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AARON D. FORD
2 Attorney General
LAURIE L. TROTTER (Bar #8696)
3 Senior Deputy Attorney General
State of Nevada
4 Office of the Attorney General
5420 Kietzke Lane, Suite 202
5 Reno, Nevada 89511
(775) 687-212- (phone)
6 (775) 688-1822 (fax)
ltrotter@ag.nv.gov
7 Attorneys for Plaintiff

8 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

9 IN AND FOR THE COUNTY OF WASHOE

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 ALEC STEVEN KOLODGE

14 Defendant.

Case No. CR21-0583

Dept. No. 15

15 **CRIMINAL INFORMATION**

16 AARON D. FORD, Attorney General of the State of Nevada, and LAURIE L. TROTTER, Senior
17 Deputy Attorney General, in the name and by the authority of the State of Nevada, inform the above-entitled
18 court that ALEC STEVEN KOLODGE (KOLODGE), contrary to the form, force and effect of statutes in
19 such cases made and provided, and against the peace and dignity of the State of Nevada, committed the
20 following offense:

21 **COUNT I**

22 **THEFT**

23 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

24 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly draw and/or pass a
25 check, and in exchange obtained property or services, when KOLODGE knew that the check will not be
26 paid when presented, and the value of the property or services involved in the theft is \$3,500 or more, in
27 the following manner, to wit:

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- 1 a. On or about March 20, 2017, KOLODGE drafted and/or passed check number 1073, made
2 payable to Dolan Toyota in the amount of approximately \$60,631.48, in exchange for a
3 vehicle; this check was not paid when presented; and/or
- 4 b. On or about March 25, 2017, KOLODGE drafted and/or passed check number 1074, made
5 payable to Dolan Toyota in the amount of approximately \$60,241.87, in exchange for a
6 vehicle; this check was not paid when presented; and/or
- 7 c. On or about March 25, 2017, KOLODGE drafted and/or passed check number 1076, made
8 payable to Dolan Lexus in the amount of approximately \$98,397.66, in exchange for a
9 vehicle; this check was not paid when presented; and/or
- 10 d. On or about March 25, 2017, KOLODGE drafted and/or passed check number 1077, made
11 payable to Dolan Lexus in the amount of approximately \$59,827.73, in exchange for a
12 vehicle; this check was not paid when presented; and/or
- 13 e. On or about June 6, 2018, KOLODGE drafted and/or passed check number 1025, made
14 payable to Audi Reno Tahoe in the amount of \$78,000, in exchange for a vehicle; this
15 check was not paid when presented; and/or
- 16 f. On or about December 22, 2017, KOLODGE drafted and/or passed check number 1095,
17 made payable to Taylor Krammer in the amount of approximately \$13,353, in exchange for
18 services rendered during the course and scope of employment, while working at
19 KOLODGE's direction; this check was not paid when presented; and/or
- 20 g. On or about November 24, 2018, KOLODGE drafted and/or passed check number 329, made
21 payable to Michael Lambert in the amount of \$50,000, in exchange for property or services
22 from which KOLODGE benefited, and which were paid by Michael Lambert on his credit
23 card upon KOLODGE's promise that KOLODGE and/or Auko Scientific or Auko Science
24 and/or MMI Research LLC and/or Metanoia Pharmaceuticals would reimburse him; this check
25 was not paid when presented.

26 The allegations set forth in Counts 2 through 8 are hereby incorporated herein as if fully set forth in
27 this count., all or some of which occurred in Washoe County, State of Nevada.

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1 **COUNT 2**

2 **THEFT**

3 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

4 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
5 intangible property or services of another person by a material misrepresentation with intent to deprive that
6 person of the property or services, and the value of the property or services involved in the theft is \$3,500
7 or more, in the following manner, to wit: between February 2017 and December 2017, KOLODGE
8 represented himself as an employee/officer/manager/agent of a business named Auko Scientific or Auko
9 Science and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to Taylor
10 Krammer. Ms. Krammer accepted this offer of employment and worked at KOLODGE's direction in the
11 above-named business without receiving wages, as promised, the value of such wages and/or out-of-
12 pocket losses due to this misrepresentation is at least \$13,000 or more. The allegations set forth in Count 1
13 and Counts 3 - 8 are hereby incorporated herein as if fully set forth in this count, all or some of which
14 occurred in Washoe County, Nevada.

15 **COUNT 3**

16 **THEFT**

17 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

18 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
19 intangible property or services of another person by a material misrepresentation with intent to deprive that
20 person of the property or services, and the value of the property or services involved in the theft is \$3,500
21 or more, in the following manner, to wit: between December 1, 2017, and April 30, 2018, KOLODGE
22 represented himself as an employee/officer/manager/agent of a business named Auko Scientific or Auko
23 Science and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to
24 Brandon Daniels. Mr. Daniels accepted this offer of employment and worked at KOLODGE's direction in
25 the above-named business without receiving wages, as promised, the value of such wages and/or losses
26 due to this misrepresentation is at least \$5,200 or more. The allegations set forth in Counts 1 – 2 and Counts
27 4 - 8 are hereby incorporated herein as if fully set forth in this count, all or some of which occurred in
28 Washoe County, Nevada.

1 **COUNT 4**

2 **THEFT**

3 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

4 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
5 intangible property or services of another person by a material misrepresentation with intent to deprive that
6 person of the property or services, and the value of the property or services involved in the theft is \$3,500
7 or more, in the following manner, to wit: between February 2018 and May 2018, KOLODGE represented
8 himself as an employee/officer/manager/agent of a business named Auko Scientific or Auko Science
9 and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to Mackenna
10 Dupont. Ms. Dupont accepted KOLODGE's offer of employment and worked at KOLODGE's direction
11 in the above-named business without receiving wages or health insurance, as promised, the value of such
12 unpaid wages and/or out-of-pocket losses due to this misrepresentation is at least \$30,000. The allegations
13 set forth in Counts 1 – 3 and Counts 5 – 8 are hereby incorporated herein as if fully set forth in this count, all
14 or some of which occurred in Washoe County, Nevada.

15 **COUNT 5**

16 **THEFT**

17 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

18 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
19 intangible property or services of another person by a material misrepresentation with intent to deprive that
20 person of the property or services, and the value of the property or services involved in the theft is \$3,500
21 or more, in the following manner, to wit: between November 2017 and March 2018, KOLODGE
22 represented himself as an employee/officer/manager/agent of a business named Auko Scientific or Auko
23 Science and/or Pfizer Pharmaceuticals and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and
24 offered employment to William Robert Varie. Mr. Varie accepted KOLODGE'S offer of employment and
25 worked at the direction of KOLODGE in the above-named business without receiving wages, as promised,
26 the value of such wages and out-of-pocket losses due to this misrepresentation is at least \$10,000 or more.
27 The allegations set forth in Counts 1 - 4 and Counts 6 - 8 are hereby incorporated herein as if fully set forth in
28 this count, all or some of which occurred in Washoe County, Nevada.

1 **COUNT 6**

2 **THEFT**

3 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

4 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
5 intangible property or services of another person by a material misrepresentation with intent to deprive that
6 person of the property or services, and the value of the property or services involved in the theft is \$3,500
7 or more, in the following manner, to wit: between September 1, 2017, and November 30, 2018,
8 KOLODGE represented himself as an employee/officer/manager/agent of a business named Auko
9 Scientific or Auko Science and/or Pfizer Pharmaceuticals and/or MMI Research LLC and/or Metanoia
10 Pharmaceuticals, and offered employment to Michael Lambert. Mr. Lambert accepted KOLODGE's offer
11 of employment and worked at KOLODGE's direction in the above-named business without receiving
12 wages, as promised. At KOLODGE's request and promise of reimbursement, Mr. Lambert paid
13 approximately \$22,883.99 for products and services with his personal credit card, for which KOLODGE
14 benefited, after KOLODGE promised that these expenses would be reimbursed by the above-named
15 business and/or KOLODGE; Mr. Lambert did not receive the promised reimbursement. The value of the
16 lost wages and out-of-pocket losses due to the misrepresentation is approximately \$22,883 or more. The
17 allegations set forth in Counts 1 - 5 and Counts 7-8 are hereby incorporated herein as if fully set forth in this
18 count, all or some of which occurred in Washoe County, Nevada.

19 **COUNT 7**

20 **THEFT**

21 **Category "B" Felony – NRS 205.0832 and NRS 205.0835(4)**

22 That the Defendant, KOLODGE, did willfully, unlawfully, and knowingly obtain real, personal or
23 intangible property or services of another person by a material misrepresentation with intent to deprive that
24 person of the property or services, and the value of the property or services involved in the theft is \$3,500
25 or more, in the following manner, to wit: between January 1, 2018, and September 30, 2018, KOLODGE
26 represented himself as an employee/officer/manager/agent of a business named Auko Scientific or Auko
27 Science and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to Sandra
28 Patterson, including the promise of reimbursement for moving expenses from Arizona. Ms. Patterson

1 accepted KOLODGE's offer of employment and moved from Arizona to Nevada, relying on the promise
2 of work and reimbursement for moving expenses, but her employment never began as promised. The
3 value of lost wages and/or out-of-pocket losses is at least \$17,000 or more. The allegations set forth in
4 Counts 1 - 6 and Count 8 are hereby incorporated herein as if fully set forth in this count, all or some of
5 which occurred in Washoe County, Nevada.

6 **COUNT 8**

7 **PRINCIPAL TO MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**
8 **Category B Felony – NRS 205.377 and NRS 195.020**

9 KOLODGE, on or between January 1, 2017, and November 30, 2018, did willfully and unlawfully,
10 aid or abet another in the commission of the offense, or acted personally, as a continuing course of conduct
11 and in the course of an enterprise or occupation, knowingly and with the intent to defraud, engage in an act,
12 practice or course of business or employ a device, scheme or artifice which operates or would operate as a
13 fraud or deceit upon a person by means of a false representation or omission of a material fact that, (a) the
14 person knows to be false or omitted; (b) the person intends another to rely on; and (c) results in a loss to any
15 person who relied on the false representation or omission, in at least two transactions that have the same or
16 similar patterns, intents, results, accomplices, victims or methods of commission, or are otherwise interrelated
17 by distinguishing characteristics and are not isolated incidents within 4 years and in which the aggregate loss
18 or intended loss is more than \$650, to-wit:

- 19 a. between February 2017 and December 2017, KOLODGE represented himself as an
20 employee/officer/manager/agent of a business named Auko Scientific or Auko Science
21 and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to
22 Taylor Krammer. Ms. Krammer accepted this offer of employment and worked at
23 KOLODGE's direction in the above-named business without receiving wages, as promised,
24 the value of such wages and/or out-of-pocket losses due to this misrepresentation is at least
25 \$13,000 or more; and/or
26 b. between December 1, 2017, and April 30, 2018, KOLODGE represented himself as an
27 employee/officer/manager/agent of a business named Auko Scientific or Auko Science
28 and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to

1 Brandon Daniels. Mr. Daniels accepted this offer of employment and worked at
2 KOLODGE's direction in the above-named business without receiving wages, as promised,
3 the value of such wages and/or losses due to this misrepresentation is at least \$5,200 or
4 more; and/or

5 c. between February 2018 and May 2018, KOLODGE represented himself as an
6 employee/officer/manager/agent of a business named Auko Scientific or Auko Science
7 and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to
8 Mackenna Dupont. Ms. Dupont accepted KOLODGE'S offer of employment and worked
9 at KOLODGE's direction in the above-named business without receiving wages or health
10 insurance, as promised, the value of such unpaid wages and/or out-of-pocket losses due to
11 this misrepresentation is at least \$30,000; and/or

12 d. between November 2017 and March 2018, KOLODGE represented himself as an
13 employee/officer/manager/agent of a business named Auko Scientific or Auko Science
14 and/or Pfizer Pharmaceuticals and/or MMI Research LLC and/or Metanoia
15 Pharmaceuticals, and offered employment to William Robert Varie. Mr. Varie accepted
16 KOLODGE'S offer of employment and worked for KOLODGE in the above-named
17 business without receiving wages, as promised, the value of such wages and out-of-pocket
18 losses due to this misrepresentation is at least \$10,000 or more; and/or

19 e. between September 1, 2017, and November 30, 2018, KOLODGE represented himself as
20 an employee/officer/manager/agent of a business named Auko Scientific or Auko Science
21 and/or Pfizer Pharmaceuticals and/or MMI Research LLC and/or Metanoia
22 Pharmaceuticals, and offered employment to Michael Lambert. Mr. Lambert accepted
23 KOLODGE's offer of employment and worked at KOLODGE's direction in the above-
24 named business without receiving wages, as promised. At KOLODGE's request and
25 promise of reimbursement, Mr. Lambert purchased approximately \$22,883.99 in products
26 and services with his personal credit card, for which KOLODGE benefited, after
27 KOLODGE promised that these expenses would be reimbursed by the above-named
28 business and/or KOLODGE; Mr. Lambert did not receive the promised reimbursement.

1 The value of the lost wages and out-of-pocket losses due to the misrepresentation is
2 approximately \$22,883 or more; and/or

3 f. between January 1, 2018, and September 30, 2018, KOLODGE represented himself as an
4 employee/officer/manager/agent of a business named Auko Scientific or Auko Science
5 and/or MMI Research LLC and/or Metanoia Pharmaceuticals, and offered employment to
6 Sandra Patterson, which included the promise of reimbursement for moving expenses from
7 Arizona. Ms. Patterson accepted KOLODGE's offer of employment and moved from
8 Arizona to Nevada, relying on the promise of work and reimbursement for moving
9 expenses, but her employment never started as promised. The value of lost wages and/or
10 out-of-pocket losses is least \$17,000 or more; and/or

11 g. KOLODGE knowingly obtained personal identifying information of another person and
12 with the intent to commit an unlawful act, and used the personal identifying information for
13 an unlawful purpose, to wit: KOLODGE obtained the personal identifying information of
14 another, to-wit: the name "David AuCoin," and used said name on or about October 2,
15 2017, in an email to create an appearance of prestige and/or legitimacy for KOLODGE
16 and/or Auko Scientific or Auko Science, for the purpose of recruiting employees and/or
17 obtaining credit, goods, or services under false pretenses; and/or

18 h. on or about December 22, 2017, KOLODGE drafted and/or passed check number 1095
19 made payable to Taylor Krammer in the amount of approximately \$13,353, in exchange for
20 services rendered during the course and scope of employment, while working at
21 KOLODGE's direction, knowing that this check would not be paid when presented; and/or

22 i. on or about November 24, 2018, KOLODGE drafted and/or passed check number 329 made
23 payable to Michael Lambert in the amount of \$50,000, in exchange for property or services for
24 which KOLODGE benefited, to reimburse Michael Lambert, in part for payments made on
25 Mr. Lambert's personal credit card; this check was not paid when presented.

26 The allegations set forth in Counts 1 - 7 are hereby incorporated herein as if fully set forth in this
27 count, all or some of which occurred in Washoe County, State of Nevada.

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

3 **AFFIRMATION PURSUANT TO NRS 239B.030**

4 The undersigned does hereby affirm that the CRIMINAL INFORMATION, filed in Second Judicial
5 District Court case number CR21-0583, does not contain the social security number of any person

6 DATED this 23rd day of February, 2021.

7 AARON D. FORD
8 Attorney General

9 By: /s/ Laurie L. Trotter
10 LAURIE L. TROTTER
11 Senior Deputy Attorney General
12 Criminal Prosecution Division
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1 **WITNESS LIST**

2 Pursuant to NRS 173.045, the following people may be called as witnesses at trial.

- 3 1. Corey Cluckey, Nevada Office of the Attorney General, 100 N. Carson Street, Carson City,
4 NV 89702
- 5 2. Daniel Logan, Federal Bureau of Investigation, 980 Sandhill Road, Reno, NV 89521
- 6 3. William Robert Varie, 4195 Tahoe Vista Drive, Rocklin, CA 95765
- 7 4. Michael Lambert, 6622 Cape Neddick Court, Apt. M, Indianapolis, IN 46217
- 8 5. Ashton Dean Carroll, Dolan Lexus, 7175 S. Virginia Street, Reno, NV 89511
- 9 6. Michael Burns, Audi Reno Tahoe (Findlay Auto), 9190 S. Virginia Street, Reno, NV
10 89511
- 11 7. Brian Michael Parvin, Audi Reno Tahoe (Findlay Auto), 9190 S. Virginia Street, Reno, NV
12 89511
- 13 8. David Paul AuCoin, 1664 N. Virginia Street, Center for Molecular Medicine, University of
14 Nevada, Reno, NV 89501
- 15 9. Christine Axelrod, 4195 Tahoe Vista Drive, Rocklin, CA 95765
- 16 10. Taylor Krammer, 1917 9th Street, Redding, CA 96001
- 17 11. Brandon Daniels, 1445 Treat Blvd., Apt. 737, Walnut Creek, CA 94597
- 18 12. Mackenna Dupont, 435 Eagle View Court, Sparks, NV 89436
- 19 13. Sandra Patterson, 400 Shady Valley Road, Sparks, NV 89414

20 RESPECTFULLY SUBMITTED this 23rd day of February, 2021.

21 **AARON D. FORD**
22 Attorney General

23 By: /s/Laurie L. Trotter
24 **LAURIE L. TROTTER**
25 Senior Deputy Attorney General
26 Criminal Prosecution Division
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CERTIFICATE OF SERVICE

I certify on this 23rd day of February, 2021, I electronically filed the foregoing CRIMINAL INFORMATION with the Clerk of the Court by using the ECF system, which will send a notice of electronic filing to the following:

Jenny Hubach, Esq.
Calvert & Hubach, LLC
435 Court Street, Second Floor
Reno, NV 89501
jhubachesq@gmail.com

/s/Rhonda Collins
An employee of the Office
of the Attorney General