

JUN 21 2017

BY, NATALIE ORTEGA, DEPUTY

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9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,

12 Plaintiff,

13 v.

14 ALICIA HERRERA, and ERNESTO
15 GERARDO FERNANDEZ-CARRANZA,

16 Defendant(s).

Case No.: C-17-324469-1

Dept. No.: XXIII

17
18 **INDICTMENT**

19 The above named defendants, ALICIA HERRERA, and ERNESTO GERARDO FERNANDEZ-
20 CARRANZA, are accused by the Clark County Grand Jury of the crimes(s) of:

- 21 • THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B" felony, in violation of NRS
22 205.0832 (one count against ALICIA HERRERA and two counts against ERNESTO GERARDO
23 FERNANDEZ-CARRANZA);
- 24 • POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION
25 TO ESTABLISH FALSE STATUS OR IDENTITY, a category "C" felony, in violation of NRS
26 205.465 (two counts against ALICIA HERRERA and one count against ERNESTO GERARDO
27 FERNANDEZ-CARRANZA); and

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- MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of NRS 205.377 (one count against each defendant),

in Clark County, State of Nevada as follows:

COUNT 1
POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY
Category "C" Felony - NRS 205.465

That the defendant, ALICIA HERRERA, in the County of Clark, State of Nevada, did possess, sell, or transfer, any document or personal identifying information for the purpose of establishing a false status for any other person, to wit:

On or about June 1, 2014 through July 1, 2014, Defendant ALICIA HERRERA did possess, sell, or transfer, to Florinda Yolanda Campos-Campos, a U.S. Customs and Border Protection Form I-94A bearing a counterfeit DHS Admission Stamp for the purpose of establishing a false legal status regarding Florinda Yolanda Campos-Campos' ability to lawfully work in the United States.

All of which constitutes the crime of POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "C" felony, in violation of NRS 205.465.

COUNT 2
THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "B" Felony - NRS 205.0832

That the defendant, ERNESTO GERARDO FERNANDEZ-CARRANZA, in the County of Clark, State of Nevada, did, without lawful authority, knowingly obtain property or services of another person by a material misrepresentation with intent to deprive that person of the property or services, and the value of said property was \$3,500 or more, to wit:

On or about March 30, 2014 through June 14, 2014, Defendant ERNESTO GERARDO FERNANDEZ-CARRANZA, without lawful authority, and knowingly, obtained \$3,500 or more from Leticia Cruz-Mejia by falsely informing her that he would provide Juan Miguel Cruz-Mejia and/or the

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1 wife of Juan Miguel Cruz-Mejia with authentic United States visas in exchange for said money, with the
2 intent to deprive Leticia Cruz-Mejia of said money.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a
4 category "B" felony, in violation NRS 205.0832.

5 **COUNT 3**
6 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
7 **Category "B" Felony - NRS 205.0832**

8 That the defendants, ALICIA HERRERA, and ERNESTO GERARDO FERNANDEZ-
9 CARRANZA, in the County of Clark, State of Nevada, did, without lawful authority, knowingly obtain, or
10 did aid and abet the other to obtain property or services of another person by a material misrepresentation,
11 with intent to deprive that person of the property or services, and the value of said property was \$3,500 or
12 more, to wit:

13 On or about January 31, 2014 through June 1, 2014:

- 14 • Defendants ERNESTO GERARDO FERNANDEZ-CARRANZA and ALICIA HERRERA,
15 without lawful authority and knowingly, obtained \$3,500 or more from Laura Martinez-Salas
16 and/or Victor Vazquez by falsely informing one or both of them that they would provide
17 authentic United States visas for Dora Ruiz-Vargas and Alfonso Vazquez-Avila, in exchange
18 for said money, with the intent to deprive Laura Martinez-Salas and/or Victor Vazquez of said
19 money; AND/OR
- 20 • Defendant ERNESTO GERARDO FERNANDEZ-CARRANZA did aid and abet Defendant
21 ALICIA HERRERA who obtained \$3,500 or more from Laura Martinez-Salas and/or Victor
22 Vazquez by knowingly and falsely informing one or both of them that she and Defendant
23 ERNESTO GERARDO FERNANDEZ-CARRANZA would provide authentic United States
24 visas for Dora Ruiz-Vargas and Alfonso Vazquez-Avila, by knowingly, falsely and
25 intentionally using his own success at crossing the border with his travel documents as proof
26 that the travel documents they were obtaining would be authentic.

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1 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a
2 category "B" felony, in violation NRS 205.0832.

3 **COUNT 4**
4 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**
5 **ESTABLISH FALSE STATUS OR IDENTITY**
6 **Category "C" Felony - NRS 205.465**

7 That the Defendants, ALICIA HERRERA, and ERNESTO GERARDO FERNANDEZ-
8 CARRANZA, in the County of Clark, State of Nevada, did possess, sell, or transfer, or did aid and abet the
9 other in possessing, selling, or transferring, any document or personal identifying information for the
10 purpose of establishing a false status for any other person, to wit:

11 On or about January 31, 2014 through June 1, 2014:

- 12 • Defendants ALICIA HERRERA and ERNESTO GERARDO FERNANDEZ-CARRANZA did
13 possess, sell, or transfer, to Laura Martinez-Salas and/or Victor Vazquez, purported U.S. visas
14 and U.S. Customs and Border Protection Form I-94As with counterfeit DHS Admission Stamps
15 for the purpose of establishing false legal statuses regarding the ability of Dora Ruiz-Vargas
16 and Alfonso Vazquez-Avila to lawfully enter and/or work in the United States; AND/OR
- 17 • Defendant ERNESTO GERARDO FERNANDEZ-CARRANZA did aid and abet Defendant
18 ALICIA HERRERA who possessed, sold or transferred, purported U.S. visas and U.S.
19 Customs and Border Protection Form I-94As with counterfeit DHS Admission Stamps to Laura
20 Martinez-Salas and/or Victor Vazquez for the purpose of establishing false legal statuses
21 regarding the ability of Dora Ruiz-Vargas and Alfonso Vazquez-Avila to lawfully enter and/or
22 work in the United States, by knowingly, falsely and intentionally using his own success at
23 crossing the border with his travel documents as proof that the travel documents they were
24 obtaining would work.

25 All of which constitutes the crime of POSSESSION OR SALE OF DOCUMENT OR PERSONAL
26 IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "C"
27 felony, in violation of NRS 205.465.

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COUNT 5
MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF
ENTERPRISE OR OCCUPATION
Category "B" Felony - NRS 205.377

That the defendants, ALICIA HERRERA, and ERNESTO GERARDO FERNANDEZ-CARRANZA, in the County of Clark, State of Nevada, in the course of an enterprise or occupation, did knowingly and with the intent to defraud, or did aid and abet the other to, engage in an act, practice or course of business or employed a device, scheme or artifice which operated or would have operated as a fraud or deceit upon a person by means of a false representation or omission of a material fact that: (a) the person knew to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any person who relied on the false representation or omission, in at least two transactions that had the same or similar pattern, intents, results, accomplices, victims or methods of commission, or were otherwise interrelated by distinguishing characteristics and were not isolated incidents within 4 years and in which the aggregate loss or intended loss was more than \$650, to wit:

On or about January 31, 2014 through July 1, 2014, Defendants ALICIA HERRERA and ERNESTO GERARDO FERNANDEZ-CARRANZA in and through the course of an enterprise purported to provide immigration services and/or travel documents, knowingly and with the intent to defraud, obtained thousands of dollars from Laura Martinez-Salas, Victor Vazquez and/or Leticia Cruz-Mejia, by means of knowingly and falsely representing to said individuals that Defendants would provide them with authentic documentation that would allow said individuals and/or associates of said individuals to enter and/or work in the United States, resulting in a loss of more than \$650. The allegations contained in counts one through four are hereby repeated and incorporated herein as if fully set forth in this count.

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1 All of which is contrary to the form, force and effect of the statutes in such cases made and
2 provided, and against the peace and dignity of the state of Nevada.

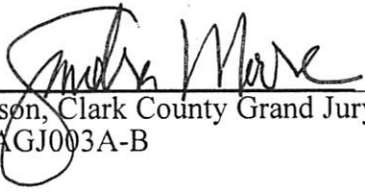
3 DATED this 20th day of June, 2017.

4 SUBMITTED BY

5 ADAM PAUL LAXALT
6 Attorney General

7 By: Kevin E. Hoff 11108
8 Michael C. Kovac, Bar No. 11177
9 Senior Deputy Attorney General
10 *Attorneys for the State of Nevada*

11 ENDORSEMENT: A True Bill

12 By: 
13 Foreperson, Clark County Grand Jury
14 GJ#17AGJ003A-B
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