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JUSTICE OF THE PEACE
BY AK CLERK

1 CATHERINE CORTEZ MASTO
Attorney General
2 RONDA CLIFTON
Senior Deputy Attorney General
3 Nevada State Bar No. 4733
5420 Kietzke Lane, Suite 202
4 Reno, Nevada 89511
Telephone: (775) 688-1818

5 *Attorneys for Plaintiff*

7 IN THE JUSTICE COURT OF CARSON TOWNSHIP
8 IN AND FOR CARSON CITY, STATE OF NEVADA

10 THE STATE OF NEVADA,)
11 Plaintiff,)
12 vs.)
13 MEGAN MARIE KLEIN,)
14 Defendant.)

Case No. 14CR00592 IC
Dept. No. II

15 **CRIMINAL COMPLAINT**

16 COMES NOW, RONDA CLIFTON, Senior Deputy Attorney General, who, based upon
17 her knowledge, information and/or belief, complains and charges under penalty of perjury,
18 MEGAN MARIE KLEIN, above-named defendant, with having committed the felony offenses
19 of OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER
20 PERSON FOR AN UNLAWFUL PURPOSE, a Category B felony in violation of NRS 205.463;
21 FORGERY, a Category D felony in violation of NRS 205.090 as defined by NRS 205.085; and
22 THEFT, a Category B felony in violation of NRS 205.0832

23 **COUNT I - OBTAINING AND USING PERSONAL IDENTIFYING**
24 **INFORMATION OF ANOTHER PERSON FOR AN UNLAWFUL PURPOSE**

25 **A Category B Felony in Violation of NRS 205.463**

26 DEFENDANT MEGAN MARIE KLEIN, on or about June 20, 2013, to on or about
27 January 16, 2014, within Carson City, State of Nevada, did knowingly, willfully and unlawfully
28 obtain and use the personal identifying information of another person with the intent to commit

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5420 Kietzke Lane, Suite 202
Reno, NV 89511

1 an unlawful act. More specifically, DEFENDANT MEGAN MARIE KLEIN obtained and used
2 Ashleigh Fiscaro's name for the purpose of defrauding high-profile athletes and/or
3 representatives by using misrepresentations, and signing Ashleigh Fiscaro's name on
4 documents and/or using her name in e-mails, in an attempt to sell fake minority portions of a
5 professional sports team and/or 2014 season floor seats.

6 **COUNT II - FORGERY**

7 **A Category D Felony in Violation of NRS 205.090**

8 DEFENDANT MEGAN MARIE KLEIN, on or about August 8, 2013, within Carson
9 City, State of Nevada, did knowingly, willfully and unlawfully forge the signature of another
10 on a contract with the intent to damage or defraud another person. More specifically,
11 DEFENDANT MEGAN MARIE KLEIN forged the signature of Ashleigh Fiscaro on a wire
12 transfer agreement with the intent to defraud David Meltzer, in an attempt to sell fake
13 minority portions of a professional sports team and/or 2014 season floor seats.

14 **COUNT III - FORGERY**

15 **A Category D Felony in Violation of NRS 205.090**

16 DEFENDANT MEGAN MARIE KLEIN, on or about September 19, 2013, within Carson
17 City, State of Nevada, did knowingly, willfully and unlawfully forge the signature of another on a
18 contract with the intent to damage or defraud another person. More specifically, DEFENDANT
19 MEGAN MARIE KLEIN forged the signature of Ashleigh Fiscaro on a Purchase Agreement
20 with the intent to defraud Don Weidenfeld and/or Gregory Glenn, in an attempt to sell fake
21 minority portions of a professional sports team and/or 2014 season floor seats.

22 **COUNT IV - FORGERY**

23 **A Category D Felony in Violation of NRS 205.090**

24 DEFENDANT MEGAN MARIE KLEIN, on or about June 20, 2013, within Carson City,
25 State of Nevada, did knowingly, willfully and unlawfully forge the signature of another on a
26 contract with the intent to damage or defraud another person. More specifically,
27 DEFENDANT MEGAN MARIE KLEIN forged the signature of Samuel Goldstein on a

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1 Purchase Agreement with the intent to defraud David Meltzer, in an attempt to sell fake
2 minority portions of a professional sports team and/or 2014 season floor seats.

3 **COUNT V - FORGERY**

4 **A Category D Felony in Violation of NRS 205.090**

5 DEFENDANT MEGAN MARIE KLEIN, on or about June 20, 2013, within Carson City,
6 State of Nevada, did knowingly, willfully and unlawfully forge the signature of another on a
7 contract with the intent to damage or defraud another person. More specifically, DEFENDANT
8 MEGAN MARIE KLEIN forged the signature of Samuel Goldstein on a legally binding
9 Assignment with the intent to defraud David Meltzer, in an attempt to sell fake minority portions
10 of a professional sports team and/or 2014 season floor seats.

11 **COUNT VI - FORGERY**

12 **A Category D Felony in Violation of NRS 205.090**

13 DEFENDANT MEGAN MARIE KLEIN, on or about June 20, 2013, to on or about
14 January 16, 2014, within Carson City, State of Nevada, did knowingly, willfully and unlawfully
15 forge the Identification document of another with the intent to damage or defraud another
16 person. More specifically, DEFENDANT MEGAN MARIE KLEIN falsely made a California
17 Driver's License of Samuel Joseph Goldstein with the intent to defraud David Meltzer, in an
18 attempt to sell fake minority portions of a professional sports team and/or 2014 season floor
19 seats.

20 **COUNT VII - THEFT**

21 **A Category B Felony in Violation of NRS 205.0832**

22 DEFENDANT MEGAN MARIE KLEIN, on or about June 20, 2013, to on or about
23 January 16, 2014, within Carson City, State of Nevada, did knowingly, willfully and unlawfully
24 obtain money from Russell Berman by material misrepresentations with intent to deprive
25 Russell Berman of the money. More specifically, DEFENDANT MEGAN KLEIN, using false
26 names and misrepresentations, attempted to sell fake minority portions of a professional sports
27 team and/or 2014 season floor seats. These misrepresentations were instrumental in payment
28 to DEFENDANT MEGAN MARIE KLEIN, in an amount over \$3,500.

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.

3 **AFFIRMATION PURSUANT TO NRS 239B.030**

4 The undersigned does hereby affirm that the preceding document, CRIMINAL
5 COMPLAINT, filed in the Carson Township Justice Court, State of Nevada v. Megan Marie
6 Klein, does not contain the social security number of any person.

7 DATED this 25th day of April, 2014.

8 CATHERINE CORTEZ MASTO
9 Attorney General

10 By:



11 RONDA CLIFTON
12 Senior Deputy Attorney General
13 Bureau of Criminal Justice
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