

ORIGINAL

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

MAY 20 2015

BY: *Katherine Streuber*  
KATHERINE STREUBER, DEPUTY

1 **AIND**  
2 ADAM PAUL LAXALT  
3 Attorney General  
4 SAMUEL R. KERN  
5 Senior Deputy Attorney General  
6 Nevada Bar No.: 10638  
7 Office of the Attorney General  
8 555 East Washington Ave., Ste. 3900  
9 Las Vegas, Nevada 89101  
10 P: (702) 486-3788  
11 F: (702) 486-0660  
12 [skern@ag.nv.gov](mailto:skern@ag.nv.gov)  
13 Attorneys for State of Nevada

14 **EIGHTH JUDICIAL DISTRICT COURT**  
15 **CLARK COUNTY, NEVADA**

16 THE STATE OF NEVADA,  
17  
18 Plaintiff,  
19  
20 vs.  
21  
22 NORMA OLGA BENAVIDEZ a.k.a. NORMA  
23 BENAVIDES, ID # 1618628,  
24  
25 Defendant.

Case No.: C-15-303537-1  
Dept. No.: XXIII

26 **AMENDED INDICTMENT**

27 The above named defendant, **NORMA OLGA BENEVIDEZ** ("BENAVIDEZ"), is  
28 accused of the crime of one (1) count of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a  
category "B" felony in violation of NRS 205.0832 and 205.0835(4), in Clark County, State of  
Nevada as follows:

29 **COUNT I**  
30 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**  
31 **CATEGORY "B" FELONY - NRS 205.0832, 205.0835(4)**

32 That the Defendant, **BENAVIDEZ**, in the County of Clark, State of Nevada, did without  
33 lawful authority knowingly obtain property or services of another person by a material  
34 misrepresentation with intent to deprive that person of the property or services, and the value  
35 of said property was \$3,500 or more, to wit:

36 ///

Office of the Attorney General  
555 East Washington Avenue, Suite 3900  
Las Vegas, Nevada 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

From on or around March 5, 2012 to March 14, 2014, **BENAVIDEZ** knowingly, and with the intent to deprive MARIA MARTINEZ, MARIA RODRIGUEZ, and ELIAS AGUILLON of their property, misrepresented separately to each of them that she was a government employee working in immigration and/or for the Chief of Immigration in Las Vegas, Nevada, and that if they paid **BENAVIDEZ** she would use her position to help them obtain citizenship and/or other help related to immigration, all of which was untrue. Relying upon these misrepresentations, MARIA MARTINEZ paid **BENAVIDEZ** approximately Five Thousand Dollars (\$5,000), MARIA RODRIGUEZ paid **BENAVIDEZ** approximately Eight Thousand Two Hundred and Sixty Dollars (\$8,260), and ELIAS AGUILLON paid **BENAVIDEZ** approximately Seven Thousand Dollars (\$7,000).


All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B" felony, in violation NRS 205.0832 and NRS 205.0835(4).

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 19<sup>th</sup> day of May, 2015.

SUBMITTED BY

ADAM PAUL LAXALT  
Attorney General

By:   
SAMUEL R. KERN  
Senior Deputy Attorney General  
Nevada Bar No.: 10638  
Attorneys for State of Nevada