

1 **AIND**  
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13 **DISTRICT COURT**  
14 **CLARK COUNTY, NEVADA**

15 STATE OF NEVADA,

16 Plaintiff,

17 vs

18 MARSHALL DAMAR BROUSSARD; MICHAEL  
19 LAMONTA DIES; **EMMANUAL FORD**;  
20 ROBERT EARL MOORE, JR.; and MICHAEL  
21 FORD,

22 Defendants.

Case No.: C-15-307610-3

Dept. No.: VI

23 **AMENDED INDICTMENT**

24 The above named Defendant, EMMANUAL FORD, is accused by the Clark County Grand Jury  
25 of the crime of **COUNT 1 – MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT,**  
26 **(CATEGORY “B” Felony)**, in violation of NRS 205.377 and **COUNT 2 – THEFT, (CATEGORY**  
27 **“B” Felony)**, in violation of NRS 205.0832(1)(c), in Clark County, State of Nevada as follows:

28 **COUNT I**

**MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**

**Category “B” Felony – NRS 205.377**

That on or between April 24, 2013 and March 20, 2014, the Defendant, EMMANUAL FORD,  
within the County of Clark, State of Nevada, 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

1 or artifice which operated or would have operated as a fraud or deceit upon a person by means of false  
2 representation or omission of a material fact that: (a) the person knew to be false or omitted; (b) the  
3 person intended another to rely on; and (c) resulting in a loss to any person who relied on the false  
4 representation or omission, in at least two transactions that had the same or similar patten, intents, results,  
5 accomplices, victims or methods of commission, or were otherwise interrelated by distinguishing  
6 characteristics and we not isolated incidents within 4 years and in which the aggregate loss or intended  
7 loss was more than \$650, to wit:

8 In the course of his occupation as a telemarketer, the Defendant, knowingly and with the intent  
9 to defraud, engaged in a tele-marketing business, which operated as a fraud upon numerous individuals  
10 including, but not limited to Gail Green, Mickey Sergeant, Catherine Mulholland and Joe Stoller, by  
11 means of falsely informing said individuals that they could profit from investing in the Defendant's  
12 business, knowing that said individuals would not profit from said investment, and intending that said  
13 individuals rely on said misrepresentation, and resulting in a loss of more than \$650.00.

14 **COUNT 2**

15 **THEFT**

16 **Category "B" Felony – NRS 205.0832(1)(c) and NRS 205.0835**

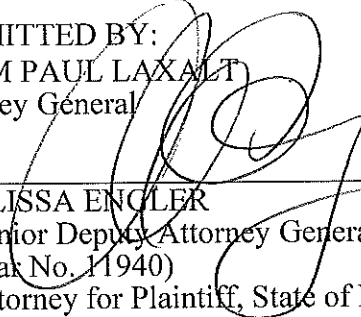
17  
18 That on or between April 24, 2013 and March 20, 2014, the Defendant, EMMANUAL FORD,  
19 within the County of Clark, State of Nevada, either by virtue of his own actions or by the actions of his  
20 agents and employees, did knowingly and without lawful authority, obtain the property or services of  
21 another person by a material misrepresentation with the intent to deprive the person of the property or  
22 services, and the value of said property was \$3,500.00 or more, to wit: the Defendant received money  
23 from Gail Green, and/or Mickey Sergeant, and/or Catherine Mulholland, and/or Joe Stoller by falsely  
24 representing to said individuals that the money paid to the Defendant would be an investment in a web-  
25 based business that would result in said individuals receiving profits based on customer activity on a  
26 particular website, and said actions were taken with the intent to permanently deprive said individuals of  
27 the money they invested; with said investments having a value of \$3,500.00 or more.

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1 All of which is contrary to the force and effect of the Nevada Revised Statutes in such cases and  
2 against the peace and dignity of the State of Nevada.

3 DATED this 1<sup>st</sup> day of June, 2018.

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5 SUBMITTED BY:  
6 ADAM PAUL LAXALT  
7 Attorney General

8 By:   
9 ALISSA ENGLER  
10 Senior Deputy Attorney General  
11 (Bar No. 11940)  
12 Attorney for Plaintiff, State of Nevada  
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