

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

NOV 03 2014

BY: 
TERI BERKSHIRE, DEPUTY

1 **AIND**
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13 **DISTRICT COURT**
14 **CLARK COUNTY, NEVADA**

15 STATE OF NEVADA,

16 Plaintiff,

17 vs.

18 ALEX SORIA, ID #1961240
19 d/b/a BIOGREEN TECK, LLC and
20 **SONIA RODIS, ID# 2836927**
21 d/b/a BIOGREEN TECK, LLC and

22 Defendants.

CASE NO. : C-12-280271-2
DEPT. NO. : X

23 **FIRST AMENDED INDICTMENT**

24 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and
25 through her deputies, JEFFREY H. SEGAL, informs this Honorable Court that ALEX SORIA
26 and SONIA RODIS, the above named Defendants have committed the crimes of PATTERN
27 OF MORTGAGE LENDING FRAUD, a Category "B" Felony in violation of NRS 205.372,
28 within the County of Clark, State of Nevada, as follows:

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COUNT I

PATTERN OF MORTGAGE LENDING FRAUD

CATEGORY "B" FELONY - NRS 205.372(2)

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4 From on or about November of 2009 to May of 2010, within the County of Clark, State
5 of Nevada, ALEX SORIA and SONIA RODIS, either by virtue of their own actions or by the
6 actions of their conspirators, agents or employees, knowingly and unlawfully committed
7 mortgage lending fraud in two or more mortgage lending transactions having the same or
8 similar purposes, results, accomplices, victims or methods of commission, or having other
9 interrelated distinguishing characteristics; to wit:

10 SORIA and RODIS charged their clients substantial up-front fees for what they called a
11 "Zero Mortgage Program" ("program") by representing to their clients the program would
12 eliminate their mortgage obligation(s). The program involved filing with the county recorder's
13 office certain documents, including an "Affidavit of Fact" and "Deed of Full Reconveyance"
14 containing false statements. SORIA and RODIS assured their clients the program was based
15 upon sound legal principles and had worked for themselves and other clients. In truth and
16 fact, SORIA and RODIS knew full well these and other representations they made to entice
17 their clients to purchase the program were false and that the program was ineffective.

18 The Defendants committed mortgage lending fraud as described herein in two or more
19 mortgage lending transactions having the same or similar purposes, results, accomplices,
20 victims or methods of commission, or having other interrelated distinguishing characteristics,
21 including, without limitation, as follows:

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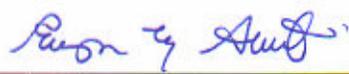
Name of Victim	Amount of Loss	Date of Transaction
Zarina Ojeda	\$1,565.00	7/8/11
Judith Melguin	\$1,065.00	5/26/11
Maria Bello	\$2,065.00	2/9/11
Francisco Betonio	\$2,565.00	2/9/11
Francisco Betonio	\$2,565.00	5/28/10
Mary Betonio	\$ 565.00	8/16/10
Mary Betonio	\$ 565.00	6/30/11
Crispin and Norma Rivera	\$2,065.00	9/19/11

All of which constitutes the crime of Pattern of Mortgage Lending Fraud - a category "B" felony in violation of NRS 205.372.

All of which is contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Nevada. Furthermore, Complainant makes this declaration upon information and belief and subject to the penalty of perjury.

Dated this 3rd day of November, 2014.

SUBMITTED BY:
CATHERINE CORTEZ MASTO
Attorney General

By: 
RAYA M. SWIFT
Senior Deputy Attorney General
Fraud Unit