



CLERK OF THE COURT

1 **INFM**
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9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

12 STATE OF NEVADA,

13 Plaintiff,

14 v.

15 **JACK LEAL, and JESSICA GARCIA**

16 Defendant(s).

Case No.: C-17-322664-2

Dept. No.: 17

18 **INFORMATION**

19 ADAM PAUL LAXALT, Attorney General for the State of Nevada, in the name and by the
20 authority of the State of Nevada, informs the Court: **JACK LEAL** and **JESSICA GARCIA** have
21 committed the crimes(s) of one (1) count of **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR**
22 **DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION**, a category "B" felony in
23 violation of NRS 205.377.

24 All of the acts alleged herein have been committed or completed on or between about March 1,
25 2015 and March 31, 2016, by the above-named Defendant(s), within the County of Clark, State of Nevada,
26 in the following manner:

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COUNT 1
MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF
ENTERPRISE OR OCCUPATION
Category "B" Felony - NRS 205.377

The Defendant(s), **JACK LEAL** and **JESSICA GARCIA**, in the County of Clark, State of Nevada, did, in the course of an enterprise or occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of business or employed a device, scheme or artifice which operated or would have operated as a fraud or deceit upon a person by means of a false representation or omission of a material fact that: (a) the person knew to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any person who relied on the false representation or omission, in at least two transactions that had the same or similar pattern, intents, results, accomplices, victims or methods of commission, or were otherwise interrelated by distinguishing characteristics and were not isolated incidents within 4 years and in which the aggregate loss or intended loss was more than \$650, to wit:

On or about March 1, 2015 through March 31, 2016, in and through the course of a real estate enterprise known as **PARCELNOMICS, LLC** (d/b/a **INVESTMENT DEALS**), Defendants knowingly and with the intent to defraud, obtained thousands of dollars from LoryLee Plancarte, Edelyn Rubin, Chatty Becker, Irene Segura, Lih-Ling Yang, Lina Palafox, Juan Eloy Ramirez, Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson Gibellato by means of knowingly and falsely representing to said individuals that the titles to properties being sold to them by the defendants were not encumbered by liens or other security interests, intending that said individuals rely on said misrepresentations, and resulting in a loss of more than \$650.00.

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

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1 All of which is contrary to the form, force and effect of the statutes in such cases made and provided,
2 and against the peace and dignity of the state of Nevada.

3 DATED this 18th day of April, 2017.

4 SUBMITTED BY

5 ADAM PAUL LAXALT
6 Attorney General

7 By: /s/ MICHAEL C. KOVAC
8 Michael C. Kovac (Bar No. 11177)
9 Senior Deputy Attorney General
10 *Attorneys for the State of Nevada*