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FILED

MAR 27 8 30 AM '15

JUSTICE COURT
LAS VEGAS, NEVADA
BY TMM
DEPUTY

8 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
9 CLARK COUNTY, STATE OF NEVADA

9 THE STATE OF NEVADA,)

10 Plaintiff,)

11 vs.)

12 ROBERT LORIN MUSICH,)

13 Defendant.)

Case No.: 15F04521X

Dept. No.: 14

15F04521X
CRM
Criminal Complaint
4888005



14
15 CRIMINAL COMPLAINT

16 ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through his
17 undersigned deputy, complains and charges the above-named defendant, ROBERT LORIN
18 MUSICH, with having committed the following offenses within the County of Clark, State of
19 Nevada:

20 THEFT IN THE AMOUNT OF \$650 OR MORE, a category "C" felony, in violation of
21 NRS 205.0832(1) and NRS 205.0835(3); OBTAINING MONEY UNDER FALSE PRETENSES,
22 a category "B" felony, in violation of NRS 205.380(1)(a); and MULTIPLE TRANSACTIONS
23 INVOLVING FRAUD OR DECEIT, a category "B" felony, in violation of NRS 205.377.

24 All of the acts alleged herein have been committed in or between November and
25 December of 2014, by the above-named Defendant, within the County of Clark, State of
26 Nevada, in the following manner:

27 ///

28 ///

COUNT 1

THEFT IN THE AMOUNT OF \$650 OR MORE
CATEGORY "C" felony - NRS 205.0832(1), NRS 205.0835(3)

Defendant ROBERT LORIN MUSICH, in the County of Clark, State of Nevada, either by virtue of his own actions or by and through the actions of his agents or employees, without lawful authority, did knowingly control property of another person with the intent to deprive that person of the property; and/or convert, make an unauthorized transfer of an interest in, or without authorization controlled property of another person, or used the property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use; and/or obtained property of another person by a material misrepresentation with intent to deprive that person of the property, and the value of said property was \$650 or more, to wit:

In or between November and December of 2014, Defendant MUSICH, doing business as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to WINK LLC, d/b/a Honey Salt ("Honey Salt"), a business located in Clark County, Nevada. The invoice falsely claimed that a company named "RMZ Fire Safety" had performed an "Annual State Required Fire Safety Equipment Inspection, Test and Certification" and was due the sum of \$413.11 for providing the aforementioned service. In reliance upon the aforementioned material misrepresentation, on or about December 15, 2014, Honey Salt remitted payment of \$413.11 to defendant at the address he provided on the invoice. At all relevant times herein, defendant MUSICH knew full well that no service had been provided and no payment was due.

In or between November and December of 2014, Defendant MUSICH, doing business as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to RSVP Party Rentals, Inc., a business located in Clark County, Nevada. The invoice falsely claimed that a company named "RMZ Fire Safety" had performed an "Annual State Required Fire Safety Equipment Inspection, Test and Certification" and was due the sum of \$413.11 for providing the aforementioned service. In reliance upon the aforementioned material misrepresentation, on or about December 9, 2014, RSVP Party Rentals, Inc. remitted payment of \$413.11 to

1 defendant at the address he provided on the invoice. At all relevant times herein, defendant
2 MUSICH knew full well that no service had been provided and no payment was due.

3 In or between November and December of 2014, Defendant MUSICH, doing business
4 as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to Nevada Barricade &
5 Sign Inc., a business located in Clark County, Nevada. The invoice falsely claimed that a
6 company named "RMZ Fire Safety" had performed an "Annual State Required Fire Safety
7 Equipment Inspection, Test and Certification" and was due the sum of \$413.11 for providing
8 the aforementioned service. In reliance upon the aforementioned material misrepresentation,
9 on or about December 15, 2014, Nevada Barricade & Sign Inc. remitted payment of \$413.11
10 to defendant at the address he provided on the invoice. At all relevant times herein,
11 defendant MUSICH knew full well that no service had been provided and no payment was
12 due.

13 Defendant MUSICH received each of the aforementioned payments at a private
14 mailbox that he maintained in Clark County, Nevada. He caused each of the payments to be
15 deposited into Wells Fargo Bank, N.A. Account No. XXXXXX3245 in the name of RMZ INC.,
16 d/b/a RMZ Fire Safety. At all relevant times herein, defendant MUSICH was the only signer
17 on this account. The aggregate loss as a result of the conduct alleged herein is \$1239.33.

18 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE, a
19 category "C" felony in violation of NRS 205.0832(1) and NRS 205.0835(3).

20 **COUNT 2**

21 **OBTAINING MONEY UNDER FALSE PRETENSES**
22 **A CATEGORY "B" felony - NRS 205.380(1)(a)**

23 Defendant ROBERT LORIN MUSICH, in the County of Clark, State of Nevada, either
24 by virtue of his own actions or by and through the actions of his agents or employees, without
25 lawful authority, knowingly and designedly, by any false pretense, obtained from any other
26 person any chose in action, money, goods, wares, chattels, effects or other valuable thing,
27 with the intent to cheat or defraud the other person, and the value of said thing was \$650 or
28 more, to wit:

1 In or between November and December of 2014, Defendant MUSICH, doing business
2 as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to WINK LLC, d/b/a
3 Honey Salt ("Honey Salt"), a business located in Clark County, Nevada. The invoice falsely
4 claimed that a company named "RMZ Fire Safety" had performed an "Annual State Required
5 Fire Safety Equipment Inspection, Test and Certification" and was due the sum of \$413.11 for
6 providing the aforementioned service. In reliance upon the aforementioned material
7 misrepresentation, on or about December 15, 2014, Honey Salt remitted payment of \$413.11
8 to defendant at the address he provided on the invoice. At all relevant times herein,
9 defendant MUSICH knew full well that no service had been provided and no payment was
10 due.

11 In or between November and December of 2014, Defendant MUSICH, doing business
12 as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to RSVP Party Rentals,
13 Inc., a business located in Clark County, Nevada. The invoice falsely claimed that a company
14 named "RMZ Fire Safety" had performed an "Annual State Required Fire Safety Equipment
15 Inspection, Test and Certification" and was due the sum of \$413.11 for providing the
16 aforementioned service. In reliance upon the aforementioned material misrepresentation, on
17 or about December 9, 2014, RSVP Party Rentals, Inc. remitted payment of \$413.11 to
18 defendant at the address he provided on the invoice. At all relevant times herein, defendant
19 MUSICH knew full well that no service had been provided and no payment was due.

20 In or between November and December of 2014, Defendant MUSICH, doing business
21 as "RMZ Inc." and/or "RMZ Fire Safety," caused an invoice to be sent to Nevada Barricade &
22 Sign Inc., a business located in Clark County, Nevada. The invoice falsely claimed that a
23 company named "RMZ Fire Safety" had performed an "Annual State Required Fire Safety
24 Equipment Inspection, Test and Certification" and was due the sum of \$413.11 for providing
25 the aforementioned service. In reliance upon the aforementioned material misrepresentation,
26 on or about December 15, 2014, Nevada Barricade & Sign Inc. remitted payment of \$413.11
27 to defendant at the address he provided on the invoice. At all relevant times herein,
28

1 defendant MUSICH knew full well that no service had been provided and no payment was
2 due.

3 Defendant MUSICH received each of the aforementioned payments at a private
4 mailbox that he maintained in Clark County, Nevada. He caused each of the payments to be
5 deposited into Wells Fargo Bank, N.A. Account No. XXXXXX3245 in the name of RMZ INC.,
6 d/b/a RMZ Fire Safety. At all relevant times herein, defendant MUSICH was the only signer
7 on this account. The aggregate loss as a result of the conduct alleged herein is \$1239.33.

8 All of which constitutes the crime of OBTAINING MONEY UNDER FALSE
9 PRETENSES, a category "B" felony in violation of NRS 205.380(1)(a).

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11 **COUNT 3**

12 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**
13 **ENTERPRISE OR OCCUPATION**
14 **CATEGORY "B" felony - NRS 205.377**

15 Defendant ROBERT LORIN MUSICH, in the County of Clark, State of Nevada, either
16 by virtue of his own actions or by the actions of his agents or employees, in the course of an
17 enterprise or occupation, knowingly and with the intent to defraud, engaged in an act, practice
18 or course of business, or employed a device scheme or artifice which operated or would have
19 operated as a fraud or deceit upon a person by means of a false representation or omission of
20 a material fact that he knew to be false or omitted, that he intended another to rely on, and
21 which resulted in a loss to a person who relied on the false representation or omission, in at
22 least two transactions having the same or similar pattern, intents, results, accomplices, victims
23 or methods of commission, or which were otherwise interrelated by distinguishing
24 characteristics and were not isolated incidents within 4 years and in which the aggregate loss
or intended loss was more than \$650, to wit:

25 In or between November and December of 2014, Defendant MUSICH, doing business
26 as "RMZ Inc." and/or "RMZ Fire Safety," committed the fraudulent acts more fully described in
27 Counts One (1) and Two (2) of this Complaint which are hereby incorporated by reference as
28 though fully set forth herein in the course of an enterprise or occupation. The purposes,

1 results, and methods of commission in all instances were the same or similar and the
2 aggregate loss or intended loss was \$1,239.33.

3 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
4 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in
5 violation of NRS 205.377.

6 All of which is contrary to the form, force and effect of the statutes in such cases made
7 and provided, and against the peace and dignity of the State of Nevada. Said complainant
8 makes this declaration under penalty of perjury.

9 Dated this 25th day of March, 2015.

10 ADAM PAUL LAXALT
11 Attorney General

12 By: 

13 JEFFREY H. SEGAL
14 Chief Deputy Attorney General
15 Attorneys for State of Nevada
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