

ORIGINAL

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JUSTICE COURT
LAS VEGAS NEVADA
BY TJD
DEPUTY

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

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 DAVID LIAM DINICOLA,
14 TONY VAUGHN CANADA ID #320029
aka ANTHONY VAUGHN CANADA,
15 RICHARD LEE MATTERS ID #7029345,
16 STEVE DENO PAPPAS IS #627184,
DALE ALAN WAGEMAN,
17 BENITO SANTIAGO IS # 2795840
aka BENITO SANTIAGO-MORENA,
18 and VIRGILIO HOMERO QUEZADA

19 Defendant.

Case No.: 17F22119ABCDEFG

Dept. No.: 11

17F22119A
CRM
Criminal Complaint
8850847



20 **CRIMINAL COMPLAINT**

21 ADAM PAUL LAXALT, Attorney General for the State of Nevada, complains and charges that:

22 The above-named defendants, DAVID LIAM DINICOLA, TONY VAUGHN CANADA,
23 RICHARD MATTERS, STEVE DENO PAPPAS, DALE ALAN WAGEMAN, BENITO SANTIAGO,
24 and VIRGILIO HOMERO QUEZADA, above named, are accused of having committed the following
25 offenses:

26 EMBEZZLEMENT, a category "B" felony in violation of NRS 205.300; EMBEZZLEMENT, a
27 category "C" felony in violation of NRS 205.300; THEFT, a category "B" felony in violation of NRS
28 205.0832; THEFT, a category "C" felony in violation of NRS 205.0832; POSSESSION OF STOLEN

1 PROPERTY, a category "C" felony in violation of NRS 205.275; BURGLARY, a category "B" felony, in
2 violation of NRS 205.060; and MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT, a
3 category "B" felony, in violation of NRS 205.377.

4 All of the acts alleged herein have been committed or consummated on or between December 19,
5 2014, and April 24, 2015, by the above-named Defendants, executed in whole or in part within the County
6 of Clark, State of Nevada, in the following manner:

7 **COUNT 1**
8 **EMBEZZLEMENT**
9 **CATEGORY "B" Felony - NRS 205.300**

10 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and DALE ALAN
11 WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the
12 actions of their agents or employees, while acting as bailee of any money, goods, or property belonging to
13 another, knowingly used or appropriated said money, goods, or property, or any part thereof, in any
14 manner or for any purpose other than that for which they were deposited or entrusted to Defendants, with
15 the intent to steal or defraud the owner of said money, goods, or property, to wit:

16 On or about December 19, 2014, Defendants DAVID LIAM DINICOLA, TONY VAUGHN
17 CANADA, and DALE ALAN WAGEMAN, without lawful authority, with the Defendants being
18 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
19 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
20 this crime be committed, by providing counsel and/or encouragement and by entering into a course of
21 conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a State of
22 Nevada credit card for approximately \$3,501.20, appropriating said tires for his own use; and whereby
23 DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and DALE ALAN WAGEMAN submitted
24 false work orders and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to
25 commit this crime, with the intent that the crime be committed; knowingly purchased tires from Southern
26 Tire Mart for approximately \$3,501.20, by using a credit card in the name of the State of Nevada, which
27 had been entrusted to TONY VAUGHN CANADA for use in his employment with the State of Nevada,
28 and then appropriating said tires for their own use.

All of which constitutes the crime of EMBEZZLEMENT, a category "B" felony in violation of

1 NRS 205.300.

2 **COUNT 2**
3 **THEFT**
4 **CATEGORY "B" Felony - NRS 205.0832**

5 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and DALE ALAN
6 WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the
7 actions of their agents or employees, did on or about December 19, 2014, willfully, knowingly,
8 feloniously, and without lawful authority, use the services or property of another person entrusted to them,
9 or placed in their possession for a limited, authorized period of determined or prescribed duration or for a
10 limited use, having a value of \$3,500.00 or more, belonging to the State of Nevada, in the following
11 manner, to wit: Defendants purchased tires from Southern Tire Mart for approximately \$3,501.20, by
12 using a credit card in the name of the State of Nevada, which had been entrusted to TONY VAUGHN
13 CANADA for use in his employment with the State of Nevada, and then appropriating said tires for their
14 own use. Defendants are criminally liable under one or more of the following principles of criminal
15 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission
16 of this crime, with the intent that this crime be committed, by providing counsel and/or encouragement and
17 by entering into a course of conduct whereby TONY VAUGHN CANADA purchased tires from Southern
18 Tire Mart using a State of Nevada credit card for approximately \$3,501.20, appropriating said tires for his
19 own use; and whereby DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and DALE ALAN
20 WAGEMAN submitted false work orders and/or false labor hours to justify said purchase; and/or (3)
21 pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

22 All of which constitutes the crime of THEFT, a category "B" felony in violation of NRS 205.0832.

23 **COUNT 3**
24 **EMBEZZLEMENT**
25 **CATEGORY "C" Felony - NRS 205.300**

26 Defendants STEVE DENO PAPPAS, TONY VAUGHN CANADA, and DALE ALAN
27 WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the
28 actions of their agents or employees, while acting as bailee of any money, goods, or property belonging to
another, knowingly used or appropriated said money, goods, or property, or any part thereof, in any
manner or for any purpose other than that for which they were deposited or entrusted to Defendants, with

1 the intent to steal or defraud the owner of said money, goods, or property, to wit:

2 On or about February 26, 2015, Defendants STEVE DENO PAPPAS, TONY VAUGHN
3 CANADA, and DALE ALAN WAGEMAN, without lawful authority, with the Defendants being
4 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
5 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
6 this crime be committed, by providing counsel and/or encouragement and by entering into a course of
7 conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a State of
8 Nevada credit card for approximately \$3,113.96, appropriating said tires for his own use; and whereby
9 STEVE DENO PAPPAS, TONY VAUGHN CANADA, and DALE ALAN WAGEMAN submitted false
10 work orders and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit
11 this crime, with the intent that the crime be committed; knowingly purchased tires from Southern Tire
12 Mart for approximately \$3,113.96, by using a credit card in the name of the State of Nevada, which had
13 been entrusted to TONY VAUGHN CANADA for use in his employment with the State of Nevada, and
14 then appropriating said tires for their own use.

15 All of which constitutes the crime of EMBEZZLEMENT, a category "C" felony in violation of
16 NRS 205.300.

17 **COUNT 4**
18 **THEFT**
19 **CATEGORY "C" Felony - NRS 205.0832**

20 Defendants STEVE DENO PAPPAS, TONY VAUGHN CANADA, and DALE ALAN
21 WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the
22 actions of their agents or employees, did on or about February 26, 2015, willfully, knowingly, feloniously,
23 and without lawful authority, use the services or property of another person entrusted to them, or placed in
24 their possession for a limited, authorized period of determined or prescribed duration or for a limited use,
25 having a value of \$650.00 or more, belonging to the State of Nevada, in the following manner, to wit:
26 Defendants purchased tires from Southern Tire Mart for approximately \$3,113.96, by using a credit card in
27 the name of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use in his
28 employment with the State of Nevada, and then appropriating said tires for their own use. Defendants are
criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly

1 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
2 this crime be committed, by providing counsel and/or encouragement and by entering into a course of
3 conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a State of
4 Nevada credit card for approximately \$3,113.96, appropriating said tires for his own use; and whereby
5 STEVE DENO PAPPAS, TONY VAUGHN CANADA, and DALE ALAN WAGEMAN submitted false
6 work orders and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit
7 this crime, with the intent that the crime be committed.

8 All of which constitutes the crime of THEFT, a category "C" felony in violation of NRS 205.0832.

9
10 **COUNT 5**
EMBEZZLEMENT
CATEGORY "C" Felony - NRS 205.300

11 Defendants TONY VAUGHN CANADA and DALE ALAN WAGEMAN, in the County of Clark,
12 State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, while
13 acting as bailee of any money, goods, or property belonging to another, knowingly used or appropriated
14 said money, goods, or property, or any part thereof, in any manner or for any purpose other than that for
15 which they were deposited or entrusted to Defendants, with the intent to steal or defraud the owner of said
16 money, goods, or property, to wit:

17 On or about March 6, 2015, Defendants TONY VAUGHN CANADA and DALE ALAN
18 WAGEMAN, without lawful authority, with the Defendants being criminally liable under one or more of
19 the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
20 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
21 providing counsel and/or encouragement and by entering into a course of conduct whereby TONY
22 VAUGHN CANADA purchased tires from Southern Tire Mart using a State of Nevada credit card for
23 approximately \$2,785.76, appropriating said tires for his own use; and whereby DAVID LIAM
24 DINICOLA, TONY VAUGHN CANADA, and DALE ALAN WAGEMAN submitted false work orders
25 and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit this crime,
26 with the intent that the crime be committed; knowingly purchased tires from Southern Tire Mart for
27 approximately \$2,785.76, by using a credit card in the name of the State of Nevada, which had been
28 entrusted to TONY VAUGHN CANADA for use in his employment with the State of Nevada, and then

1 appropriating said tires for their own use.

2 All of which constitutes the crime of EMBEZZLEMENT, a category "C" felony in violation of
3 NRS 205.300.

4 **COUNT 6**
5 **THEFT**
6 **CATEGORY "C" Felony - NRS 205.0832**

7 Defendants TONY VAUGHN CANADA and DALE ALAN WAGEMAN, in the County of Clark,
8 State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, did on
9 or about March 6, 2015, willfully, knowingly, feloniously, and without lawful authority, use the services
10 or property of another person entrusted to them, or placed in their possession for a limited, authorized
11 period of determined or prescribed duration or for a limited use, having a value of \$650.00 or more,
12 belonging to the State of Nevada, in the following manner, to wit: Defendants purchased tires from
13 Southern Tire Mart for approximately \$2,785.76, by using a credit card in the name of the State of Nevada,
14 which had been entrusted to TONY VAUGHN CANADA for use in his employment with the State of
15 Nevada, and then appropriating said tires for their own use. Defendants are criminally liable under one or
16 more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
17 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
18 providing counsel and/or encouragement and by entering into a course of conduct whereby TONY
19 VAUGHN CANADA purchased tires from Southern Tire Mart using a State of Nevada credit card for
20 approximately \$2,785.76, appropriating said tires for his own use; and whereby TONY VAUGHN
21 CANADA and DALE ALAN WAGEMAN submitted false work orders and/or false labor hours to justify
22 said purchase; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
23 committed.

24 All of which constitutes the crime of THEFT, a category "C" felony in violation of NRS 205.0832.

25 **COUNT 7**
26 **EMBEZZLEMENT**
27 **CATEGORY "B" Felony - NRS 205.300**

28 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, STEVE DENO PAPPAS,
and DALE ALAN WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own
actions or by the actions of their agents or employees, while acting as bailee of any money, goods, or

1 property belonging to another, knowingly used or appropriated said money, goods, or property, or any part
2 thereof, in any manner or for any purpose other than that for which they were deposited or entrusted to
3 Defendants, with the intent to steal or defraud the owner of said money, goods, or property, to wit:

4 On or about March 19, 2015, Defendants DAVID LIAM DINICOLA, TONY VAUGHN
5 CANADA, STEVE DENO PAPPAS, and DALE ALAN WAGEMAN, without lawful authority, with the
6 Defendants being criminally liable under one or more of the following principles of criminal liability, to-
7 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime,
8 with the intent that this crime be committed, by providing counsel and/or encouragement and by entering
9 into a course of conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart
10 using a State of Nevada credit card for approximately \$4,662.00, appropriating said tires for his own use;
11 and whereby DAVID LIAM DINICOLA, TONY VAUGHN CANADA, STEVE DENO PAPPAS, and
12 DALE ALAN WAGEMAN submitted false work orders and/or false labor hours to justify said purchase;
13 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed;
14 knowingly purchased tires from Southern Tire Mart for approximately \$4,662.00, by using a credit card in
15 the name of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use in his
16 employment with the State of Nevada, and then appropriating said tires for their own use.

17 All of which constitutes the crime of EMBEZZLEMENT, a category "B" felony in violation of
18 NRS 205.300.

19 **COUNT 8**
20 **THEFT**
CATEGORY "B" felony - NRS 205.0832

21 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, STEVE DENO PAPPAS,
22 and DALE ALAN WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own
23 actions or by the actions of their agents or employees, did on or about March 19, 2015, willfully,
24 knowingly, feloniously, and without lawful authority, use the services or property of another person
25 entrusted to them, or placed in their possession for a limited, authorized period of determined or prescribed
26 duration or for a limited use, having a value of \$3,500.00 or more, belonging to the State of Nevada, in the
27 following manner, to wit: Defendants purchased tires from Southern Tire Mart for approximately
28 \$4,662.00, by using a credit card in the name of the State of Nevada, which had been entrusted to TONY

1 VAUGHN CANADA for use in his employment with the State of Nevada, and then appropriating said
2 tires for their own use. Defendants are criminally liable under one or more of the following principles of
3 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
4 commission of this crime, with the intent that this crime be committed, by providing counsel and/or
5 encouragement and by entering into a course of conduct whereby TONY VAUGHN CANADA purchased
6 tires from Southern Tire Mart using a State of Nevada credit card for approximately \$4,662.00,
7 appropriating said tires for his own use; and whereby DAVID LIAM DINICOLA, TONY VAUGHN
8 CANADA, STEVE DENO PAPPAS, and DALE ALAN WAGEMAN submitted false work orders and/or
9 false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit this crime, with
10 the intent that the crime be committed.

11 All of which constitutes the crime of THEFT, a category "B" felony in violation of NRS 205.0832.

12 **COUNT 9**
13 **EMBEZZLEMENT**
14 **CATEGORY "B" Felony - NRS 205.300**

15 Defendants DAVID LIAM DINICOLA and TONY VAUGHN CANADA in the County of Clark,
16 State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, while
17 acting as bailee of any money, goods, or property belonging to another, knowingly used or appropriated
18 said money, goods, or property, or any part thereof, in any manner or for any purpose other than that for
19 which they were deposited or entrusted to Defendants, with the intent to steal or defraud the owner of said
20 money, goods, or property, to wit:

21 On or about April 3, 2015, Defendants DAVID LIAM DINICOLA and TONY VAUGHN
22 CANADA, without lawful authority, with the Defendants being criminally liable under one or more of the
23 following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding
24 or abetting in the commission of this crime, with the intent that this crime be committed, by providing
25 counsel and/or encouragement and by entering into a course of conduct whereby TONY VAUGHN
26 CANADA purchased tires from Southern Tire Mart using a State of Nevada credit card for approximately
27 \$4,178.40, appropriating said tires for his own use; and whereby DAVID LIAM DINICOLA and TONY
28 VAUGHN CANADA submitted false work orders and/or false labor hours to justify said purchase; and/or
(3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly

1 purchased tires from Southern Tire Mart for approximately \$4,178.40, by using a credit card in the name
2 of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use in his
3 employment with the State of Nevada, and then appropriating said tires for their own use.

4 All of which constitutes the crime of EMBEZZLEMENT, a category "B" felony in violation of
5 NRS 205.300.

6 **COUNT 10**
7 **THEFT**
8 **CATEGORY "B" felony - NRS 205.0832**

8 Defendants DAVID LIAM DINICOLA and TONY VAUGHN CANADA in the County of Clark,
9 State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, did on
10 or about April 3, 2015, willfully, knowingly, feloniously, and without lawful authority, use the services or
11 property of another person entrusted to them, or placed in their possession for a limited, authorized period
12 of determined or prescribed duration or for a limited use, having a value of \$3,500.00 or more, belonging
13 to the State of Nevada, in the following manner, to wit: Defendants purchased tires from Southern Tire
14 Mart for approximately \$4,178.40, by using a credit card in the name of the State of Nevada, which had
15 been entrusted to TONY VAUGHN CANADA for use in his employment with the State of Nevada, and
16 then appropriating said tires for their own use. Defendants are criminally liable under one or more of the
17 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding
18 or abetting in the commission of this crime, with the intent that this crime be committed, by providing
19 counsel and/or encouragement and by entering into a course of conduct whereby TONY VAUGHN
20 CANADA purchased tires from Southern Tire Mart using a State of Nevada credit card for approximately
21 \$4,178.40, appropriating said tires for his own use; and whereby DAVID LIAM DINICOLA and TONY
22 VAUGHN CANADA submitted false work orders and/or false labor hours to justify said purchase; and/or
23 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

24 All of which constitutes the crime of THEFT, a category "B" felony in violation of NRS 205.0832.

25 **COUNT 11**
26 **EMBEZZLEMENT**
27 **CATEGORY "B" Felony - NRS 205.300**

27 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and STEVE DENO
28 PAPPAS, in the County of Clark, State of Nevada, either by virtue of their own actions or by the actions of

1 their agents or employees, while acting as bailee of any money, goods, or property belonging to another,
2 knowingly used or appropriated said money, goods, or property, or any part thereof, in any manner or for
3 any purpose other than that for which they were deposited or entrusted to Defendants, with the intent to
4 steal or defraud the owner of said money, goods, or property, to wit:

5 On or about April 17, 2015, Defendants DAVID LIAM DINICOLA, TONY VAUGHN
6 CANADA, and STEVE DENO PAPPAS, without lawful authority, with the Defendants being criminally
7 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing
8 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
9 be committed, by providing counsel and/or encouragement and by entering into a course of conduct
10 whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a State of Nevada
11 credit card for approximately \$4,722.84, appropriating said tires for his own use; and whereby DAVID
12 LIAM DINICOLA and TONY VAUGHN CANADA submitted false work orders and/or false labor hours
13 to justify said purchase; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
14 crime be committed; knowingly purchased tires from Southern Tire Mart for approximately \$4,722.84, by
15 using a credit card in the name of the State of Nevada, which had been entrusted to TONY VAUGHN
16 CANADA for use in his employment with the State of Nevada, and then appropriating said tires for their
17 own use.

18 All of which constitutes the crime of EMBEZZLEMENT, a category "B" felony in violation of
19 NRS 205.300.

20 **COUNT 12**
21 **THEFT**
22 **CATEGORY "B" felony - NRS 205.0832**

23 Defendants DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and STEVE DENO
24 PAPPAS in the County of Clark, State of Nevada, either by virtue of their own actions or by the actions of
25 their agents or employees, did on or about April 17, 2015, willfully, knowingly, feloniously, and without
26 lawful authority, use the services or property of another person entrusted to them, or placed in their
27 possession for a limited, authorized period of determined or prescribed duration or for a limited use,
28 having a value of \$3,500.00 or more, belonging to the State of Nevada, in the following manner, to wit:
Defendants purchased tires from Southern Tire Mart for approximately \$4,722.84, by using a credit card in

1 the name of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use in his
2 employment with the State of Nevada, and then appropriating said tires for their own use. Defendants are
3 criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly
4 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
5 this crime be committed, by providing counsel and/or encouragement and by entering into a course of
6 conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a State of
7 Nevada credit card for approximately \$4,722.84, appropriating said tires for his own use; and whereby
8 DAVID LIAM DINICOLA, TONY VAUGHN CANADA, and STEVE DENO PAPPAS submitted false
9 work orders and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit
10 this crime, with the intent that the crime be committed.

11 All of which constitutes the crime of THEFT, a category "B" felony in violation of NRS 205.0832.

12 **COUNT 13**
13 **EMBEZZLEMENT**
14 **CATEGORY "C" Felony - NRS 205.300**

15 Defendants STEVE DENO PAPPAS, TONY VAUGHN CANADA, RICHARD MATTERS, and
16 DALE ALAN WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions
17 or by the actions of their agents or employees, while acting as bailee of any money, goods, or property
18 belonging to another, knowingly used or appropriated said money, goods, or property, or any part thereof,
19 in any manner or for any purpose other than that for which they were deposited or entrusted to Defendants,
20 with the intent to steal or defraud the owner of said money, goods, or property, to wit:

21 On or about April 24, 2015, Defendants STEVE DENO PAPPAS, TONY VAUGHN CANADA,
22 RICHARD MATTERS, and DALE ALAN WAGEMAN, without lawful authority, with the Defendants
23 being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by
24 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the
25 intent that this crime be committed, by providing counsel and/or encouragement and by entering into a
26 course of conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart using a
27 State of Nevada credit card for approximately \$3,361.36, appropriating said tires for his own use; and
28 whereby STEVE DENO PAPPAS, TONY VAUGHN CANADA, RICHARD MATTERS, and DALE
ALAN WAGEMAN submitted false work orders and/or false labor hours to justify said purchase; and/or

1 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly
2 purchased tires from Southern Tire Mart for approximately \$3,361.36, by using a credit card in the name
3 of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use in his
4 employment with the State of Nevada, and then appropriating said tires for their own use.

5 All of which constitutes the crime of EMBEZZLEMENT, a category "C" felony in violation of
6 NRS 205.300.

7 **COUNT 14**
8 **THEFT**
9 **CATEGORY "C" Felony - NRS 205.0832**

10 Defendants STEVE DENO PAPPAS, TONY VAUGHN CANADA, RICHARD MATTERS, and
11 DALE ALAN WAGEMAN, in the County of Clark, State of Nevada, either by virtue of their own actions
12 or by the actions of their agents or employees, did on or about April 24, 2015, willfully, knowingly,
13 feloniously, and without lawful authority, use the services or property of another person entrusted to them,
14 or placed in their possession for a limited, authorized period of determined or prescribed duration or for a
15 limited use, having a value of \$650.00 or more, belonging to the State of Nevada, in the following manner,
16 to wit: Defendants purchased tires from Southern Tire Mart for approximately \$3,361.36, by using a credit
17 card in the name of the State of Nevada, which had been entrusted to TONY VAUGHN CANADA for use
18 in his employment with the State of Nevada, and then appropriating said tires for their own use.
19 Defendants are criminally liable under one or more of the following principles of criminal liability, to wit:
20 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime,
21 with the intent that this crime be committed, by providing counsel and/or encouragement and by entering
22 into a course of conduct whereby TONY VAUGHN CANADA purchased tires from Southern Tire Mart
23 using a State of Nevada credit card for approximately \$3,361.36, appropriating said tires for his own use;
24 and whereby STEVE DENO PAPPAS, TONY VAUGHN CANADA, RICHARD MATTERS, and DALE
25 ALAN WAGEMAN submitted false work orders and/or false labor hours to justify said purchase; and/or
26 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

27 All of which constitutes the crime of THEFT, a category "C" felony in violation of NRS 205.0832.

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1 COUNT 21
2 MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF
3 ENTERPRISE OR OCCUPATION
4 Category "B" Felony - NRS 205.377

5 December 19, 2014, and April 24, 2015, Defendants DAVID LIAM DINICOLA, TONY
6 VAUGHN CANADA, STEVE DENO PAPPAS, DALE ALAN WAGEMAN, and RICHARD
7 MATTERS, without lawful authority, with the Defendants being criminally liable under one or more of
8 the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
9 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
10 providing counsel and/or encouragement and by entering into a course of conduct whereby DAVID LIAM
11 DINICOLA, TONY VAUGHN CANADA, STEVE DENO PAPPAS, DALE ALAN WAGEMAN, and/or
12 RICHARD MATTERS purchased tires from using a State of Nevada credit card and/or submitted false
13 work orders and/or false labor hours to justify said purchase; and/or (3) pursuant to a conspiracy to commit
14 this crime, with the intent that the crime be committed;

15 As set forth in Counts One (1) through Fourteen (14), incorporated by reference as though fully set
16 forth herein, Defendants have committed multiple transactions involving fraud or deceit in the course of
17 enterprise or occupation, in two or more transactions in which the purpose, results, methods or commission
18 was the same or similar, each having a value of \$650 or more.

19 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR
20 DECEIT, a category "B" felony in violation of NRS 205.377.


21 Said Complainant makes this declaration under penalty of perjury.

22 DATED this 15th day of December, 2017.

23 SUBMITTED BY

24 ADAM PAUL LAXALT
25 Attorney General

26 By:

27  NV Bar # 5491
28 DANIEL WESTMEYER (Bar No. 10273)
Senior Deputy Attorney General
Attorneys for the State of Nevada