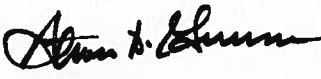


Attorney General's Office
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1 **INFM**
2 **CATHERINE CORTEZ MASTO**
3 **Attorney General**
4 **GARY J. MATHEWS**
5 **Deputy Attorney General**
6 **Nevada Bar Number 12255**
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13 **Attorney for State of Nevada**

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CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,)
11)
12) Plaintiff,)
13)
14) vs.)
15)
16) **DEON DERRICK DERRICO, #1989046**)
17) **aka DERRICK DEON DERRICO,**)
18) **aka MARLO ABBOTT; and**)
19) **OLUJUWON DEVIN BRYANT,**)
20)
21) Defendants.)

Case No.: C-14-298964-1
Dept. No.: X

INFORMATION

22 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
23 Nevada, by and through Deputy Attorney General GARY J. MATHEWS, upon information and
24 belief and under penalty of perjury, complains and charges the above named Defendants, with
25 having committed the following offenses:

26 DEON DERRICK DERRICO, aka DERRICK DEON DERRICO, aka MARLO ABBOTT,
27 d/b/a REEC ENTERPRISES, LLC, ("DERRICO") and OLUJUWON DEVIN BRYANT d/b/a
28 BRYANT ENTERPRISES ("BRYANT") have committed two (2) counts of THEFT OVER
\$3500, a category "B" felony, in violation of NRS 205.0832, NRS 205.0835, and NRS 195.020;
three (3) counts of FALSE REPRESENTATION CONCERNING TITLE, a category "C" felony,
in violation of NRS 205.395(1)(a), and NRS 195.020; three (3) counts of FALSE
REPRESENTATION CONCERNING TITLE, a category "C" felony, in violation of

1 NRS 205.395(1)(b), and NRS 195.020; three (3) counts of FALSE REPRESENTATION
2 CONCERNING TITLE, a category "C" felony, in violation of NRS 205.395(1)(c), and NRS
3 195.020; one (1) count of PATTERN OF MAKING FALSE REPRESENTATIONS
4 CONCERNING TITLE, a category "B" felony, in violation of NRS 205.395(3), and NRS
5 195.020; One (1) count of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN
6 THE COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of
7 NRS 205.377, and NRS 195.020; and three (3) counts of NOTARIZATION OF SIGNATURE
8 OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC, a gross misdemeanor, in violation
9 of NRS 240.155, and NRS 195.020.

10 All of the acts alleged herein were committed on or about June 1, 2012 to February 20,
11 2013, in the North Las Vegas Township, the County of Clark, State of Nevada, in the following
12 manner:

13 **COUNT I**

14 **THEFT**

15 **Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020**

16 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
17 Township, County of Clark, State of Nevada, defendants DERRICO and BRYANT, did without
18 lawful authority, knowingly and willfully, either on their own or through an agent or employee,
19 make a transfer of interest in real, personal or intangible property of another person or were
20 instrumental in causing an unlawful transfer or control of property belonging to another person
21 by virtue of a material misrepresentation with the intent to deprive said person of their
22 property, valued at \$3500 or more, or did aid, abet, counsel, encourage, hire, command,
23 induce or otherwise procure another to do so, to wit:

24 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
25 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
26 participated in a fraudulent scheme, to either directly or indirectly gain control of real property
27 belonging to JOHN MARSHALL ("J. MARSHALL") and GERTRUDE MARSHALL ("G.
28 MARSHALL"), located at 21 Amethyst Stars Avenue, North Las Vegas, NV 89031, by filing

1 two fraudulent and fictitious quitclaim deeds with the Clark County Recorder's Office,
2 transferring the MARSHALLS' property into the name of DERRICO, and depriving the
3 MARSHALLS of their property, without their prior knowledge or consent, valued over \$3500.

4 All of which constitutes the crime of THEFT, a category "B" felony in violation NRS
5 205.0832, NRS 205.0835, and NRS 195.020.

6 **COUNT II**

7 **FALSE REPRESENTATION CONCERNING TITLE**

8 **Category "C" Felony – NRS 205.395(1)(a), and NRS 195.020**

9 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
10 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
11 knowingly and willfully, claim an interest in, or a lien or encumbrance against, real property,
12 that was recorded in the office of the county recorder in which real property was located and
13 who knows or has reason to know that the document filed was forged or groundless,
14 contained a material misstatement or false claim or is otherwise invalid, or did aid, abet,
15 counsel, encourage, hire, command, induce or otherwise procure another to do so, to wit:

16 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
17 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
18 participated in a fraudulent scheme, to knowingly claim an interest in real property belonging
19 to G. MARSHALL located at 21 Amethyst Stars Avenue, North Las Vegas, NV 89031, by
20 filing a fraudulent and forged quitclaim deed with the Clark County Recorder's Office,
21 transferring G. MARSHALL'S property into the name of DERRICO without G. MARSHALL'S
22 prior knowledge or consent.

23 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
24 TITLE, a category "C" felony, in violation of NRS 205.395(1)(a), and NRS 195.020.

25 ///
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28 ///

1 **COUNT III**

2 **FALSE REPRESENTATION CONCERNING TITLE**

3 **Category "C" Felony – NRS 205.3959(1)(b), and NRS 195.020**

4 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
5 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, either
6 by virtue of their own actions or by the actions of their agent or employee, and without lawful
7 authority, executed or notarized a document purporting to create an interest in, or a lien or
8 encumbrance against, real property, that was recorded in the office of the county recorder in
9 which real property was located and who knows or has reason to know that the document was
10 forged or groundless, contained a material misrepresentation or false claim or is otherwise
11 invalid, or did aid, abet, counsel, encourage, hire, command, induce or otherwise procure
12 another to do so, to wit:

13 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
14 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT either
15 directly or indirectly, participated in a scheme by executing and causing a false or forged
16 quitclaim deed to be recorded in the Clark County Recorder's Office for property belonging to
17 G. MARSHALL, located at 21 Amethyst Stars Avenue, North Las Vegas, NV 89031, in the
18 Clark County Recorder's Office after forging G. MARSHALL'S signature on said quitclaim
19 deed without her prior knowledge or consent.

20 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
21 TITLE, a category "C" felony, in violation of NRS 205.395(1)(b), and NRS 195.020.

22 **COUNT IV**

23 **FALSE REPRESENTATION CONCERNING TITLE**

24 **Category "C" Felony – NRS 205.395(1)(c), and NRS 195.020**

25 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
26 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
27 knowingly and willfully, cause a document which was executed or notarized for which an
28 interest was created, or claimed an interest in, or a lien or encumbrance against real property

1 that was recorded in the office of the county recorder which the real property was located and
2 who knows or has reason to know that the document was forged or groundless, contained a
3 material misstatement, or false claim, or was otherwise invalid by making a false
4 representation concerning title, to wit:

5 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
6 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
7 participated in a fraudulent scheme, to knowingly execute, or notarize, or claim an interest in,
8 or a lien or encumbrance against, as described in NRS 205.395 (1)(a) or (1)(b), a document to
9 be recorded for real property belonging to G. MARSHALL located at 21 Amethyst Stars
10 Avenue, North Las Vegas, NV 89031, by filing a fraudulent and forged quitclaim deed with the
11 Clark County Recorder's Office, transferring G. MARSHALL'S property into the name of
12 DERRICO without G. MARSHALL'S prior knowledge or consent.

13 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
14 TITLE, a category "C" felony, in violation of NRS 205.395(1)(c), and NRS 195.020.

15
16 **COUNT V**

17 **FALSE REPRESENTATION CONCERNING TITLE**

18 **Category "C" Felony – NRS 205.395(1)(a), and NRS 195.020**

19 On or between June 1, 2012 and November 20, 2012 within North Las Vegas
20 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
21 knowingly and willfully, claim an interest in, or a lien or encumbrance against, real property,
22 that was recorded in the office of the county recorder in which real property was located and
23 who knows or has reason to know that the documents were forged or groundless, contained a
24 material misstatement or false claim or is otherwise invalid, or did aid, abet, counsel,
25 encourage, hire, command, induce or otherwise procure another to do so, to wit:

26 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
27 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
28 participated in a fraudulent scheme, to knowingly claim an interest in real property belonging

1 to J. MARSHALL, located at 21 Amethyst Stars Avenue, North Las Vegas, NV 89031, by filing
2 a fraudulent and forged quitclaim deed with the Clark County Recorder's Office, transferring J.
3 MARSHALL'S property into the name of DERRICO without J. MARSHALL'S prior knowledge
4 or consent.

5 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
6 TITLE, a category "C" felony, in violation of NRS 205.395(1)(a), and NRS 195.020.

7
8 **COUNT VI**

9 **FALSE REPRESENTATION CONCERNING TITLE**

10 **Category "C" Felony – NRS 205.395(1)(b), and NRS 195.020**

11 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
12 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, either
13 by virtue of their own actions or by the actions of their agent or employee, and without lawful
14 authority, knowingly and willfully, executed or notarized a document purporting to create an
15 interest in, or a lien or encumbrance against, real property, that was recorded in the office of
16 the county recorder in which real property was located and who knows or has reason to know
17 that the documents were forged or groundless, contained a material misrepresentation or
18 false claim or is otherwise invalid, or did aid, abet, counsel, encourage, hire, command, induce
19 or otherwise procure another to do so, to wit:

20 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
21 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, either
22 directly or indirectly, participated in a scheme by executing and causing a false or forged
23 quitclaim deed to be recorded for property belonging to J. MARSHALL, located at 21
24 Amethyst Stars Avenue, North Las Vegas, NV 89031, in the Clark County Recorder's Office,
25 having forged J. MARSHALL'S signature on said quitclaim deed after his death, and without
26 his prior knowledge or consent.

27 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
28 TITLE, a category "C" felony, in violation of NRS 205.395(1)(b), and NRS 195.020.

1 **COUNT VII**

2 **FALSE REPRESENTATION CONCERNING TITLE**

3 **Category "C" Felony – NRS 205.395(1)(c), and NRS 195.020**

4 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
5 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
6 knowingly and willfully, cause a document which was executed or notarized or which an
7 interest was created, or claimed an interest in, or a lien or encumbrance against real property
8 to be recorded in the office of the county recorder in which the real property was located and
9 who knows or has reason to know that the document was forged or groundless, contained a
10 material misstatement, or false claim or is otherwise invalid making a false representation
11 concerning title, to wit:

12 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
13 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
14 participated in a fraudulent scheme, to knowingly execute, or notarize or claim an interest in
15 property belonging to J. MARSHALL located at 21 Amethyst Stars Avenue, North Las Vegas,
16 NV 89031, by filing a fraudulent and forged quitclaim deed with the Clark County Recorder's
17 Office, transferring J. MARSHALL'S property into the name of DERRICO without G.
18 MARSHALL'S prior knowledge or consent.

19 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
20 TITLE, a category "C" felony, in violation of NRS 205.395(1)(c), and NRS 195.020.

21
22 **COUNT VIII**

23 **THEFT**

24 **Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020**

25 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
26 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
27 without lawful authority, knowingly and willfully, either by virtue of their own actions or through
28 an agent or employee, make a transfer of interest in real, personal or intangible property of

1 another person or was instrumental in causing an unlawful transfer or control of property
2 belonging to another person by virtue of a material misrepresentation with the intent to deprive
3 said person of their property, valued at \$3500 or more, or did aid, abet, counsel, encourage,
4 hire, command, induce or otherwise procure another to do so, to wit:

5 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
6 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
7 participated in a scheme, to either directly or indirectly obtain real property belonging to JOSE
8 AVILES ("AVILES"), located at 6227 Texas Crude Street, North Las Vegas, NV 89081, by
9 filing a false and forged quitclaim deed with the Clark County Recorder's Office to fraudulently
10 gain control and transfer AVILES' property into the name of DERRICO, depriving AVILES of
11 his property, valued over \$3500.

12 All of which constitutes the crime of THEFT OVER \$3500, a category "B" felony in
13 violation NRS 205.0832, NRS 205.0835, and NRS 195.020.

14
15 **COUNT IX**

16 **FALSE REPRESENTATION CONCERNING TITLE**

17 **Category "C" Felony – NRS 205.395(1)(a), and NRS 195.020**

18 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
19 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
20 knowingly and willfully, claim an interest in, or a lien or encumbrance against, real property,
21 that was recorded in the office of the county recorder in which real property was located and
22 who knows or has reason to know that the documents were forged or groundless, contained a
23 material misstatement or false claim or is otherwise invalid, or did aid, abet, counsel,
24 encourage, hire, command, induce or otherwise procure another to do so, to wit:

25 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
26 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
27 participated in a fraudulent scheme, to knowingly claim an interest in real property belonging
28 to AVILES located at 6227 Texas Crude, North Las Vegas, NV 89081, by filing a fraudulent

1 and forged quitclaim deed with the Clark County Recorder's Office, transferring AVILES'
2 property into the name of DERRICO without AVILES' prior knowledge or consent.

3 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
4 TITLE, a category "C" felony, in violation of NRS 205.395(1)(a), and NRS 195.020.

5

6

COUNT X

7

FALSE REPRESENTATION CONCERNING TITLE

8

Category "C" Felony – NRS 205.395(1)(b), and NRS 195.020

9 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
10 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, either
11 by virtue of their own actions or by the actions of their agent or employee, and without lawful
12 authority, knowingly and willfully, executed or notarized a document purporting to create an
13 interest in, or a lien or encumbrance against, real property, that was recorded in the office of
14 the county recorder in which real property was located and who knows or has reason to know
15 that the document was forged or groundless, contained a material misrepresentation or false
16 claim or is otherwise invalid, or did aid, abet, counsel, encourage, hire, command, induce or
17 otherwise procure another to do so, to wit:

18 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
19 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
20 participated in a scheme, either directly or indirectly, by executing and causing a false or
21 forged quitclaim deed to be recorded in the Clark County Recorder's Office for real property
22 belonging to AVILES, located at 6227 Texas Crude Street, North Las Vegas, NV 89081,
23 having forged AVILES' signature on said quitclaim deed and without his prior knowledge or
24 consent.

25 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
26 TITLE, a category "C" felony, in violation of NRS 205.395(1)(b) and NRS 195.020.

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28 ///

1 **COUNT XI**

2 **FALSE REPRESENTATION CONCERNING TITLE**

3 **Category "C" Felony – NRS 205.395(1)(c), and NRS 195.020**

4 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
5 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, did
6 knowingly and willfully, cause a document which was executed or notarized for which interest
7 was created, or claimed an interest in, or a lien or encumbrance against real property that was
8 recorded in the office of the county recorder's office, which the real property was located and
9 who knows or has reason to know that the document was forged or groundless, contained a
10 material misstatement, or false claim, or was otherwise invalid by making a false
11 representation concerning title, to wit:

12 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
13 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT
14 participated in a fraudulent scheme, to knowingly execute, or notarize, or claim an interest in,
15 or a lien or encumbrance against, as described in NRS 205.395(1)(a) or NRS 205.395(1)(b), a
16 document that was recorded for real property belonging to AVILES, located at 6227 Texas
17 Crude Street, North Las Vegas, NV 89081, by filing a fraudulent and forged quitclaim deed
18 with the Clark County Recorder's Office, transferring AVILES' property into the name of
19 DERRICO without AVILES' prior knowledge or consent.

20 All of which constitutes the crime of FALSE REPRESENTATION CONCERNING
21 TITLE, a category "C" felony, in violation of NRS 205.395(1)(c), and NRS 195.020.

22
23 **COUNT XII**

24 **PATTERN OF MAKING FALSE REPRESENTATIONS CONCERNING TITLE**

25 **Category "B" Felony – NRS 205.395(3), and NRS 195.020**

26 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
27 Township, County of Clark, the State of Nevada, defendants DERRICO and BRYANT, either
28 by virtue of their own actions or by the actions of their agent or employee, and without lawful

1 authority, knowingly and willfully, executed or notarized (2) two or more documents purporting
2 to create an interest in, or a lien or encumbrance against, real property, as described in
3 NRS 205.395 (1)(a),(b) or (c) that was recorded in the office of the county recorder in which
4 the real property was located and who knows or has reason to know that the documents were
5 forged or groundless, contained a material misrepresentation or false claim or is otherwise
6 invalid, or did aid, abet, counsel, encourage, hire, command, induce or otherwise procure
7 another to do so, to wit:

8 As set forth in Counts II, III, IV, V, VI, VII, IX, X, and XI from on or between June 1,
9 2012 to November 20, 2012, within North Las Vegas Township, the County of Clark, State of
10 Nevada, defendants DERRICO and BRYANT participated in a scheme, either directly or
11 indirectly, by offering two or more false, forged or altered quitclaim deeds to be recorded in the
12 Clark County Recorder's Office, having signed the property owner's name on said quitclaim
13 deeds without property owner's prior knowledge or consent.

14 All of which constitutes the crime of PATTERN OF MAKING FALSE
15 REPRESENTATIONS CONCERNING TITLE, a category "B" felony, in violation of NRS
16 205.395(3) and NRS 195.020.

17 **COUNT XIII**

18 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**

19 **CATEGORY "B" FELONY - NRS 205.377, and NRS 195.020**

20 On or between June 1, 2012 and November 20, 2012, within the County of Clark, State
21 of Nevada, DERRICO and BRYANT, either by virtue of their own actions or by the actions of
22 their agent or employee, while in the course of an occupation or enterprise, knowingly and
23 with the intent to defraud, engage in an act, practice or course of business or employ a device,
24 scheme or artifice which operates or would operate as a fraud or deceit upon a person by
25 means of false representation or omission of a material fact that a person knows to be false
26 or omitted, intends another to rely on, and results in a loss to a person who relied on the false
27 representation or omission in at least two or more transactions that have the same or similar
28 pattern, intents, results, accomplices, victims or methods of commission or otherwise

1 interrelated by distinguishing characteristics and is not isolated incidents within 4 years and in
2 which the aggregate loss or intended loss is more than \$650, or did aid, abet, counsel,
3 encourage, hire, command, induce or otherwise procure another to do so, to wit:

4 As set forth in Counts II, III, IV, V, VI, VII, IX, X, and XI from on or between June 1,
5 2012 to November 20, 2012, within North Las Vegas Township, the County of Clark, State of
6 Nevada, defendants DERRICO and BRYANT have committed multiple transactions involving
7 fraud or deceit in course of enterprise or occupation by either directly or indirectly, offering two
8 or more false, forged or altered quitclaim deeds which were recorded in the Clark County
9 Recorder's Office, after having signed the property owner's name on said quitclaim deeds
10 without the property owner's prior knowledge or consent.

11 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
12 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony in
13 violation of NRS 205.377, and NRS 195.020.

14 **COUNT XIV**

15 **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC**

16 **Gross Misdemeanor – NRS 240.155, and NRS 195.020**

17 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
18 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT did
19 either directly or indirectly, notarize the signature of a person not in their presence and without
20 either knowing said person or having a credible witness or documentary evidence or
21 identification for that person, or did aid, abet, counsel, encourage, hire, command, induce or
22 otherwise procure another to do so, to wit:

23 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
24 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT, either
25 directly or indirectly, notarized the signature of G. MARSHALL on a quitclaim deed for the
26 property belonging to G. MARSHALL, located at 21 Amethyst Stars Avenue, North Las Vegas,
27 NV 89031, without being in the presence of G. MARSHALL, and without providing a credible
28 witness or necessary evidence of identification.

1 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
2 NOT IN PRESENCE OF NOTARY PUBLIC, a gross misdemeanor, in violation of NRS
3 240.155, and NRS 195.020.

4 **COUNT XV**

5 **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC**

6 **Gross Misdemeanor – NRS 240.155, and NRS 195.020**

7 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
8 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT did
9 directly or indirectly notarize the signature of a person not in their presence and without either
10 knowing said person or having a credible witness or documentary evidence or identification for
11 that person, or did aid, abet, counsel, encourage, hire, command, induce or otherwise procure
12 another to do so, to wit:

13 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
14 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT either
15 directly or indirectly, notarized the signature of J. MARSHALL on a quitclaim deed to the
16 property belonging to J. MARSHALL, located at 21 Amethyst Stars Avenue, North Las Vegas,
17 NV 89031, without being in the presence of J. MARSHALL, and without providing a credible
18 witness or necessary evidence of identification.

19 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20 NOT IN PRESENCE OF NOTARY PUBLIC, a gross misdemeanor, in violation of NRS
21 240.155, and NRS 195.020.

22 **COUNT XVI**

23 **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC**

24 **Gross Misdemeanor – NRS 240.155, and NRS 195.020**

25 On or between June 1, 2012 and November 20, 2012, within North Las Vegas
26 Township, the County of Clark, State of Nevada, defendants DERRICO and BRYANT did
27 directly or indirectly notarize the signature of a person not in their presence and without either
28 knowing said person or having a credible witness or documentary evidence or identification for

Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

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that person, or did aid, abet, counsel, encourage, hire, command, induce or otherwise procure another to do so, to wit:

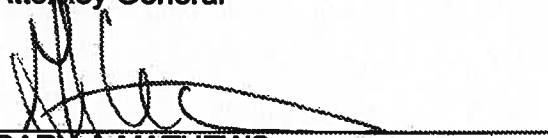
On or between June 1, 2012 and November 20, 2012, within North Las Vegas Township, the County of Clark, State of Nevada, defendant DERRICO and BRYANT, either directly or indirectly, notarized the signature of AVILES on a quitclaim deed for the property belonging to AVILES, located at 6227 Texas Crude St., North Las Vegas, NV 89081, without being in the presence of AVILES, and without providing a credible witness or necessary evidence of identification.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC, a gross misdemeanor, in violation of NRS 240.155, and NRS 195.020.

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. Said complainant makes this declaration under penalty of perjury.

Dated this 25th day of June, 2014.

SUBMITTED BY:
CATHERINE CORTEZ MASTO
Attorney General

By: 
GARY J. MATHEWS
Deputy Attorney General
Fraud Unit