



CLERK OF THE COURT

1 **INFM**
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DISTRICT COURT

CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,)	
)	Case No.: C-14-301113-1
11 Plaintiff,)	
)	Dept. No.: XVII
12 v.)	
)	
13 LINA KHACHEKIAN, #2616716,)	
)	
14 Defendant.)	
)	

INFORMATION

17 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and
18 through Deputy Attorney General ADAM L. WOODRUM, informs this Honorable Court that
19 LINA KHACHEKIAN, the above named defendant, has committed the crime of THEFT, TWO
20 COUNTS (Category "B" Felonies – NRS 205.0832, NRS 205.0835, NRS 195.020) within the
21 County of Clark, State of Nevada, as follows:

COUNT ONE

THEFT – MORE THAN \$3500.00

(Category "B" Felony – NRS 205.0832, NRS 205.0835, NRS 195.020)

25 That the defendant, LINA KHACHEKIAN, controlled any property of another person
26 with the intent to deprive that person of the property; and/or converted, made an unauthorized
27 transfer of an interest in, or without authorization controlled any property of another person;
28 and/or obtained real, personal or intangible property or the services of another person by a

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1 material misrepresentation with intent to deprive that person of the property or services;
2 and/or controlled property of another person knowing or having reason to know that the
3 property was stolen, to wit: That during December 2012 the defendant, an employee of the
4 University of Nevada, Las Vegas (UNLV) engaged in unauthorized transactions involving the
5 financial accounts of UNLV, whereby goods were ordered using funds and/or associated
6 purchase accounts belonging to UNLV but never delivered to the possession of UNLV, and
7 instead were diverted for the use of the defendant or third parties for sale or private use,
8 and/or simply were never received by UNLV.

9 Forty-Eight such fraudulent transactions during the month of December 2012
10 amounted to more than \$3500.00, totaling approximately \$60,498.73.

11 Furthermore, LINA KHACHEKIAN either directly committed the act charged, or aided
12 or abetted MARISA NEUHAUS or unnamed third parties in its commission, and/or directly or
13 indirectly, counseled, encouraged, hired, commanded, induced or otherwise procured
14 MARISA NEUHAUS or unnamed third parties to commit the act charged, to wit: that together
15 or individually LINA KHACHEKIAN and MARISA NEUHAUS participated in a scheme of
16 ordering consumer goods using the funds of UNLV, preparing false documentation to cover
17 the true nature of the orders, then diverting said goods. False receipts for seemingly
18 legitimate office equipment and supplies were created by LINA KHACHEKIAN and MARISA
19 NEUHAUS and supplied to UNLV to conceal the theft

20 **COUNT TWO**

21 **THEFT – MORE THAN \$3500.00**

22 **(Category “B” Felony – NRS 205.0832, NRS 205.0835, NRS 195.020)**

23 That the defendant, LINA KHACHEKIAN, controlled any property of another person
24 with the intent to deprive that person of the property; and/or converted, made an unauthorized
25 transfer of an interest in, or without authorization controlled any property of another person;
26 and/or obtained real, personal or intangible property or the services of another person by a
27 material misrepresentation with intent to deprive that person of the property or services;
28 and/or controlled property of another person knowing or having reason to know that the

1 property was stolen, to wit: That during January 2013, the defendant, an employee of the
2 University of Nevada, Las Vegas (UNLV) engaged in unauthorized transactions involving the
3 financial accounts of UNLV, whereby goods were ordered using funds and/or associated
4 purchase accounts belonging to UNLV but never delivered to the possession of UNLV, and
5 instead were diverted for the use of the defendants or third parties for sale or private use,
6 and/or simply were never received by UNLV.

7 Thirty-Nine such fraudulent transactions during the month of January 2013 amounted
8 to more than \$3500.00, totaling approximately \$37,633.15.

9 Furthermore, LINA KHACHEKIAN either directly committed the act charged, or aided
10 or abetted MARISA NEUHAUS or unnamed third parties in its commission, and/or directly or
11 indirectly, counseled, encouraged, hired, commanded, induced or otherwise procured
12 MARISA NEUHAUS or unnamed third parties to commit the act charged, to wit: that together
13 or individually LINA KHACHEKIAN and MARISA NEUHAUS participated in a scheme of
14 ordering consumer goods using the funds of UNLV, preparing false documentation to cover
15 the true nature of the orders, then diverting said goods. False receipts for seemingly
16 legitimate office equipment and supplies were created by LINA KHACHEKIAN and MARISA
17 NEUHAUS and supplied to UNLV to conceal the theft

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

20 DATED this 7th day of October, 2014.

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22 CATHERINE CORTEZ MASTO
Attorney General

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24 By: /s/ Adam L. Woodrum
ADAM L. WOODRUM
Deputy Attorney General

WITNESS LIST

The following list contains the names and addresses of all witnesses known to the Office of the Attorney General's Criminal Justice Division, Special Prosecutions Unit at the time accompanying the filing of this Criminal Information.

1. Eida Sidhu, General Counsel
UNLV
4505 Maryland Pkwy
Las Vegas, NV 89154
2. David Heiser, Desktop and Field Manager
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4505 Maryland Pkwy
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3. Michelle Read, Administrative Asst. III
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4505 Maryland Pkwy
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4. Lori Temple, Vice Provost for Information Technology
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4505 Maryland Pkwy
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5. Gabriela Duarte, Student Asst.
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6. Ryan Loyola, Public Service Intern 2
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7. Georgia Stergios, Supervisor HR, Financial Records
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8. Michele Kraus, Director, IT Operations
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9. Derek Whitaker
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- 10. Todd Bishop, Forensic Computer Analyst
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555 East Washington Ave., Ste. 3900
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- 11. Tony Kotlarz, Supervising Criminal Investigator
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Las Vegas Justice Court Dept.
Case # 14F01555AB