

CLERK OF THE COURT

1 **IND**  
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9 **DISTRICT COURT**  
10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**

Case No.: C-15-309488-1

12 **Plaintiff,**

Dept. No.: XXV

13 **vs.**

14 **JAMES LIMPERIS,**  
15 **#2644838**

16 **Defendant.**

17 **INDICTMENT**

18 The above named Defendant(s), **JAMES LIMPERIS**, is accused by the Clark County  
19 Grand Jury of the crimes of (1) one count of **THEFT OF \$3,500 OR MORE**, a category "B"  
20 felony in violation of NRS 205.0832.

21 All of the acts alleged herein have been committed or consummated on or about  
22 between April 23, 2012, and October 9, 2012, by the above-named Defendant, within the  
23 County of Clark, State of Nevada, in the following manner:

24 **COUNT I**  
25 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**  
26 **CATEGORY "B" FELONY - NRS 205.0832**

27 That the Defendant, **LIMPERIS**, in the County of Clark, State of Nevada, did without  
28 lawful authority knowingly: control property of another person with the intent to deprive that  
person of the property; and/or convert, make an unauthorized transfer of an interest in, or

1 without authorization control property of another person, or used the services or property of  
2 another person entrusted to him or placed in his possession for a limited, authorized period of  
3 determined or prescribed duration or for a limited use; and/or obtain property or services of  
4 another person by a material misrepresentation with intent to deprive that person of the  
5 property or services; and/or control property of another person knowing or having reason to  
6 know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

7 On or about between April 23, 2012, and October 9, 2012, **LIMPERIS** knowingly,  
8 without lawful authority, and with the intent to deprive THOMAS MULLER, of his property,  
9 withdrew approximately One Million, Seven Hundred Fifty Eight Thousand, Six Hundred Fifty-  
10 Eight Dollars and Thirteen Cents (\$1,758,658.13) from an escrow account, \$3,500 or more of  
11 which belonged to MULLER, placed MULLER's money into a bank account that **LIMPERIS**  
12 controlled, and then converted \$3,500 or more of MULLER's money to **LIMPERIS's** own use  
13 and/or controlled \$3,500 or more of MULLER's money with the intent to deprive MULLER of it.


14 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a  
15 category "B" felony, in violation NRS 205.0832.

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.

18 DATED this 18<sup>th</sup> day of September, 2015.

19 SUBMITTED BY

20 ADAM PAUL LAXALT  
21 Attorney General

22 By:   
23 SAMUEL R. KERN  
24 Senior Deputy Attorney General  
25 Nevada Bar No.: 10638  
26 Attorneys for State of Nevada

25 ENDORSEMENT: A True Bill

26  
27 By:   
28 Foreperson, Clark County Grand Jury