

# ORIGINAL

1 **AIND**  
 2 ADAM PAUL LAXALT  
 3 Attorney General  
 4 Michael C. Kovac, Bar No. 11177  
 5 Chief Deputy Attorney General  
 6 Raya M. Swift, Bar No. 11108  
 7 Senior Deputy Attorney General  
 8 Office of the Attorney General  
 9 555 E. Washington Ave., Ste. 3900  
 10 Las Vegas, Nevada 89101-1068  
 11 P: (702) 486-3420  
 12 F: (702) 486-0660  
 13 mkovac@ag.nv.gov  
 14 *Attorneys for the State of Nevada*

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

OCT 29 2018

BY:   
 KATHERINE STREUBER, DEPUTY

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

STATE OF NEVADA,

Plaintiff,

v.

**PAULETTE MARIE GOETZ a.k.a.**  
**PAULETTE MARIE SCHMIDTBERGER;**  
 and **JAMES HENRY CHASE a.k.a. JAMES**  
**HENRY COCKRERHAM,**

Defendant(s).

Case No.: C-14-297179-1  
 Dept. No.: XXIII

C-14-297179-1  
 AIND  
 Amended Indictment  
 4791755



**THIRD AMENDED INDICTMENT**

The Defendant(s) above named, **PAULETTE MARIE GOETZ a.k.a. PAULETTE MARIE SCHMIDTBERGER ("GOETZ")**, is accused by the Clark County Grand Jury of having committed one count of Securities Fraud, a category "B" felony in violation of NRS 90.570 and 90.650, **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OR AN ENTERPRISE OR OCCUPATION**, a category B felony, in violation of NRS 205.377, in Clark County, Nevada as follows:

**COUNT - I**  
**SECURITIES FRAUD**  
**Category B Felony - NRS 90.570, and 90.650**

That the Defendant, **GOETZ** in Clark County, Nevada, did willfully and unlawfully, in connection with the offer to sell, sale, offer to purchase, or purchase of a security, directly or indirectly,

1 employ a device, scheme or artifice to defraud; and/or made an untrue statement of a material fact or  
2 omitted to state a material fact necessary in order to make the statements made not misleading in the light  
3 of the circumstances under which they are made; and/or engaged in an act, practice, or course of business  
4 which operates or would operate as a fraud or deceit upon a person, to wit:

5 That on or about November of 2010 through December of 2011, **GOETZ** directly and/or through  
6 the counseling, encouragement, hiring, commanding, or inducement of another, offered to sell and/or  
7 sold a security and/or securities to WINDELL BAILEY, ROBERT VOGELER, JOHN SCHWEERS,  
8 DAVID EASTBURN, KEITH JACOBSON, and an UNDERCOVER FBI SPECIAL AGENT. During  
9 all times relevant to the allegations herein, **GOETZ** operated and controlled CORPORATE  
10 ASSOCIATES, INC., a Nevada company. In selling and/or offering to sell this security and/or securities,  
11 **GOETZ** directly and/or through the efforts of another, utilized one or more of the following  
12 misrepresentations, omissions, and/or acts or practices which were fraudulent or deceitful:

13 MATERIAL MISREPRESENTATIONS:

- 14 • **GOETZ** misrepresented to the victims that their money would be placed into an account held by  
15 CORPORATE ASSOCIATES, INC. for the purposes of participating in an investment;
- 16 • **GOETZ** misrepresented to the victims that investor funds were placed into a “blocked trust fund  
17 account;”
- 18 • **GOETZ** misrepresented to victims that their investments would earn a minimum of 10 to 25%  
19 per month;
- 20 • **GOETZ** misrepresented to the victims that investment funds would remain in the blocked trust  
21 fund account until distributed to the investors;
- 22 • **GOETZ** misrepresented to the victims that investor funds were guaranteed against loss.

23 MATERIAL OMISSIONS:

- 24 • **GOETZ** did not inform the victims that **GOETZ** regularly removed money from the account into  
25 which BAILEY’S money was to be deposited for purposes other than returning investor funds.

26 All of which constitutes the crime of **SECURITIES FRAUD**, a category “B” felony, in violation of  
27 NRS 90.570 and NRS 90.650.

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

3 Dated this 22<sup>nd</sup> day of October, 2018.

4 Submitted by:

5 ADAM PAUL LAXALT  
6 Attorney General

7 By: Michael C. Kovac  
8 MICHAEL C. KOVAC  
9 Chief Deputy Attorney General  
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