

1 **AIND**
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FILED IN OPEN COURT
STEVEN D. GRIFFIN
CLERK OF THE COURT

JUN - 4 - 2015

BY: _____
KEITH R...

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 DIES,

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
15 COUNT 2

THEFT

16 ~~MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT~~

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

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 ^{mis-}representation 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 1st 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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