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FOR IMMEDIATE RELEASE
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ATTORNEY GENERAL ANNOUNCES FOUR INDIVIDUALS PLEAD GUILTY IN CONNECTION WITH RENO IMMIGRATION ASSISTANCE SCAM

Group Defrauded 191 Victims, Claimed They Worked for Federal Authorities

Las Vegas, NV – Four Reno individuals plead guilty on Jan. 31 for their participation in a Reno-area immigration assistance scam, announced Nevada Attorney General Catherine Cortez Masto.

Charles Doucette, 39, Deborah Stilson, 40, and Shauna Shaw, 37, pled guilty before Judge Stephen Elliott for felony charges of obtaining money under false pretenses. Cybil Duran Berti, 37, a co-defendant pled guilty to a gross misdemeanor charge of conspiracy to obtain money under false pretenses.

“These individuals swindled money and exploited immigrants who were tricked into believing this was a legitimate business or that they were dealing directly with federal authorities,” said Masto. “This case should send a clear message that we will continue to hold individuals accountable.

The State’s filed complaint alleges criminal action against Doucette, Stilson, Shaw and Berti based on information they were operating a business, that went by a variety of names, that deceived people into believing they were employees or agents of the U.S. Immigration and Customs Enforcement and could assist customers in obtaining forms, completing these forms and filing them with U.S. Citizenship and Immigration Services.

The charges are the result of a joint action between the State of Nevada and federal authorities resulting in the seizure of Telestaffing, which was doing business under several names, including Immigration Forms, Immigration Forms Processing Center, Immigration Forms and Services, Immigration Forms and Documents, USA-Helpline.Info, and Immigration Helpline. Reno business locations, where several internet websites and call centers were maintained, include 160 Hubbard Way and 510 Plumb Lane.

Those customers who paid by check found the defendants used the information on those checks to create a duplicate electronic check without authority, resulting in a double payment for the filing. Those who paid by money order or by other means found the defendants either refused to file the documents with U.S. Citizenship and Immigration Services or simply took no action and kept the money. Delays in the processing of customers' immigration papers caused some to lose their legal status.

Conviction for felony charges of obtaining money under false pretenses carries a potential penalty of imprisonment from one to six years in Nevada State Prison and/or a fine of not more than \$10,000, and payment of restitution to the six victims who were willing to testify and were named in the criminal information. Conviction for the gross misdemeanor charge of conspiracy to obtain money under false pretenses carries a potential penalty of one year in jail and a fine of not more than \$1,000.

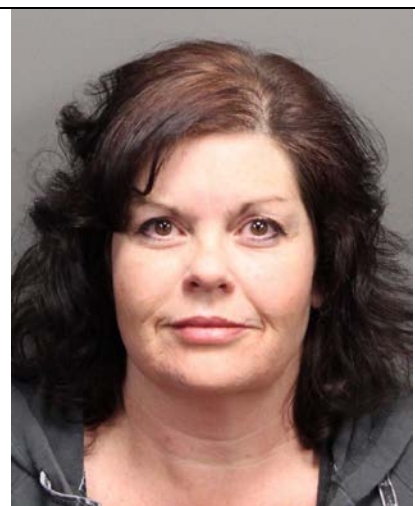
Action taken by the Nevada Attorney General was made possible through the cooperation of the Better Business Bureau of Northern Nevada, City of Reno, Reno Police Department, Colorado Attorney General, Missouri Attorney General, U.S. Marshals Service, U.S. Immigration and Customs Enforcement, Federal Trade Commission, and U. S. Department of Justice, all who assisted in the investigation of this matter.

In total the Nevada Attorney Generals office received 191 complaints, which help launch an investigation into the matter.

Sentencing is set for March 27. The case is being prosecuted by John McGlamery, Senior Deputy Attorney General.

If you suspect you may be a victim, contact the Federal Trade Commission to recover any documents sent to this operation.

Read the criminal information by visiting: <http://bit.ly/DoucetteStilsonShawBerti>



<i>DOUCETTE, CHARLES</i>	<i>STILSON, DEBORAH</i>	<i>SHAW, SHAUNA</i>	<i>DURAN BL</i>
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Case No. CR12-0070

Dept. No. 10

FILED

2012 JAN 17 PM 2:05

JOE H. HAYES

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

STATE OF NEVADA, OFFICE OF THE ATTORNEY
GENERAL, ex. rel. CATHERINE CORTEZ MASTO,
Attorney General,

Plaintiff,

v.

CRIMINAL INFORMATION

CHARLES ROBERT DOUCETTE, a.k.a. CHARLES
DOUCETTE and CHARLES DOUCETTE, JR.,
DEBORAH STILSON, CYBIL DURAN BERTI a.k.a.
CYBIL BERTI and CYBIL HUMBOLT, and SHAUNA
SHAW, d.b.a. TELESTAFFING, IMMIGRATION
FORMS, IMMIGRATION FORMS
PROCESSING CENTER, IMMIGRATION
FORMS AND SERVICES, IMMIGRATION
FORMS & DOCUMENTS, USA-
HELPLINE.INFO, and/or IMMIGRATION
HELPLINE,

Defendants

The undersigned, Catherine Cortez Masto, Attorney General of the State of Nevada, by and through her deputy, John R. McGlamery, within his knowledge, information and belief, complains and charges under penalty of perjury that CHARLES ROBERT DOUCETTE, a.k.a. CHARLES DOUCETTE and CHARLES DOUCETTE, JR., DEBORAH STILSON, CYBIL DURAN BERTI a.k.a. CYBIL BERTI and CYBIL HUMBOLT, and SHAUNA SHAW, d.b.a. TELESTAFFING, IMMIGRATION FORMS, IMMIGRATION FORMS PROCESSING CENTER, IMMIGRATION FORMS AND SERVICES, IMMIGRATION FORMS & DOCUMENTS, USA-HELPLINE.INFO, and/or IMMIGRATION HELPLINE, hereinafter referred to as "DOUCETTE," "STILSON," "BERTI" and/or "SHAW" have committed the felony offense of OBTAINING MONEY UNDER FALSE PRETENSES, a violation of NRS 205.380 and NRS 195.020 (1 Count), OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A

1 TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217 (5
2 Counts), the gross misdemeanor offense of CONSPIRING TO OBTAIN MONEY UNDER
3 FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
4 205.380, NRS 199.480, and NRS 179.1217 (6 Counts), RACKETEERING in violation of NRS
5 207.360(26), NRS 207.390 and NRS 207.400(1)(c) (1 Count), and RACKETEERING in
6 violation of NRS 207.360(33), NRS 205.377, NRS 207.390, and NRS 207.400(1)(c) (1 Count),
7 within Reno Township, State of Nevada, as follows:

8 **COUNT 1: OBTAINING MONEY UNDER FALSE PRETENSES, a violation of NRS 205.380**
9 **and NRS 195.020**, a felony, in the manner following, to wit:

10 1. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
11 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
12 County, State of Nevada, as principles as defined by NRS 195.020, did and/or aided and abetted
13 another to violate NRS 205.380 by knowingly and designedly obtaining from EMILIE ANDREA
14 GEORGIA LANCERY, money or other valuable things by a false pretense with the intent to cheat
15 or defraud her in an amount in excess of \$250.00.

16 2. That on or about February 18, 2010, and at various times thereafter, DOUCETTE,
17 STILSON, BERTI and/or SHAW, acting individually, as a group, or through employees under
18 their control, cheated EMILIE ANDREA GEORGIA LANCERY by taking \$1365.00 by committing
19 one or more of the following false and deceptive actions, to wit:

- 20 a. By creating websites and other advertising which were designed to mislead
21 and/or did mislead EMILIE ANDREA GEORGIA LANCERY to purchase services
22 from DOUCETTE, STILSON, BERTI and/or SHAW under the impression that
23 DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or
24 connected to the United States Citizenship and Immigration Services;
- 25 b. By falsely promising to provide, process and file all necessary forms with the
26 United States Citizenship and Immigration Services to obtain a "green card" for
27 the payment of \$1365.00, which was paid by EMILIE ANDREA GEORGIA
28 LANCERY;

- c. By misleading EMILIE ANDREA GEORGIA LANCERY to obtain information and authorization to draft electronic checks on her bank account;
- d. By drafting an electrically generated check on EMILIE ANDREA GEORGIA LANCERY without express authority for an additional \$1365.00; and/or
- e. By refusing to provide or file all of the necessary forms in order for EMILIE ANDREA GEORGIA LANCERY to obtain a "green card" as promised.

3. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE PRETENSES, a violation of NRS 205.380 and NRS 195.020, a category "B" felony pursuant to NRS 205.0835(4).

COUNT 2: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor, in the manner following, to wit:

4. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by knowingly and designedly obtaining from EMILIE ANDREA GEORGIA LANCERY, money or other valuable things by a false pretense with the intent to cheat or defraud her in an amount in excess of \$250.00, deriving that property partially through the use of computers and/or telephones which represent components, devices, equipment, systems or networks that, alone or in conjunction with any other component, device, equipment, system or network, were designed or had the capability to be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS 179.1219.

5. That on or about February 18, 2010, and at various times thereafter, DOUCETTE, STILSON, BERTI and/or SHAW, or through employees under their control, conspired to cheat EMILIE ANDREA GEORGIA LANCERY by conspiring to take \$1365.00 by committing one or

more of the following false and deceptive actions, to wit:

- a. By creating websites and other advertising which were designed to mislead and/or did mislead EMILIE ANDREA GEORGIA LANCERY to purchase services from DOUCETTE, STILSON, BERTI and/or SHAW under the impression that DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or connected to the United States Citizenship and Immigration Services;
- b. By falsely promising to provide, process and file all necessary forms with the United States Citizenship and Immigration Services to obtain a "green card" for the payment of \$1365.00, which was paid by EMILIE ANDREA GEORGIA LANCERY;
- c. By misleading EMILIE ANDREA GEORGIA LANCERY to obtain information and authorization to draft electronic checks on her bank account;
- d. By drafting an electrically generated check on EMILIE ANDREA GEORGIA LANCERY without express authority for an additional \$1365.00; and/or
- e. By refusing to provide or file all of the necessary forms in order for EMILIE ANDREA GEORGIA LANCERY to obtain a "green card" as promised,
- f. Through the use of telephones, computers, and/ or computer networks to obtain said funds.

6. All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g) and subject to the forfeiture provisions of NRS 179.1219.

COUNT 3: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217,
a felony, in the manner following, to wit:

7. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe County, State of Nevada, as principles as defined by NRS 195.020, did and/or aided and abetted

1 another to violate NRS 205.380 by knowingly and designedly obtaining from GEORGINA
2 RIVERA, money or other valuable things by a false pretense with the intent to cheat or defraud
3 her in an amount in excess of \$250.00, deriving that property partially through the use of
4 computers and/or telephones which represent components, devices, equipment, systems or
5 networks that, alone or in conjunction with any other component, device, equipment, system or
6 network, were designed or had the capability to be programmed; or generate, process, store,
7 retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image,
8 program, signal or sound in a technological format, including a format that involves analog, digital,
9 electronic, electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and
10 subject to the forfeiture provisions of NRS 179.1219.

11 8. That on or about June 1, 2010, and at various times thereafter, DOUCETTE,
12 STILSON, BERTI and/or SHAW, acting individually, as a group, or through employees under
13 their control, cheated GEORGINA RIVERA by taking \$675.00 by committing one or more of the
14 following false and deceptive actions, to wit:

- 15 a. By creating websites and other advertising which were designed to mislead
16 and/or did mislead GEORGINA RIVERA to purchase services from
17 DOUCETTE, STILSON, BERTI and/or SHAW under the impression that
18 DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or
19 connected to the United States Citizenship and Immigration Services;
- 20 b. By falsely promising to provide, process and file a "N-400" application for
21 naturalization with the United States Citizenship and Immigration Services for
22 the payment of \$675.00, which was paid by GEORGINA RIVERA;
- 23 c. By refusing to file any documentation with the United States Citizenship and
24 Immigration Services unless GEORGINA RIVERA agreed to pay an additional
25 \$675.00; and/or
- 26 d. By failing to file any documentation with the United States Citizenship and
27 Immigration Services on GEORGINA RIVERA as promised,
- 28 e. Through the use of telephones, computers, and/ or computer networks to obtain

1 said funds.

2 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE PRETENSES IN THE
3 COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS
4 179.1217 a category "B" felony pursuant to NRS 205.0835(4) and subject to the forfeiture
5 provisions of NRS 179.1219.

6 **COUNT 4: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE**
7 **COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and**
8 **NRS 179.1217**, a gross misdemeanor, in the manner following, to wit:

9 9. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
10 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
11 County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by
12 knowingly and designedly obtaining from GEORGINA RIVERA, money or other valuable things
13 by a false pretense with the intent to cheat or defraud her in an amount in excess of \$250.00,
14 deriving that property partially through the use of computers and/or telephones which represent
15 components, devices, equipment, systems or networks that, alone or in conjunction with any
16 other component, device, equipment, system or network, were designed or had the capability to
17 be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay,
18 record or reproduce any data, information, image, program, signal or sound in a technological
19 format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or
20 optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS
21 179.1219.

22 10. That on or about June 1, 2010, and at various times thereafter, DOUCETTE, STILSON,
23 BERTI and/or SHAW, or through employees under their control, conspired to cheat GEORGINA
24 RIVERA by conspiring to take \$675.00 by committing one or more of the following false and
25 deceptive actions, to wit:

- 26 a. By creating websites and other advertising which were designed to mislead
27 and/or did mislead GEORGINA RIVERA to purchase services from
28 DOUCETTE, STILSON, BERTI and/or SHAW under the impression that

- 1 DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or
2 connected to the United States Citizenship and Immigration Services;
3 b. By falsely promising to provide, process and file a "N-400" application for
4 naturalization with the United States Citizenship and Immigration Services for
5 the payment of \$675.00, which was paid by GEORGINA RIVERA;
6 c. By refusing to file any documentation with the United States Citizenship and
7 Immigration Services unless GEORGINA RIVERA agreed to pay an additional
8 \$675.00; and/or
9 d. By failing to file any documentation with the United States Citizenship and
10 Immigration Services on GEORGINA RIVERA as promised,
11 e. Through the use of telephones, computers, and/ or computer networks to obtain
12 said funds.

13 11. All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER
14 FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
15 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g)
16 and subject to the forfeiture provisions of NRS 179.1219.

17 **COUNT 5: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
18 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217,**
19 a felony, in the manner following, to wit:

20 12. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno;
21 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
22 County, State of Nevada, as principals as defined by NRS 195.020, did and/or aided and abetted
23 another to violate NRS 205.380 by knowingly and designedly obtaining from IRIS TREADO,
24 money or other valuable things by a false pretense with the intent to cheat or defraud her in an
25 amount in excess of \$250.00, deriving that property partially through the use of computers and/or
26 telephones which represent components, devices, equipment, systems or networks that, alone or
27 in conjunction with any other component, device, equipment, system or network, were designed
28 or had the capability to be programmed; or generate, process, store, retrieve, convey, emit,

1 transmit, receive, relay, record or reproduce any data, information, image, program, signal or
2 sound in a technological format, including a format that involves analog, digital, electronic,
3 electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and subject to the
4 forfeiture provisions of NRS 179.1219.

5 13. That on or about June 1, 2010, and at various times thereafter, DOUCETTE,
6 STILSON, BERTI and/or SHAW, acting individually, as a group, or through employees under
7 their control, cheated IRIS TREADO by taking \$370.00 by committing one or more of the
8 following false and deceptive actions, to wit:

- 9 a. By creating websites and other advertising which were designed to mislead
10 and/or did mislead IRIS TREADO to purchase services from DOUCETTE,
11 STILSON, BERTI and/or SHAW under the impression that DOUCETTE,
12 STILSON, BERTI and/or SHAW's operation was part of or connected to the
13 United States Citizenship and Immigration Services;
14 b. By falsely promising to provide, process and file all necessary forms with the
15 United States Citizenship and Immigration Services to renew her permanent
16 residence authorization for the payment of \$370.00, which was paid by IRIS
17 TREADO;
18 c. By refusing to file any documentation with the United States Citizenship and
19 Immigration Services unless IRIS TREADO agreed to pay an additional
20 \$370.00; and/or
21 d. By refusing to file all of the necessary forms in order for IRIS TREADO to obtain
22 a permanent residence authorization as promised,
23 e. Through the use of telephones, computers, and/ or computer networks to obtain
24 said funds

25 14. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
26 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380,
27 NRS 195.020, and NRS 179.1217 a category "B" felony pursuant to NRS 205.0835(4) and
28 subject to the forfeiture provisions of NRS 179.1219.

COUNT 6: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE
COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and
NRS 179.1217, a gross misdemeanor, in the manner following, to wit:

15. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by knowingly and designedly obtaining from IRIS TREADO, money or other valuable things by a false pretense with the intent to cheat or defraud her in an amount in excess of \$250.00, deriving that property partially through the use of computers and/or telephones which represent components, devices, equipment, systems or networks that, alone or in conjunction with any other component, device, equipment, system or network, were designed or had the capability to be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS 179.1219.

16. That on or about June 1, 2010, and at various times thereafter, DOUCETTE, STILSON, BERTI and/or SHAW, or through employees under their control, conspired to cheat IRIS TREADO by conspiring to take \$370.00 by committing one or more of the following false and deceptive actions, to wit:

- a. By creating websites and other advertising which were designed to mislead and/or did mislead IRIS TREADO to purchase services from DOUCETTE, STILSON, BERTI and/or SHAW under the impression that DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or connected to the United States Citizenship and Immigration Services;
- b. By falsely promising to provide, process and file all necessary forms with the United States Citizenship and Immigration Services to renew her permanent residence authorization for the payment of \$370.00, which was paid by IRIS

TREADO;

- c. By refusing to file any documentation with the United States Citizenship and Immigration Services unless IRIS TREADO agreed to pay an additional \$370.00; and/or
- d. By refusing to file all of the necessary forms in order for IRIS TREADO to obtain a permanent residence authorization as promised,
- e. Through the use of telephones, computers, and/ or computer networks to obtain said funds.

All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g).

COUNT 7: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217,

a felony, in the manner following, to wit:

17. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe County, State of Nevada, as principles as defined by NRS 195.020, did and/or aided and abetted another to violate NRS 205.380 by knowingly and designedly obtaining from JEFFERY ORME, money or other valuable things by a false pretense with the intent to cheat or defraud him in an amount in excess of \$250.00, deriving that property partially through the use of computers and/or telephones which represent components, devices, equipment, systems or networks that, alone or in conjunction with any other component, device, equipment, system or network, were designed or had the capability to be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS 179.1219.

18. That on or about May 14, 2010, and at various times thereafter, DOUCETTE,

1 STILSON, BERTI and/or SHAW, acting individually, as a group, or through employees under
2 their control, cheated JEFFERY ORME by taking \$1365.00 by committing one or more of the
3 following false and deceptive actions, to wit:

- 4 a. By creating websites and other advertising which were designed to mislead
5 and/or did mislead JEFFERY ORME to purchase services from DOUCETTE,
6 STILSON, BERTI and/or SHAW under the impression that DOUCETTE,
7 STILSON, BERTI and/or SHAW's operation was part of or connected to the
8 United States Citizenship and Immigration Services;
- 9 b. By falsely promising to provide, process and file all necessary forms with the
10 United States Citizenship and Immigration Services to obtain a permanent
11 residence authorization for the payment of \$1365.00, which was paid by
12 JEFFERY ORME;
- 13 c. By refusing to file any documentation with the United States Citizenship and
14 Immigration Services unless JEFFERY ORME agreed to pay an additional
15 \$1365.00; and/or
- 16 d. By refusing to file all of the necessary forms in order for JEFFERY ORME to
17 obtain a permanent residence authorization as promised,
- 18 e. Through the use of telephones, computers, and/ or computer networks to obtain
19 said funds.

20 19. All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
21 PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380,
22 NRS 195.020, and NRS 179.1217 a category "B" felony pursuant to NRS 205.0835(4) and
23 subject to the forfeiture provisions of NRS 179.1219.

24 **COUNT 8: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE**
25 **COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and**
26 **NRS 179.1217**, a gross misdemeanor, in the manner following, to wit:

27 20. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
28 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe

1 County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by
2 knowingly and designedly obtaining from JEFFERY ORME, money or other valuable things by a
3 false pretense with the intent to cheat or defraud him in an amount in excess of \$250.00, deriving
4 that property partially through the use of computers and/or telephones which represent
5 components, devices, equipment, systems or networks that, alone or in conjunction with any
6 other component, device, equipment, system or network, were designed or had the capability to
7 be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay,
8 record or reproduce any data, information, image, program, signal or sound in a technological
9 format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or
10 optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS
11 179.1219.

12 21. That on or about May 14, 2010, and at various times thereafter, DOUCETTE,
13 STILSON, BERTI and/or SHAW, or through employees under their control, conspired to cheat
14 JEFFERY ORME by conspiring to take \$1365.00 by committing one or more of the following false
15 and deceptive actions, to wit:

- 16 a. By creating websites and other advertising which were designed to mislead
17 and/or did mislead JEFFERY ORME to purchase services from DOUCETTE,
18 STILSON, BERTI and/or SHAW under the impression that DOUCETTE,
19 STILSON, BERTI and/or SHAW's operation was part of or connected to the
20 United States Citizenship and Immigration Services;
- 21 b. By falsely promising to provide, process and file all necessary forms with the
22 United States Citizenship and Immigration Services to obtain a permanent
23 residence authorization for the payment of \$1365.00, which was paid by
24 JEFFERY ORME;
- 25 c. By refusing to file any documentation with the United States Citizenship and
26 Immigration Services unless JEFFERY ORME agreed to pay an additional
27 \$1365.00; and/or
28 d. By refusing to file all of the necessary forms in order for JEFFERY ORME to

- 1 obtain a permanent residence authorization as promised,
2 e. Through the use of telephones, computers, and/ or computer networks to obtain
3 said funds.

4 22. All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER
5 FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
6 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g).
7 **COUNT 9: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
8 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217,**
9 a felony, in the manner following, to wit:

10 23. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno;
11 510 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
12 County, State of Nevada, as principles as defined by NRS 195.020, did and/or aided and abetted
13 another to violate NRS 205.380 by knowingly and designedly obtaining from MOHAMMED
14 KAKAY, money or other valuable things by a false pretense with the intent to cheat or defraud
15 him in an amount in excess of \$250.00, deriving that property partially through the use of
16 computers and/or telephones which represent components, devices, equipment, systems or
17 networks that, alone or in conjunction with any other component, device, equipment, system or
18 network, were designed or had the capability to be programmed; or generate, process, store,
19 retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image,
20 program, signal or sound in a technological format, including a format that involves analog, digital,
21 electronic, electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and
22 subject to the forfeiture provisions of NRS 179.1219.

23 24. That on or about May 1, 2010, and at various times thereafter, DOUCETTE, STILSON,
24 BERTI and/or SHAW, acting individually, as a group, or through employees under their control,
25 cheated MOHAMMED KAKAY by taking \$675.00 by committing one or more of the following
26 false and deceptive actions, to wit:

- 27 a. By creating websites and other advertising which were designed to mislead
28 and/or did mislead MOHAMMED KAKAY to purchase services from

- 1 DOUCETTE, STILSON, BERTI and/or SHAW under the impression that
2 DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or
3 connected to the United States Citizenship and Immigration Services;
4 b. By falsely promising to provide, process and file a "N-400" application for
5 naturalization with the United States Citizenship and Immigration Services for
6 the payment of \$675.00, which was paid by MOHAMMED KAKAY; and/or
7 c. By failing to file any documentation with the United States Citizenship and
8 Immigration Services on MOHAMMED KAKAY as promised,
9 d. Through the use of telephones, computers, and/ or computer networks to obtain
10 said funds

11 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE PRETENSES IN THE
12 COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS
13 179.1217 a category "B" felony pursuant to NRS 205.0835(4) and subject to the forfeiture
14 provisions of NRS 179.1219.

15 **COUNT 10: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE**
16 **COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and**
17 **NRS 179.1217**, a gross misdemeanor, in the manner following, to wit:

18 25. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
19 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
20 County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by
21 knowingly and designedly obtaining from MOHAMMED KAKAY, money or other valuable things
22 by a false pretense with the intent to cheat or defraud him in an amount in excess of \$250.00,
23 deriving that property partially through the use of computers and/or telephones which represent
24 components, devices, equipment, systems or networks that, alone or in conjunction with any
25 other component, device, equipment, system or network, were designed or had the capability to
26 be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay,
27 record or reproduce any data, information, image, program, signal or sound in a technological
28 format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or

1 optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS
2 179.1219.

3 26. That on or about May 1, 2010, and at various times thereafter, DOUCETTE, STILSON,
4 BERTI and/or SHAW, or through employees under their control, conspired to cheat MOHAMMED
5 KAKAY by conspiring to take \$675.00 by committing one or more of the following false and
6 deceptive actions, to wit:

- 7 a. By creating websites and other advertising which were designed to mislead
8 and/or did mislead MOHAMMED KAKAY to purchase services from
9 DOUCETTE, STILSON, BERTI and/or SHAW under the impression that
10 DOUCETTE, STILSON, BERTI and/or SHAW's operation was part of or
11 connected to the United States Citizenship and Immigration Services;
12 b. By falsely promising to provide, process and file a "N-400" application for
13 naturalization with the United States Citizenship and Immigration Services for
14 the payment of \$675.00, which was paid by MOHAMMED KAKAY; and/or
15 c. By failing to file any documentation with the United States Citizenship and
16 Immigration Services on MOHAMMED KAKAY as promised,
17 d. Through the use of telephones, computers, and/ or computer networks to obtain
18 said funds.

19 27. All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER
20 FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
21 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g).

22 ///

23 **COUNT 11: OBTAINING MONEY UNDER FALSE PRETENSES IN THE COURSE OF A**
24 **TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS 179.1217,**

25 a felony, in the manner following, to wit:

26 28. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
27 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
28 County, State of Nevada, as principals as defined by NRS 195.020, did and/or aided and abetted

1 another to violate NRS 205.380 by knowingly and designedly obtaining from ROXANNE MOODY
2 money or other valuable things by a false pretense with the intent to cheat or defraud her in an
3 amount in excess of \$250.00, deriving that property partially through the use of computers and/or
4 telephones which represent components, devices, equipment, systems or networks that, alone or
5 in conjunction with any other component, device, equipment, system or network, were designed
6 or had the capability to be programmed; or generate, process, store, retrieve, convey, emit,
7 transmit, receive, relay, record or reproduce any data, information, image, program, signal or
8 sound in a technological format, including a format that involves analog, digital, electronic,
9 electromagnetic, magnetic or optical technology, as defined by NRS 179.1217 and subject to the
10 forfeiture provisions of NRS 179.1219.

11 29. That on or about September 2, 2010, and at various times thereafter, DOUCETTE,
12 STILSON, BERTI and/or SHAW, acting individually, as a group, or through employees under
13 their control, cheated ROXANNE MOODY by taking \$740.00 by committing one or more of the
14 following false and deceptive actions, to wit:

- 15 a. By creating websites and other advertising which were designed to mislead
16 and/or did mislead ROXANNE MOODY to purchase services from DOUCETTE,
17 STILSON, BERTI and/or SHAW under the impression that DOUCETTE,
18 STILSON, BERTI and/or SHAW's operation was part of or connected to the
19 United States Citizenship and Immigration Services;
- 20 b. By falsely promising to provide an all-inclusive service of processing and filing
21 an "I-90" application for name change on a green card for the payment of
22 \$740.00, which was paid by ROXANNE MOODY; and/or
- 23 c. By duplicating the fee and withdrawing additional funds from the bank account
24 of ROXANNE MOODY, with the intent of forwarding payment to the United
25 States Citizenship and Immigration Services, without disclosing that a second
26 fee would be charged,
- 27 d. Through the use of telephones, computers, and/ or computer networks to obtain
28 said funds.

1 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE PRETENSES IN THE
2 COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 195.020, and NRS
3 179.1217 a category "B" felony pursuant to NRS 205.0835(4) and subject to the forfeiture
4 provisions of NRS 179.1219.

5 **COUNT 12: CONSPIRING TO OBTAIN MONEY UNDER FALSE PRETENSES IN THE**
6 **COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS 205.380, NRS 199.480, and**
7 **NRS 179.1217**, a gross misdemeanor, in the manner following, to wit:

8 30. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
9 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
10 County, State of Nevada, did conspire, as defined by NRS 199.480, to violate NRS 205.380 by
11 knowingly and designedly obtaining from ROXANNE MOODY, money or other valuable things
12 by a false pretense with the intent to cheat or defraud her in an amount in excess of \$250.00,
13 deriving that property partially through the use of computers and/or telephones which represent
14 components, devices, equipment, systems or networks that, alone or in conjunction with any
15 other component, device, equipment, system or network, were designed or had the capability to
16 be programmed; or generate, process, store, retrieve, convey, emit, transmit, receive, relay,
17 record or reproduce any data, information, image, program, signal or sound in a technological
18 format, including a format that involves analog, digital, electronic, electromagnetic, magnetic or
19 optical technology, as defined by NRS 179.1217 and subject to the forfeiture provisions of NRS
20 179.1219.

21 31. That on or about September 2, 2010, and at various times thereafter, DOUCETTE,
22 STILSON, BERTI and/or SHAW, or through employees under their control, cheated ROXANNE
23 MOODY by taking \$740.00 by committing one or more of the following false and deceptive
24 actions, to wit:

- 25 a. By creating websites and other advertising which were designed to mislead
26 and/or did mislead ROXANNE MOODY to purchase services from DOUCETTE,
27 STILSON, BERTI and/or SHAW under the impression that DOUCETTE,
28 STILSON, BERTI and/or SHAW's operation was part of or connected to the

1 United States Citizenship and Immigration Services;

2 b. By falsely promising to provide an all-inclusive service of processing and filing
3 an "I-90" application for name change on a green card for the payment of

4 \$370.00, which was paid by ROXANNE MOODY; and/or

5 c. By duplicating the fee and withdrawing additional funds from the bank account
6 of ROXANNE MOODY, with the intent of forwarding payment to the United
7 States Citizenship and Immigration Services, without disclosing that a second
8 fee would be charged,

9 d. Through the use of telephones, computers, and/ or computer networks to obtain
10 said funds

11 32. All of which constitutes the crime of CONSPIRING TO OBTAIN MONEY UNDER
12 FALSE PRETENSES IN THE COURSE OF A TECHNOLOGICAL CRIME, a violation of NRS
13 205.380, NRS 199.480, and NRS 179.1217, a gross misdemeanor pursuant to NRS 199.480(g)
14 and subject to the forfeiture provisions of NRS 179.1219.

15 **COUNT 13: RACKETEERING, a violation of NRS 207.360(26), NRS 207.390, NRS**
16 **207.400(1)(c) and NRS 195.020.**

17 33. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
18 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
19 County, State of Nevada, as principles as defined by NRS 195.020, being employed by or
20 associated with any enterprise to conduct or participate, directly or indirectly, in the affairs of the
21 enterprise through racketeering activity or racketeering activity through the affairs of the
22 enterprise, as defined by NRS 207.400, did violate, aid or abet, or conspire to violate NRS
23 207.360(26), NRS 207.390, NRS 207.400(1)(c) and NRS 195.020 by engaging in .
24 RACKETEERING, by the commission of, attempt to commit or conspiracy to commit at least two
25 crimes of obtaining possession of money or property valued at \$250 or more by means of false
26 pretenses and racketeering activity, as defined by NRS 207.360(26), thus engaging in at least
27 two crimes related to racketeering that have the same or similar pattern, intents, results,
28 accomplices, victims or methods of commission, or are otherwise interrelated by distinguishing

1 characteristics and are not isolated incidents where the last of the incidents occurred within five
2 years, as defined by NRS 207.390 to wit:

3 34. That since December 1, 2009, DOUCETTE, STILSON, BERTI and/or SHAW,
4 employed by or associated with employees under their control, engaged in criminal racketeering
5 to wit:

- 6 a. Were employed by or associated with an enterprise under the names of
7 TELESTAFFING, IMMIGRATION FORMS PROCESSING CENTER,
8 IMMIGRATION FORMS, USA-HELPLINE.INFO, IMMIGRATION HELPLINE,
9 and/or other names, obtained money under false pretenses from EMILIE
10 ANDREA GEORGIA LANCERY, GEORGINA RIVERA, IRIS TREADO,
11 JEFFREY ORME, MOHAMMED KAKAY, and/or ROXANNE MOODY, as
12 described above, consisting of two or more violations within the same or similar
13 pattern, intents, results, accomplices, victims or methods of commission, or are
14 otherwise interrelated by distinguishing characteristics which were not isolated
15 incidents within five years;

16 35. All of which constitutes the crime of RACKETEERING in violation of NRS
17 207.360(26), NRS 207.390 and NRS 207.400, a category B felony pursuant to NRS 207.400(2).

18 **COUNT 14: RACKETEERING, a violation of NRS 207.360(33), NRS 205.377, NRS 207.390,**
19 **NRS 207.400(1)(c) and NRS 195.020.**

20 36. DOUCETTE, STILSON, BERTI and/or SHAW at 160 Hubbard Way, Ste. C, Reno; 510
21 E Plumb Lane, Ste. B, Reno; and/or 2213 Big Trail Circle, Reno; Reno Township, in Washoe
22 County, State of Nevada, as principles as defined by NRS 195.020, being employed by or
23 associated with any enterprise to conduct or participate, directly or indirectly, in the affairs of the
24 enterprise through racketeering activity or racketeering activity through the affairs of the
25 enterprise, as defined by NRS 207.400, did violate, aid or abet, or conspire to violate NRS
26 207.360(33), NRS 205.377, NRS 207.390, NRS 207.400(1)(c) and NRS 195.020 by engaging in
27 RACKETEERING, by violating NRS 207.360(33) by the commission of, attempt to commit or
28 conspiracy to engage in an enterprise or occupation, knowingly and with the intent to defraud,

engage in an act, practice or course of business or employ a device, scheme or artifice which operates or would operate as a fraud or deceit upon a person by means of a false representation or omission of a material fact in at least two transactions that have the same or similar pattern, intents, results, accomplices, victims or methods of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated incidents within four years and in which the aggregate loss or intended loss is more than \$250 as defined by NRS 205.377, and by engaging in racketeering activity by engaging in at least two crimes related to racketeering that have the same or similar pattern, intents, results, accomplices, victims or methods of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated incidents as defined by NRS 207.400(1)(c); to wit:

37. That since December 1, 2009, DOUCETTE, STILSON, BERTI and/or SHAW, or though employees under their control, have been engaging in criminal racketeering to wit:

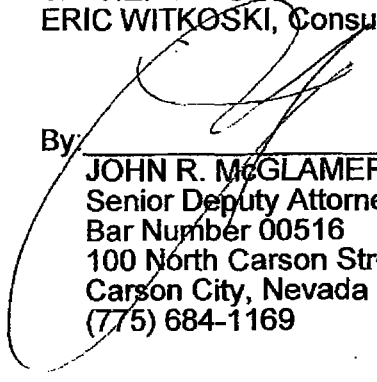
- a. In the course of an enterprise or occupation under the names of TELESTAFFING, IMMIGRATION FORMS PROCESSING CENTER, IMMIGRATION FORMS, USA-HELPLINE.INFO, IMMIGRATION HELPLINE, and/or other names, knowingly and with the intent to defraud, engage in an act, practice or course of business or employ a device, scheme or artifice which operates or would operate as a fraud or deceit upon a person by means of a false representation or omission of a material fact in at least two transactions that have the same or similar pattern, intents, results, accomplices, victims or methods of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated incidents within four years against EMILIE ANDREA GEORGIA LANCERY, GEORGINA RIVERA, IRIS TREADO, JEFFREY ORME, MOHAMMED KAKAY, and/or ROXANNE MOODY, as described above, where the aggregate loss or intended loss is more than \$250.

38. All of which constitutes the crime of RACKETEERING in violation of NRS 207.360(33), NRS 205.377, NRS 207.390, NRS 207.400(1)(c) and NRS 195.020, a category B felony pursuant to NRS 207.400(2).

1 All of which is contrary to the form, force and effect of the statutes in such cases made
2 and provided and against the peace and dignity of the State of Nevada. Said complainant
3 makes this declaration subject to the penalty of perjury.

4 DATED this 17th day of January, 2012.

5 CATHERINE CORTEZ MASTO, Attorney General
6 ERIC WITKOSKI, Consumer Advocate

7
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