


CLERK OF THE COURT

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8
9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 THE STATE OF NEVADA,

12 Plaintiff,

13 vs.

14 ROY EDWIN HARDEN,
#1848950,

15 Defendant.

Case No. C-13-292119-1

Dept. No. V

16
17 AMENDED INFORMATION

18 ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through her
19 undersigned deputy, complains and charges the above-named defendant, ROY EDWIN
20 HARDEN, with having committed the following offenses within the County of Clark, State of
21 Nevada:

22 COUNT I
THEFT

23 (Category B Felony – NRS 205.0832, 205.0833, 205.0835)

24 On or between September 6, 2011, and March 15, 2012, within Clark County, State of
25 Nevada, defendant ROY EDWIN HARDEN did then and there willfully and unlawfully obtain real,
26 personal or intangible property or the services of another person, valued at \$3,500 or more, by a
27 material misrepresentation with intent to deprive that person of the property or services, by:
28 participating in a scheme to misrepresent to the Nevada Department of Education that charter

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1 school Renaissance Academy, located at 1050 East Tropicana Avenue, Las Vegas, Nevada,
2 had 481 students enrolled, when in fact it only had 121 students enrolled, said misrepresentation
3 resulted in the State of Nevada overpaying the Renaissance Academy in the amount of
4 \$300,000.

5 **COUNT II**
6 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
7 **(Category C Felony – NRS 239.330)**

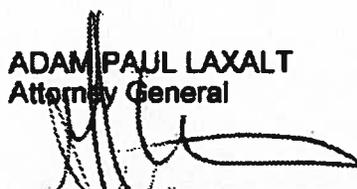
8 On or between December 6, 2011, and March 2, 2012, within Clark County, State of
9 Nevada, defendant **ROY EDWIN HARDEN** did then and there knowingly procure or offer any
10 false or forged instrument to be filed, registered or recorded in any public office, which
11 instrument, if genuine, might be filed, registered or recorded in a public office under any law of
12 this State or of the United States, by: submitting false teacher/student telephone contact logs to
13 auditors from the Nevada Department of Education during an audit of the Renaissance
14 Academy located at 1050 East Tropicana Avenue, Las Vegas, Nevada, said logs falsely inflated
15 the student enrollment.

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

19 Dated this 15th day of January, 2015.

20 **ADAM PAUL LAXALT**
21 **Attorney General**

22 By:

23 
24 **GARY J. MATHEWS**
25 **Deputy Attorney General**
26 **Fraud Unit**
27
28