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FILED

JUN 28 12 18 PM '13

JUSTICE COURT  
LAS VEGAS NEVADA

JSNB

8 **IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP**  
9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

Case No. 13F03345AB

Dept. No. 2

13 RICHARD JAMES PENARDO, JR. AKA  
14 RICHARD KING, #1203622, AND  
15 TANYA MARIE-MEECH BOGGIO AKA  
16 TANYA MARIE BOGGIO, #1974376,

Defendants,

17  
18  
19 **CRIMINAL COMPLAINT**

20 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and through  
21 her undersigned deputy, complains and charges the above-named defendants, RICHARD  
22 JAMES PENARDO, JR., and TANYA MARIE-MEECH BOGGIO, with having committed the  
23 following offenses within Clark County, State of Nevada:

24 **COUNT ONE**  
25 **UNEMPLOYMENT INSURANCE FRAUD**  
**(NRS 612.445 – Category B Felony)**

26 On or about July 9, 2011 through September 24, 2011, within Clark County (NV),  
27 Defendants **RICHARD JAMES PENARDO, JR.**, and **TANYA MARIE-MEECH BOGGIO** then  
28 and there, made and directly or indirectly counseled, encouraged, hired, commanded, induced

1 or otherwise procured another to make, false statements or representations, knowing them to be  
2 false, or knowingly fail to disclose a material fact, to the Employment Security Division of the  
3 Department of Employment, Training and Rehabilitation of the State of Nevada, located at 2800  
4 East Saint Louis Avenue, Las Vegas, Nevada 89104-4267, to wit, stating that RICHARD JAMES  
5 PENARDO, JR., was able to work and failing to disclose RICHARD JAMES PENARDO, JR.'s  
6 incarceration in the Clark County Detention Center and High Desert State Prison in the County  
7 of Clark, State of Nevada, in order to obtain benefits of \$2,500.00 or more under Chapter 612 of  
8 the Nevada Revised Statutes.

9  
10 **COUNT TWO**  
**CONSPIRACY TO OBTAIN OR INCREASE UNEMPLOYMENT BENEFITS**  
**(NRS 612.720 – Gross Misdemeanor)**

11 On or about July 9, 2011 through September 24, 2011, within Clark County (NV),  
12 Defendants **RICHARD JAMES PENARDO, JR.**, and **TANYA MARIE-MEECH BOGGIO**, and  
13 each of them, conspired to obtain or increase benefits or other payments under Chapter 612 of  
14 the Nevada Revised Statutes by making false statements or representations knowing them to be  
15 false, or by knowingly failing to disclose a material fact, as more fully set forth in Count One.

16  
17 **COUNT THREE**  
**OBTAINING MONEY UNDER FALSE PRETENSES**  
**(Category B Felony – NRS 205.380)**

18  
19 On or about July 9, 2011 through September 24, 2011, within Clark County (NV),  
20 Defendants **RICHARD JAMES PENARDO, JR.**, and **TANYA MARIE-MEECH BOGGIO** then  
21 and there, by any false pretense obtained from any other person any chose in action, money,  
22 goods, wares, chattels, effects or other valuable thing, including rent or the labor of another  
23 person not his employee, valued at \$250.00 or more, with the intent to cheat or defraud the  
24 other person, in that they made and directly or indirectly counseled, encouraged, hired,  
25 commanded, induced or otherwise procured another to make, false statements or  
26 representations, knowing them to be false, or knowingly fail to disclose a material fact, to the  
27 Employment Security Division of the Department of Employment, Training and Rehabilitation of  
28 the State of Nevada, located at 2800 East Saint Louis Avenue, Las Vegas, Nevada 89104-4267,

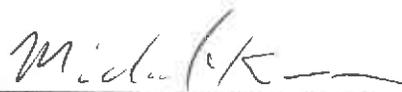
Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

1 to wit, falsely and fraudulently stating that RICHARD JAMES PENARDO, JR., was able to work  
2 and failing to disclose RICHARD JAMES PENARDO, JR.'s incarceration in the Clark County  
3 Detention Center and High Desert State Prison in the County of Clark, State of Nevada, in order  
4 to obtain benefits of \$250.00 or more under Chapter 612 of the Nevada Revised Statutes.

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

8 Dated this 27<sup>th</sup> day of February, 2013.

9 CATHERINE CORTEZ MASTO  
10 Attorney General

11  
12 By:   
13 MICHAEL C. KOVAC, ESQ.  
14 Deputy Attorney General  
15 Office of the Attorney General

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