROM A PERSON 60
YEARS OF AGE OR OLDER
25 CATEGORY "B" FELONY - NRS 205.0832(1); NRS 193.167

26 Defendant DERRID EMANUEL DEAN, in Clark County, Nevada, either by virtue of his
27 own actions or by the actions of his agent(s) or employee(s), without lawful authority, did
28 knowingly: control property of another person with the intent to deprive that person of the

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1 property; and/or convert, make an unauthorized transfer of an interest in, or without
2 authorization control property of another person, or used the services or property of another
3 person entrusted to him or placed in his possession for a limited, authorized period of
4 determined or prescribed duration or for a limited use; and/or obtain property or services of
5 another person by a material misrepresentation, with intent to permanently deprive that
6 person of the property or services, and the value of said property was \$2,500.00 or more,
7 while the owner of said property was 60 years of age or older, to wit:

- 8 • In May of 2011, Defendant DERRID EMANUEL DEAN, either by virtue of his own
9 actions or by the actions of his agent(s) or employee(s), without lawful authority,
10 knowingly, and with the intent to obtain \$2,500.00 or more from L. Kenneth
11 Schoenfeld, who was 78 years of age at the time of the relevant events, entered
12 into an agreement under which Defendant was to collect a total sum of \$140,000.00
13 for Schoenfeld from individuals named Co Quoc Phan and/or Tammy Phung.
- 14 • On July 18, 2011, Phan and Phung paid Defendant \$30,000.00 of the \$140,000.00;
- 15 • Immediately thereafter, Defendant converted said \$30,000.00 to his own use and
16 has failed and refused to pay the money to Schoenfeld.

17 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$2,500.00 OR
18 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation
19 of NRS 205.0832(1); NRS 193.167.

20 **COUNT 2**
21 **THEFT IN THE AMOUNT OF \$3,500 OR MORE FROM A PERSON 60 YEARS OF AGE OR**
22 **OLDER**
23 **CATEGORY "B" FELONY - NRS 205.0832(1); NRS 193.167**

24 Defendant DERRID EMANUEL DEAN, in Clark County, Nevada, either by virtue of his
25 own actions or by the actions of his agent(s) or employee(s), without lawful authority, did
26 knowingly: control property of another person with the intent to deprive that person of the
27 property; and/or convert, make an unauthorized transfer of an interest in, or without
28 authorization control property of another person, or used the services or property of another
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 permanently deprive that
3 person of the property or services, and the value of said property was \$3,500.00 or more,
4 while the owner of said property was 60 years of age or older, to wit:

- 5 • In May of 2011, Defendant DERRID EMANUEL DEAN, either by virtue of his own
6 actions or by the actions of his agent(s) or employee(s), without lawful authority,
7 knowingly, and with the intent to obtain \$2,500.00 or more from L. Kenneth
8 Schoenfeld, who was 78 years of age at the time of the relevant events, entered
9 into an agreement under which Defendant was to collect a total sum of \$140,000.00
10 for Schoenfeld from individuals named Co Quoc Phan and/or Tammy Phung.
- 11 • On October 18, 2011, Phan and Phung paid Defendant \$40,000.00 of the
12 \$140,000.00;
- 13 • Immediately thereafter, Defendant converted said \$40,000.00 to his own use and
14 has failed and refused to pay the money to Schoenfeld.

15 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR
16 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation
17 of NRS 205.0832(1); NRS 193.167.

18 **COUNT 3**
19 **THEFT IN THE AMOUNT OF \$3,500 OR MORE FROM A PERSON 60 YEARS OF AGE OR**
20 **OLDER**
21 **CATEGORY "B" FELONY - NRS 205.0832(1); NRS 193.167**

22 Defendant DERRID EMANUEL DEAN, in Clark County, Nevada, either by virtue of his
23 own actions or by the actions of his agent(s) or employee(s), without lawful authority, did
24 knowingly: control property of another person with the intent to deprive that person of the
25 property; and/or convert, make an unauthorized transfer of an interest in, or without
26 authorization control property of another person, or used the services or property of another
27 person entrusted to him or placed in his possession for a limited, authorized period of
28 determined or prescribed duration or for a limited use; and/or obtain property or services of
another person by a material misrepresentation, with intent to permanently deprive that

1 person of the property or services, and the value of said property was \$3,500.00 or more,
2 while the owner of said property was 60 years of age or older, to wit:

- 3 • In May of 2011, Defendant DERRID EMANUEL DEAN, either by virtue of his own
4 actions or by the actions of his agent(s) or employee(s), without lawful authority,
5 knowingly, and with the intent to obtain \$3,500.00 or more from L. Kenneth
6 Schoenfeld, who was 79 years of age at the time of the relevant events, entered
7 into an agreement under which Defendant was to collect a total sum of \$140,000.00
8 for Schoenfeld from individuals named Co Quoc Phan and/or Tammy Phung.
- 9 • On January 5, 2012, Phan and Phung paid Defendant \$35,000.00 of the
10 \$140,000.00;
- 11 • Immediately thereafter, Defendant converted said \$35,000.00 to his own use and
12 has failed and refused to pay the money to Schoenfeld.

13 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR
14 MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation
15 of NRS 205.0832(1); NRS 193.167.

16 **COUNT 4**
17 **THEFT IN THE AMOUNT OF \$3,500 OR MORE FROM A PERSON 60 YEARS OF AGE OR**
18 **OLDER**
19 **CATEGORY "B" FELONY - NRS 205.0832(1); NRS 193.167**

20 Defendant DERRID EMANUEL DEAN, in Clark County, Nevada, either by virtue of his
21 own actions or by the actions of his agent(s) or employee(s), without lawful authority, did
22 knowingly: control property of another person with the intent to deprive that person of the
23 property; and/or convert, make an unauthorized transfer of an interest in, or without
24 authorization control property of another person, or used the services or property of another
25 person entrusted to him or placed in his possession for a limited, authorized period of
26 determined or prescribed duration or for a limited use; and/or obtain property or services of
27 another person by a material misrepresentation, with intent to permanently deprive that
28 person of the property or services, and the value of said property was \$3,500.00 or more,
while the owner of said property was 60 years of age or older, to wit:

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- In May of 2011, Defendant DERRID EMANUEL DEAN, either by virtue of his own actions or by the actions of his agent(s) or employee(s), without lawful authority, knowingly, and with the intent to obtain \$3,500.00 or more from L. Kenneth Schoenfeld, who was 79 years of age at the time of the relevant events, entered into an agreement under which Defendant was to collect a total sum of \$140,000.00 for Schoenfeld from individuals named Co Quoc Phan and/or Tammy Phung.
- On April 11, 2012, Phan and Phung paid Defendant \$35,000.00 of the \$140,000.00;
- Immediately thereafter, Defendant converted \$18,600.00 of said \$35,000.00 to his own use and has failed and refused to pay the remaining \$18,600.00 to Schoenfeld.

All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR MORE FROM A PERSON 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS 205.0832(1); NRS 193.167.

All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the State of Nevada. Said complainant makes this declaration under penalty of perjury.

DATED this 12th day of January, 2015.

ADAM PAUL LAXALT
Attorney General

By: Michael C. Kovac
MICHAEL C. KOVAC, ESQ.
Deputy Attorney General
Office of the Attorney General