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

OCT - 5 2016

BY, _____
ALAN PAUL CASTLE, SR, DEPUTY

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

10 THE STATE OF NEVADA,) Case No.: C-16-318521-1
11)
12 Plaintiff,) Dept. No.: X
13 vs.)
14 RENA ESTHER STARKS, a.k.a. RENEE)
15 STARKS, a.k.a. REN'A STARKS,)
16 Defendant.)

16 **INDICTMENT**

17 The above named defendant, **RENA ESTHER STARKS a.k.a. RENEE STARKS,**
18 **a.k.a. REN'A STARKS** (hereinafter "**STARKS**"), is accused by the Clark County Grand Jury
19 of the crimes(s) of three (3) counts of **THEFT IN THE AMOUNT OF \$3,500 OR MORE**, a
20 category "B" felony in violation of NRS 205.0832, two (2) counts of **THEFT IN THE AMOUNT**
21 **OF \$650 OR MORE**, a category "C" felony in violation of NRS 205.0832, and one (1) count of
22 **Multiple Transactions of Fraud and Deceit in Course of Enterprise or Occupation**, a category
23 "B" felony in violation of NRS 205.377, in Clark County, State of Nevada as follows:

24 **COUNT 1**
25 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
26 **CATEGORY "B" FELONY - NRS 205.0832**

27 That the Defendant, **STARKS**, in the County of Clark, State of Nevada, by virtue of her
28 own actions or by the actions of her agents or employees, without lawful authority, did
knowingly: control property of another person with the intent to deprive that person of the

1 property; and/or convert, make an unauthorized transfer of an interest in, or without
2 authorization control property of another person, or used the services or property of another
3 person entrusted to her or placed in her possession for a limited, authorized period of
4 determined or prescribed duration or for a limited use; and/or obtain property or services of
5 another person by a material misrepresentation with intent to deprive that person of the
6 property or services, and the value of said property was \$3,500 or more, to wit:

7 From on or around May 19, 2015 to July 3, 2015, **STARKS** knowingly, and with the
8 intent to deprive LISA SHEPPERSON-GARNHART of her property, misrepresented to LISA
9 SHEPPERSON-GARNHART and VERONICA FRESCAS that using her immigration
10 connections, **STARKS** would obtain American citizenship for HECTOR GARCIA FLORES and
11 liberate him from custody, all of which was untrue. Relying upon these misrepresentations,
12 LISA SHEPPERSON-GARNHART paid **STARKS** \$7,500 and \$6,850, totaling fourteen
13 thousand, three hundred and fifty dollars (\$14,350).

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 **COUNT 2**
17 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
18 **CATEGORY "B" FELONY - NRS 205.0832**

19 That the Defendant, **STARKS**, in the County of Clark, State of Nevada, did without
20 lawful authority knowingly: control property of another person with the intent to deprive that
21 person of the property; and/or convert, make an unauthorized transfer of an interest in, or
22 without authorization control property of another person, or used the services or property of
23 another person entrusted to her or placed in her possession for a limited, authorized period of
24 determined or prescribed duration or for a limited use; and/or obtain property or services of
25 another person by a material misrepresentation with intent to deprive that person of the
26 property or services, and the value of said property was \$3,500 or more, to wit:

27 From on or around September 22, 2014 to December 17, 2014, **STARKS** knowingly,
28 and with the intent to deprive LESBIA ORTIZ, of her property, misrepresented to LESBIA
ORTIZ that she was an attorney and would obtain American citizenship for WALFER OMAR

1 HERNANDEZ ORTIZ and liberate him from custody by obtaining a letter from President
2 Obama demanding WALTER OMAR HERNANDEZ ORTIZ's release, all of which was untrue.
3 Relying upon these misrepresentations, LESBIA ORTIZ paid **STARKS** \$4,000, \$2,200, and
4 \$1,500, totaling seven thousand, seven hundred dollars (\$7,700).

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

7 **COUNT 3**
8 **THEFT IN THE AMOUNT OF \$650 OR MORE**
9 **CATEGORY "C" FELONY - NRS 205.0832**

10 That the Defendant, **STARKS**, in the County of Clark, State of Nevada, did without
11 lawful authority knowingly: control property of another person with the intent to deprive that
12 person of the property; and/or convert, make an unauthorized transfer of an interest in, or
13 without authorization control property of another person, or used the services or property of
14 another person entrusted to her or placed in her possession for a limited, authorized period of
15 determined or prescribed duration or for a limited use; and/or obtain property or services of
16 another person by a material misrepresentation with intent to deprive that person of the
17 property or services, and the value of said property was \$650 or more, to wit:

18 From on or around September 3, 2014 to April 1, 2015, **STARKS** knowingly, and with
19 the intent to deprive JOSE ANTONIO CARDENAS LUGO, of his property, misrepresented to
20 him that **STARKS** would obtain American citizenship for him, diverting the "normal"
21 immigration process by taking his files directly to Washington D.C., all of which was untrue.
22 Relying upon these misrepresentations, JOSE ANTONIO CARDENAS LUGO paid **STARKS**
23 \$100, \$100, \$750, \$250, and \$250, totaling one thousand, four hundred and fifty dollars
24 (\$1,450).

25 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE, a
26 category "C" felony, in violation NRS 205.0832.

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1 **COUNT 4**
2 **THEFT IN THE AMOUNT OF \$3500 OR MORE OR MORE**
3 **CATEGORY "B" FELONY - NRS 205.0832**

4 That the Defendant, **STARKS**, in the County of Clark, State of Nevada, did without
5 lawful authority knowingly: control property of another person with the intent to deprive that
6 person of the property; and/or convert, make an unauthorized transfer of an interest in, or
7 without authorization control property of another person, or used the services or property of
8 another person entrusted to her or placed in her possession for a limited, authorized period of
9 determined or prescribed duration or for a limited use; and/or obtain property or services of
10 another person by a material misrepresentation with intent to deprive that person of the
11 property or services, and the value of said property was \$3,500 or more, to wit:

12 From on or around December 5, 2014 to April, 2105, **STARKS** knowingly, and with the
13 intent to deprive MARIA MUNGUIA, of her property, misrepresented to MARIA MUNGUIA and
14 DEISY VILLAGRANA that by using **STARKS'** immigration connections, **STARKS** would
15 obtain American citizenship for GILBERTO VILLAGRANA PANDURO and JOSE ROJAS and
16 liberate them from custody, and that **STARKS** would also renew DEISY VILLAGRANA's grant
17 of Deferred Action for Childhood Arrivals (DACA), all of which was untrue. Relying upon these
18 misrepresentations, MARIA MUNGUIA paid **STARKS** \$600, \$2,000, \$155, \$550, \$350,
19 \$5,000, \$1,000, \$3,500, and \$500, totaling thirteen thousand, six hundred and fifty-five dollars
20 (\$13,655).

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

23 **COUNT 5**
24 **THEFT IN THE AMOUNT OF \$650 OR MORE**
25 **CATEGORY "C" FELONY - NRS 205.0832**

26 That the Defendant, **STARKS**, in the County of Clark, State of Nevada, did without
27 lawful authority knowingly: control property of another person with the intent to deprive that
28 person of the property; and/or convert, make an unauthorized transfer of an interest in, or
without authorization control property of another person, or used the services or property of
another person entrusted to her or placed in her possession for a limited, authorized period of

1 determined or prescribed duration or for a limited use; and/or obtain property or services of
2 another person by a material misrepresentation with intent to deprive that person of the
3 property or services, and the value of said property was \$3,500 or more, to wit:

4 From on or around June 5, 2014 to April 2, 2015, **STARKS** knowingly, and with the
5 intent to deprive JULIO PAZOS VARGAS, of his property, misrepresented to him that
6 **STARKS** would obtain American citizenship and/or travel visas for him and his relatives, all of
7 which was untrue. Relying upon these misrepresentations, JULIO PAZOS VARGAS paid
8 **STARKS** \$350, \$1,750 and \$75, totaling two thousand, one hundred and seventy-five dollars
9 (\$2,175).

10 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE, a
11 category "C" felony, in violation NRS 205.0832.

12
13 **COUNT 6**
MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF
ENTERPRISE OR OCCUPATION
14 **CATEGORY "B" FELONY – NRS 205.377**

15 Defendant, **STARKS** in the County of Clark, State of Nevada, either by virtue of their
16 own actions or by the actions of their agents or employees, in the course of an enterprise or
17 occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of
18 business, or employed a device scheme or artifice which operated or would have operated as
19 a fraud or deceit upon a person by means of a false representation or omission of a material
20 fact that: she knew to be false or omitted; that she intended another to rely on; and which
21 resulted in a loss to a person who relied on the false representation or omission, in at least
22 two transactions having the same or similar pattern, intents, results, accomplices, victims or
23 methods of commission, or which were otherwise interrelated by distinguishing characteristics
24 and were not isolated incidents within 4 years and in which the aggregate loss or intended
25 loss was more than \$650, to wit:

26 As set forth in Counts One through Five, which are hereby incorporated by reference
27 as though fully set forth herein, Defendant **STARKS**, either by virtue of her own actions or by
28 the actions of her agents or employees, knowingly and intentionally defrauded individuals in

1 two or more transactions as set forth more fully in those counts from between about June,
2 2014 and July, 2015. As stated in Counts One through Five, Defendant, in the course of an
3 enterprise or occupation, solicited money from her clients for the purported purpose of helping
4 them obtain citizenship for themselves or their family members or prevent deportation of their
5 family members. The purposes, results and methods of commission in all instances were the
6 same or similar.

7 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
8 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in
9 violation of NRS 205.377.

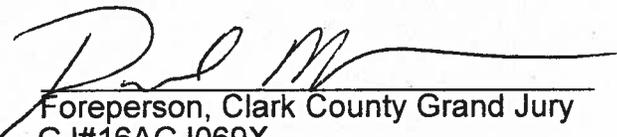
10 All of which is contrary to the form, force and effect of the statutes in such cases made
11 and provided, and against the peace and dignity of the State of Nevada.

12 DATED this 4th day of October, 2016.

13 ADAM PAUL LAXALT
14 Attorney General

15 By: /s/ Raya Swift
16 RAYA SWIFT
Senior Deputy Attorney General

17 ENDORSEMENT: A True Bill

18
19 By: 
20 Foreperson, Clark County Grand Jury
GJ#16AGJ069X