



1 **INFM**  
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9 **DISTRICT COURT**  
10 **CLARK COUNTY, STATE OF NEVADA**

11 STATE OF NEVADA,

12 Plaintiff,

13 v.

14 LORI JEAN ALLEN-COOK, ID #1177983  
a.k.a. Lori Jean Cook,

15 Defendant.  
16

Case No.: C-18-333369-1

Dept. No.: 28

17 **INFORMATION**

18 ADAM PAUL LAXALT, Attorney General for the State of Nevada, in the name and by the  
19 authority of the State of Nevada, informs the Court:

20 The above-named defendant, LORI ALLEN-COOK, has committed the crime of one (1) count of  
21 THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B" felony in violation of NRS 205.0832.  
22 All of the acts alleged herein have been committed or completed on or between October 11, 2013, and  
23 August 14, 2014, by the above-named defendant, within the County of Clark, State of Nevada, in the  
24 following manner:

25 **COUNT 1**  
26 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**  
**Category "B" Felony - NRS 205.0832**

27 The defendant, LORI ALLEN-COOK, in the County of Clark, State of Nevada, committed the  
28 crime of Theft by knowingly acting without lawful authority to control the property of another person with

1 the intent to deprive that person of the property; and/or did convert, make an unauthorized transfer of an  
2 interest in, or control property of another person placed in her possession for a limited, authorized use, to  
3 wit:

4 On or between October 11, 2013, and August 14, 2014, the Defendant, as operator of Nevada Short  
5 Sale Services, LLC and/or Citywide Closing Services, facilitated a short sale of real property located at  
6 5132 Mountain Foliage in Clark County, Nevada, between buyer, LV Homes, LLC; sellers, Christopher  
7 and Yun Coyer; and the holders of mortgage notes secured by said property, Countrywide and Wells Fargo  
8 Bank. Countrywide and its successor in interest, Bank of New York Mellon, contracted with Select  
9 Portfolio Servicing for purposes of closing escrow. As the operator of Nevada Short Sale Services, LLC  
10 and/or Citywide Closing Services, Defendant received escrow funds of approximately \$854,599.50, of  
11 which \$3,500.00 or more lawfully belonged to Christopher and Yun Coyer and/or Select Portfolio  
12 Servicing and/or Countrywide and/or Bank of New York Mellon, with said funds to be held in the Bank of  
13 George account ending in 1156 pending the close of escrow of a said real property. Rather than  
14 distributing said funds; however, Defendant converted \$773,337.76 from the bank account, of which  
15 \$3,500.00 or more belonged to Christopher and Yun Coyer, and/or Select Portfolio Servicing and/or  
16 Countrywide and/or Bank of New York Mellon and used the money to fund a series of personal  
17 transactions, thereby depriving Christopher and Yun Coyer, and/or Select Portfolio Servicing and/or  
18 Countrywide and/or Bank of New York Mellon of the money.

19 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500.00 OR MORE, a  
20 category "B" felony in violation of NRS 205.0832(1).

21 Said Complainant makes this declaration under penalty of perjury.

22 DATED this 18<sup>th</sup> day of July, 2018.

23 SUBMITTED BY:  
24 ADAM PAUL LAXALT  
25 Attorney General

26 By: /s/ Alissa Engler  
27 ALISSA ENGLER (Bar No. 11940)  
28 Senior Deputy Attorney General  
*Attorneys for the State of Nevada*

WITNESS LIST

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