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Attorneys for Plaintiff

IN THE SECOND JUDICIAL DISTRICT COURT  
IN AND FOR WASHOE COUNTY, STATE OF NEVADA

STATE OF NEVADA,	)	Case No. CR15-1741
Plaintiff,	)	Dept. No. 10
v.	)	
SUSANA VASQUEZ	)	
aka EMILY VASQUEZ,	)	
Defendant.	)	

**CRIMINAL INFORMATION**

ADAM PAUL LAXALT, Attorney General of the State of Nevada, and ERIC NICKEL, Senior Deputy Attorney General, in the name and by the authority of the State of Nevada, inform the above-entitled court that SUSANA VASQUEZ, aka EMILY VASQUEZ, contrary to the form, force and effect of statutes in such cases made and provided and against the peace and dignity of the State of Nevada, has committed the following offense:

**COUNT I**

**ATTEMPTED THEFT**

a category C felony in violation of NRS 205.0832(1)(c), NRS 205.0834,  
NRS 205.0835(4) & NRS 193.330

That the said defendant, SUSANA VASQUEZ, aka EMILY VASQUEZ, individually and/or in joint participation with HECTOR MENENDEZ, on or between July 31, 2010, and June 30, 2011, within the County of Washoe, State of Nevada, did

1 without lawful authority, knowingly attempt to obtain personal property of another, in an  
2 amount in excess of \$3,500.00, by one or more material misrepresentations, with the  
3 intent to deprive that person of the property, in the following manner:

4 The defendant attempted to obtain Eleven Thousand One Hundred Ninety Five  
5 dollars (\$11,195.00) from Norma Estrada (Estrada) by using a foreclosure avoidance  
6 scheme whereby the defendant made one or more material misrepresentations to  
7 Estrada, including that defendant would stop the foreclosure of her parents' property,  
8 and/or defendant would lower the mortgage payment, and/or defendant would pool  
9 Estrada's monies with those of other participants to purchase the note on her parents'  
10 home from the lender and then sell the real estate back to her at a lower cost, resulting  
11 in more favorable terms, lowered principal or lowered payments. In fact, the defendant  
12 did not provide any of the services promised. Defendant's fraudulent promises,  
13 misrepresentations and statements were instrumental in the wrongful obtaining of  
14 Estrada's property.

15 All of which is contrary to the form, force and effect of the statutes in such cases  
16 made and provided, and against the peace and dignity of the State of Nevada.

17 **AFFIRMATION PURSUANT TO NRS 239B.030**

18 The undersigned does hereby affirm that this document does not contain the  
19 social security number of any person.

20 DATED this 18th day of November, 2015.

21 ADAM PAUL LAXALT  
22 Attorney General

23 By: /s/ Eric Nickel  
24 ERIC NICKEL  
25 Senior Deputy Attorney General  
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