

1 All of the above-referenced crimes occurred in Clark County, State of Nevada as follows:

2 **COUNT I**
3 **MORTGAGE LENDING FRAUD**
4 **CATEGORY "C" FELONY – NRS 205.372(1), NRS 645F.310 and NRS 645F.400**

5 From on or about May 1, 2016, to on or about April 30, 2017, the Defendant either by virtue of her
6 own actions or by the actions of her conspirators, agents or employees, while engaging in the performance
7 of covered service(s) as defined by NRS 645F.310, for compensation, violated one or more provisions of
8 NRS 205.372 and/or NRS 645F.400, without limitation, to wit:

9 The Defendant LYNN BENSON and/or her agents made representations to [REDACTED]—either
10 expressed and/or implied—about the benefits, performance, or efficacy of the covered service(s) she
11 offered. The Defendant LYNN BENSON and/or her agents advised, explained, or instructed [REDACTED]
12 [REDACTED] that she could avoid a foreclosure action and/or obtain title to her house without paying the
13 mortgage by engaging in a scheme, expedient, and/or artifice provided to [REDACTED] by the Defendant
14 and/or the Defendant's agents in exchange for compensation.

15 The Defendant LYNN BENSON being criminally liable under one or more of the following
16 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
17 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
18 encouraging, hiring, commanding, inducing, and/or otherwise procuring the other to commit the crime;
19 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
20 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
21 concert throughout.

22 **COUNT II**
23 **MORTGAGE LENDING FRAUD**
24 **CATEGORY "C" FELONY – NRS 205.372(1), NRS 645F.310 and NRS 645F.400**

25 From on or about June 1, 2015, to on or about May 31, 2016, the Defendant either by virtue of her
26 own actions or by the actions of her conspirators, agents or employees, while engaging in the performance
27 of covered service(s) as defined by NRS 645F.310, for compensation, violated one or more provisions of
28 NRS 205.372 and/or NRS 645F.400, without limitation, to wit:

The Defendant LYNN BENSON and/or her agents made representations to [REDACTED]—either
expressed and/or implied—about the benefits, performance, or efficacy of the covered service(s) she

1 offered. The Defendant LYNN BENSON and/or her agents advised, explained, or instructed [REDACTED]
2 [REDACTED] that she could avoid a foreclosure action and/or obtain title to her house by engaging in a scheme,
3 expedient, and/or artifice provided to [REDACTED] by the Defendant and/or the Defendant's agents in
4 exchange for compensation.

5 The Defendant LYNN BENSON being criminally liable under one or more of the following
6 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
7 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
8 encouraging, hiring, commanding, inducing, and/or otherwise procuring the other to commit the crime;
9 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
10 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
11 concert throughout.

12 **COUNT III**
13 **MORTGAGE LENDING FRAUD**
14 **CATEGORY "C" FELONY – NRS 205.372(1), NRS 645F.310, NRS 645F.400**

15 From on or about August 1, 2015, to on or about September 30, 2015, the Defendant either by
16 virtue of her own actions or by the actions of her conspirators, agents, or employees, while engaging in the
17 performance of covered service(s) as defined by NRS 645F.310, for compensation, violated one or more
18 provisions of NRS 205.372 and/or NRS 645F.400, without limitation, to wit:

19 The Defendant LYNN BENSON and/or her agents made representations to [REDACTED]—either
20 expressed and/or implied—about the benefits, performance, or efficacy of the covered service(s) she
21 offered. The Defendant LYNN BENSON and/or her agents advised, explained, or instructed [REDACTED]
22 that she could avoid a foreclosure action and/or obtain title to her house by engaging in a scheme,
23 expedient, and/or artifice provided to [REDACTED] by the Defendant and/or the Defendant's agents in
24 exchange for compensation.

25 The Defendant LYNN BENSON being criminally liable under one or more of the following
26 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
27 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
28 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;
and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the

1 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
2 concert throughout.

3 **COUNT IV**
4 **MORTGAGE LENDING FRAUD**
5 **CATEGORY "C" FELONY – NRS 205.372(1), NRS 645F.310, NRS 645F.400**

6 From on or about March 1, 2015, to on or about November 18, 2016, the Defendant either by virtue
7 of her own actions or by the actions of her conspirators, agents, or employees, while engaging in the
8 performance of covered service(s) as defined by NRS 645F.310, for compensation, violated one or more
9 provisions of NRS 205.372 and/or NRS 645F.400, without limitation, to wit:

10 The Defendant LYNN BENSON and/or her agents made representations to [REDACTED]—either
11 expressed and/or implied—about the benefits, performance, or efficacy of the covered service(s) she
12 offered. The Defendant LYNN BENSON and/or her agents advised, explained, or instructed [REDACTED]
13 that she could avoid a foreclosure action and/or obtain title to her house by engaging in a scheme,
14 expedient, and/or artifice provided to [REDACTED] by the Defendant and/or the Defendant's agents in
15 exchange for compensation.

16 The Defendant LYNN BENSON being criminally liable under one or more of the following
17 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
18 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
19 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;
20 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
21 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
22 concert throughout.

23 **COUNT V**
24 **MORTGAGE LENDING FRAUD**
25 **CATEGORY "C" FELONY – NRS 205.372(1), NRS 645F.310, NRS 645F.400**

26 From on or about August 1, 2013, to on or about July 31, 2016, the Defendant either by virtue of
27 her own actions or by the actions of her conspirators, agents, or employees, while engaging in the
28 performance of covered service(s) as defined by NRS 645F.310, for compensation, violated one or more
29 provisions of NRS 205.372 and/or NRS 645F.400, without limitation, to wit:

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1 The Defendant LYNN BENSON and/or her agents made representations to [REDACTED]
2 [REDACTED]—either expressed and/or implied—about the benefits, performance, or efficacy of the covered
3 service(s) she offered. The Defendant LYNN BENSON and/or her agents advised, explained, or
4 instructed [REDACTED] that she could avoid a foreclosure action and/or obtain title to her house
5 by engaging in a scheme, expedient, and/or artifice provided to [REDACTED] by the Defendant
6 and/or the Defendant’s agents in exchange for compensation.

7 The Defendant LYNN BENSON being criminally liable under one or more of the following
8 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
9 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
10 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;
11 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
12 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
13 concert throughout.

14 **COUNT VI**
15 **PATTERN OF MORTGAGE LENDING FRAUD**
16 **CATEGORY “B” FELONY – NRS.205.372(2)**

17 From on or about April 1, 2014 to on or about April 30, 2017, the Defendant, either acting in
18 concert, aiding the others and/or by virtue of her own actions or by the actions of his conspirators, agents,
19 or employees, committed mortgage lending fraud in two or more mortgage lending transactions having the
20 same or similar purposes, results, accomplices, victims or methods of commission, or having other
21 interrelated distinguishing characteristics; to wit:

22 As set forth in Counts I, II, III, IV, and V which are hereby incorporated by reference as though
23 fully set forth herein, the Defendant has committed mortgage lending fraud in two or more mortgage
24 lending transactions as set more fully in those counts. The purposes, results, and methods of commission
25 in all three instances was the same or similar.

26 Defendant being criminally liable under one or more of the following principles of criminal
27 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission
28 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,
commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a

1 conspiracy to commit this crime, with the intent that this crime be committed, the Defendant aiding or
2 abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in concert throughout.

3 **COUNT VII**
4 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
5 **CATEGORY "B" FELONY – NRS 205.0832, NRS 205.0835(4)**

6 From on or about May 1, 2016, to on or about April 30, 2017, the Defendant LYNN BENSON
7 either by virtue of her own actions or by the actions of her conspirators, agents, or employees, did without
8 lawful authority knowingly: control property of another person with the intent to deprive that person of the
9 property; and/or convert, make an unauthorized transfer of an interest in, or without authorization control
10 property of another person, or used the services or property of another person entrusted to her or placed in
11 her possession for a limited, authorized period of determined or prescribed duration or for a limited use;
12 and/or obtain property or services of another person by a material misrepresentation with intent to deprive
13 that person of the property or services; and/or control property of another person knowing or having reason
14 to know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

15 The Defendant LYNN BENSON and/or the Defendant's agents, knowingly, and with the intent to
16 deprive ██████████ of her property, provided ██████████ with a scheme, expedient, or artifice and
17 misrepresented that this scheme, expedient, or artifice would make it unnecessary for ██████████ to
18 make any more payments on the mortgage on her home and would prevent any foreclosure actions on the
19 home. ██████████ relied on the Defendant's and/or her agents' misrepresentations, and through the
20 Defendant's and/or the Defendant's agents' misrepresentations the Defendant, and/or the Defendant's
21 agents, and/or the Defendant's charity the Batangyagit Foundation unlawfully obtained over \$3,500 of
22 ██████████ money.

23 The Defendant LYNN BENSON being criminally liable under one or more of the following
24 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
25 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
26 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;
27 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
28 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
concert throughout.

COUNT VIII
THEFT IN THE AMOUNT OF \$3,500 OR MORE
CATEGORY "B" FELONY – NRS 205.0832, NRS 205.0835(4)

From on or about June 1, 2015, to on or about May 31, 2016, the Defendant either by virtue of her own actions or by the actions of her conspirators, agents, or employees, did without lawful authority knowingly: control property of another person with the intent to deprive that 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 determined or prescribed duration or for a limited use; and/or obtain property or services of another person by a material misrepresentation with intent to deprive that person of the property or services; and/or control property of another person knowing or having reason to know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

The Defendant LYNN BENSON and/or the Defendant's agents, knowingly, and with the intent to deprive [REDACTED] of her property, provided [REDACTED] with a scheme, expedient, or artifice and misrepresented that this scheme, expedient, or artifice that would prevent and/or delay a foreclosure action on the home. [REDACTED] relied on the Defendant's and/or her agents' misrepresentations, and through the Defendant's and/or the Defendant's agents' misrepresentations the Defendant, and/or the Defendant's agents, and/or the Defendant's charity the Batangyagit Foundation unlawfully obtained over \$3,500 of [REDACTED] money.

The Defendant LYNN BENSON being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in concert throughout.

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COUNT IX
THEFT IN THE AMOUNT OF \$3,500 OR MORE
CATEGORY "B" FELONY – NRS 205.0832, NRS 205.0835(4)

From on or about August 1, 2015, to on or about September 30, 2015, the Defendant either by virtue of her own actions or by the actions of her conspirators, agents, or employees, did without lawful authority knowingly: control property of another person with the intent to deprive that 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 determined or prescribed duration or for a limited use; and/or obtain property or services of another person by a material misrepresentation with intent to deprive that person of the property or services; and/or control property of another person knowing or having reason to know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

The Defendant LYNN BENSON and/or the Defendant's agents, knowingly, and with the intent to deprive ██████████ of her property, provided ██████████ with a scheme, expedient, or artifice and misrepresented that this scheme, expedient, or artifice that would prevent and/or delay a foreclosure action on the home. ██████████ relied on the Defendant's and/or her agents' misrepresentations, and through the Defendant's and/or the Defendant's agents' misrepresentations the Defendant, and/or the Defendant's agents, and/or the Defendant's charity the Batangyagit Foundation unlawfully obtained over \$3,500 of ██████████ money.

The Defendant LYNN BENSON being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in concert throughout.

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COUNT X
THEFT IN THE AMOUNT OF \$3,500 OR MORE
CATEGORY "B" FELONY – NRS 205.0832, NRS 205.0835(4)

From on or about March 1, 2015, to on or about November 18, 2016, the Defendant either by virtue of her own actions or by the actions of her conspirators, agents or employees, did without lawful authority knowingly: control property of another person with the intent to deprive that 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 determined or prescribed duration or for a limited use; and/or obtain property or services of another person by a material misrepresentation with intent to deprive that person of the property or services; and/or control property of another person knowing or having reason to know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

The Defendant LYNN BENSON and/or the Defendant's agents, knowingly, and with the intent to deprive [REDACTED] of her property, provide [REDACTED] with a scheme, expedient, or artifice and misrepresented that this scheme, expedient, or artifice would prevent and/or delay any foreclosure actions on the home. [REDACTED] relied on the Defendant's and/or her agents' misrepresentations, and through the Defendant's and/or the Defendant's agents' misrepresentations the Defendant, and/or the Defendant's agents, and/or the Defendant's charity the Batangyagit Foundation unlawfully obtained over \$3,500 of [REDACTED] money.

The Defendant LYNN BENSON being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in concert throughout.

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1 COUNT XI
2 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
3 **CATEGORY "B" FELONY – NRS 205.0832, NRS 205.0835(4)**

4 From on or about August 1, 2013, to on or about July 31, 2016, the Defendant either by virtue of
5 her own actions or by the actions of her conspirators, agents or employees, did without lawful authority
6 knowingly: control property of another person with the intent to deprive that person of the property; and/or
7 convert, make an unauthorized transfer of an interest in, or without authorization control property of
8 another person, or used the services or property of another person entrusted to her or placed in her
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use; and/or
10 obtain property or services of another person by a material misrepresentation with intent to deprive that
11 person of the property or services; and/or control property of another person knowing or having reason to
12 know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

13 The Defendant LYNN BENSON and/or the Defendant's agents, knowingly, and with the intent to
14 deprive [REDACTED] of her property, provide [REDACTED] with a scheme, expedient,
15 or artifice and misrepresented that this scheme, expedient, or artifice would prevent and/or delay any
16 foreclosure actions on the home. [REDACTED] relied on the Defendant's and/or her agents'
17 misrepresentations, and through the Defendant's and/or the Defendant's agents' misrepresentations the
18 Defendant, and/or the Defendant's agents, and/or the Defendant's charity the Batangyagit Foundation
19 unlawfully obtained over \$3,500 of [REDACTED] money.

20 The Defendant LYNN BENSON being criminally liable under one or more of the following
21 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
22 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
23 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;
24 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, the
25 Defendant aiding or abetting THOMAS BENSON and/or conspiring with THOMAS BENSON by in
26 concert throughout.

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

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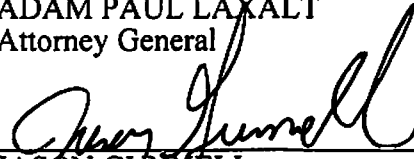
1 All of which is contrary to the form, force and effect of the statutes in such cases made and
2 provided, and against the peace and dignity of the state of Nevada.

3 DATED this 22ND day of August, 2018.

4 SUBMITTED BY

5 ADAM PAUL LAXALT
6 Attorney General

7 By:



8 JASON GUNNELL
9 Nevada Bar No. 13997
Attorneys for the State of Nevada

10 ENDORSEMENT: A True Bill

11
12 By:


13 Foreperson, Clark County Grand Jury
14 GJ#17BGJ179X

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WITNESS LIST

Names of Witnesses testifying before the Grand Jury:

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

6. [REDACTED]

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