



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

12 STATE OF NEVADA,

13 Plaintiff,

14 v.

15 TRUNG ANH LE  
a.k.a. Trunk Ann Le,

16 Defendant.

Case No.: C-18-333562-1

Dept. No.: 23

17  
18 **INFORMATION**

19 ADAM PAUL LAXALT, Attorney General for the State of Nevada, in the name and by the  
20 authority of the State of Nevada, informs the Court:

21 TRUNG ANH LE has committed the crimes(s) of one (1) count of PATTERN OF MORTGAGE  
22 LENDING FRAUD, a category "B" felony in violation of NRS 205.372.

23 All of the acts alleged herein have been committed or completed between March 11, 2015 and  
24 March 24, 2015 by the above-named defendant, within the County of Clark, State of Nevada, in the  
25 following manner:

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**COUNT I**  
**PATTERN OF MORTGAGE LENDING FRAUD**  
**Category "B" Felony - NRS 205.372**

That the defendant, TRUNG ANH LE, in the County of Clark, State of Nevada, on or between March 11, 2015 and March 24, 2015, knowingly, and with the intent to defraud, misrepresented himself as the true and correct owners of real property located at [REDACTED]

[REDACTED] by impersonating the true owners, [REDACTED], as a way to secure hard money loans in the amount of \$180,000.00 via an electronic wire transfer from ROBERT C. WELCH, III. As a result of the Defendant's misrepresentations, Tigor Title filed with the Clark County Recorder's Office three (3) Quitclaim Deeds and three (3) Deeds of Trust with Assignment of Rents signed by the Defendant. However, these properties were not owned by the Defendant, nor did he have authority to cloud title or otherwise encumber the properties. Defendant was aware of the misrepresentations of ownership/authority over these properties when he caused the documents to be filed with the Clark County Recorder's Office.

All of which constitutes the crime of PATTERN OF MORTGAGE LENDING FRAUD, a category "B" felony in violation of NRS 205.372.

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

DATED this 19<sup>th</sup> day of July, 2018.

SUBMITTED BY:

ADAM PAUL LAXALT  
Attorney General

By: /s/ Alissa Engler  
ALISSA ENGLER (Bar No. 11940)  
Senior Deputy Attorney General  
*Attorneys for the State of Nevada*