ORIGINAL 04/04/2014 01:57:42 PM IND CATHERINE CORTEZ MASTO 2 Attorney General MICHAEL C. KOVAC **CLERK OF THE COURT** 3 **Deputy Attorney General** Nevada Bar No. 11177 4 Office of the Attorney General Workers' Compensation Fraud Unit 5 555 E. Washington Ave., Ste. 3900 Las Vegas, Nevada 89101-1068 6 P: (702) 486-0622 F: (702) 486-3768 7 MKovac@ag.nv.gov Attorneys for Plaintiff 8 DISTRICT COURT 9 **CLARK COUNTY. STATE OF NEVADA** STATE OF NEVADA. 10 Case No.: 6-/4-297/01-/ AMENDED BY ORDER OF THE COURT
STEVEN D. GRIEFISON, CLERK OF THE COURT OF 17 2005 Best Weshington Avenue, Suite 3900 11 Plaintiff. Dept. No.: V DENISE TROUTED STOTE 12 ٧. 13 14 Defendant. 15 16 17 INDICTMENT Defendants JOSHUA EPHRAIM JONES and REGINA GENOVEBA OWENS are 18 19 accused by the Grand Jury of Clark County, Nevada, of the crimes of UNEMPLOYMENT 20 INSURANCE FRAUD (a Category C Felony, in violation of NRS 612.445); CONSPIRACY TO 21 UNLAWFULLY OBTAIN OR INCREASE UNEMPLOYMENT BENEFITS (a Gross 22 Misdemeanor, in violation of NRS 612.720); and OBTAINING MONEY UNDER FALSE 23 PRETENSES (a Category B Felony, in violation of NRS 205.380) committed within Clark 24 County, Nevada as follows:

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Office of the Attorney General 55 East Westington Avenue, Suite 3900 Les Veges, Nevada 89101

COUNT ONE UNEMPLOYMENT INSURANCE FRAUD (NRS 612.445 – Category C Felony)

On or about August 26, 2013 through October 27, 2013, within Clark County, Nevada, Defendant JOSHUA EPHRAIM JONES and REGINA GENOVEBA OWENS made and/or directly or indirectly counseled, encouraged, hired, commanded, induced or otherwise procured another to make, false statements or representations, knowing them to be false, or knowingly fall to disclose a material fact, to the Employment Security Division of the Department of Employment, Training and Rehabilitation of the State of Nevada, located at 2800 East Saint Louis Avenue, Las Vegas, Nevada 89104-4267, to wit, stating that JOSHUA EPHRAIM JONES, was able to work and failing to disclose JOSHUA EPHRAIM JONES' incarceration in the Clark County Detention Center and the High Desert State Prison, in order to obtain benefits in the amount of \$850 or more, but less than \$3,500, under Chapter 612 of the Nevada Revised Statutes.

COUNT TWO CONSPIRACY TO UNLAWFULLY OBTAIN OR INCREASE UNEMPLOYMENT BENEFITS (NRS 612.720 – Gross Misdemeanor)

On or about August 26, 2013 through October 27, 2013, within Clark County, Nevada, Defendant JOSHUA EPHRAIM JONES and REGINA GENOVEBA OWENS conspired to obtain or increase benefits or other payments under Chapter 612 of the Nevada Revised Statutes by making false statements or representations knowing them to be false, or by knowingly failing to disclose a material fact, as more fully set forth in Count One.

COUNT THREE OBTAINING MONEY UNDER FALSE PRETENSES (NRS 205.380 - Category B Felony)

On or about August 26, 2013 through October 27, 2013, within Clark County, Nevada, Defendant JOSHUA EPHRAIM JONES and REGINA GENOVEBA OWENS by any false pretense obtained from any other person any chose in action, money, goods, wares, chattels, effects or other valuable thing valued at \$650.00 or more, with the intent to cheat or defraud the other person, in that they made and/or directly or indirectly counseled, encouraged, hired, commanded, induced or otherwise procured another to make, false statements or

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representations, knowing them to be false, or knowingly fail to disclose a material fact, to the Employment Security Division of the Department of Employment, Training and Rehabilitation of the State of Nevada, located at 2800 East Saint Louis Avenue, Las Vegas, Nevada 89104-4267, to wit, falsely and fraudulently stating that JOSHUA EPHRAIM JONES was able to work and failing to disclose JOSHUA EPHRAIM JONES' incarceration in the Clark County Detention Center and High Desert State Prison, in order to obtain benefits of \$650.00 of more under Chapter 612 of the Nevada Revised Statutes.

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.

DATED this 3rd day of April, 2014.

CATHERINE CORTEZ MASTO Attorney General

By: MICHAEL C. KOVAC, ESQ
Deputy Attorney General
Nevada Bar No. 11177

ENDORSEMENT: A True Bill

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Horeperson, Clark County Grand Jury GJ#13BGJ066A-B

WITNESS LIST:

- 1. David Molnar (State of Nevada, Office of the Inspector General);
- Oscar Pericon (State of Nevada, Department of Employment, Training, and Rehabilitation);
 - 3. Person most knowledgeable of Clark County Detention Center;
 - 4. Any and all persons most knowledgeable deemed necessary; and
 - 5. Any and all other custodians of records deemed necessary.