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

OCT 29 2018

BY *Katherine Streuber*
KATHERINE STREUBER, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

11 STATE OF NEVADA,
12 Plaintiff,

Case No.: C-14-297179-2
Dept. No.: XXIII

13 v.

14 PAULETTE MARIE GOETZ a.k.a.
15 PAULETTE MARIE SCHMIDTBERGER; and
16 JAMES HENRY CHASE a.k.a. JAMES
17 HENRY COCKRERHAM,

18 Defendant(s).

C-14-297179-2
AIND
Amended Indictment
4791751



THIRD AMENDED INDICTMENT

19 The Defendant(s) above named, JAMES HENRY CHASE a.k.a. JAMES HENRY
20 COCKREHAM, is accused by the Clark County Grand Jury of one count of Conspiracy to Commit
21 Theft, a gross misdemeanor, in violation of NRS 199.480 and 205.0832, in Clark County, Nevada as
22 follows:

COUNT I

**CONSPIRACY TO COMMIT THEFT
Gross Misdemeanor – NRS 199.480 and 205.0832**

26 That the defendant, CHASE, in Clark County, Nevada, did conspire with another to knowingly,
27 willfully, and unlawfully, obtain the personal property of another by material misrepresentation with the
28 intent to deprive said person of the property, or did convert, make an unauthorized transfer of an interest

1 in, or without authorization control any property of another person, or use the services or property of
2 another person entrusted to him or placed in his possession for a limited, authorized period of determined
3 or prescribed duration or for a limited use, and the value of said property was \$3,500.00 or more, to wit:

4 That on or about between May of 2011 through and December of 2011, **CHASE** conspired with
5 another to defraud **ROBERT VOGELER, JOHN SCWEERS, DAVID EASTBURN, and KEITH**
6 **JACOBSON** by soliciting investments on the false promises that:

- 7 • The money invested was guaranteed against loss;
- 8 • The victims would earn profits of at least 10% of their investments per month; and
- 9 • No commissions would be paid in relation to their investments.

10 All of which constitutes the crime of **CONSPIRACY TO COMMIT THEFT**, a gross
11 misdemeanor, in violation of NRS 199.480 and 205.0832.

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

14 Dated this 9th day of October, 2018.

15 Submitted by:

16 ADAM PAUL LAXALT
17 Attorney General

18 By: Michael C. Kovac
19 MICHAEL C. KOVAC
20 Chief Deputy Attorney General
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