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8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,)
11 Plaintiff,)
12 v.)
13 RICHARD HUGHES,)
14 Defendant.)
15

CASE NO: C-15-309997-2
DEPT NO: 6

17 **INFORMATION**

18 Defendant RICHARD HUGHES is accused of two (2) counts of the crime of Obtaining
19 Money Under False Pretenses, a category B felony in violation of NRS 205.380.

20 All acts alleged herein were committed on or between January 2012 and February 2012
21 by the above-named Defendant. The alleged acts occurred in the State of Nevada, County of
22 Clark.

23 **COUNT ONE**
OBTAINING MONEY UNDER FALSE PRETENSES
24 **(Category "B" Felony – NRS 205.380)**

25 Defendant RICHARD HUGHES, in the County of Clark, State of Nevada, either by
26 virtue of his own actions or by the actions of his agents or employees, without lawful authority,
27 with the Defendant being criminally liable under one or more of the following principles of
28 criminal liability, to-wit: (1) by directly committing this crime and/or (2) by aiding or abetting

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1 in the commission of this crime, with the intent that this crime be committed, by providing
2 counsel and/or encouragement and by entering into a course of conduct whereby Duane
3 Delbeke operated Corporate Acquisitions, LLC, and whereby RICHARD HUGHES acted as an
4 authorized user of and obtained monies from a bank account in the name of Corporate
5 Acquisitions; and/or (3) pursuant to a conspiracy to commit this crime;

6 Defendant knowingly, by false pretense, obtained from any other person any money,
7 goods, wares, chattels, effects, or other valuable thing, with the intent to cheat or defraud the
8 other person, and the value of said thing was \$650 or more, to wit:

9 From about January 2012 to February 2012, Defendant RICHARD HUGHES
10 knowingly, and with the intent to deprive LARRY SOUTHGATE of his property,
11 misrepresented that RICHARD HUGHES and/or Duane Delbeke and/or Michael Tell and/or an
12 unknown individual would sell LARRY SOUTHGATE's timeshare property in exchange for an
13 upfront fee, which Defendant would later return. Relying on that misrepresentation, LARRY
14 SOUTHGATE paid Corporate Acquisitions, LLC a total of approximately \$8,523.31.
15 However, neither Defendant nor Corporate Acquisitions ever actually attempted to sell a
16 timeshare for LARRY SOUTHGATE, nor has he refunded LARRY SOUTHGATE's money.

17 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
18 PRETENSES, a category "B" felony in violation of NRS 205.380 and 193.167.

19
20 **COUNT 2**
OBTAINING MONEY UNDER FALSE PRETENSES
21 **CATEGORY "B" felony - NRS 205.380**

22 Defendants RICHARD HUGHES, in the County of Clark, State of Nevada, either by
23 virtue of his own actions or by the actions of his agents or employees, without lawful authority,
24 with the Defendant being criminally liable under one or more of the following principles of
25 criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting
26 in the commission of this crime, with the intent that this crime be committed, by providing
27 counsel and/or encouragement and by entering into a course of conduct whereby Duane
28 Delbeke operated Corporate Acquisitions, LLC, and whereby RICHARD HUGHES acted as

1 an authorized user of and obtained monies from a bank account in the name of Corporate
2 Acquisitions; and/or (3) pursuant to a conspiracy to commit this crime;

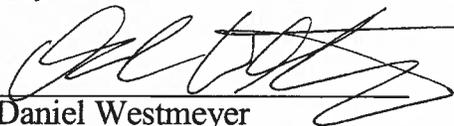
3 Defendant knowingly, by false pretense, obtained from any other person any money,
4 goods, wares, chattels, effects, or other valuable thing, with the intent to cheat or defraud the
5 other person, and the value of said thing was \$650 or more, to wit:

6 From about January 2012 to February 2012, Defendant RICHARD HUGHES and/or
7 Duane Delbeke and/or Michael Tell, knowingly, and with the intent to deprive HARRY
8 ECHEVARRIA of his property, misrepresented that RICHARD HUGHES and/or Duane
9 Delbeke and/or Michael Tell and/or an unknown individual would sell HARRY
10 ECHEVARRIA's timeshare property in exchange for an upfront fee, which Defendant would
11 later return. Relying on that misrepresentation, HARRY ECHEVARRIA paid Corporate
12 Acquisitions, Inc. a total of approximately \$8,038. However, Defendant never actually
13 attempted to sell a timeshare for HARRY ECHEVARRIA, nor has he refunded HARRY
14 ECHEVARRIA's money.

15 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
16 PRETENSES, a category "B" felony in violation of NRS 205.380.

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18 DATED this 2nd day of November, 2015.

19 ADAM PAUL LAXALT
20 Attorney General

21 By: 
22 Daniel Westmeyer
23 Deputy Attorney General
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