

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**AIND**  
CATHERINE CORTEZ MASTO  
Attorney General  
RAYA M. SWIFT  
Senior Deputy Attorney General  
Nevada Bar No. 11108  
555 E. Washington Avenue, #3900  
Las Vegas, Nevada 89101  
P: 702-486-3396  
F: 702-486-0660  
rswift@ag.nv.gov  
Attorneys for Plaintiff, State of Nevada

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

NOV 13 2014

  
BY, TERI BERKSHIRE, DEPUTY

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
  
Plaintiff,  
  
vs.  
  
**ALEX SORIA, ID #1961240**  
d/b/a BIOGREEN TECK, LLC and  
SONIA RODIS, ID# 2836927  
d/b/a BIOGREEN TECK, LLC and  
  
Defendants.

**CASE NO. : C-12-280271-1**  
**DEPT. NO. : X**

**FIRST AMENDED INDICTMENT**

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

///  
///  
///

COUNT I

PATTERN OF MORTGAGE LENDING FRAUD

CATEGORY "B" FELONY - NRS 205.372(2)

1  
2  
3  
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:

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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.

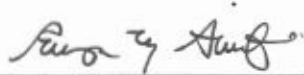
Dated this 3<sup>rd</sup> day of November, 2014.

SUBMITTED BY:

CATHERINE CORTEZ MASTO

Attorney General

By:

  
RAYA M. SWIFT  
Senior Deputy Attorney General  
Fraud Unit