

ORIGINAL

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

JUN 06 2016

BY *Roshonda Mayfield*
ROSHONDA MAYFIELD, DEPUTY

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 v.

13 ALICIA RUIZ,

14 Defendant.

CASE NO: C-16-315227-1

DEPT NO: X

C-16-315227-1
INFM
Information
4663166



17 INFORMATION

18 Defendant ALICIA RUIZ is accused of the crimes of Theft, category C felonies in
19 violation of NRS 205.0832 and 205.0835.

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

23 COUNT ONE
24 THEFT IN THE AMOUNT OF \$650 OR MORE
25 CATEGORY "C" felony - NRS 205.0832, 205.0835

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

1 commission of this crime, with the intent that this crime be committed, by providing counsel
2 and/or encouragement and by entering into a course of conduct whereby RUIZ promised to
3 engage in a "short sale buyback" with ALICIA RODRIGUEZ; and/or (3) pursuant to a
4 conspiracy to commit this crime;

5 did knowingly control property of another person with the intent to deprive that person
6 of the property; and/or convert, make an unauthorized transfer of an interest in, or without
7 authorization control property of another person, or used the property of another person
8 entrusted to them or placed in their possession for a limited, authorized period of determined
9 or prescribed duration or for a limited use; and/or obtain property of another person by a
10 material misrepresentation with intent to deprive that person of the property, and the value of
11 said property was \$650 or more, to wit:

12 In or about May 2012, Defendant knowingly, and with the intent to deprive ALICIA
13 RODRIGUEZ of her property, misrepresented that ALICIA RUIZ, and/or JESSICA SALINAS,
14 and/or MARIA CERVANTES would buy ALICIA RODRIGUEZ's home in exchange for an
15 upfront fee, and would thereafter sell said home to ALICIA RODRIGUEZ at a reduced price.
16 Relying on that misrepresentation, ALICIA RODRIGUEZ paid Defendants a total of
17 approximately \$6,300. However, Defendant never actually attempted to buy the home for
18 ALICIA RODRIGUEZ.

19 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650.00 OR MORE,
20 a category "C" felony in violation of NRS 205.0832 and 205.0835.

21 **COUNT TWO**
22 **THEFT IN THE AMOUNT OF \$650 OR MORE**
CATEGORY "C" felony - NRS 205.0832, 205.0835

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

1 terms of a "short sale buyback" with ELENA ZAMUDIO; and/or (3) pursuant to a conspiracy to
2 commit this crime;

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

10 From about March 2012 to November 2012, Defendant RUIZ, knowingly, and with the
11 intent to deprive ELENA ZAMUDIO of her property, misrepresented that Defendant and/or
12 JESSICA SALINAS and/or MARIA CERVANTES would buy ELENA ZAMUDIO's home in
13 exchange for an upfront fee, and would thereafter sell said home to ELENA ZAMUDIO at a
14 reduced price. Relying on that misrepresentation, ELENA ZAMUDIO paid Defendant and/or
15 JESSICA SALINAS and/or MARIA CERVANTES a total of approximately \$9,975. However,
16 Defendant never actually attempted to buy the home for ELENA ZAMUDIO.

17 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650.00 OR MORE,
18 a category "C" felony in violation of NRS 205.0832 and 205.0835.

19
20 DATED this 9 day of June, 2016.

21
22 ADAM PAUL LAXALT
Attorney General

23
24 By: 

Daniel Westmeyer
Senior Deputy Attorney General