

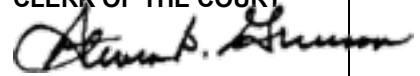
CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing APPELLANT'S APPENDIX VOLUME I of I was made this January 23, 2018, upon the appropriate parties hereto by electronic filing using the ECF system which will send a notice of electronic filing to the following and/or by facsimile transmission to:

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Chief Deputy District Attorney
Nevada Bar No. 4352
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Steven.Owens@clarkcountyda.com
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Nevada Bar No. 12426
100 N. Carson St.
Carson City, Nevada 89701
Adam.Laxalt@ag.nv.gov
Counsel for Respondent

/s/ Lester M. Paredes III, Esq. _____
Lester M. Paredes III, Esq.
Counsel for Appellant



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DISTRICT COURT

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CLARK COUNTY, NEVADA

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THE STATE OF NEVADA,)	CASE NO. C-17-322664-2
)	
Plaintiff,)	DEPT. XVII
)	
vs.)	(ARRAIGNMENT HELD IN DEPT. LLA)
)	
JACK LEAL,)	
)	
)	
Defendant.)	
)	
)	

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BEFORE THE HONORABLE JENNIFER L. HENRY, HEARING MASTER
MONDAY, APRIL 24, 2017

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**RECORDER'S TRANSCRIPT OF HEARING RE:
ARRAIGNMENT CONTINUED**

17

18

APPEARANCES:

19

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For the State: MICHAEL KOVAC, ESQ.,
Senior Deputy Attorney General

21

22

For the Defendant: JASON WEINER, ESQ.,
Attorney at Law

23

24

25

RECORDED BY: KIARA SCHMIDT, COURT RECORDER

1 MONDAY, APRIL 24, 2017

2 * * * * *

3 P R O C E E D I N G S

4
5 THE CLERK: Jack Leal, C322664-2.

6 THE COURT: All right. And, counsels, can I get
7 both of your appearances for the record?

8 MR. WEINER: Your Honor, Jason Weiner, Bar
9 No. 7555, on behalf of Jack Leal.

10 MR. KOVAC: Good afternoon. Michael Kovac, Bar
11 No. 11177, for the State of Nevada.

12 THE COURT: Thank you.

13 Sir, you're going to be pleading guilty to multiple
14 transactions involving fraud or deceit in the course of an
15 enterprise or occupation, that would be a category B felony.

16 You agree to pay restitution to the named and
17 unnamed victims in the total amount of \$757,420 as follows:

18 That would be \$70,000 to LoryLee Plancarte; \$75,000
19 to Edelyn Rubin; \$37,500 to Chatty Becker; \$57,500 to Irene
20 Segura; \$98,620 to Lih-Ling Yang; \$90,300 to Lina Palafox;
21 \$85,000 to Adilson Gibellato; \$50,000 to Juan Eloy Ramirez;
22 \$115,000 to Catherine Wyngardner -- Wyngarden. Sorry,
23 Catherine Wyngarden; \$25,000 to Shahram Bozorgnia; and
24 \$53,500 to Tat Lam.

25 Should the named victims have previously recovered

1 any of their losses, they should not be entitled to
2 restitution covering any such sum, instead, the portion of
3 the restitution covering said sum shall be forfeited to the
4 State of Nevada, Office of the Attorney General.

5 You agree to pay restitution in full on or before
6 the time that you're sentenced in this case, that you and
7 your co-conspirator, Jessica Garcia, are jointly and
8 severally responsible for the restitution, that should you
9 pay restitution in full at or before the time you're
10 sentenced in the present case the State will not oppose the
11 imposition of a term of probation not to exceed five years
12 with a suspended 36 to 90 months term of imprisonment.

13 If you fail to pay restitution in full at or before
14 the time you are sentenced in the present case, the State
15 will retain the right to argue for the imposition of a term
16 of imprisonment.

17 You agree that the \$157,105.17 seized in relation
18 to the present case shall be forfeited to the State of
19 Nevada, Office of the Attorney General, and said money shall
20 be applied to your restitution requirements, that you will
21 execute and file in the Clark County Recorder's office a
22 lien agreement and lien in favor of the State of Nevada,
23 Office of the Attorney General, in the amount of \$600,314.83
24 against the home located at 1024 Santa Helena Avenue,
25 Henderson, Nevada, 89002, assessor's parcel number

1 179-33-710-065[sic].

2 MR. WEINER: 056, your Honor, 056.

3 THE COURT: Oh, I'm sorry, 056. That would be 179-
4 33-710-056, legally described as Mission Hills EST AMD Plat
5 Book 17 Page 12 Lot 223 & Lot 223A, with the proceeds of the
6 sale of the home to be applied to any restitution
7 requirements. You will pay all fees and costs imposed by
8 the Court. You will submit to any of the terms and
9 conditions of the Division of Parole and Probation if
10 probation is granted, and that you understand that victims
11 may make impact statements.

12 Is that correct, State?

13 MR. KOVAC: That's correct, your Honor.

14 THE COURT: Counsel, correct.

15 MR. WEINER: That is correct, your Honor.

16 THE COURT: I apologize. I was doing really well
17 this morning.

18 Sir, is that your understanding of the agreement
19 and negotiation?

20 THE DEFENDANT: Yes, it is.

21 THE COURT: So what is your true, full name?

22 THE DEFENDANT: Jack Leal.

23 THE COURT: And how old are you?

24 THE DEFENDANT: Thirty-two.

25 THE COURT: How far did you go in school?

1 THE DEFENDANT: Some college.

2 THE COURT: Okay. So do you read, write, and
3 understand the English language?

4 THE DEFENDANT: Yes.

5 THE COURT: Are you currently taking any medication
6 or do you have a medical condition that would cause you not
7 to understand the terms of this guilty plea agreement or
8 these proceedings today?

9 THE DEFENDANT: No.

10 THE COURT: Do you understand that you're being
11 charged with multiple transactions involving fraud or deceit
12 in the course of an enterprise or occupation, that would be
13 a category B felony?

14 THE DEFENDANT: Yes.

15 THE COURT: And how do you plead to that, guilty or
16 not guilty?

17 THE DEFENDANT: Guilty.

18 THE COURT: Is anybody forcing you to plead guilty?

19 THE DEFENDANT: No.

20 THE COURT: Are you pleading guilty of your own
21 free will?

22 THE DEFENDANT: Yes.

23 THE COURT: Do you understand as a consequence of
24 pleading guilty this Court must sentence you to time in the
25 Nevada Department of Corrections for a period of not less

1 than one year, not more than 20 years, fine you up to
2 \$10,000 and have you pay an administrative assessment fee?

3 THE DEFENDANT: Yes.

4 THE COURT: Do you understand that this is a
5 probationable offense?

6 THE DEFENDANT: Yes.

7 THE COURT: Do you understand that sentencing will
8 be strictly up to the Court so nobody can promise you
9 probation, leniency, or special treatment?

10 THE DEFENDANT: Yes.

11 THE COURT: Okay, sir. I do have the original
12 guilty plea in front of me. Did you read it?

13 THE DEFENDANT: Yes.

14 THE COURT: And did you understand it?

15 THE DEFENDANT: Yes.

16 THE COURT: Was your attorney present with you to
17 answer any questions you had on this guilty plea agreement?

18 THE DEFENDANT: Yes.

19 THE COURT: Were you satisfied with his services?

20 THE DEFENDANT: Yes.

21 THE COURT: Did you sign this agreement?

22 THE DEFENDANT: Yes.

23 THE COURT: I'm going to show you page six. Is
24 this your signature?

25 THE DEFENDANT: Yes.

1 THE COURT: And did you sign this document freely
2 and voluntarily?

3 THE DEFENDANT: Yes.

4 THE COURT: Do you understand that by pleading
5 guilty you're giving up the constitutional rights that are
6 listed in this agreement?

7 THE DEFENDANT: Yes.

8 THE COURT: Do you understand if you're not a U.S.
9 citizen you could be deported based upon your guilty plea?

10 THE DEFENDANT: Yes.

11 THE COURT: Did you discuss your case and your
12 rights with your attorney?

13 THE DEFENDANT: Yes.

14 THE COURT: And did you have any questions
15 regarding those rights or this negotiation?

16 THE DEFENDANT: No.

17 THE COURT: Are you pleading guilty because on or
18 between March the 1st of the year 2015 and March the 31st of
19 the year 2016, in Clark County, Nevada, you and Jessica
20 Garcia did, in the course of an enterprise or occupation,
21 knowingly and with the intent to defraud, engage in an act,
22 practice, or course of business, or employed a device,
23 scheme, or artifice which operated or would have operated as
24 a fraud or deceit upon a person by means of a false
25 representation or omission of a material fact that, A, the

1 person knew to be false or omitted or, B, the person
2 intended another to rely on and, C, resulted in a loss to
3 any person who relied on the false representation or
4 omission in at least two transactions that had the same or
5 similar pattern, intents, results, accomplices, victims, or
6 methods of commission, or were otherwise interrelated by
7 distinguishing characteristics and were not isolated
8 incidents within four years in which the aggregate loss or
9 intended loss was more than \$650, that being, on or between
10 March the 1st of 2015 and March the 31st of 2016 that in and
11 through the course of a real estate enterprise known as
12 Parcelnomics, LLC, doing business as Investment Deals, you
13 knowingly and with the intent to defraud obtained thousands
14 of dollars from LoryLee Plancarte, Edelyn Rubin, Chatty
15 Becker, Irene Segura, Liih-Ling Yang, Lina Palafox, Juan
16 Eloy Ramirez, Catherine Wyngardner -- Wyngarden, I'm sorry,
17 Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson
18 Gibellato, by means of knowingly and falsely representing to
19 said individuals that the titles to properties being sold to
20 them by you were not encumbered by liens or other security
21 interests, intending that said individuals rely on the
22 misrepresentations and resulting in a loss of more than
23 \$650; is that true?

24 THE DEFENDANT: Yes.

25 THE COURT: All right. This Court will accept your

1 plea as being freely and voluntarily entered today.

2 And, counsel, I do need you to approach and sign
3 the certificate of counsel.

4 MR. WEINER: Yeah, that's what I was kind of
5 leaning forward to see.

6 THE COURT: Sir, I am going to refer you to Parole
7 and Probation for what's called a presentence investigation
8 report. You do have 48 hours from now to report for that
9 interview, and then you're ordered to come back for
10 sentencing on the following date.

11 THE CLERK: August 15th, 8:30, Department 17.

12 THE COURT: And, for the record, I do have the
13 conflict of interest waiver in front of me where Mr. Jack
14 Leal is agreeing that Mr. Weiner can also represent the
15 co-defendant, and that there's not a conflict of interest.
16 Correct, sir?

17 THE DEFENDANT: Correct.

18 THE COURT: Yes. Thank you.

19 He gave me the conflict of waiver without a cover
20 page. Can we just attach it to the GPA?

21 THE CLERK: That's what -- it should have been on
22 both of them.

23 THE COURT: Okay.

24 MR. WEINER: And I'm sorry --

25 THE COURT: Here --

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MR. WEINER: What was the --

THE COURT: Here was his then.

MR. WEINER: In terms of the sentencing date, your Honor, I'm going to ask for the longest date we can get as part of the plea requires the house to be sold.

THE COURT: Yeah.

MR. WEINER: And if it's not sold there is a penalty to my clients in terms of the State having RTA.

THE COURT: I would agree.

THE CLERK: Okay. So now instead of the 15th you want the 17th because that's as far out as I can go.

MR. WEINER: Okay. And I'm sorry, what was that date, Madam Clerk?

THE CLERK: So it's going to be August 17th, 8:30, Department 17.

MR. WEINER: Thank you.

(Whereupon, the proceedings concluded.)

* * * * *

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Kiara Schmidt, Court Recorder/Transcriber

April 24, 2017 1:00 PM Arraignment Continued

HEARD BY: Henry, Jennifer COURTROOM: RJC Lower Level Arraignment

COURT CLERK: Kristen Brown

RECORDER: Kiara Schmidt

REPORTER:

PARTIES

PRESENT:	Kovac, Michael C.	Attorney for the State
	Leal, Jack	Defendant
	State of Nevada	Plaintiff
	Weiner, Jason G.	Attorney for the Defendant

JOURNAL ENTRIES

- NEGOTIATIONS are as contained in the Guilty Plea Agreement FILED IN OPEN COURT. DEFT. LEAL ARRAIGNED AND PLED GUILTY TO MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION (F). Court ACCEPTED plea and ORDERED, matter referred to the Division of Parole and Probation (P & P) and set for SENTENCING. Court DIRECTED Deft. to report to P & P within 48 hours.

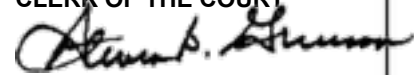
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8/17/17 8:30 AM SENTENCING (DEPT. 17)

PRINT DATE: 05/03/2017

Page 1 of 1

Minutes Date: April 24, 2017



1 **NOTC**
2 **ADAM PAUL LAXALT**
3 Attorney General
4 Michael C. Kovac (Bar No. 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 555 E. Washington Ave., Ste. 3900
8 Las Vegas, NV 89101-1068
9 P: (702) 486-5706
10 F: (702) 486-0660
11 MKovac@ag.nv.gov
12 Attorneys for Plaintiff *State of Nevada*

8 **EIGHTH JUDICIAL DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,
11 Plaintiff,
12 vs.
13 JACK LEAL and JESSICA GARCIA,
14 Defendant.

Case No.: C-17-322664-2/3
Dept. No.: 17

15 **NOTICE OF INTENT TO PRESENT VICTIM IMPACT STATEMENTS**

16 The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and
17 through Senior Deputy Attorney General MICHAEL C. KOVAC, informs the Court, the Defendant,
18 and counsel that the named victims in the above captioned matter, LoryLee Plancarte, Irene Segura, and
19 Chatty Becker, will present a victim impact statement regarding this case in person or in writing at the
20 time of sentencing.

21 DATED this 11th day of August, 2017.

22 Submitted by:
23 ADAM PAUL LAXALT
24 Attorney General

25 By: /s/ Michael C. Kovac
26 MICHAEL C. KOVAC (Bar No. 11177)
27 Senior Deputy Attorney General
28

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **Notice of Intent to Present Victim Impact Statements** with the Clerk of Court by using the electronic filing system on the 11th day of August, 2017.

I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or via facsimile transmission or e-mail; or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following unregistered participants:

Jason, Weiner, Esq
2820 W. Charleston Blvd., #35
Las Vegas, NV 89102

/s/ Lanette Davis
Lanette Davis, an employee of
the office of the Nevada Attorney General

August 17, 2017 8:30 AM Sentencing

HEARD BY: Villani, Michael COURTROOM: RJC Courtroom 11A

COURT CLERK: Olivia Black

RECORDER: Cynthia Georgilas

PARTIES

PRESENT:	Kovac, Michael C.	Attorney for State
	Leal, Jack	Defendant
	State of Nevada	Plaintiff
	Weiner, Jason G.	Attorney for Defendant

JOURNAL ENTRIES

- CONFERENCE AT BENCH. Court noted it had two conflict waivers signed by Mr. Leal and Ms. Garcia. Exhibits presented (see worksheet). DEFT LEAL ADJUDGED GUILTY of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION (F). Arguments by counsel and statement by Defendant. Victim Speaker Irene Sequra SWORN and TESTIFIED. Victim Speaker Luis Lafox SWORN and TESTIFIED. Victim Speaker Lori Plancarte SWORN and TESTIFIED. Pursuant to NRS 176.063, COURT ORDERED, in addition to the \$25.00 Administrative Assessment fee, a \$150.00 DNA analysis fee, including testing to determine genetic markers, \$3.00 DNA Collection fee and Restitution in the amount of \$757,420.00 payable to (\$70,000 LoryLee Plancarte, \$75,000 Edelyn Rudin, \$37,500 Chatty Becker, \$57,500 Irene Segura, \$98,620 Lih-Ling Yang, \$90,300 Lina Palafox, \$85,000 Adilson Gibellato, \$50,000 Juan Eloy Ramirez, \$115,000 Catherine Wyngarden, \$25,000 Shahram Bozorgnia, \$53,500 Tat Lam) Defendant SENTENCED to a MAXIMUM of ONE HUNDRED EIGHTY (180) MONTHS and a MINIMUM of SEVENTY-TWO (72) MONTHS in the Nevada Department of Corrections (NDC) with ZERO (0) DAYS credit for time served. BOND, if any, EXONERATED.

NDC

PRINT DATE: 09/25/2017

Page 1 of 2

Minutes Date: August 17, 2017

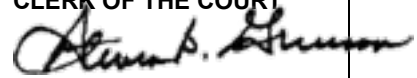
PRINT DATE: 09/25/2017

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Minutes Date: August 17, 2017

APPELLANT'S APPENDIX

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RTRAN

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

JACK LEAL, and JESSICA GARCIA

Defendant.

CASE NO.: C-17-322664-2
C-17-322664-3

DEPT. XVII

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE MICHAEL P. VILLANI, DISTRICT COURT JUDGE
THURSDAY, AUGUST 17, 2017

SENTENCING (BOTH)

APPEARANCES:

For the State:

MICHAEL C. KOVAC, ESQ.
Senior Deputy Attorney General

For the Defendant:

JASON G. WEINER, ESQ.

Victim Impact Speakers:

IRENE SEGURA
LUIS PALAFOX
LORYLEE PLANCARTE

RECORDED BY: CYNTHIA GEORGILAS, COURT RECORDER

1 LAS VEGAS, NEVADA, THURSDAY, AUGUST 17, 2017

2 [Proceedings commenced at 9:08 a.m.]

3 MR. WEINER: And, Your Honor, I have one more with the MR. GILL: .

4 THE COURT: Sure.

5 MR. WEINER: It's Leal and Garcia, top of 8 -- well, Leal's is top of 8, Garcia's
6 bottom.

7 THE COURT: All right, Jack Leal. Time set for sentencing, and Jessica
8 Garcia. You have both of these; correct? Both of --

9 MR. WEINER: Correct, Your Honor. In the theme of the morning, can
10 Mr. Kovac and I approach briefly?

11 THE COURT: All right.

12 [Bench conference not transcribed]

13 THE COURT: Now, we do have two conflict of interest waivers signed by
14 Mr. Leal and Ms. Garcia. I'm going to -- for some reason we can't find them in the
15 Court's file. I'll have my staff make copies of these and return the originals to
16 Counsel.

17 So, we can go forward on Mr. Leal; is that correct?

18 MR. WEINER: Yes, Your Honor.

19 THE COURT: All right, he is hereby adjudged guilty of multiple transactions
20 involving fraud or deceit in the course of an enterprise and occupation.

21 Argument by the State.

22 MR. KOVAC: And, Your Honor, we have three victim speakers here today, at
23 least three victim speakers --

24 THE COURT: All right.

25 MR. KOVAC: -- here today.

1 THE COURT: They'll go last.

2 MR. KOVAC: Okay.

3 I'm going to be arguing that Mr. Leal obviously go to prison. He has two
4 prior felonies so they are similar in nature; ones for forgery, ones for theft by
5 deception and possession of a fraudulent ID. P&P's recommending 24 to 120
6 months. I think that's going to be a little light. I'm recommending 60 to 180 months.
7 The amount that was stolen in this case was pretty substantial. We're talking over
8 three quarters of a million dollars. We have 11 named victims. Each of them lost at
9 least five figures. You'll hear the impact on each of these victims pretty soon.

10 And basically, Mr. Leal went and bought properties at a bankruptcy
11 foreclosure auction. He bought the properties at a bankruptcy foreclosure auction
12 and when he did that -- there's basically two lists of properties. There's one list that
13 says you take these properties subject to the existing mortgages and you get them
14 for pennies on the dollar, maybe two or three thousand dollars. You have another
15 list that makes it clear that there are no mortgages on these properties and they're
16 more like the prices you would expect, you know, five, six figure properties. And Mr.
17 Leal bought a bunch of properties on the smaller list for pennies on the dollar and
18 then represented to these victims, or had his employees represent to the victims,
19 that they were free and clear of any kind of liens or mortgages. And as a result,
20 these -- I mean basically ruined the retirements of most of these victims.

21 Based on the financial impact of this case, and really no remorse by the
22 Defendant, -- he's done little to nothing to make restitution in this case. He said that
23 he was going to sell a house in order to pay this off. We had this arraignment back
24 in April when I met with his attorney and the Defendant's downstairs in lower level
25 arraignment. I said you need to get this property back in your name. You need to

1 sign a lien in this state's favor and get this sold. First time anything happens is now
2 a week before sentencing. They did absolutely nothing for 4 months. And the house
3 is on the market. It's valued about \$580,000.00. That's what the last recorder entry
4 notes and they have it on the market for 1.2 million dollars. Now they dropped it to
5 one million dollars. There's no real efforts to make restitution in this case.

6 THE COURT: All right, thank you.

7 Mr. Leal, do you have anything to say before I sentence you?

8 THE DEFENDANT: I do. There's been a lot of issues going on between
9 myself and Jessica who is not here. She was actually in charge of the property sale.
10 I've since jumped in. I have recorded a lien in the state's favor for over \$600,000.00
11 which is the balance due. I accept responsibility for this but there's a lot of
12 underlying things that are not addressed at the moment, I should say. My goal was
13 to get restitution to everybody. The property, as per the Assessor's site today, is
14 valued just over a million which is what it's listed at. There's an offer that should be
15 in today. I've done all I could to remove myself from the house to get everybody
16 restitution, put everybody else before myself at the moment. Jessica's not here. She
17 -- like I said, she was the one who was dealing with this. We have a no contacting
18 order. She cannot contact me. I've had no contact with her for the past 60 days. I
19 have a copy of that. That's really where the delay in all of this came out. It wasn't us
20 doing nothing. It was me assuming she was doing it but being unable to contact
21 each other.

22 THE COURT: Whose name is on the title?

23 THE DEFENDANT: Mine as of --

24 MR. WEINER: [Indiscernible].

25 THE DEFENDANT: -- last week. I transferred it because she had gotten

1 nothing done to this point.

2 THE COURT: Well, how could you transfer it if it was her name?

3 THE DEFENDANT: It was in a trust. The trustee was able to sign it over to
4 me. I recorded the deed on the 11th. The property's in my name. As soon as that
5 came out I flew out here. I recorded a lien. I have a copy of the lien in the State's
6 favor right now. The property is actively marketed. The restitution is the main
7 concern in my eyes. I assumed Jessica had been getting that done. I -- we're not
8 allowed to speak. She has an open domestic case and we have no contact. I
9 assumed this was done by now. As soon as I found it wasn't, I flew out here. I've
10 been trying to get this all done. The restitution -- I mean there should be no issue
11 with it. I have a copy of the title policy I've got. No liens; the property's free and
12 clear. We take whatever amount just to settle the restitution figure at this point.

13 MR. KOVAC: And, Your Honor, Defense counsel -- I have to speak up.
14 Defense counsel sent me the title assessment just yesterday and it shows a bunch
15 of liens on this property.

16 THE DEFENDANT: There's two Republic garbage -- Republic Waste
17 [indiscernible] for \$256.00 each. I have a copy of it right here from Fidelity Title.

18 THE COURT: Anything else, sir?

19 THE DEFENDANT: To the victims, like I said, I mean I've been trying to do
20 the restitution. I had no idea it wasn't taken care of or paid. Apparently, the conflict
21 waiver was a mistake. As far as the situation that happened, we were under the
22 assumption that -- we didn't explain it correctly, I guess, what we were selling. We
23 did transfer title to them. We did sell them the properties. It wasn't as if we just took
24 their money and ran and --

25 THE COURT: Where's the money, the \$750,000.00? Where is it?

1 THE DEFENDANT: It's tied up in this property which is what we're trying to
2 liquidate.

3 THE COURT: You had 11 transactions. You used 11 transactions to buy the
4 one property; correct?

5 THE DEFENDANT: Correct. We had money -- we didn't --

6 THE COURT: So the property -- you spent \$750,000.00 on a property that is
7 either \$500,000.00 or 1.1 million?

8 THE DEFENDANT: \$585,000.00 is what we purchased it for at a foreclosure.
9 The county assessed value as of today is just over a million. When we were selling
10 the properties, like I said, we initially bought the properties. We had money tied up in
11 them. We thought they were worth it. It wasn't as if we just took people's money
12 and ran. It was a huge -- I guess we didn't explain exactly what they were getting it
13 for -- their money. At this point, as I stated to my attorney, I'd be willing to even sign
14 the property over to the State for the remaining balance. There's \$600,000.00 owed.
15 They already seized \$157,000.00 I believe. I'd be willing to sign over the property for
16 the 585 value and throw in the difference out of pocket to satisfy restitution at this
17 point. I have no issue with that route.

18 THE COURT: Is there a paper trail showing these funds directly going to the
19 purchase of the property, do you know, Counsel?

20 MR. KOVAC: I don't know. And that's the State's problem, we're not going to
21 take over this house given --

22 THE COURT: Right.

23 MR. KOVAC: -- all the lies that were from the other properties that are subject
24 to this case.

25 THE DEFENDANT: It was -- it was actually out of the Bank of America

1 account.

2 THE COURT: Well, we have these transactions going on for -- from 2015
3 through 2016.

4 MR. WEINER: And, Your Honor, that is correct. They -- there were houses
5 they did buy from the HOA where the mortgages were extinguished. I think there
6 was some confusion on what was what. Some of them were initially charged in this
7 case were dismissed out. They did figure this out on some of the houses involved
8 here, and actually before the AG even got involved, paid a couple of people back
9 their purchase price before even a criminal case was initiated by Nevada. So, it's not
10 that, as he stated, they're not trying to run away. They're trying to fix this.

11 The -- well, as an initial matter, Your Honor, just to address what we
12 discussed at the bench, the ongoing conflict waivers -- the dispute between them
13 began after the change of plea but before sentencing. If you want to put on the
14 record, I contacted the bar ethics hotline. They recommended that I withdraw based
15 on what's going on here. I did. I will make that motion. I do understand that the
16 Court's going to insist that we go forward today and that's certainly the Court's right
17 to do but --

18 THE COURT: Well, is the conflict the fact that your client thought that
19 Ms. Garcia was going to pay this off? Is that the conflict?

20 MR. WEINER: Well, no, it wasn't they were paying it off. They were supposed
21 to be working together. Then they had a no contact order so they couldn't. So
22 they're now basically pointing at each other saying this is -- she's saying this is his
23 fault, he's saying that's her fault. That's an antagonistic defense. I mean I should not
24 be --

25 THE COURT: Well, it's -- that relates -- it's not a defense to the case --

1 MR. WEINER: Well --

2 THE COURT: -- because if it says why the --

3 MR. WEINER: -- in terms of sentencing.

4 THE COURT: -- restitution wasn't paid and this is joint and several which
5 means if one --

6 MR. WEINER: Correct.

7 THE COURT: -- doesn't pay the other owes the full amount. That's what --

8 MR. WEINER: Oh, and like I said, Your Honor, he's correct. We have a print
9 out from the Clark County Assessor's website for the 2017 - 2018 year that values
10 the property at \$1,032,044.00. The lien has been filed with the State in favor of the
11 Attorney General's office. I've provided a copy of that to Mr. Kovac. His name is
12 even on it to be informed once it's actually approved because the assessor kind of
13 went cross eyed on my client when he went down there because liens are generally
14 not filed against yourself. And so, they wanted to send it to their legal department
15 and contact the AG's office which apparently hasn't happened yet, but we do have
16 the paperwork showing that my client signed off on it. He is desperately trying to get
17 this money out and he will do it any way, shape, or form he can to get it out of the
18 residence. The fact that he started paying restitution before there was even a
19 criminal case I think shows his intent to get these people paid back.

20 THE COURT: Was an offer on the property that he has now made back in
21 March 2015 because that's when this whole house of cards started?

22 MR. WEINER: An offer -- he went and purchased this house -- when?

23 THE DEFENDANT: We bought this January '16.

24 MR. WEINER: They bought this January '16, the first --

25 THE COURT: Of --

1 MR. WEINER: We have a letter which I provided to Mr. Kovac showing -- from
2 the real estate agent showing that it has been actively marketed. There are, as I
3 said, we now basically have a bid in 30 --

4 THE COURT: No, when they purchased the property; --

5 MR. WEINER: Yes, Your Honor.

6 THE COURT: -- okay? Or when was the offer [indiscernible] originally
7 purchase this property? I know there's a bid to sell it?

8 MR. WEINER: Right.

9 THE COURT: But when did they purchase it?

10 MR. WEINER: January of '16 is when --

11 THE COURT: 2016. Well, if they purchased it January '16, we have
12 transactions of February 2016 and March 2016.

13 MR. WEINER: No, I think that's some of the funds that, as again, one
14 hundred and fifty some odd thousands of dollars were already seized by the State
15 out of a bank account.

16 THE COURT: No, but the point is they were obtaining funds from people
17 allegedly to purchase this home and you're telling me they purchased it in January
18 and they were still doing these bogus transactions in February of 2016.

19 MR. WEINER: Well, Your Honor, I don't think at that point -- and like again,
20 some of the -- they were doing a lot of transactions only a few of which are the
21 subject of this case. [Indiscernible] indicated the HOA cases the mortgages were
22 extinguished. There were several home sales that involved those that there is no
23 problem with that aren't a subject to this case. So, as I indicated, this is a company
24 called Parcelnomics.

25 THE COURT: Your client's a real estate agent; right?

1 MR. WEINER: I don't think you're --

2 THE DEFENDANT: I'm not an agent. We just buy and sell. We bought -- we
3 buy all kind of foreclosures, HOA's, bankruptcies.

4 THE COURT: You never went through a title company? You never met -- at
5 the title company? It seems like you were meeting these people at the Clerk's office
6 and you wanted them to hand you a cashier's check.

7 MR. WEINER: Some of it was by agents, 'cause again, they're kind of bi-
8 coastal. They are also in Florida. That is why Ms. Garcia is not here today. She's
9 there. She couldn't get on a plane. But they were doing this without essentially the
10 benefit of being licensed. They were just doing individual home sale flipping kind of
11 deals and they got themselves in trouble 'cause they didn't understand what they
12 were doing.

13 THE COURT: How about the two prior fraud cases?

14 MR. WEINER: I do not believe those involved --

15 THE COURT: No, I want to know his past --

16 MR. WEINER: -- real --

17 THE COURT: -- record, what are those about?

18 MR. WEINER: I think those were how many years ago?

19 [Colloquy between Counsel and Defendant]

20 MR. WEINER: Yeah, I think it was just a theft. That's what I thought.

21 [Colloquy between Counsel and Defendant]

22 THE COURT: Well, one was forgery pled to a theft. One was theft by
23 deception which sounds like what we have here and he pled to theft by deception
24 and he got 20 --

25 MR. WEINER: Right, that's the one in 2007, Your Honor. They're actually

1 from the same case. That's why the dates are the same.

2 THE COURT: It was a different -- I mean, --

3 MR. WEINER: The 9/17 of 2007, the Court looked at the two convictions.

4 They're both from the same --

5 THE DEFENDANT: Incident.

6 MR. WEINER: -- incident.

7 THE COURT: State, do you know anything about the facts of those cases?

8 MR. KOVAC: I don't know the facts. I just see that there's two separate cases
9 listed, one with one felony, one with two felonies.

10 THE COURT: Anything else, Counsel?

11 MR. WEINER: No, Your Honor. The only other thing I could say is I didn't get
12 a notice of speakers, but Court's pleasure.

13 THE COURT: All right, let's hear from our speaker.

14 MR. KOVAC: Let's see, the first one, Irene Segura.

15 THE MARSHAL: Irene Segura.

16 **VICTIM IMPACT SPEAKER: IRENE SEGURA**

17 [having been called as a witness and first being duly sworn in testified as follows:]

18 THE CLERK: Please state and spell your name for the Court's record.

19 MS. SEGURA: My name is Irene Segura, that's S as in Sam, -E-G-U-R-A.

20 THE COURT: All right, ma'am, go ahead and tell me how this has impacted
21 you. And can you give me a little bit of background on how this transaction took
22 place.

23 MS. SEGURA: Okay, yes sir. Thank you -- first of all thank you very much for
24 giving me this opportunity to give a statement.

25 It wasn't too long ago I was here at this criminal court building. I was

1 given the opportunity to make a statement during sentencing to three criminals who
2 fatally shot my son in the back while running away from his attackers. Twelve years
3 later, today, I am given the same opportunity to speak again at the sentencing of
4 criminals. You may not be a murderer in the true sense of the word, however, in my
5 eyes and in the eyes of my family --

6 THE COURT: Ma'am, please address the Court so we don't have any issues;
7 okay?

8 MS. SEGURA: You are killers. You have killed the dream of a young man
9 [indiscernible] by the murder of my son, his father. When my son was killed he left
10 behind his toddler son fatherless. It was at this time when I promised my deceased
11 son at his grave site that I would help fund my -- his son's college education when
12 the time comes. I knew I had enough time to save for this promise. So in addition to
13 saving for our golden years, I have set aside some extra money for my grandson's
14 college education. My husband and I scrimped, saved and cut back on every
15 possible expense we can think of. We cut back on dining out, taking vacations, and
16 hung on to our 20 year old car until it gave up on us. We wanted to surprise our
17 grandson with a check on his high school graduation. He graduated last June and
18 there was no check to surprise him with because you guys have stolen his college
19 fund by scamming us with two worthless properties. It was fraud, pure and simple.
20 The last two years were both mentally and emotionally draining. My husband is 75
21 and I am 64, both seniors whose means to a debt free and comfortable life in our
22 remaining years you have killed by your brand of fraud. We are not in the business
23 of buying and flipping properties. We were just looking at ways of adding extra
24 money to our nest egg, to our modest nest egg which took more than half of our
25 married life to save. Instead, we lost a nest egg, plus a few more. We had to

1 refinance the house we currently live in to pay for some of the most urgent medical
2 bills not covered by Medicare like radiation and chemotherapy. In March of last year
3 I was diagnosed with stage 2 uterine cancer. In all probability the heartache and
4 stress of falling victim to your kind of fraud contributed to the cancer that I now have.
5 It is a no brainer to conclude that being stress free and peace of mind will help beat
6 this cancer. The sleepless nights have also cost my hypertension to worsen. But
7 now I ask you how can I be stress free to beat this disease when I am up to my
8 eyeballs in debt? While you guys were having the time of your life from proceeds of
9 your fraud and scams, we, the victims, were left with a undeniable fact that we paid
10 a high price for being trusting and naïve. I hope and pray that Karma, the law of the
11 universe, will get back at you sooner than later and that Karma starts today in this
12 court. May this Honorable Court sentence you with the highest possible punishment
13 for your crimes, doubly so because you have victimized seniors like us who have
14 worked all our lives to enjoy out twilight years in peace and comfort.

15 Thank you, Your Honor.

16 THE COURT: Ma'am, I have a question for you. When you learned that there
17 was a problem with the property, funding the properties, did you contact either Mr.
18 Leal or Ms. Jackson [sic] and what was their response?

19 MS. SEGURA: No, but I left like hundreds of messages and nobody returned
20 my call. They were no longer in that office. The phone number of the guy, I think one
21 of their employees who I dealt with, never answered the phone and then until it was,
22 you know, the -- its -- the service has been disconnected, so.

23 THE COURT: All right, thank you.

24 MS. SEGURA: I at least recoup some of our, you know, lost money. I have
25 contacted -- I have engaged a lawyer.

1 THE COURT: All right, thank you, ma'am.

2 Do we have another speaker?

3 MS. SEGURA: Thank you, Your Honor.

4 MR. KOVAC: I have Juan Ramirez.

5 THE MARSHAL: Mr. Ramirez, Juan.

6 MR. KOVAC: Oh, it looks like he must have stepped out. I have Luis Palafox
7 for Lena Palafox.

8 **VICTIM IMPACT SPEAKER: LUIS PALAFOX**

9 [having been called as a witness and first being duly sworn testified as follows:]

10 THE CLERK: Please state and spell your name for the record.

11 THE WITNESS: Okay, Luis Palafox, L-U-I-S, P-A-L-A-F-O-X.

12 THE COURT: Go ahead, sir.

13 MR. PALAFOX: Okay, Your Honor, well, the house was bought cheap. My
14 wife purchased two houses from Mr. Leal and Jessica. And she's been in the
15 country for about 6 years so she saw these properties listed on Zillow and -- but her
16 -- she's -- she doesn't have like any idea that it was -- these houses had liens on
17 them and they're -- they had foreclosure mortgages from the previous owners. So,
18 what they told us when we met them, they told us that we can go through a process,
19 a quiet title or something. And actually, the lawyer that we spoke to was the same
20 lawyers that they were dealing with. So, when we met them they -- we let them
21 know, okay, we went through your lawyer that you recommended us to clean the
22 title -- the liens through this lawyer -- we went to the lawyer and it was the same
23 lawyer they were using so the lawyer was kind of into the scam too. And the lawyer
24 said there's no way you can do that. There's no way you can do a quiet title and
25 clean the titles. You're gonna lose your properties. And I mean she -- it was a lot of

1 money so I mean she's in college and I mean we heard of all the other victims that
2 went through all this process too. I mean we were hearing about seniors like this
3 lady that just passed by right now that lost all their 401K accounts and they just
4 cleaned my wife like out. So, the only thing I want is justice because I mean it's a lot
5 of money. It's not two, three thousand dollars you know. She paid \$60,000.00 for
6 one property and she's just had dreams you know to just have some properties and
7 when their -- when her parents come from China she wanted to have a house for
8 them. So, -- and that just went away. They're -- right now we're renting a property
9 and we're not really owners and -- but it's just -- we want justice, justice and -- what
10 their -- what they did is no good. What they did is -- they just can't take people's
11 money. And I mean people that work hard for them, people that have no idea how
12 the -- I mean how the process works and they just took everyone's money. I mean
13 it's just -- hard working you know people that they hurt. And my wife, she was -- she
14 wanted to come but she had a dentist appointment and -- doctor's appointment,
15 sorry, and -- but we want justice. And she has a lawyer too that she's working on
16 the case. It's just they can't do that to innocent people that you know they -- it's all
17 their savings. They work hard every day. I mean honest work, honest people and
18 they just scammed a lot of people.

19 THE COURT: Sir, when this matter fell through, did you or your wife try to
20 contact them --

21 MR. PALAFOX: Yeah, same --

22 THE COURT: -- and what happened?

23 MR. PALAFOX: -- thing. We were -- they left voice messages. One case I
24 think she did answer but she said -- I don't know, she spoke to my wife and she said
25 something about if she'd sign the property back or something to her she would give

1 her the money but that never happened and -- I mean that was the last. We kept on
2 calling and then the victims you know spoke to each other and told them what
3 happened. I mean we were going to go like go up to the -- call the news or
4 something so it can't happen to other people because I mean Zillow's a site you can
5 trust. I mean we didn't know that now. Now we know we can't trust it but you
6 wouldn't expect that from you know the website Zillow. That's -- and it just said call
7 this agent and we met with another guy named Kevin and I went -- one
8 circumstance we called him and he said, oh, yeah, I'm buying a Harley right now,
9 you know, with the -- I'm pretty sure with the victims money. He's buying a Harley.
10 And so we're like, okay, these guys are just you know spending money left and right
11 and -- without having no remorse of the victims what they're going through. I like --
12 she said, yeah, its, -- I mean hypertension. It's stress. I mean we're living check to
13 check, so yeah, it's not easy. We just want justice.

14 THE COURT: Sir, you had mentioned that you met with an attorney that
15 represented him?

16 MR. PALAFOX: No.

17 THE COURT: No?

18 MR. PALAFOX: She -- we got a lawyer. His name is Michael Lee.

19 THE COURT: Oh, I thought you said that you went to a lawyer's office, or
20 was that the previous victim?

21 MR. PALAFOX: Oh, 'cause they said we -- to go to a process named quiet
22 title. I'm pretty sure all the victims know this. They say, oh, yeah, go through quiet
23 title and you can take off the trash liens and this and that. But we had no idea there
24 was a mortgage in the property. We thought it was clear. You know I mean you don't
25 expect that. You don't expect, okay, we're buying a house in cash, its -- everything's

1 okay with it. And my wife put in money. She put money in the properties. She put
2 new tile. She put -- I mean appliances and she put -- I mean that was another
3 \$5,000.00 extra on what they scammed her with.

4 THE COURT: All right, thank you, sir.

5 MR. PALAFOX: Thank you.

6 THE COURT: Do we have Mr. Ramirez back?

7 MR. KOVAC: Yeah, did Juan Ramirez come back? Is there a Lorylee
8 Plancarte?

9 MS. PLANCARTE: I'm here.

10 MR. KOVAC: Okay; one more.

11 **VICTIM IMPACT SPEAKER: LORYLEE PLANCARTE**

12 [having been called as a witness and first being duly sworn in testified as follows:]

13 THE CLERK: Please state and spell your name for the Court's record.

14 THE WITNESS: Lorylee Plancarte, P-L-A-N-C-A-R-T-E.

15 THE COURT: Go ahead, ma'am.

16 MS. PLANCARTE: Thank you for this opportunity. I just wanted to say that I
17 purchased a property from the two that are here today, Jack Leal. I don't even know
18 exactly. I just knew their names after I dealt with two of their associates or who they
19 had under the company Pacelnomics. I purchased -- I came down twice to Las
20 Vegas to purchase. I was shown probably 11 different properties. The first time that I
21 had come down to look, those properties had not been able to become available to
22 me 'cause I was told they were sold so I came down two weeks later. And because I
23 didn't want to miss out on the opportunity to buy a house, they had shown me one. It
24 was a rehab. It didn't have all the toilets. It didn't have the sinks and everything on it.
25 So, the price that I purchased it for I thought was decent 'cause I thought it was a flip

1 house. I was told it was free and clear, once the work was done on it that it would be
2 great. I brought my entire family down, my children and myself, and my husband.
3 Once we had run out of our money to do the rehab, we went in to do a refinance on
4 the property. That's when we found out that the property had liens on it. We were
5 given the notice on our door that we had to be out. We tried to contact them. We got
6 nowhere with that. We have met with three separate lawyers on three separate
7 occasions and also two other occasions we met with other victims who had
8 purchased properties from them. We were trying to put together a lawsuit with --
9 'cause we needed 10 or more so we had 10 or more and they were also waiting at
10 the lawyers office to get more people together to file the suit, the civil claim. I was
11 probably one of the first ones. I was told to go speak to the AG's office and file my
12 name down and then I was told about all the other victims. There was different
13 types. Mine was -- I was told that my property was free and clear from a bankruptcy
14 sale. That's how it was attained. I know there was other victims that were HOA
15 sales. I didn't pursue -- it was another \$15,000.00 to \$20,000.00 for us to go
16 through a criminal case -- or not the criminal but the civil case, to go through the
17 money and they said it could take you know years for that to happen for us. And at
18 this point right now we had to try and make a life for ourselves again and purchase a
19 new home and get ourselves settled somewhere else. We came down from Oregon
20 today. We were also at one point told we could purchase a home from them in
21 Florida which we didn't want to. We were also told that they were gonna give us
22 restitution. One of the woman that had purchased two homes from them, she was
23 settled with them. They gave her half of her money. They had paid \$70,000.00 for a
24 property; they gave her \$35,000.00. I still am in contact with several of the victims.
25 We still talk and I've seen where everything goes. It's you know stressful. It's time

1 consuming. It's frustrating. But the idea that it was you know -- we purchased our
2 house in 2015 of August. We were not even in our house for a year. It's been a year
3 today -- another year, so it's been two years that -- since we purchased our
4 property. We still see no restitution. We've heard nothing. We did receive a call --
5 our attorney called us and said, oh, right before the last court case they wanted to
6 settle and give us restitution if we gave them the deed to the property and all these
7 different things; nothing ever came of it. So, I mean I don't think -- I feel like I'm one
8 in many which in some weird sense gives me a sense of you know like I wasn't the
9 only fool that had this happen to them. But, I mean I don't want to see --

10 THE COURT: Ma'am, you're not a fool. You're a trusting person.
11 Unfortunately, someone took advantage of you.

12 MS. PLANCARTE: Yeah, but I --

13 THE COURT: Did you have any communications with them when you found
14 out that everything's fallen through?

15 MS. PLANCARTE: Nothing. Nothing. Even the office where I had met the
16 person at, no one was there, no phone calls returned, no texts returned. Nothing. It
17 was like it was all gone. No contact was ever made again.

18 THE COURT: Thank you, ma'am.

19 MS. PLANCARTE: Thank you.

20 MR. KOVAC: I think that's everyone. Is there anyone I missed for this case,
21 any of the victims? I believe that's all, Your Honor.

22 THE COURT: Ramirez; did he ever return?

23 MR. KOVAC: I don't know what happened to him.

24 THE COURT: JR, can you check the hallway for Mr. Ramirez.

25 [Pause in proceedings]

1 THE MARSHAL: No, Your Honor.

2 THE COURT: All right, thank you.

3 We have 11 victims at least over a 12 month period of time and this is
4 pure and simple a scam. It's almost worse than going into a fast food place or a
5 convenience store, an armed robbery. This is more planned out than those types of
6 crimes. This went over a whole year and you scammed these people. Is anyone
7 here from P&P? Anyone? No? Is there?

8 THE PROBATION OFFICER: [Indiscernible], Your Honor.

9 THE COURT: I know you're not part of this but just you know I've often
10 complained about the program that P&P has for sentencing and we have 11 victims,
11 a quarter of a million dollars, over a year, and they recommend one year above
12 minimums. I don't know what program you guys are using. It's broken.

13 THE PROBATION OFFICER: I'll let sentencing know.

14 THE COURT: I've had people, Public Defender client's where they steal a car
15 for \$3,500.00 and they recommend more than 2 years.

16 MR. WEINER: And, Your Honor, I --

17 THE COURT: The Court's going to --

18 MR. WEINER: -- would just --

19 THE COURT: I'm sorry.

20 MR. WEINER: -- point out based on something the speaker said that they
21 were paying people back before the State got involved and that's not the kind of
22 people that scam and run, otherwise that's what they would have done. They paid
23 back over -- before the State filed its case over I think \$140,000.00 or \$150,000.00
24 to people once they figured out that there was a problem. That's not the actions of
25 grifters or someone doing this as a straight out scam.

1 MR. KOVAC: And some of those people they grabbed the title back, gave
2 back a portion of the money, then resold the title to somebody else. So, basically,
3 they were double dipping basically.

4 MR. WEINER: And, again, this -- a lot of this was done, as I said, through
5 agents. They never spoke to these people directly.

6 MR. KOVAC: That's not true. There's some through agents, there's plenty of
7 those done directly.

8 THE COURT: All right, anything further, Counsel?

9 MR. WEINER: No, I was just addressing --

10 THE COURT: Okay.

11 MR. WEINER: -- what the speakers had to say.

12 THE COURT: I'm going to sentence the Defendant to confinement in the
13 Nevada Department of Corrections for a maximum term of 180 months, a minimum
14 term of 72 months. He's ordered to pay a \$25.00 administrative assessment fee; a
15 \$3.00 DNA administrative assessment fee; \$150.00 DNA fee, submit to DNA testing.
16 And he has zero days credit for time served.

17 Counsel, they're identifying restitution of \$757,420.00; are you disputing
18 that amount or --

19 MR. WEINER: No, the amount was never in dispute, Your Honor, but in less
20 than 30 days these people would be paid back in full. What I would ask the Court to
21 maybe consider is to kind of reserving that judgment, having us come back when
22 the house sells. Everybody would made paid -- everybody would be paid in full at
23 that point and that may certainly impact the Court's sentencing on us.

24 THE COURT: No, they had time. They had time to do this. They ripped these
25 people off. They took advantage of them. They stabbed them in the back and I'm not

1 standing for it.

2 MR. WEINER: But basically it also puts in a position, Your Honor, how can we
3 complete the sale.

4 THE COURT: Well, they can -- either the State might be able to help them
5 out or an attorney might be able to help them out and get this property sold.

6 And there's a no bail bench warrant for Ms. Garcia.

7 MR. KOVAC: Thank you, Your Honor.

8 THE COURT: And if she's here within a week she may get the similar
9 sentence. If she's out and about and trying to avoid prosecution that's going to tell
10 me she's not taking this serious and I'm going to max her out. I'm not mad --

11 MR. WEINER: Understood, Your Honor.

12 THE COURT: -- at you, Counsel. You did your job. You got 11 felonies down
13 to 1 so I mean you should be commended because you did a good job for them but
14 these people need to pay the price.

15 MR. KOVAC: Thank you, Your Honor.

16 [Colloquy between Court and clerk]

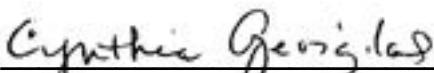
17 MR. WEINER: Your Honor, the State already has one hundred and fifty-seven
18 if the Court wants to direct how it's to be dispersed.

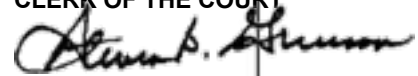
19 [Colloquy between Court and clerk]

20 [Proceedings concluded at 9:49 a.m.]

21 * * * * *

22 ATTEST: I do hereby certify that I have truly and correctly transcribed the
23 audio/video recording in the above-entitled case to the best of my ability.

24 
25 CYNTHIA GEORGILAS
Court Recorder/Transcriber/DC XVII



1 JOCP
2
3
4

5 DISTRICT COURT
6 CLARK COUNTY, NEVADA
7

8 THE STATE OF NEVADA,
9

10 Plaintiff,

11 -vs-

12 JACK LEAL
13 #X0157754

14 Defendant.
15

CASE NO. C-17-322664-2

DEPT. NO. XVII

16
17 JUDGMENT OF CONVICTION
18 (PLEA OF GUILTY)
19

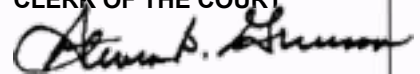
20 The Defendant previously appeared before the Court with counsel and entered a
21 plea of guilty to the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
22 OR DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION
23 (Category B Felony) in violation of NRS 205.377; thereafter, on the 17th day of August,
24 2017, the Defendant was present in court for sentencing with counsel JASON
25 WEINER, ESQ., and good cause appearing,
26
27
28

1 THE DEFENDANT IS HEREBY ADJUDGED guilty of said offense and, in
2 addition to the \$25.00 Administrative Assessment Fee, \$757,420.00 Restitution,
3 (\$70,000.00 payable to LoryLee Plancarte, \$75,000.00 payable to Edelyn Rudin,
4 \$37,000.00 payable to Chatty Becker, \$57,500.00 payable to Irene Segura, \$98,620.00
5 payable to Liih-Ling Yang, \$90,300.00 payable to Lina Palafox, \$85,000.00 payable to
6 Adilson Gibellato, \$50,000.00 payable to Juan Eloy Ramirez, \$115,000.00 payable to
7 Catherine Wyngarden, \$25,000.00 payable to Shahram Bozorgnia, \$53,500.00 payable
8 to Tat Lam) and \$150.00 DNA Analysis Fee including testing to determine genetic
9 markers plus \$3.00 DNA Collection Fee, the Defendant is sentenced as follows: a
10 MAXIMUM of ONE HUNDRED EIGHTY (180) MONTHS with a MINIMUM parole
11 eligibility of SEVENTY-TWO (72) MONTHS in the Nevada Department of
12 Corrections (NDC); with ZERO (0) DAYS credit for time served.

13 DATED this 22 day of August, 2017

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MICHAEL VILLANI ^{OB}
DISTRICT COURT JUDGE



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ORDM

DISTRICT COURT
CLARK COUNTY, NEVADA

Nevada State of, Plaintiff(s)
vs.
\$6,616.04, Defendant(s)

Case No.: A-16-744347-C


Department 2

ORDER FOR DISMISSAL

It appears to the Court that more than 120 days have passed since the filing of the Complaint in this action and service of the Summons and Complaint have not been made on Defendant. Now, therefore, pursuant to NRCP 4(i), it is hereby

ORDERED that this action be, and it hereby is, dismissed.

DATED: 5th day of September, 2017.



DISTRICT JUDGE
RICHARD F. SCOTTI

I hereby certify that on the date filed, I mailed or placed a copy of this Order in the Attorney's folder in the Clerk's Office to:

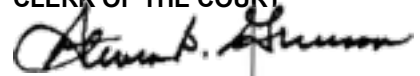
Michael C. Kovac
Office of Attorney General
555 E. Washington Ave.
Las Vegas, NV 89101

<input type="checkbox"/> Voluntary Dismissal	<input type="checkbox"/> Summary Judgment
<input type="checkbox"/> Involuntary Dismissal	<input type="checkbox"/> Stipulated Judgment
<input type="checkbox"/> Stipulated Dismissal	<input type="checkbox"/> Default Judgment
<input type="checkbox"/> Motion to Dismiss by Deft(s)	<input type="checkbox"/> Judgment of Arbitration

/s/ Melody Howard

Melody Howard, Judicial Assistant

NOTE: EDCR 2.90: Case may be reinstated within 30 days upon written request of a party or party's attorney.



1 NOASC
2 CRAIG A. MUELLER, Esq.
3 Nevada Bar No. 4703
4 **MUELLER, HINDS & ASSOCIATES, CHTD.**
5 600 South Eighth Street
6 Las Vegas, NV 89101
7 P: (702) 940-1234
8 F: (702) 940-1235
9 Attorney for Appellant
10 JACK LEAL

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

9 THE STATE OF NEVADA;
10 Respondent-Plaintiff,
11 vs.
12 JACK LEAL;
13 Appellant-Defendant.

) Case No.: C-17-322664-2
) Dept. No: 17

) **NOTICE OF APPEAL**

14
15 Notice is hereby given that JACK LEAL, defendant above named, hereby appeals to the
16 Supreme Court of Nevada from the final judgment entered in this action on the 23rd day of August
17 2017.

18 DATED this 14th day of September 2017.

20 MUELLER, HINDS & ASSOCIATES, CHTD.

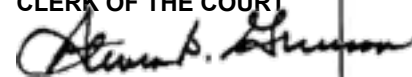
21 /s/ Craig Mueller
22 CRAIG A. MUELLER, ESQ.
23 Nevada Bar No. 4703
24 MUELLER, HINDS & ASSOCIATES, CHTD.
25 600 South Eighth Street
26 Las Vegas, NV 89101
27 P: (702) 940-1234
28 F: (702) 940-1235
Attorney for Appellant

1 CERTIFICATE OF SERVICE

2 Pursuant to NRAP 25(d), I hereby certify that on the 14th day of September 2017, I served a true
3 and correct copy of the Notice of Appeal to the last known address set forth below:
4

5
6 Steve Wolfson, Esq.
7 Clark County District Attorney
8 Regional Justice Center
9 200 Lewis Avenue
10 Las Vegas, Nevada 89101

11 /s/ David Barragan
12 Employee of
13 MUELLER, HINDS & ASSOCIATES, CHTD.
14
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28



1 **MOT**
2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac (Bar No. 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 East Washington Ave., Ste. 3900
9 Las Vegas, Nevada 89101
10 P: (702) 486-5706
11 F: (702) 486-0660
12 mkovac@ag.nv.gov
13 Attorneys for the State of Nevada

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,
12 Plaintiff,
13 v.

Case No.: A-16-744347-C
Dept. No. II

14 \$6,616.04; \$150,489.13; and 1024 SANTA
15 HELENA AVENUE, HENDERSON,
16 NEVADA 89002, MORE PARTICULARLY
17 DESCRIBED AS FOLLOWS: LOT 223 OF
18 AMENDED MISSION HILLS ESTATES,
19 AS SHOWN BY MAP THEREOF ON FILE
20 IN BOOK 17 OF PLATS, PAGE 12 IN THE
21 OFFICE OF THE COUNTY RECORDER
22 OF CLARK COUNTY, NEVADA,
23 TOGETHER WITH A PORTION OF
24 VACATED ROAD KNOWN AS LOT 223-
25 A AND APPURTENANCES THEREON;
26 APN: 179-33-710-056,

[Exempt from arbitration under NRS 38.255 and
NAR 3(A) as a declaratory action]

22 Defendant(s).

24 **PLAINTIFF'S EX PARTE MOTION FOR ORDER REOPENING CASE AND**
25 **STAYING PROCEEDINGS**

26 The STATE OF NEVADA (hereinafter "Plaintiff"), by and through Attorney General Adam
27 Paul Laxalt and Senior Deputy Attorney General Michael C. Kovac, hereby submits this PLAINTIFF'S
28 EX PARTE MOTION FOR ORDER REOPENING CASE AND STAYING PROCEEDINGS.

1 This motion is made and based upon the pleadings and papers on file, the following
2 memorandum of points and authorities, and any oral argument the Court may allow.

3 DATED this 22nd day of September, 2017.

4 ADAM PAUL LAXALT
Attorney General

5 By: /s/ Michael C. Kovac
6 MICHAEL C. KOVAC (Bar No. 11177)
7 Senior Deputy Attorney General

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 On September 30, 2016, Plaintiff filed a Complaint for Forfeiture in the present matter. The
10 basis for that action is criminal case that is currently pending in the Eighth Judicial District Court –
11 *State v. Leal, et al.*, C-17-3222664-1/2.¹ That case was initiated in Las Vegas Justice Court on
12 November 28, 2016 in case number 16F19220AB. By order filed on September 7, 2017, this Court
13 dismissed the present Complaint for Forfeiture for lack of service.

14 NRS 179.1173(2) provides, in pertinent part: “At a proceeding for forfeiture, the court shall
15 issue an order staying the proceeding that remains in effect while the criminal action which is the basis
16 of the proceeding is pending trial.” Given the pending criminal matter noted above, Plaintiff is
17 restrained from taking any action in the present forfeiture action.

18 For these reasons, the State respectfully requests that the Court issue an order reopening and
19 staying the present proceedings, with said stay being effective as of November 28, 2016 – the date on
20 which the relevant criminal proceedings were initiated.

21 Dated this 22nd day of September, 2017.

22 SUBMITTED BY:
23 ADAM PAUL LAXALT
Attorney General

24 /s/ Michael C. Kovac
25 MICHAEL C. KOVAC (Bar No. 11177)
26 Senior Deputy Attorney General

27
28 ¹ While a criminal Judgment of Conviction has been entered against defendant Jack Leal in that matter, the case against his
codefendant, Jessica Garcia, has not yet been resolved.

1 **ORDER**

2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac (Bar No. 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 East Washington Ave., Ste. 3900
9 Las Vegas, Nevada 89101
10 P: (702) 486-5706
11 F: (702) 486-0660
12 mkovac@ag.nv.gov
13 Attorneys for the State of Nevada

DISTRICT COURT
CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 \$6,616.04; \$150,489.13; and 1024 SANTA
14 HELENA AVENUE, HENDERSON,
15 NEVADA 89002, MORE PARTICULARLY
16 DESCRIBED AS FOLLOWS: LOT 223 OF
17 AMENDED MISSION HILLS ESTATES, AS
18 SHOWN BY MAP THEREOF ON FILE IN
19 BOOK 17 OF PLATS, PAGE 12 IN THE
20 OFFICE OF THE COUNTY RECORDER OF
21 CLARK COUNTY, NEVADA, TOGETHER
22 WITH A PORTION OF VACATED ROAD
23 KNOWN AS LOT 223-A AND
24 APPURTENANCES THEREON; APN: 179-
25 33-710-056,

26 Defendant(s).

Case No.: A-16-744347-C

Dept. No.: II

[Exempt from arbitration under NRS 38.255 and
NAR 3(A) as a declaratory action]

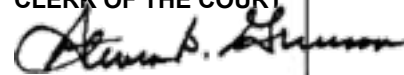
22 **ORDER REOPENING CASE AND STAYING PROCEEDINGS**

23 Because the present matter is based upon pending criminal proceedings in the case of *State v.*
24 *Leal, et al.*, C-17-3222664-1/2, pursuant to NRS 179.1173(2), this matter is hereby reopened, and the
25 proceedings are hereby stayed, with said stay effective as of November 28, 2016.

26 DATED this 25th day of September, 2017.

27 By: 

28 District Court Judge 



1 **ORDR**
2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac (Bar No. 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 East Washington Ave., Ste. 3900
9 Las Vegas, Nevada 89101
10 P: (702) 486-5706
11 F: (702) 486-0660
12 mkovac@ag.nv.gov
13 *Attorneys for the State of Nevada*

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 \$6,616.04; \$150,489.13; and 1024 SANTA
14 HELENA AVENUE, HENDERSON,
15 NEVADA 89002, MORE PARTICULARLY
16 DESCRIBED AS FOLLOWS: LOT 223 OF
17 AMENDED MISSION HILLS ESTATES, AS
18 SHOWN BY MAP THEREOF ON FILE IN
19 THE OFFICE OF THE COUNTY RECORDER OF
20 CLARK COUNTY, NEVADA, TOGETHER
21 WITH A PORTION OF VACATED ROAD
22 KNOWN AS LOT 223-A AND
23 APPURTENANCES THEREON; APN: 179-
24 33-710-056,

25 Defendant(s).

Case No.: A-16-744347-C

Dept. No.: II

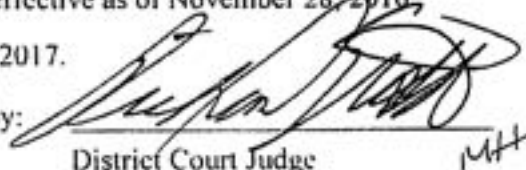
[Exempt from arbitration under NRS 38.255 and
NAR 3(A) as a declaratory action]

22 **ORDER REOPENING CASE AND STAYING PROCEEDINGS**

23 Because the present matter is based upon pending criminal proceedings in the case of *State v.*
24 *Leal, et al.*, C-17-3222664-1/2, pursuant to NRS 179.1173(2), this matter is hereby reopened, and the
25 proceedings are hereby stayed, with said stay effective as of November 28, 2016.

26 DATED this 25th day of September, 2017.

27 By:

28 
District Court Judge

REGISTER OF ACTIONS

CASE NO. A-16-744347-C

Nevada State of, Plaintiff(s) vs. \$6,616.04, Defendant(s)

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§

Case Type: **Other Civil Matters**
Date Filed: **09/30/2016**
Location: **Department 2**
Cross-Reference Case Number: **A744347**

PARTY INFORMATION

Lead Attorneys

Defendant **\$6,616.04**

Plaintiff **Nevada State of**

Michael C. Kovac
Retained
702-486-3420(W)

EVENTS & ORDERS OF THE COURT

DISPOSITIONS

09/07/2017 **Order of Dismissal** (Judicial Officer: Scotti, Richard F.)
Debtors: 1024 Santa Helena Trust (Claimant), Jack Leal (Claimant), Jessica Garcia (Claimant), Parcelnomics LLC (Claimant)
Creditors: Nevada State of (Plaintiff)
Judgment: 09/07/2017, Docketed: 09/07/2017

OTHER EVENTS AND HEARINGS

09/30/2016 **Complaint**
Complaint for Forfeiture

09/30/2016 **Lis Pendens**
Notice of Lis Pendens

01/02/2017 **Case Reassigned to Department 18**
Case reassigned from Judge Elizabeth Gonzalez Dept 11

06/05/2017 **Administrative Reassignment - Judicial Officer Change**
From Judge David Barker to Judge Mark B. Bailus

08/21/2017 **Case Reassigned to Department 2**
Civil Case Reassignment to Judge Richard F. Scotti

09/07/2017 **Order of Dismissal**
Order for Dismissal

09/28/2017 **Ex Parte Motion**
Plaintiff's Ex Parte Motion for Order Reopening Case and Staying Proceedings

10/10/2017 **Order**
Order Reopening Case and Staying Proceedings

02/21/2018 **Status Check** (3:00 AM) (Judicial Officer Scotti, Richard F.)

FINANCIAL INFORMATION

	Plaintiff Nevada State of		
	Total Financial Assessment		11.50
	Total Payments and Credits		11.50
	Balance Due as of 01/22/2018		0.00
10/11/2016	Transaction Assessment		11.50
10/11/2016	Payment (Window)	Receipt # 2016-98798-CCCLK	Jessica Garcia
			(11.50)

[Minutes](#)
04/24/2017 Reset by Court to 04/24/2017
 Result: Plea Entered
 04/24/2017 **Guilty Plea Agreement**
 07/18/2017 **PSI**
 08/11/2017 **Notice**
Notice of Intent of Present Victim Impact Statements
 08/17/2017 **Sentencing** (8:30 AM) (Judicial Officer Villani, Michael)
[Parties Present](#)
[Minutes](#)
 Result: Defendant Sentenced
 08/23/2017 **Judgment of Conviction**
JUDGMENT OF CONVICTION (PLEA OF GUILTY)
 09/05/2017 **Criminal Order to Statistically Close Case**
Criminal Order to Statistically Close Case
 09/08/2017 **Order**
Order Allowing Notary Public
 09/14/2017 **Notice of Appeal (criminal)**
Notice of Appeal
 09/14/2017 **Certificate of Mailing**
CERTIFICATE OF MAILING
 10/03/2017 **Case Appeal Statement**
Case Appeal Statement
 10/11/2017 **Reporters Transcript**
Request for Transcript of Proceedings
 11/17/2017 **Recorders Transcript of Hearing**
Transcript of Proceedings Sentencing (Both) Heard on August 17, 2017
 11/20/2017 **Recorders Transcript of Hearing**
Recorders Transcript of Hearing Re: Initial Arraignment
 11/20/2017 **Recorders Transcript of Hearing**
Recorders Transcript of Hearing Re: Arraignment Continued

FINANCIAL INFORMATION

<p>Defendant Leal, Jack Total Financial Assessment Total Payments and Credits Balance Due as of 01/22/2018</p>	<p>178.00 0.00 178.00</p>
<p>09/22/2017 Transaction Assessment</p>	<p>178.00</p>

REGISTER OF ACTIONS CASE No. 16F19220B

State of Nevada vs. LEAL, JACK

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Case Type: **Felony**
Date Filed: **11/29/2016**
Location: **JC Department 7**

RELATED CASE INFORMATION

Related Cases

- 16F19220A (Multi-Defendant Case)
- 16F19220C (Multi-Defendant Case)

PARTY INFORMATION

Defendant **LEAL, JACK**

Lead Attorneys
Jason G. Weiner
Retained
702-202-0500(W)

State of Nevada **State of Nevada**

CHARGE INFORMATION

Charges: LEAL, JACK

Charges: LEAL, JACK	Statute	Level	Date
1. Racketeering [53190]	207.400	Felony	03/01/2015
2. Theft, \$3500+ [55991]	205.0835.4	Felony	06/01/2015
3. Theft, \$3500+ [55991]	205.0835.4	Felony	09/20/2015
4. Theft, \$3500+ [55991]	205.0835.4	Felony	08/01/2015
5. Theft, \$3500+ [55991]	205.0835.4	Felony	08/01/2015
6. Theft, \$3500+ [55991]	205.0835.4	Felony	03/01/2015
7. Theft, \$3500+ [55991]	205.0835.4	Felony	08/01/2015
8. Theft, \$3500+ [55991]	205.0835.4	Felony	09/21/2015
9. Theft, \$3500+ [55991]	205.0835.4	Felony	03/05/2015
10. Theft, \$3500+ [55991]	205.0835.4	Felony	04/13/2016
11. Theft, \$3500+ [55991]	205.0835.4	Felony	09/28/2015
12. Theft, \$3500+ [55991]	205.0835.4	Felony	03/09/2015
13. Theft, \$3500+ [55991]	205.0835.4	Felony	04/16/2015
14. Fraud/deceit in course of enterprise/occup [55110]	205.377	Felony	03/01/2015

EVENTS & ORDERS OF THE COURT

DISPOSITIONS

- 04/11/2017 (Judicial Officer: Bennett-Haron, Karen P.)
1. Racketeering [53190]
Waiver of Preliminary Hearing - Bound Over to District Court
 2. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 3. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 4. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 5. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 6. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 7. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 8. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 9. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 10. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 11. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
 12. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court

APPELLANT'S APPENDIX

13. Theft, \$3500+ [55991]
Waiver of Preliminary Hearing - Bound Over to District Court
14. Fraud/deceit in course of enterprise/occup [55110]
Waiver of Preliminary Hearing - Bound Over to District Court

OTHER EVENTS AND HEARINGS

- 11/28/2016 **Multi-Defendant Case**
- 11/28/2016 **CTRACK Track Assignment JC07**
- 11/29/2016 **Criminal Complaint**
- 11/29/2016 **Summons Issued**
- 11/29/2016 **Request for Summons**
- 12/14/2016 **Summons Returned**
Not deliverable as addressed; Unable to forward.
- 12/19/2016 **Notice of Confirmation of Counsel**
- 12/27/2016 **Initial Appearance (7:30 AM)** (Judicial Officers Pro Tempore, Judge, Hua, Jeannie)
No bail posted
Result: Matter Heard
- 12/27/2016 **Counsel Confirms as Attorney of Record**
J. Weiner, Esq
- 12/27/2016 **Amended Criminal Complaint**
Filed in open court
- 12/27/2016 **Initial Appearance Completed**
Defense Advised of Charges on Criminal Complaint, Waives Reading of Criminal Complaint
- 12/27/2016 **Motion to Continue - Defense**
for negotiations - Motion granted
- 12/27/2016 **Minute Order - Department 07**
- 02/07/2017 **Negotiations (8:00 AM)** (Judicial Officer Bennett-Haron, Karen P.)
No bail posted
Result: Matter Heard
- 02/07/2017 **Motion to Continue - Defense**
for negotiations - Motion granted
- 02/07/2017 **Continued For Negotiations**
- 02/07/2017 **Minute Order - Department 07**
- 03/07/2017 **Negotiations (8:00 AM)** (Judicial Officer Bennett-Haron, Karen P.)
No bail posted
Result: Matter Heard
- 03/07/2017 **Continued by Stipulation of Counsel**
- 03/07/2017 **Stipulation**
filed in open court
- 03/07/2017 **Continued For Negotiations**
- 03/07/2017 **Notify**
Attorney General/clm via email
- 03/07/2017 **Minute Order - Department 07**
- 04/04/2017 **Negotiations (8:00 AM)** (Judicial Officer Bennett-Haron, Karen P.)
No bail posted
Result: Matter Heard
- 04/04/2017 **Motion to Continue - Defense**
to file a corrected Waiver - motion granted
- 04/04/2017 **Minute Order - Department 07**
- 04/11/2017 **Status Check (8:00 AM)** (Judicial Officer Bennett-Haron, Karen P.)
No bail posted
Result: Bound Over
- 04/11/2017 **Waiver**
of Unconditional Bindover filed in open court
- 04/11/2017 **Unconditional Bind Over to District Court**
Defendant unconditionally waives right to Preliminary Hearing. Defendant Bound Over to District Court as Charged. Defendant to Appear in the Lower Level Arraignment Courtroom A.
- 04/11/2017 **Case Closed - Bound Over**
- 04/11/2017 **District Court Appearance Date Set**
Apr 20 2017 10:00AM: No bail posted
- 04/11/2017 **Minute Order - Department 07**
- 04/11/2017 **Certificate, Bindover and Order to Appear**
- 04/11/2017 **Amended Certificate, Bind Over and Order to Appear**

1 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
2 magnetic or optical technology, to wit:

3 On or about March 9, 2015, Defendants knowingly obtained \$3,500 or more from Shahram Bozorgnia
4 by personally, or through an agent acting at Defendants' direction, selling Bozorgnia a home located at
5 2730 Sandy Lane, Las Vegas, Nevada, by either personally or through an agent acting at Defendants'
6 direction, falsely representing to Bozorgnia that, at the time of said sale, Defendants possessed title to
7 said property, which was free and clear of existing liens and all other security interests; Defendants
8 utilized a website to advertise the sale of said property to Bozorgnia. The allegations contained in Count
9 One are hereby incorporated herein as if fully set forth in this count.

10 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
11 "B" felony, in violation NRS 205.0832; 205A.030.

12 **COUNT 13**
13 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
14 **Category "B" Felony - NRS 205.0832; 205A.030**

15 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
16 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
17 obtain property or services of another person by a material misrepresentation with intent to deprive that
18 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
19 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
20 in conjunction with any other component, device, equipment, system or network, is designed or has the
21 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
22 relay, record or reproduce any data, information, image, program, signal or sound in a technological
23 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
24 magnetic or optical technology, to wit:

25 On or about April 16, 2015, Defendants knowingly obtained \$3,500 or more from Tat Lam by
26 personally, or through an agent acting at Defendants' direction, selling Lam a home located at 556
27 Liverpool Avenue, Henderson, Nevada, by either personally or through an agent acting at Defendants'
28 direction, falsely representing to Lam that, at the time of said sale, Defendants possessed title to said
property, which was free and clear of existing liens and all other security interests; Defendants utilized

1 the website Zillow.com to advertise the sale of said property to Lam. The allegations contained in Count
2 One are hereby incorporated herein as if fully set forth in this count.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
4 "B" felony, in violation NRS 205.0832; 205A.030.

5
6 **COUNT 14**
7 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**
8 **ENTERPRISE OR OCCUPATION**
9 **Category "B" Felony - NRS 205.377**

10 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
11 JESSICA GARCIA, in the County of Clark, State of Nevada, did, in the course of an enterprise or
12 occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of business
13 or employed a device, scheme or artifice which operated or would have operated as a fraud or deceit upon
14 a person by means of a false representation or omission of a material fact that: (a) the person knew to be
15 false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any person who
16 relied on the false representation or omission, in at least two transactions that had the same or similar
17 pattern, intents, results, accomplices, victims or methods of commission, or were otherwise interrelated
18 loss or intended loss was more than \$650, to wit:

19 On or about March 1, 2015 through March 31, 2016, in and through the course of a real estate
20 enterprise known as PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), Defendants knowingly
21 and with the intent to defraud, obtained thousands of dollars from LoryLee Plancarte, Edelyn Rubin,
22 Chatty Becker, Irene Segura, Lih-Ling Yang, Lina Palafox, Juan Eloy Ramirez, Pham Delaware Realty,
23 Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson Gibellato by means of knowingly and
24 falsely representing to said individuals that the titles to properties being sold to them by the defendants
25 were not encumbered by liens or other security interests, intending that said individuals rely on said
26 misrepresentations, and resulting in a loss of more than \$650.00. The allegations contained in counts one
27 through 13 are hereby repeated and incorporated herein as if fully set forth in this count.

28 ///

///

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 1

NRS 207.420(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 1, the State of Nevada will seek forfeiture of property, namely \$886,800.00, pursuant to NRS 207.420(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a violation of NRS 207.400.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value by the conduct of the defendant;
- (e) Has been commingled with other property which cannot be divided without difficulty or undue injury to innocent persons; or
- (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek forfeiture of other property of the defendants, including but not limited to real property located at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is unreachable.

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 2

NRS 179.1219(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 2, the State of Nevada will seek forfeiture of property, namely \$70,000, pursuant to NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a technological crime under NRS 205A.030.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;

- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 6 forfeiture of other property of the defendants, including but not limited to real property located at
- 7 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 3**
10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

12 charged in Count 3, the State of Nevada will seek forfeiture of property, namely \$75,000, pursuant to

13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

14 through, or used or intended for use in the course of an unlawful act that constitutes a technological

15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 24 forfeiture of other property of the defendants, including but not limited to real property located
- 25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 26 unreachable.

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- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 6 forfeiture of other property of the defendants, including but not limited to real property located
- 7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 6**
10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

12 charged in Count 6, the State of Nevada will seek forfeiture of property, namely \$98,000, pursuant to

13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

14 through, or used or intended for use in the course of an unlawful act that constitutes a technological

15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 24 forfeiture of other property of the defendants, including but not limited to real property located
- 25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 26 unreachable.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 7**

2 **NRS 179.1219(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 7, the State of Nevada will seek forfeiture of property, namely \$90,300, pursuant to
5 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a technological
7 crime under NRS 205A.030.

8 In the event that any of the above-described forfeitable property:

- 9 (a) Cannot be located;
- 10 (b) Has been sold to a purchaser in good faith for value;
- 11 (c) Has been placed beyond the jurisdiction of the court;
- 12 (d) Has been substantially diminished in value by the conduct of the defendant;
- 13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or
- 15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

19 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 8**

20 **NRS 179.1219(1)**

21 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
22 charged in Count 8, the State of Nevada will seek forfeiture of property, namely \$85,000, pursuant to
23 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
24 through, or used or intended for use in the course of an unlawful act that constitutes a technological
25 crime under NRS 205A.030.

26 In the event that any of the above-described forfeitable property:

- 27 (a) Cannot be located;

- 1 (b) Has been sold to a purchaser in good faith for value;
- 2 (c) Has been placed beyond the jurisdiction of the court;
- 3 (d) Has been substantially diminished in value by the conduct of the defendant;
- 4 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 5 injury to innocent persons; or
- 6 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 7 forfeiture of other property of the defendants, including but not limited to real property located
- 8 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 9 unreachable.

10 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 9**

11 **NRS 179.1219(1)**

12 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

13 charged in Count 9, the State of Nevada will seek forfeiture of property, namely \$50,000, pursuant to

14 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

15 through, or used or intended for use in the course of an unlawful act that constitutes a technological

16 crime under NRS 205A.030.

17 In the event that any of the above-described forfeitable property:

- 18 (a) Cannot be located;
- 19 (b) Has been sold to a purchaser in good faith for value;
- 20 (c) Has been placed beyond the jurisdiction of the court;
- 21 (d) Has been substantially diminished in value by the conduct of the defendant;
- 22 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 23 injury to innocent persons; or
- 24 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 25 forfeiture of other property of the defendants, including but not limited to real property located at
- 26 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 27 unreachable.
- 28

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 10
NRS 179.1219(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 10, the State of Nevada will seek forfeiture of property, namely \$90,000, pursuant to NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a technological crime under NRS 205A.030.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value by the conduct of the defendant;
- (e) Has been commingled with other property which cannot be divided without difficulty or undue injury to innocent persons; or
- (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek forfeiture of other property of the defendants, including but not limited to real property located at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is unreachable.

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 11
NRS 179.1219(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 11, the State of Nevada will seek forfeiture of property, namely \$115,000, pursuant to NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a technological crime under NRS 205A.030.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;

- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 6 forfeiture of other property of the defendants, including but not limited to real property located
- 7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 12**

10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

12 charged in Count 12, the State of Nevada will seek forfeiture of property, namely \$25,000, pursuant to

13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

14 through, or used or intended for use in the course of an unlawful act that constitutes a technological

15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 24 forfeiture of other property of the defendants, including but not limited to real property located
- 25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 26 unreachable.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 13**
2 **NRS 179.1219(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, pursuant to
5 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a technological
7 crime under NRS 205A.030.

8 In the event that any of the above-described forfeitable property:

- 9 (a) Cannot be located;
10 (b) Has been sold to a purchaser in good faith for value;
11 (c) Has been placed beyond the jurisdiction of the court;
12 (d) Has been substantially diminished in value by the conduct of the defendant;
13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or
15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

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

21 The Complainant requests a Summons be issued at this time pursuant to NRS 171.106.

22 DATED this 20th day of December, 2016.

23 SUBMITTED BY

24 ADAM PAUL LAXALT
25 Attorney General

26 By: Michael C. Kovac
27 Michael C. Kovac (Bar. No. 11177)
28 Senior Deputy Attorney General
Attorneys for the State of Nevada

Justice Court, Las Vegas Township
Clark County, Nevada

Court Minutes

Department: 07



L007620138

16F19220B State of Nevada vs. LEAL, JACK

Lead Atty: Jason G. Weiner

2/7/2017 8:00:00 AM Negotiations (No bail posted)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Attorney
Kallas, Chelsea
Weiner, Jason G.

Judge: Bennett-Haron, Karen P.
Court Reporter: O'Neill, Jennifer
Court Clerk: Meccia, Cherie

PROCEEDINGS

Hearings: 3/7/2017 8:00:00 AM: Negotiations Added

Events: **Motion to Continue - Defense**
for negotiations - Motion granted
Continued For Negotiations

Justice Court, Las Vegas Township
Clark County, Nevada

Court Minutes

Department: 07



L007730414

16F19220B State of Nevada vs. LEAL, JACK

Lead Atty: Jason G. Weiner

3/7/2017 8:00:00 AM Negotiations (No bail posted)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Attorney LoGrippo, Frank Weiner, Jason G.

Judge: Bennett-Haron, Karen P.

Court Reporter: O'Neill, Jennifer

Court Clerk: Meccia, Cherie

PROCEEDINGS

Hearings: 4/4/2017 8:00:00 AM: Negotiations

Added

Events: **Continued by Stipulation of Counsel**

Stipulation

filed in open court

Continued For Negotiations

Notify

Attorney General/clm via email

Review Date: 3/8/2017

AB + C Defs.
Requesting 2 weeks
Lead AG in hospital

702-671-0606

Kristi

1 JASON G. WEINER, ESQ.
Nevada Bar Number 7555
2 WEINER LAW GROUP, LLC.
2820 W. Charleston Blvd., Suite D35
3 Las Vegas, Nevada 89102
Tel. No. (702) 202-0500
4 Fax No. (702) 202-4999
Attorney for Defendant
5 JESSICA GARCIA

FILED IN OPEN
COURT ON
MAR 07 2017

Chrecca
Court Clerk

6 JUSTICE COURT, LAS VEGAS TOWNSHIP
7 ***
8 COUNTY OF CLARK, STATE OF NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,
11 vs.
12 JESSICA GARCIA,
13 Defendant.

CASE NO. 16F19220C
DEPT. 7

14 STIPULATION AND ORDER TO CONTINUE

15 Plaintiff, by and through its attorney, Deputy Attorney General, MICHAEL C. KOVAC
16 ESQ., and Defendant JESSICA GARCIA, by and through her attorney, JASON G. WEINER,
17 ESQ., of the law firm of WEINER LAW GROUP, LLC., hereby stipulate that the negotiations
18 hearing in the above entitled case, currently scheduled for March 7, 2017, at 08:00 a.m., be
19 vacated and continued to a date most convenient to the calendar of this Honorable Court,
20 considering that counsel for the Plaintiff will be temporarily unavailable during that period of
21 time. DATED this ____ day of March, 2017.

22 WEINER LAW GROUP, LLC.
23
24
25 *[Signature]*
26 JASON G. WEINER, ESQ.
Nevada State Bar No. 7555
27 2820 W. Charleston Blvd., Suite D35
Las Vegas, Nevada 89102
28 Attorney for the Defendant
JESSICA GARCIA

OFFICE OF THE DISTRICT ATTORNEY
Chelsea Kallala for
MICHAEL C. KOVAK, ESQ.
Deputy Attorney General
Nevada State Bar No. 11177
555 E. Washington Ave., #3900
Las Vegas, Nevada 89101
Attorney for the Plaintiff

WEINER LAW GROUP, LLC
2820 W. Charleston Blvd #35
Las Vegas, Nevada 89102
Tel: (702) 202-0500 Fax: (702) 202-4999



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STATE OF NEVADA vs. JESSICA GARCIA

Case No. 16F19220C

ORDER

Upon the foregoing Stipulation of Counsel, both counsel being under the obligation not to continue the proceedings for the purpose of delay, IT IS THEREFORE ORDERED that the sentencing in the above matter previously scheduled on March 7, 2017 at 08:00 a.m., is vacated and re-scheduled to April 4, 2017, at 8:00 a.m./p.m.

Dated this 7th day of March, 2017.

Karen Beaudet Haron

DISTRICT COURT JUDGE

Justice

WEINER LAW GROUP, LLC
2820 W. Charleston Blvd. #305
Las Vegas, Nevada 89102
Tel (702) 202-6500 Fax (702) 202-4919

HP LaserJet 400 MFP M425dn

Fax Activity Log

Mar-6-2017 12:50PM

Date	Time	Type	Identification	Duration	Pages	Result
1/18/2017	9:47:51AM	Receive	7023690247	0:42	2	OK
1/18/2017	1:37:54PM	Receive		0:50	6	OK
1/19/2017	12:21:53PM	Send	7028281543	0:44	2	OK
1/19/2017	1:36:03PM	Receive	0000000000	0:57	2	OK
1/19/2017	11:31:57PM	Receive	17024468357	0:38	1	OK
1/20/2017	9:12:21AM	Receive		0:20	1	OK
1/20/2017	2:56:00PM	Receive		0:32	2	OK
1/23/2017	8:55:55AM	Receive		0:41	4	OK
1/23/2017	8:57:10AM	Receive	(866) 219-1263	0:46	1	OK
1/23/2017	5:41:45PM	Receive	17028520984	15:29	6	Comm Error 232
1/23/2017	5:59:36PM	Receive	17028520984	1:18	2	OK
1/24/2017	1:19:19PM	Send	7028281543	0:47	2	OK
1/24/2017	1:55:58PM	Receive	7028281543	0:56	2	OK
1/24/2017	4:33:49PM	Receive		2:34	5	OK
1/26/2017	11:48:28AM	Receive		1:25	4	OK
1/30/2017	7:03:29AM	Receive	7024728884	0:30	1	OK
1/30/2017	12:03:56PM	Receive		0:39	3	OK
2/ 1/2017	10:00:54AM	Receive	702 492 2178	1:27	4	OK
2/ 2/2017	1:36:36PM	Send	7024552294,702455627	0:46	2	OK
2/10/2017	1:10:47PM	Receive		2:52	1	OK
2/14/2017	1:11:23PM	Receive		0:48	1	OK
2/14/2017	2:39:24PM	Receive	702 565 6246	1:16	2	OK
2/14/2017	9:30:32PM	Receive		0:24	1	Comm Error 283
2/14/2017	9:36:02PM	Receive		3:14	5	OK
2/15/2017	11:45:57AM	Receive	7023849961	0:43	7	OK
2/16/2017	9:52:04AM	Receive		0:48	1	OK
2/16/2017	10:24:51AM	Receive		0:30	1	OK
2/16/2017	4:47:36PM	Receive	17024428301	1:55	4	OK
2/17/2017	12:23:54PM	Receive		1:09	2	OK
2/23/2017	3:15:08PM	Receive		9:11	8	OK
2/24/2017	10:06:38AM	Send	7023617607	1:14	1	OK
2/27/2017	9:41:04AM	Receive		1:58	3	OK
2/27/2017	10:22:30AM	Receive	1 702 382 1836	0:28	1	OK
2/28/2017	11:57:34AM	Receive		0:19	1	OK
2/28/2017	6:10:35PM	Receive	7024468363	0:56	2	OK
3/ 1/2017	10:33:18AM	Receive		0:32	1	OK
3/ 2/2017	9:12:08AM	Receive	917-534-6271	0:24	1	OK
3/ 2/2017	9:18:11AM	Receive	917-534-6271	0:18	1	OK
3/ 2/2017	4:45:50PM	Receive		0:25	2	OK
3/ 6/2017	12:50:14PM	Receive	7024860660	0:31	2	OK

Justice Court, Las Vegas Township
Clark County, Nevada

Court Minutes

Department: 07



L007828103

16F19220B State of Nevada vs. LEAL, JACK

Lead Atty: Jason G. Weiner

4/4/2017 8:00:00 AM Negotiations (No bail posted)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Attorney Kovac, Michael Weiner, Jason G.

Judge: Bennett-Haron, Karen P.

Court Reporter: O'Neill, Jennifer

Court Clerk: Meccia, Cherie

PROCEEDINGS

Hearings: 4/11/2017 8:00:00 AM: Status Check Added

Events: Motion to Continue - Defense
to file a corrected Waiver - motion granted

Justice Court, Las Vegas Township
Clark County, Nevada

Department: 07

Court Minutes



L007854931

16F19220B State of Nevada vs. LEAL, JACK

Lead Atty: Jason G. Weiner

4/11/2017 8:00:00 AM Status Check (No bail posted)

Result: Bound Over

PARTIES PRESENT: State Of Nevada Attorney Kovac, Michael Weiner, Jason G.
Judge: Bennett-Haron, Karen P.
Court Reporter: Ott, Shawn
Court Clerk: Meccia, Cherie

PROCEEDINGS

Events: **Waiver**

of Unconditional Bindover filed in open court

Unconditional Bind Over to District Court

Review Date: 4/12/2017

Defendant unconditionally waives right to Preliminary Hearing. Defendant Bound Over to District Court as Charged. Defendant to Appear in the Lower Level Arraignment Courtroom A.

Case Closed - Bound Over

District Court Appearance Date Set

Apr 20 2017 10:00AM: No bail posted

Plea/Disp:

001: Racketeering [53190]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

002: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

003: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

004: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

005: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

006: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

007: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

008: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

**Justice Court, Las Vegas Township
Clark County, Nevada**

009: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

010: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

011: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

012: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

013: Theft, \$3500+ [55991]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

014: Fraud/deceit in course of enterprise/occup [55110]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

2016 NOV 29 P 3:30

THE STATE OF NEVADA,
Plaintiff

VS

JACK LEAL

Defendant

CASE NO: 16F19220B

DEPT NO: JC Department 7

SUMMONS

JUSTICE COURT
LAS VEGAS, NEVADA
JSM

THE STATE OF NEVADA TO:
JACK LEAL
1421 North Jones Boulevard, #116
Las Vegas, NV 89108

YOU ARE HEREBY SUMMONED TO APPEAR before me at the Las Vegas Township Justice Court, 200 E Lewis Ave, Las Vegas, Nevada on the following date and time:

27th day of December, 2016 at 7:30 AM in RJC Courtroom 8A
(Verify the courtroom location by viewing the courthouse monitors upon arrival)

Your appearance is required to answer the charge(s) of:

COUNT:	CC:	NRS:	CHARGE:
001	0030051191	207.400	Racketeering [53190]
002	0030051191	205.0835.4	Theft, \$3500+ [55991]
003	0030051191	205.0835.4	Theft, \$3500+ [55991]
004	0030051191	205.0835.4	Theft, \$3500+ [55991]
005	0030051191	205.0835.4	Theft, \$3500+ [55991]
006	0030051191	205.0835.4	Theft, \$3500+ [55991]
007	0030051191	205.0835.4	Theft, \$3500+ [55991]
008	0030051191	205.0835.4	Theft, \$3500+ [55991]
009	0030051191	205.0835.4	Theft, \$3500+ [55991]
010	0030051191	205.0835.4	Theft, \$3500+ [55991]
011	0030051191	205.0835.4	Theft, \$3500+ [55991]
012	0030051191	205.0835.4	Theft, \$3500+ [55991]
013	0030051191	205.0835.4	Theft, \$3500+ [55991]
014	0030051191	205.377	Fraud/deceit in course of enterprise/occup [55110]

16F19220B
SMI
Summons Issued
7330516

Summons JC7




APPELLANT'S APPENDIX

Revised on December 10, 2012

71 of 153

CC: Attorney

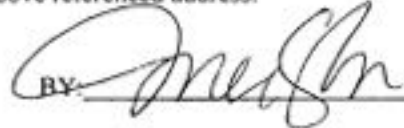
Dated this 29th day of November, 2016



KAREN BENNETT-HARON
JUSTICE OF THE PEACE

CERTIFICATE OF MAILING

I hereby certify that service of the SUMMONS was made this 29th day of November, 2016 by depositing a copy in the U.S. Mail, postage prepaid, to the above referenced address.

BY: 

FILED

2016 NOV 29 P 3:33

ADAM PAUL LAXALT
Attorney General
JUSTICE COURT
LAS VEGAS, NEVADA



WESLEY K. DUNCAN
First Assistant Attorney General

NICHOLAS A. TRUTANICH
First Assistant Attorney General

STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL

555 E. Washington Ave. Suite 3900
Las Vegas, Nevada 89101

November 23, 2016

**REQUEST FOR SUMMONS AND
FILE-STAMPED COPIES**

Clerk of the Court
Las Vegas Justice Court
200 Lewis Avenue
Las Vegas, Nevada 89155

Re: **State of Nevada v. Parcelnomics, Jack Leal, Jessica Garcia**
Case No. 16F19220A/B/C

Dear Clerk:

This is to request that Summonses be issued in the above-referenced matter addressed to:

Jessica Garcia, Resident Agent
Parcelnomics
3157 N. Rainbow Blvd. #248
Las Vegas, NV 89108

Jessica Garcia
c/o Michael D. Pariente, Esq.
3960 Howard Hughes Parkway, Suite
615
Las Vegas, NV 89169

Jack Leal
c/o Michael D. Pariente, Esq.
3960 Howard Hughes Parkway, Suite
615
Las Vegas, NV 89169

Jack Leal
1421 North Jones Boulevard, #116
Las Vegas, NV 89108

Jessica Garcia
2915 N. Jones Blvd.
Las Vegas, NV 89108

Please forward the Summons and certificate of service to Marsha Landreth, Legal Secretary II, at mlandreth@ag.nv.gov and Julie Fox-McCullough, Supervising Legal Secretary, at jfox@ag.nv.gov.

In addition, please **file-stamp** the attached copies of the **Complaint** and return to the **Office of the Attorney General** along with a copy of this cover sheet.

16F19220A
RSUMM
Request for Summons
7330568



Clerk, LV Justice Court
Page 2
November 23, 2016

Please contact me at (702) 486-3305 if you have any questions or need any additional information.

Sincerely,



Marsha Landreth
Legal Secretary II

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

2016 NOV 29 P 3 30

THE STATE OF NEVADA,
Plaintiff

VS

JACK LEAL

Defendant

CASE NO: 16F19220B

DEPT NO: JC Department 7

SUMMONS

JUSTICE COURT
LAS VEGAS, NEVADA

DEPUTY

THE STATE OF NEVADA TO:
JACK LEAL
1421 North Jones Boulevard, #116
Las Vegas, NV 89108

RETURNED SUMMONS

YOU ARE HEREBY SUMMONED TO APPEAR before me at the Las Vegas Township Justice Court, 200 E Lewis Ave, Las Vegas, Nevada on the following date and time:

27th day of December, 2016 at 7:30 AM in RJC Courtroom 8A
(Verify the courtroom location by viewing the courthouse monitors upon arrival)

Your appearance is required to answer the charge(s) of:

COUNT:	CC:	NRS:	CHARGE:
001	0030051191	207.400	Racketeering [53190]
002	0030051191	205.0835.4	Theft, \$3500+ [55991]
003	0030051191	205.0835.4	Theft, \$3500+ [55991]
004	0030051191	205.0835.4	Theft, \$3500+ [55991]
005	0030051191	205.0835.4	Theft, \$3500+ [55991]
006	0030051191	205.0835.4	Theft, \$3500+ [55991]
007	0030051191	205.0835.4	Theft, \$3500+ [55991]
008	0030051191	205.0835.4	Theft, \$3500+ [55991]
009	0030051191	205.0835.4	Theft, \$3500+ [55991]
010	0030051191	205.0835.4	Theft, \$3500+ [55991]
011	0030051191	205.0835.4	Theft, \$3500+ [55991]
012	0030051191	205.0835.4	Theft, \$3500+ [55991]
013	0030051191	205.0835.4	Theft, \$3500+ [55991]
014	0030051191	205.377	Fraud/deceit in course of enterprise/occup [55110]

16F19220B
SUMR
Summons Returned
7393886

Summons JC7



Revised on December 10, 2012

APPELLANT'S APPENDIX

75 of 153

CC: Attorney

Dated this 29th day of November, 2016



KAREN BENNETT-HARON
JUSTICE OF THE PEACE

CERTIFICATE OF MAILING

I hereby certify that service of the SUMMONS was made this 29th day of November, 2016 by depositing a copy in the U.S. Mail, postage prepaid, to the above referenced address.

BY: _____

JUSTICE COURT, LAS VEGAS TOWNSHIP
200 LEWIS AVE 2ND FL
BOX 552511
LAS VEGAS NV 89155-2511
RETURN SERVICE REQUESTED

FILED

2016 DEC 14 P 1:02

PRESORTED
FIRST CLASS



U.S. POSTAGE PITNEY BOWES
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0001389640NOV. 30. 2016

JUSTICE COURT
LAS VEGAS NEVADA

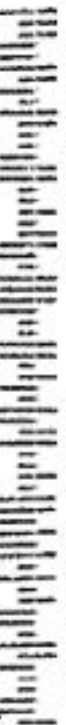
BY SECURITY

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RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
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SC: 89101630000 *0294-04948-10-34



99 JPD 8910163000

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Las Vegas Justice Court

Regional Justice Center
200 Lewis Avenue 2nd Fl. P.O. Box 552511 Las Vegas NV 89155-2511
(702) 671-3116 Fax (702) 671-3183
<http://www.lasvegasjusticecourt.us/>

FILED

DEC 19 10 28 AM '16

JUSTICE COURT
LAS VEGAS, NEVADA
AMC

NOTICE OF CONFIRMATION OF COUNSEL

ATTENTION JC CRIMINAL DIVISION:

This notice shall serve as Confirmation of Counsel on the case listed below

CASE INFORMATION:

JUSTICE COURT CASE NUMBER: 16F19220B		DEFENDANT'S ID NUMBER
DEFENDANT'S FIRST NAME JACK	MIDDLE INITIAL:	LAST NAME LEAL

ATTORNEY OF RECORD INFORMATION:

NAME OF ATTORNEY: JASON G. WEINER, ESQ.		BAR NUMBER: 7555
ADDRESS: 2820 W. CHARLESTON BLVD., SUITE 35, LAS VEGAS, NEVADA 89102		
PHONE NUMBER: 7022020500	E-MAIL ADDRESS: JWEINER@WEINERLAWNEVADA.COM	

This Notice of Confirmation may be submitted to the court via E-mail sent to the address below:

E-Mail: lvjcCounselConfirmation@clarkcountynv.gov

Alternative methods:

Fax To: (702) 671-3183

**Mail To: Attn: Counsel Confirmation
Las Vegas Justice Court
200 Lewis Avenue, 2nd Floor
P.O. Box 552511
Las Vegas, NV 89155-2511**

16F19220B
ACON
Notice of Confirmation of Counsel
74116-13



LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT

APR 11 2017

BY C. Mecca
CLERK

1 JASON G. WEINER, ESQ.
2 Nevada Bar. No. 7555
3 WEINER LAW GROUP.
4 2820 W. Charleston Blvd; Ste 35
5 Las Vegas, Nevada, 89102
6 Telephone: (702) 202-0500
7 Attorneys for Defendant

16F19220B
WAIV
Waiver
7854925



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

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 JACK LEAL,

14 Defendant.

Case No. 16F19220B

Dept. No. 7

15
16 **UNCONDITIONAL WAIVER OF PRELIMINARY HEARING**

17 I, JACK LEAL, knowingly and voluntarily enter an unconditional waiver of my Preliminary
18 Hearing in the above-entitled case.

19 I, JACK LEAL, enter this unconditional waiver as this matter has been negotiated. I have
20 agreed to plead Guilty to one (1) count of Multiple Transactions involving Fraud, a category B
21 Felony, in violation of NRS 205.377. The State has agreed to recommend a sentence of probation,
22 not exceed five (5) years, with an underlying 36-90 months imprisonment. Additionally full
23 restitution, in the amount of \$757,420.00 must be made to the named victims jointly and severally
24 with co-defendant Garcia.

25 I understand that I may either follow through with any negotiations or I may choose to reject
26 said offers and proceed to trial, but I will not return to Justice Court for a Preliminary Hearing
27 under any circumstances.
28

WEINER LAW GROUP, LLC
2820 W. Charleston Blvd. #35
Las Vegas, Nevada 89102
Tel: (702) 202-0500 Fax: (702) 202-4999

WEINER LAW GROUP, LLC
2820 W. Charleston Blvd, #35
Las Vegas, Nevada 89102
Tel: (702) 202-0500 Fax: (702) 202-4999

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I, JACK LEAL, further understand that I am waiving my rights as follows:


1. Preliminary Hearing before the Court;
2. Right to cross examine witnesses;
3. Right to compulsory service of process to subpoena witnesses on my behalf;
4. Right to testify or not testify on my behalf at a Preliminary Hearing;
5. That I have been offered no awards, immunities or promises, other than in the plea

bargain, and acknowledge that no one is in a position to forecast the sentence to be imposed by the District Court.

I, JACK LEAL, understand that the maximum penalty which may be imposed by this Court is that I may be imprisoned in the Nevada Department of Corrections for a period of not less than one year and not more than twenty years; I further understand that I am eligible for probation should the Court so approve.


I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-10-2017
(Date)

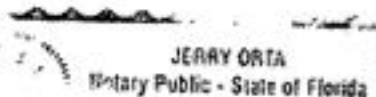

JESSICA GARCIA
Jack Leal

ACKNOWLEDGMENT

Florida
STATE OF ~~NEVADA~~ }
COUNTY OF ~~CLARK~~ } ss.
Orange

 JERRY ORTA
Notary Public - State of Florida
My Comm. Expires Mar 2, 2018
Commission # FF 097740

On the 10 day of April, 2017, personally appeared before me, a Notary Public in and for the said County and State, Defendant, who acknowledged to me that the foregoing Unconditional Waiver of Preliminary Hearing was executed freely and voluntarily and for the uses and purposes therein stated.


JERRY ORTA
Notary Public - State of Florida
My Comm. Expires Mar 2, 2018


Notary Public

WEINER LAW GROUP, LLC
2820 W. Charleston Blvd. #35
Las Vegas, Nevada 89102
Tel: (702) 202-0500 Fax: (702) 202-4999

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RECEIPT OF COPY

RECEIPT OF COPY of the above and foregoing Unconditional Waiver of Preliminary Hearing is hereby acknowledged this ____ day of _____, 2017.

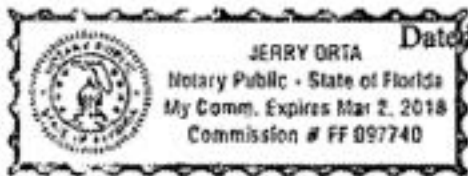
Office of the Clark County District Attorney

By: _____

CONFLICT-OF-INTEREST WAIVER

I, Jack Leal, am a defendant in the case of *State of Nevada v. Jack Leal*, Case Number 16F19220B. I acknowledge that attorney Jason G. Weiner, Esq. of the Weiner Law Group, LLC, will be representing both myself and my co-defendant in the above-stated case. I understand that this dual-representation may result in a conflict-of-interest wherein my attorney will be precluded from taking certain actions, including actions that would be beneficial to my individual case, because he is obligated to protect both my interests and the interests of my co-defendant simultaneously. This possibility has been fully and completely explained to me by my attorney who has additionally provided a copy of NRPC 1.7 (attached) which delineates his responsibilities.

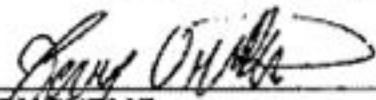
In spite of the known risk, I hereby knowingly, intelligently, and voluntarily consent to dual representation wherein attorney Jason G. Weiner, Esq. of the Weiner Law Group will represent both me and my co-defendant in the above-stated case and I do hereby waive any right to later file an appeal or claim ineffective assistance of counsel based on a conflict-of-interest arising out of this dual representation.



Dated this 10th day of April, 2017


SIGNATURE

SUBSCRIBED AND SWORN TO
before me this 10 day of April, 2017.


NOTARY PUBLIC

Rule 1.7. Conflict of Interest: Current Clients.

(a) Except as provided in paragraph (b), a lawyer shall not represent a client if the representation involves a concurrent conflict of interest. A concurrent conflict of interest exists if:

(1) The representation of one client will be directly adverse to another client; or

(2) There is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to another client, a former client or a third person or by a personal interest of the lawyer.

(b) Notwithstanding the existence of a concurrent conflict of interest under paragraph (a), a lawyer may represent a client if:

(1) The lawyer reasonably believes that the lawyer will be able to provide competent and diligent representation to each affected client;

(2) The representation is not prohibited by law;

(3) The representation does not involve the assertion of a claim by one client against another client represented by the lawyer in the same litigation or other proceeding before a tribunal; and

(4) Each affected client gives informed consent, confirmed in writing.


Initial

April 20, 2017 10:00 AM Initial Arraignment

HEARD BY: Henry, Jennifer

COURTROOM: RJC Lower Level Arraignment

COURT CLERK: Kristen Brown

RECORDER: Kiara Schmidt

REPORTER:

PARTIES

PRESENT:

Kovac, Michael C.
Leal, Jack
State of Nevada
Weiner, Jason G.

Attorney for the State
Defendant
Plaintiff
Attorney for the Defendant

JOURNAL ENTRIES

- At the request of counsel, COURT ORDERED, matter CONTINUED.

NIC

4/24/17 10:00 AM ARRAIGNMENT CONTINUED (LLA)

PRINT DATE: 05/01/2017

Page 1 of 1

Minutes Date: April 20, 2017

1 THURSDAY, APRIL 20, 2017

2 * * * * *

3 P R O C E E D I N G S

4
5 THE CLERK: Page 14, Jack Leal, C322664-2. Page 15,
6 Jessica Garcia, C322664-3.

7 THE COURT: Okay. And can I get the --

8 MR. KOVAC: Good morning. Michael Kovac for the
9 Attorney General's office.

10 THE COURT: Thank you.

11 MR. WEINER: And we're just going to ask to
12 continue this to Monday either -- probably the afternoon
13 calendar would probably be simpler.

14 THE COURT: Okay. And are you representing both
15 co-defendants?

16 MR. WEINER: Yes, your Honor. Conflict waivers
17 were filed in Justice Court at the waiver --

18 THE COURT: Okay. So you did waive conflicts and
19 he's okay representing both of you?

20 THE DEFENDANT: Yes.

21 THE COURT: Okay. And, counsel, any objection to a
22 Monday continuance?

23 MR. KOVAC: No, that's fine, your Honor.

24 THE COURT: You said you wanted a one o'clock
25 setting?

1 MR. WEINER: Yeah, probably just to make sure I'm
2 not caught up in District Court upstairs.

3 THE COURT: Okay. One o'clock setting is fine.

4 THE CLERK: That'll be --

5 THE COURT: I'm sorry. And are you okay coming
6 back at one o'clock?

7 MR. KOVAC: Yeah, that's fine.

8 THE COURT: Okay.

9 THE CLERK: April 24th, one o'clock.

10 MR. WEINER: Thank you, your Honor.

11 THE COURT: Thank you.

12 (Whereupon, the proceedings concluded.)

13 * * * * *

14 ATTEST: I do hereby certify that I have truly and correctly
15 transcribed the audio/video proceedings in the above-
entitled case to the best of my ability.

16

17



18

Kiara Schmidt, Court Recorder/Transcriber

19

20

21

22

23

24

25

APR 24 2017

BY Kristen Brown
KRISTEN BROWN, DEPUTY

1 **GPA**
2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac Bar No. 11177
5 Senior Deputy Attorney General
6 Chelsea Kallas Bar No. 13902
7 Deputy Attorney General
8 Office of the Attorney General
9 555 E. Washington Ave., Ste. 3900
10 Las Vegas, Nevada 89101-1068
11 P: (702) 486-3420
12 F: (702) 486-2377
13 mkovac@ag.nv.gov
14 *Attorneys for the State of Nevada*

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

11 STATE OF NEVADA,
12
13 Plaintiff,
14
15 v.
16 JACK LEAL,
17
18 Defendant.

Case No.: C-17-322664-2
Dept. No.: 17

17 **GUILTY PLEA AGREEMENT**

18 I hereby agree to plead guilty to: MULTIPLE TRANSACTIONS INVOLVING FRAUD OR
19 DECEIT IN THE COURSE OF AN ENTERPRISE OR OCCUPATION, a CATEGORY B Felony, in
20 violation of NRS 205.377, as more fully alleged in the charging document attached hereto as Exhibit "1."

21 My decision to plead guilty is based upon the plea agreement in this case which is as follows:

22 1. I, JACK LEAL, will enter a plea of GUILTY to MULTIPLE TRANSACTIONS
23 INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN ENTERPRISE OR OCCUPATION, in
24 violation of NRS 205.377, as alleged in Count One of the Criminal Information attached hereto as Exhibit
25 "1";

26 2. I, JACK LEAL, will pay restitution to the named and unnamed victims in the total amount
27 of seven hundred fifty-seven thousand four hundred twenty dollars (\$757,420) as follows:

28 i. \$70,000 to LoryLee Plancarte;

C-17-322664-2
GPA
Guilty Plea Agreement
4843783



15

- 1 ii. \$75,000 to Edelyn Rudin;
- 2 iii. \$37,500 to Chatty Becker;
- 3 iv. \$57,500 to Irene Segura;
- 4 v. \$98,620 to Lih-Ling Yang;
- 5 vi. \$90,300 to Lina Palafox;
- 6 vii. \$85,000 to Adilson Gibellato;
- 7 viii. \$50,000 to Juan Eloy Ramirez;
- 8 ix. \$115,000 to Catherine Wyngarden;
- 9 x. \$25,000 to Shahram Bozorgnia; and
- 10 xi. \$53,500 to Tat Lam.

11 3. Should any of the named victims have previously recovered any of their losses, they shall
12 not be entitled to restitution covering any such sum; instead, the portion of the restitution covering said
13 sum shall instead be forfeited to the State of Nevada, Office of the Attorney General;

14 4. I, JACK LEAL, shall pay the restitution in full at or before the time I am sentenced in the
15 present case;

16 5. I, JACK LEAL, and my co-conspirator, JESSICA GARCIA, are jointly and severally
17 responsible for said restitution;

18 6. Should I, JACK LEAL, pay restitution in full at or before the time I am sentenced in the
19 present case, the State will not oppose the imposition of a term of probation not to exceed a term of five
20 years, with a suspended 36- to-90 month term of imprisonment;

21 7. Should I, JACK LEAL, fail to pay restitution in full at or before the time I am sentenced in
22 the present case, the State will retain the right to argue for the imposition of a term of imprisonment;

23 8. I, JACK LEAL, agree that the \$157,105.17 seized in relation to the present case shall be
24 forfeited to the State of Nevada, Office of the Attorney General, with said money to be applied to my
25 restitution requirements;

26 9. I, JACK LEAL, will execute and file in the Clark County Recorder's Office a lien
27 agreement and lien in favor of the State of Nevada, Office of the Attorney General, in the amount of
28 \$600,314.83 against the home located at 1024 Santa Helena Avenue, Henderson, Nevada 89002, assessor

1 parcel number 179-33-710-056, legally described as MISSION HILLS EST AMD PLAT BOOK 17 PAGE
2 12 LOT 223 & LOT 223A, with the proceeds of the sale of said home to be applied to my restitution
3 requirements;

4 10. I, JACK LEAL, will pay all fees and costs imposed by the Court;

5 11. I, JACK LEAL, will submit to any and all terms and conditions imposed by the Division of
6 Parole and Probation, if granted probation;

7 12. I understand that, pursuant to NRS 176.015(3), victims so desiring will be allowed to make
8 impact statements; and

9 13. I understand and agree that, if I fail to interview with the Department of Parole and
10 Probation, fail to appear at any subsequent hearings in this case, or an independent judge or magistrate, by
11 affidavit review or other satisfactory proof, confirms probable cause against me for new criminal charges,
12 including reckless driving or DUI, but excluding minor traffic violations, that the State will have the
13 unqualified right to argue for any legal sentence and term of confinement allowable for the crime(s) to
14 which I am pleading guilty, including the use of any prior convictions I may have to increase my sentence
15 as a habitual criminal to five (5) to twenty (20) years, life without the possibility of parole, life with the
16 possibility of parole after ten (10) years, or a definite twenty-five (25) year term with the possibility of
17 parole after ten (10) years. Otherwise, I am entitled to receive the benefits of these negotiations as stated
18 in the plea agreement.

19 **CONSEQUENCES OF THE PLEA**

20 I understand that by pleading guilty I admit the facts that support all the elements of the offense(s)
21 to which I now plead as set forth in Exhibit "1."

22 I understand that as a consequence of my plea of guilty the Court must sentence me to
23 imprisonment in the Nevada Department of Corrections for a minimum term of not less than one year and
24 a maximum term of not more than 20 years. The minimum term of imprisonment may not exceed forty
25 percent (40%) of the maximum term of imprisonment. I understand that I may also be fined up to \$10,000.
26 I understand the law requires me to pay an Administrative Assessment Fee.

27 I understand that, if appropriate, I will be ordered to make restitution to the victim(s) of the
28 offense(s) to which I am pleading guilty and to the victim(s) of any related offense(s) being dismissed or

1 not prosecuted pursuant to this agreement. I will also be ordered to reimburse the State of Nevada for any
2 expenses related to my extradition, if any.

3 I understand that I am eligible for probation for the offense(s) to which I am pleading guilty. I
4 further understand that, except as otherwise provided by statute, the question of whether I receive
5 probation is in the discretion of the sentencing judge.

6 I also understand that I must submit to blood and/or saliva tests under the direction of the Division
7 of Parole and Probation to determine genetic markers and/or secretor status.

8 I understand that if more than one sentence of imprisonment is imposed and I am eligible to serve
9 the sentences concurrently, the sentencing judge has the discretion to order the sentences served
10 concurrently or consecutively.

11 I understand that information regarding charges not filed, dismissed charges, or charges to be
12 dismissed pursuant to this agreement may be considered by the judge at sentencing.

13 I have not been promised or guaranteed any particular sentence by anyone. I know that my
14 sentence is to be determined by the Court within the limits prescribed by statute. I understand that if my
15 attorney or the State of Nevada or both recommend any specific punishment to the Court, the Court is not
16 obligated to accept the recommendation.

17 I understand the Division of Parole and Probation will prepare a report for the sentencing judge
18 prior to sentencing. This report will include matters relevant to the issue of sentencing, including my
19 criminal history. This report may contain hearsay information regarding my background and criminal
20 history. My attorney and I will each have the opportunity to comment on the information contained in the
21 report at the time of sentencing. Unless the Attorney General has specifically agreed otherwise, the
22 Attorney General may also comment on this report.

23 I understand if the offense to which I am pleading guilty was committed while I was incarcerated
24 on another charge or while I was on probation or parole that I am not eligible for credit for time served
25 toward the instant offense(s).

26 I understand that if I am not a United States citizen, this criminal conviction will likely result in
27 serious negative immigration consequences including but not limited to: removal from the United States
28 through deportation; an inability to reenter the United States; the inability to gain United States citizenship

1 or legal residency; an inability to renew and/or retain any legal residency status; and/or an indeterminate
2 term of confinement, with the United States Federal Government based on my conviction and immigration
3 status. Regardless of what I have been told by an attorney, no one can promise me that this conviction will
4 not result in negative immigration consequences and/or impact my ability to become a United States
5 citizen and/or legal resident.

6 WAIVER OF RIGHTS

7 By entering my plea of guilty, I understand that I am waiving and forever giving up the following
8 rights and privileges:

9 1. The constitutional privilege against self-incrimination, including the right to refuse to
10 testify at trial, in which event the prosecution would not be allowed to comment to the jury about my
11 refusal to testify.

12 2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive
13 pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an
14 attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a
15 reasonable doubt each element of the offense charged.

16 3. The constitutional right to confront and cross-examine any witnesses who would testify
17 against me.

18 4. The constitutional right to subpoena witnesses to testify on my behalf.

19 5. The constitutional right to testify in my own defense.

20 6. The right to appeal the conviction, with the assistance of an attorney, either appointed or
21 retained, unless the appeal is based upon reasonable constitutional, jurisdictional or other grounds that
22 challenge the legality of the proceedings and except as otherwise provided in subsection 3 of NRS
23 174.035.

24 VOLUNTARINESS OF PLEA

25 I have discussed the elements of all the original charges against me with my attorney and I
26 understand the nature of the charges against me.

27 I understand the State would have to prove each element of the charges against me at trial.

28 I have discussed with my attorney any possible defenses, defense strategies and circumstances

1 which might be in my favor.

2 All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly
3 explained to me by my attorney.

4 I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial
5 would be contrary to my best interest.

6 I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting
7 under duress or coercion or by virtue of any promises of leniency, except for those set forth in this
8 agreement.

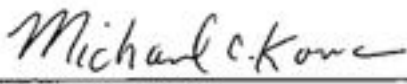
9 I am not now under the influence of any intoxicating liquor, a controlled substance or other drug
10 which would in any manner impair my ability to comprehend or understand this agreement or the
11 proceedings surrounding my entry of this plea.

12 My attorney has answered all my questions regarding this guilty plea agreement and its
13 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

14 DATED this 24th day of April, 2017

15
16
17 
JACK LEAL, Defendant

18 AGREED TO BY:

19 
20 Michael C. Kovac
21 Senior Deputy Attorney General
22
23
24
25
26
27
28

1 **CERTIFICATE OF DEFENSE COUNSEL**

2 I, the undersigned, as the attorney for JACK LEAL named herein and as an officer of the court
3 hereby certify that:

4 1. I have fully explained to JACK LEAL the allegations contained in the charges to which
5 guilty pleas are being entered.

6 2. I have advised JACK LEAL of the penalties for each charge and the restitution that JACK
7 LEAL may be ordered to pay.

8 3. I have inquired of JACK LEAL facts concerning JACK LEAL's immigration status and
9 explained to JACK LEAL that if JACK LEAL is not a United States citizen any criminal conviction will
10 most likely result in serious negative immigration consequences including but not limited to:

- 11 a. The removal from the United States through deportation;
- 12 b. An inability to reenter the United States;
- 13 c. The inability to gain United States citizenship or legal residency;
- 14 d. An inability to renew and/or retain any legal residency status; and/or
- 15 e. An indeterminate term of confinement with the United States Federal Government
16 based on his/her conviction and immigration status.

17 Moreover, I have explained that regardless of what JACK LEAL may have been told by any
18 attorney, no one can promise JACK LEAL that this conviction will not result in negative immigration
19 consequences and/or impact JACK LEAL's ability to become a United States citizen and/or legal resident.

20 4. All pleas of guilty offered by JACK LEAL pursuant to this agreement are consistent with
21 all the facts known to me, and are made with my advice to JACK LEAL and are in the best interest of
22 JACK LEAL:

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

- 1 5. To the best of my knowledge and belief JACK LEAL:
2 a. Is competent and understands the charges and the consequences of pleading guilty as
3 provided in this agreement.
4 b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily.
5 c. Was not under the influence of intoxicating liquor, a controlled substances or other drug
6 at the time of the execution of this agreement.
7

8
9 DATED this 27th day of April, 2017


10
11 
12 JASON G. WEINER
13 Attorney for JACK LEAL
14
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EXHIBIT 1


CLERK OF THE COURT

1 **INFM**
2 **ADAM PAUL LAXALT**
3 Attorney General
4 Michael C. Kovac (Bar No. 11177)
5 Senior Deputy Attorney General
6 Chelsea Kallas Bar No. 13902
7 Deputy Attorney General
8 Office of the Attorney General
9 555 E. Washington Ave., Ste. 3900
10 Las Vegas, Nevada 89101-1068
11 P: (702) 486-3420
12 F: (702) 486-2377
13 mkovac@ag.nv.gov
14 *Attorneys for the State of Nevada*

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

12 **STATE OF NEVADA,**
13 **Plaintiff,**
14 **v.**
15 **JACK LEAL, and JESSICA GARCIA**
16 **Defendant(s).**

Case No.: C-17-322664-2
Dept. No.: 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: **JACK LEAL** and **JESSICA GARCIA** have
21 committed the crimes(s) of one (1) count of **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR**
22 **DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION**, a category "B" felony in
23 violation of NRS 205.377.

24 All of the acts alleged herein have been committed or completed on or between about March 1,
25 2015 and March 31, 2016, by the above-named Defendant(s), within the County of Clark, State of Nevada,
26 in the following manner:

27 ///

28 ///

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

5 The Defendant(s), **JACK LEAL** and **JESSICA GARCIA**, in the County of Clark, State of
6 Nevada, did, in the course of an enterprise or occupation, knowingly and with the intent to defraud,
7 engaged in an act, practice or course of business or employed a device, scheme or artifice which operated
8 or would have operated as a fraud or deceit upon a person by means of a false representation or omission
9 of a material fact that: (a) the person knew to be false or omitted; (b) the person intended another to rely
10 on; and (c) resulted in a loss to any person who relied on the false representation or omission, in at least
11 two transactions that had the same or similar pattern, intents, results, accomplices, victims or methods of
12 commission, or were otherwise interrelated by distinguishing characteristics and were not isolated
13 incidents within 4 years and in which the aggregate loss or intended loss was more than \$650, to wit:

14 On or about March 1, 2015 through March 31, 2016, in and through the course of a real estate
15 enterprise known as **PARCELNOMICS, LLC** (d/b/a **INVESTMENT DEALS**), Defendants knowingly and
16 with the intent to defraud, obtained thousands of dollars from LoryLee Plancarte, Edelyn Rubin, Chatty
17 Becker, Irene Segura, Liih-Ling Yang, Lina Palafox, Juan Eloy Ramirez, Catherine Wyingarden, Shahram
18 Bozorgnia, Tat Lam, and Adilson Gibellato by means of knowingly and falsely representing to said
19 individuals that the titles to properties being sold to them by the defendants were not encumbered by liens
20 or other security interests, intending that said individuals rely on said misrepresentations, and resulting in a
21 loss of more than \$650.00.

22 All of which constitutes the crime of **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR**
23 **DECEIT IN THE COURSE OF AN ENTERPRISE AND OCCUPATION**, a category "B" felony in
24 violation of **NRS 205.377**.

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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 DATED this 18th day of April, 2017.

4 SUBMITTED BY

5 ADAM PAUL LAXALT
6 Attorney General

7 By: /s/ MICHAEL C. KOVAC
8 Michael C. Kovac (Bar No. 11177)
9 Senior Deputy Attorney General
10 *Attorneys for the State of Nevada*

CONFLICT-OF-INTEREST WAIVER

I, Jack Leal, am a defendant in the case of *State of Nevada v. Jack Leal*. I acknowledge that attorney Jason. G. Weiner, Esq. of the Weiner Law Group, LLC, will be representing both myself and my co-defendant in the above-stated case. I understand that this dual-representation may result in a conflict-of-interest wherein my attorney will be precluded from taking certain actions, including actions that would be beneficial to my individual case, because he is obligated to protect both my interests and the interests of my co-defendant simultaneously. This possibility has been fully and completely explained to me by my attorney who has additionally provided a copy of NRPC 1.7 (attached) which delineates his responsibilities.

Jason. G. Weiner, Esq. , has advised me of my right to consult with independent counsel to review the potential conflict of interest posed by dual representation and the consequences of waiving the right to conflict free representation. If I choose not to seek advice of independent counsel then I expressly waive my right to do so.

I hereby waive my right to withdraw my guilty plea or to a mistrial as a result of Jason. G. Weiner, Esq.'s potential or actual conflict of interest depriving me of my right to effective assistance of counsel arising from the dual representation.

I understand that joint representation presents a number of risks including: the possibility of inconsistent pleas; factually inconsistent alibis; conflicts in testimony; difference in degree of involvement in the crime; tactical admission of evidence; the calling, cross-examination. And impeachment of witnesses; strategy in final argument; and the possibility of guilt by association.

I understand that this waiver of conflict is binding throughout trial, on appeal, and in habeas proceedings.

In spite of the known risk, I hereby knowingly, intelligently, and voluntarily consent to dual representation wherein attorney Jason G. Weiner, Esq. of the Weiner Law Group will represent both me and my co-defendant in the above-stated case.

Dated this 20th day of April, 2017



JACK LEAL

Rule 1.7. Conflict of Interest: Current Clients

(a) Except as provided in paragraph (b), a lawyer shall not represent a client if the representation involves a concurrent conflict of interest. A concurrent conflict of interest exists if:

(1) The representation of one client will be directly adverse to another client; or

(2) There is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to another client, a former client or a third person or by a personal interest of the lawyer.

(b) Notwithstanding the existence of a concurrent conflict of interest under paragraph (a), a lawyer may represent a client if:

(1) The lawyer reasonably believes that the lawyer will be able to provide competent and diligent representation to each affected client;

(2) The representation is not prohibited by law;

(3) The representation does not involve the assertion of a claim by one client against another client represented by the lawyer in the same litigation or other proceeding before a tribunal; and

(4) Each affected client gives informed consent, confirmed in writing.


Initial

DISTRICT COURT CIVIL COVER SHEET

County, Nevada

XI

Case No.

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): State of Nevada	Defendant(s) (name/address/phone): \$6,616.04 \$150,489.13
1034 SANTA HELENA AVENUE, HENDERSON, NEVADA 89002, MORE PARTICULARLY DESCRIBED AS FOLLOWS: LOT 230 OF AMENDED MISSION HILLS ESTATES, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 17 OF PLATS, PAGE	
Attorney (name/address/phone): Michael C. Kovac Senior Deputy Attorney General 555 E. Washington Ave., Ste. 3900, Las Vegas, NV 89101 (702) 486-5706	Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)

Civil Case Filing Types

<p>Real Property</p> <p>Landlord/Tenant</p> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <p>Title to Property</p> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <p>Other Real Property</p> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<p>Negligence</p> <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <p>Malpractice</p> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<p>Torts</p> <p>Other Torts</p> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
<p>Probate</p> <p>Probate (select case type and estate value)</p> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <p>Estate Value</p> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<p>Construction Defect & Contract</p> <p>Construction Defect</p> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <p>Contract Case</p> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	<p>Judicial Review/Appeal</p> <p>Judicial Review</p> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <p>Nevada State Agency Appeal</p> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <p>Appeal Other</p> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
<p>Civil Writ</p> <p>Civil Writ</p> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrantum	<p>Other Civil Filing</p> <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	<p>Other Civil Filing</p> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

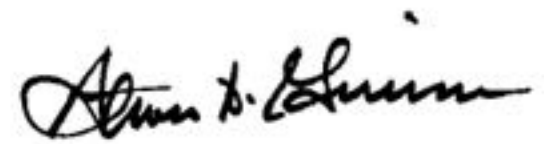
09/29/16

Date

Michael Kovac

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

1 **COMP**
ADAM PAUL LAXALT
2 Attorney General
MICHAEL C. KOVAC (Bar No.: 11177)
3 Senior Deputy Attorney General
State of Nevada
4 Office of the Nevada Attorney General
555 East Washington Ave., Ste. 3900
5 Las Vegas, Nevada 89101
(702) 486-5706 - office
6 (702) 486-2377 – fax
mkovac@ag.nv.gov
7 Attorneys for the State of Nevada

8 **DISTRICT COURT**

9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 \$6,616.04; \$150,489.13; and 1024 SANTA
HELENA AVENUE, HENDERSON,
14 NEVADA 89002, MORE PARTICULARLY
DESCRIBED AS FOLLOWS: LOT 223 OF
15 AMENDED MISSION HILLS ESTATES, AS
SHOWN BY MAP THEREOF ON FILE IN
16 BOOK 17 OF PLATS, PAGE 12 IN THE
OFFICE OF THE COUNTY RECORDER
17 OF CLARK COUNTY, NEVADA,
TOGETHER WITH A PORTION OF
18 VACATED ROAD KNOWN AS LOT 223-A
AND APPURTENANCES THEREON; APN:
19 179-33-710-056,

20 Defendant(s).

Case No.: A-16-744347-C

Dept. No.: XI

[Exempt from arbitration under NRS 38.255
and NAR 3(A) as a declaratory action]

21 **COMPLAINT FOR FORFEITURE**

22
23 The STATE OF NEVADA (hereinafter "Plaintiff"), by and through Attorney General
24 Adam Paul Laxalt and Senior Deputy Attorney General Michael C. Kovac, in an action for
25 forfeiture *in rem* of the property described below, hereby alleges and complains as follows:

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I.

PARTIES AND JURISDICTION

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3 1. This is a civil action for the forfeiture of property, brought by Plaintiff pursuant to
4 NRS 179.1171, 179.1231, and 207.490, and shall have priority over other civil proceedings
5 pursuant to NRS 179.1173, 179.1231, and 207.490.

6 2. This action is exempt from arbitration under NRS 38.255(3)(g) and (l), as well as
7 NAR 3(A), as it constitutes an action for declaratory relief and it involves unusual
8 circumstances that constitute good cause for removal from the program.

9 3. This action is *in rem* and involves property located in Clark County, Nevada.

10 4. Plaintiff is informed and believes and, therefore alleges upon information and
11 belief, that the person(s) and/or entities that may have any ownership interest in the property
12 at issue are: 1024 SANTA HELENA TRUST; JACK LEAL; JESSICA GARCIA; and/or
13 PARCELNOMICS, LLC.

II.

GENERAL ALLEGATIONS

14
15
16 5. Plaintiff hereby incorporates by reference each and every preceding paragraph
17 as though fully stated herein.

18 6. On or about September 2, 2016, within Clark County, State of Nevada, and
19 pursuant to a search and seizure warrant issued by the Las Vegas Township Justice Court
20 upon probable cause, a duly authorized law enforcement officer of the State of Nevada seized
21 property consisting of:

22 a. \$6,616.04 from a Bank of America account ending in 5085; and

23 b. \$150,489.13 from a Bank of America account ending in 9635 (hereinafter,
24 collectively referred to as "the Currency").

25 7. The two Bank of America accounts referenced above, from which the Currency
26 was seized, were opened under the name of PARCELNOMICS, LLC.

27 8. At all relevant times, LEAL and GARCIA engaged in business in the State of
28 Nevada through PARCELNOMICS, LLC, a limited liability company formed under the laws of

1 the State of Nevada.

2 9. At all relevant times, LEAL and GARCIA were managing members of
3 PARCELNOMICS, LLC.

4 10. At all relevant times, LEAL and GARCIA were the signors on the two Bank of
5 America accounts referenced above, from which the Currency was seized.

6 11. At all relevant times, LEAL and GARCIA operated PARCELNOMICS, LLC, out of
7 Clark County, Nevada, specifically, 3157 Rainbow Boulevard, #248, Las Vegas, Nevada,
8 and/or Post Office Box 3157 Rainbow Boulevard, Las Vegas, Nevada.

9 12. On or about January 14, 2016, GARCIA purchased real property located at 1024
10 Santa Helena Avenue, Henderson, Nevada 89002 (APN: 179-33-710-056) (hereinafter,
11 referred to as the "Real Property") with proceeds directly or indirectly derived from the crimes
12 noted herein.

13 13. On or about January 21, 2016 GARCIA transferred title to said Real Property to
14 1024 Santa Helena Trust.

15 14. Despite said transfer, GARCIA has remained the beneficial owner of said Real
16 Property and continues maintain control over it.

17 15. LEAL, GARCIA and/or PARCELNOMICS, LLC, committed the crimes of
18 racketeering and/or theft, a technological crime, through fraudulent sales of real property,
19 including, but are not limited to, the following:

20 a. On or about June 1, 2015 through August 7, 2015, PARCELNOMICS,
21 LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from LoryLee Plancarte by
22 personally, or through an agent acting at the direction of PARCELNOMICS, LLC, LEAL
23 and/or GARCIA, selling Plancarte a home located at 8109 Jo Mary Drive, Las Vegas,
24 Nevada, by either personally, or through an agent acting at the direction of
25 PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Plancarte that, at the
26 time of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said
27 property, which was free and clear of existing liens and all other security interests;
28 PARCELNOMICS, LLC, LEAL, and/or GARCIA utilized the website Zillow.com to advertise

1 the sale of said property to Plancarte. Plancarte paid PARCELNOMICS, LLC, LEAL, and/or
2 GARCIA \$70,000 for said property.

3 b. On or about September 20, 2015 through September 21, 2015,
4 PARCELNOMICS, LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from
5 Edelyn Rubin by personally, or through an agent acting at the direction of PARCELNOMICS,
6 LLC, LEAL, and/or GARCIA, selling Rubin a home located at 4018 Cotton Seed Court, Las
7 Vegas, Nevada, by either personally, or through an agent acting at the direction of
8 PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Rubin that, at the time
9 of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said property,
10 which was free and clear of existing liens and all other security interests; Defendants utilized
11 the website Zillow.com to advertise the sale of said property to Rubin. Rubin paid
12 PARCELNOMICS, LLC, LEAL, and/or GARCIA \$75,000 for said property.

13 c. On or about August 1, 2015 through September 30, 2015,
14 PARCELNOMICS, LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from
15 Chatty Becker by personally, or through an agent acting at the direction of PARCELNOMICS,
16 LLC, LEAL, and/or GARCIA, selling Becker a home located at 9816 Eagle Rock Court, Las
17 Vegas, Nevada, by either personally, or through an agent acting at the direction of
18 PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Becker that, at the
19 time of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said
20 property, which was free and clear of existing liens and all other security interests;
21 PARCELNOMICS, LLC, LEAL, and/or GARCIA utilized the website Craigslist.org to advertise
22 the sale of said property to Becker. Becker paid PARCELNOMICS, LLC, LEAL, and/or
23 GARCIA \$87,500 for said property.

24 d. On or about August 1, 2015 through August 30, 2015, PARCELNOMICS,
25 LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from Irene Segura by
26 personally, or through an agent acting at the direction of PARCELNOMICS, LLC, LEAL,
27 and/or GARCIA, selling Segura a home located at 4824 Morning Falls Avenue, Las Vegas,
28 Nevada, by either personally, or through an agent acting at the direction of

1 PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Segura that, at the
2 time of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said
3 property, which was free and clear of existing liens; PARCELNOMICS, LLC, LEAL, and/or
4 GARCIA utilized the website Zillow.com to advertise the sale of said property to Segura.
5 Segura paid PARCELNOMICS, LLC, LEAL, and/or GARCIA \$57,500 for said property.

6 e. On or about March 1, 2015 through April 30, 2015, PARCELNOMICS,
7 LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from Lih-Ling Yang by
8 personally, or through an agent acting at the direction of PARCELNOMICS, LLC, LEAL,
9 and/or GARCIA, selling Yang a home located at 2051 Donna Street, North Las Vegas,
10 Nevada, 6360 Katella Avenue, Las Vegas, NV, and/or 4326 Oasis Plains Avenue, Las
11 Vegas, Nevada by either personally, or through an agent acting at the direction of
12 PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Yang that, at the time
13 of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said property,
14 which was free and clear of existing liens and all other security interests; PARCELNOMICS,
15 LLC, LEAL, and/or GARCIA utilized the website eBay.com to advertise the sale of said
16 property to Yang. Yang paid PARCELNOMICS, LLC, LEAL, and/or GARCIA \$98,620 for said
17 property.

18 f. On or about August 1, 2015 through March 21, 2016, PARCELNOMICS,
19 LLC, LEAL, and/or GARCIA knowingly obtained \$3,500 or more from Lina Palafox by
20 personally, or through an agent acting at the direction of PARCELNOMICS, LLC, LEAL,
21 and/or GARCIA, selling Palafox a home located at 6213 Lawton Avenue, Las Vegas, Nevada
22 and/or 2005 Aquarius Drive, by either personally, or through an agent acting at the direction
23 of PARCELNOMICS, LLC, LEAL, and/or GARCIA, falsely representing to Palafox that, at the
24 time of said sale, PARCELNOMICS, LLC, LEAL, and/or GARCIA possessed title to said
25 property, which was free and clear of existing liens and all other security interests, with the
26 exception of possible sewer or trash liens; PARCELNOMICS, LLC, LEAL, and/or GARCIA
27 utilized the website Zillow.com to advertise the sale of said property to Palafox. Palafox paid
28 PARCELNOMICS, LLC, LEAL, and/or GARCIA \$90,300 for said property.

1 g. On or about September 21, 2015, PARCELNOMICS, LLC, LEAL, and/or
2 GARCIA knowingly obtained \$3,500 or more from Adilson Gibellato by personally, or through
3 an agent acting at the direction of PARCELNOMICS, LLC, LEAL, and/or GARCIA, selling
4 Gibellato a home located at 4701 Wandering Way, Tampa, Florida, by either personally, or
5 through an agent acting at the direction of PARCELNOMICS, LLC, LEAL, and/or GARCIA,
6 falsely representing to Gibellato that, at the time of said sale, PARCELNOMICS, LLC, LEAL,
7 and/or GARCIA possessed title to said property, which was free and clear of existing liens
8 and all other security interests; PARCELNOMICS, LLC, LEAL, and/or GARCIA utilized the
9 website Zillow.com to advertise the sale of said property to Gibellato. Gibellato paid
10 PARCELNOMICS, LLC, LEAL, and/or GARCIA \$85,000 for said property.

11 III.

12 **FIRST CAUSE OF ACTION**

13 **Civil Forfeiture of Property Attributable to or Used in the Commission of One or More**
14 **Acts of Racketeering and/or Felony Theft – NRS 179.1171, 179.1164, 179.121**

15 16. Plaintiff hereby incorporates by reference each and every preceding paragraph
16 as though fully stated herein.

17 17. As alleged in greater detail above, PARCELNOMICS, LLC, LEAL, and/or
18 GARCIA committed the crime(s) of:

19 a. Racketeering under NRS 207.400(1)(c), by conducting or participating,
20 directly or indirectly, in (i) the affairs of an enterprise through racketeering activity, and/or (ii)
21 racketeering activity through the affairs on an enterprise, while employed by or associated
22 with said enterprise; and/or

23 b. Theft in an amount of \$3,500 or more by material misrepresentation
24 under NRS 205.0832 and NRS 205.0835(4), by obtaining, and/or conspiring with another to
25 obtain, personal property of another person by material misrepresentation with intent to
26 deprive that person of the property.

27 18. The Currency and Real Property constitute proceeds attributable to, and/or
28 instrumentalities used in the commission of, said crimes committed by PARCELNOMICS,
LLC, LEAL, and/or GARCIA within Clark County, State of Nevada, in or about March of 2015

1 through March of 2016, and therefore, the Currency and Real Property are subject to forfeiture
2 pursuant to NRS 179.1171, 179.1164, and 179.121.

3 III.

4 **SECOND CAUSE OF ACTION**

5 **Civil Forfeiture of Property Derived from, Realized through, or Used or Intended to Be**
6 **Used in the Course of, One or More Technological Crimes Punishable as a Felony –**
7 **NRS 179.1229**

8 19. Plaintiff hereby incorporates by reference each and every preceding paragraph
9 as though fully stated herein.

10 20. As alleged in greater detail above, PARCELNOMICS, LLC, LEAL, and/or
11 GARCIA committed the crime(s) of:

12 a. Racketeering under NRS 207.400(1)(c), by conducting or participating,
13 directly or indirectly, in (i) the affairs of an enterprise through racketeering activity, and/or (ii)
14 racketeering activity through the affairs on an enterprise, while employed by or associated
15 with said enterprise; and/or

16 b. Theft in an amount of \$3,500 or more by material misrepresentation
17 under NRS 205.0832 and NRS 205.0835(4), by obtaining, and/or conspiring with another to
18 obtain, personal property of another person by material misrepresentation with intent to
19 deprive that person of the property.

20 21. The crimes set forth above involved, directly or indirectly, a component, device,
21 equipment, system or network that, alone or in conjunction with any other component, device,
22 equipment, system, or network, is designed or had the capability to be programmed or
23 generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce
24 any data, information, image, program, signal or sound in a technological format.

25 22. PARCELNOMICS, LLC, LEAL, and/or GARCIA, while committing, attempting to
26 commit, or conspiring with unknown individuals to commit, the crimes stated above, directly
27 and/or indirectly utilized websites, including Zillow.com, Craigslist.org, and/or eBay.com to
28 solicit the victims of the above-noted crimes to purchase the above-named properties.

29 23. The Currency and Real Property constitute property derived from, realized
through, or used or intended to be used in the course of, one or more technological crimes

1 punishable as a felony and noted above, committed by PARCELNOMICS, LLC, LEAL, and/or
2 GARCIA within Clark County, State of Nevada in or about March of 2015 through March of
3 2016, and therefore, the Currency and Real Property are subject to forfeiture pursuant to NRS
4 179.1229.

5 **THIRD CAUSE OF ACTION**
6 **Civil Forfeiture of Property Used in the Course of, Intended for Use in the Course of,**
7 **Derived from, or Gained through, Racketeering – NRS 207.460, 207.490**

8 1. Plaintiff hereby incorporates by reference each and every preceding paragraph
9 as though fully stated herein.

10 2. The Currency and Real Property constitute property used in the course of,
11 intended for use in the course of, derived from, or gained through, one or more acts of
12 racketeering committed by PARCELNOMICS, LLC, LEAL, and/or GARCIA, in violation of NRS
13 207.400(1)(c), within Clark County, State of Nevada in or about March of 2015 through March
14 of 2016, as described in greater detail above, and therefore, the Currency and Real Property
15 are subject to forfeiture pursuant to NRS 207.460, 207.490.

16 **IV.**

17 **PRAYER**

18 WHEREFORE, Plaintiff STATE OF NEVADA prays for the following relief:

19 1. That all persons interested in the above-named Currency and Real Property be
20 noticed to appear and show cause, if any they have, why the forfeiture of the Currency and
21 Real Property should not be judicially declared and confirmed;

22 2. That upon such hearing as may be ordered, the Court issue an order declaring that
23 the STATE OF NEVADA is the owner of the Currency and Real Property by way of statutory
24 civil forfeiture;

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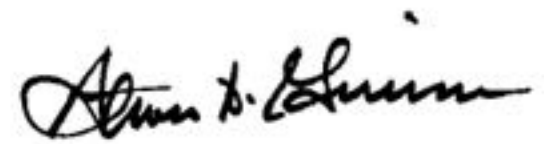
- 3. For reasonable attorney's fees and costs of suit; and
- 4. For such other and further relief as the Court deems just and proper.

Dated this 30th day of September, 2016.

SUBMITTED BY:

ADAM PAUL LAXALT
Attorney General

/s/ Michael C. Kovac
MICHAEL C. KOVAC
Senior Deputy Attorney General



CLERK OF THE COURT

1 **LIS**
2 ADAM PAUL LAXALT
3 Attorney General
4 MICHAEL C. KOVAC (Bar No.: 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 East Washington Ave., Ste. 3900
9 Las Vegas, Nevada 89101
10 (702) 486-5706 – office
11 (702) 486-2377 – fax
12 mkovac@ag.nv.gov
13 Attorneys for the State of Nevada

8 **DISTRICT COURT**

9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 \$6,616.04; \$150,489.13; and 1024 SANTA
14 HELENA AVENUE, HENDERSON,
15 NEVADA 89002, MORE PARTICULARLY
16 DESCRIBED AS FOLLOWS: LOT 223 OF
17 AMENDED MISSION HILLS ESTATES, AS
18 SHOWN BY MAP THEREOF ON FILE IN
19 BOOK 17 OF PLATS, PAGE 12 IN THE
20 OFFICE OF THE COUNTY RECORDER
21 OF CLARK COUNTY, NEVADA,
22 TOGETHER WITH A PORTION OF
23 VACATED ROAD KNOWN AS LOT 223-A
24 AND APPURTENANCES THEREON; APN:
25 179-33-710-056,

21 Defendant(s).

Case No.: A-16-744347-C

Dept. No.: XI

NOTICE OF LIS PENDENS

23 NOTICE IS HEREBY GIVEN that the above-entitled action concerning and affecting
24 real property as described herein was commenced on September 30, 2016, by Plaintiff, the
25 State of Nevada, against Defendants \$6,616.04; \$150,489.13; and 1024 SANTA HELENA
26 AVENUE, HENDERSON, NEVADA 89002, MORE PARTICULARLY DESCRIBED AS
27 FOLLOWS: LOT 223 OF AMENDED MISSION HILLS ESTATES, AS SHOWN BY MAP
28 THEREOF ON FILE IN BOOK 17 OF PLATS, PAGE 12 IN THE OFFICE OF THE COUNTY

Office of the Attorney General
555 East Washington Avenue, Suite 3900
Las Vegas, Nevada 89101

1 RECORDER OF CLARK COUNTY, NEVADA, TOGETHER WITH A PORTION OF VACATED
2 ROAD KNOWN AS LOT 223-A AND APPURTENANCES THEREON; APN: 179-33-710-056,
3 and is now pending in the above-captioned matter in this Court, located at 200 Lewis Avenue,
4 Las Vegas, Nevada.

5 The action affects title to or right to possess that certain real property commonly
6 known as **1024 Santa Helena Avenue, Henderson, Nevada 89002**, Parcel No. 179-33-
7 710-056, and legally described as:

8 1024 SANTA HELENA AVENUE, HENDERSON, NEVADA 89002,
9 MORE PARTICULARLY DESCRIBED AS FOLLOWS: LOT 223
10 OF AMENDED MISSION HILLS ESTATES, AS SHOWN BY MAP
11 THEREOF ON FILE IN BOOK 17 OF PLATS, PAGE 12 IN THE
12 OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY,
13 NEVADA, TOGETHER WITH A PORTION OF VACATED ROAD
14 KNOWN AS LOT 223-A AND APPURTENANCES THEREON;
15 APN: 179-33-710-056.

16 The parties to said action are set forth in the caption of the present notice.

17 Dated this 30th day of September, 2016.

18 SUBMITTED BY:
19 ADAM PAUL LAXALT
20 Attorney General

21 /s/ Michael C. Kovac _____
22 MICHAEL C. KOVAC
23 Senior Deputy Attorney General
24
25
26
27
28

Thomas J. Linn
CLERK OF THE COURT

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

JACK ADAM LEAL,

Defendant

District Court Case No.: C-17-322664-2
Dept.: XVII

Justice Court Case No.: 16F19220B

****AMENDED CERTIFICATE****

I hereby certify the foregoing to be a full, true and correct copy of the proceedings as the same appear in the above case.

Dated this 11th day of April, 2017

Karen Bennett Haron

Justice of the Peace, Las Vegas Township

1
2 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
3 **CLARK COUNTY, NEVADA**

4 STATE OF NEVADA,

5 Plaintiff,

6 vs.

7 JACK ADAM LEAL

8 Defendant

District Court Case No.: C-17-322664-2

Justice Court Case No.: 16F19220B

9
10 ****AMENDED BINDOVER and ORDER TO APPEAR****

11 An Order having been made this day by me that **JACK ADAM LEAL** be held to
12 answer before the Eighth Judicial District Court, upon the charge(s) of **Racketeering**
13 **[53190]; Theft, \$3500+ [55991]; Theft, \$3500+ [55991]; Theft, \$3500+ [55991]; Theft,**
14 **\$3500+ [55991]; Theft, \$3500+ [55991]; Theft, \$3500+ [55991]; Theft, \$3500+ [55991];**
15 **Theft, \$3500+ [55991]; Theft, \$3500+ [55991]; Theft, \$3500+ [55991]; Theft, \$3500+**
16 **[55991]; Theft, \$3500+ [55991]; Fraud/deceit in course of enterprise/occup [55110]**
17 committed in said Township and County, on or between March 01, 2015 and March 31,

18 **IT IS FURTHER ORDERED** that said defendant is commanded to appear in the
19 Eighth Judicial District Court, Regional Justice Center, Lower Level Arraignment
20 Courtroom "A", Las Vegas, Nevada on April 20, 2017 at 10:00 AM for arraignment and
21 further proceedings on the within charge(s).

22 Dated this 11th day of April, 2017

23 

24 _____
25 Justice of the Peace, Las Vegas Township

FILED

2016 NOV 29 P 1:31

CLERK OF DISTRICT COURT
CLARK COUNTY, NEVADA
JSM

1 **COMP**
2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac (Bar. No. 11177)
5 Senior Deputy Attorney General
6 State of Nevada
7 Office of the Attorney General
8 555 E. Washington Ave., Ste. 3900
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12 Attorneys for the State of Nevada

13 JUSTICE COURT, LAS VEGAS TOWNSHIP
14 CLARK COUNTY, NEVADA

15 STATE OF NEVADA,)
16) Case No. 16F19220A/B/C
17 Plaintiff,)
18) Dept. No. 7
19 v.)
20)
21 PARCELNOMICS, LLC (d/b/a)
22 INVESTMENT DEALS); JACK LEAL;)
23 and JESSICA GARCIA,)
24)
25 Defendant(s).)

26 **CRIMINAL COMPLAINT**

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

29 The above-named defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); JACK
30 LEAL; and JESSICA GARCIA, have committed the following crimes: one count of
31 RACKETEERING, a category "B" felony, in violation of NRS 207.400(1)(c); 12 counts of THEFT IN
32 THE AMOUNT OF \$3,500 OR MORE, a technological crime under NRS 205A.030 and a category
33 "B" felony, in violation of NRS 205.0832; and one count of MULTIPLE TRANSACTIONS
34 INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category
35 "B" felony, in violation of NRS 205.377.

36 ///
37 ///

16F19220A
CRM
Criminal Complaint
7327955



1 All of the acts alleged herein have been committed or completed on or about March 1, 2015
2 through March 31, 2016, by the above-named Defendant, within the County of Clark, State of Nevada,
3 in the following manner:

4 **COUNT 1**
5 **RACKETEERING**
6 **Category "B" Felony - NRS 207.400(1)(c)**

7 On or about March 1, 2015 through March 31, 2016, the Defendant(s), PARCELNOMICS,
8 LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and JESSICA GARCIA, in the County of Clark,
9 State of Nevada, while employed by or associated with an enterprise, conducted or participated, directly
10 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, and/or (ii) racketeering
11 activity through the affairs of the enterprise, to wit:

- 12 1. The allegations contained in Counts Two through 13 are hereby incorporated herein as if
13 fully set forth in this count.

14 **The Enterprise**

- 15 2. During all relevant times, Defendants PARCELNOMICS, LLC (d/b/a INVESTMENT
16 DEALS), JACK LEAL, and JESSICA GARCIA carried out business activities conducted
17 within Clark County, Nevada, through companies doing business as PARCELNOMICS,
18 LLC, and/or INVESTMENT DEALS.
- 19 3. During all relevant times, Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
20 DEALS) was registered with the Nevada Secretary of State's Office as a Nevada Limited
21 Liability Company.
- 22 4. During all relevant times, Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
23 DEALS) maintained a bank account with Bank of America, with said account ending in
24 9635, for the purpose of receiving deposits unlawfully obtained from those victimized by
25 the unlawful acts of Defendants described herein.
- 26 5. During all relevant times, Defendant PARCELNOMICS, LLC, maintained a bank account
27 with Bank of America, with said account ending in 5085, for the purpose of receiving
28 deposits unlawfully obtained from those victimized by the unlawful acts of Defendants
described herein.

- 1 6. During all relevant times, Defendant JACK LEAL: (i) acted as a managing member of
2 Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); (ii) opened and
3 maintained a post office box located in Clark County, Nevada, and used by Defendants to
4 conduct the unlawful activities described herein; (iii) was a signor on the Bank of America
5 accounts established in Clark County, Nevada, and ending in 9635 and 5085 that were
6 instruments of the unlawful acts described herein; and (iv) personally conducted, and/or
7 directed other agents of Defendants to conduct, the sales of properties described in Counts
8 Two through Eight contained herein, knowingly, falsely representing to the purchasers that
9 said properties were not encumbered by liens or other security interests.
- 10 7. During all relevant times, Defendant JESSICA GARICA: (i) acted as a managing member
11 of Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); (ii) opened and
12 maintained a post office box located in Clark County, Nevada, and used by Defendants to
13 conduct the unlawful activities described herein; (iii) was a signor on the Bank of America
14 accounts established in Clark County, Nevada, and ending in 9635 and 5085 that were
15 instruments of the unlawful acts described herein; and (iv) personally conducted, and/or
16 directed other agents of Defendants to conduct, the sales of properties described in Counts
17 Two through Eight contained herein, knowingly, falsely representing to the purchasers that
18 said properties were not encumbered by liens or other security interests.
- 19 8. Defendant LEAL, through Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
20 DEALS), purchased the properties named herein through a bankruptcy trustee sale, knowing
21 that said properties were encumbered by liens and/or other security interests.
- 22 9. Through Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), all of the
23 Defendants, either personally or by and through their agent(s), solicited through internet
24 advertisements prospective purchasers of real property, including the properties Defendant
25 LEAL purchased at the bankruptcy trustee sale described herein.
- 26 10. Said advertisements were placed on Zillow.com, Craigslist.org, and eBay.com.
- 27 11. Defendants LEAL and GARCIA, through Defendant PARCELNOMICS, LLC (d/b/a
28 INVESTMENT DEALS), personally misrepresented to the prospective purchasers that the

1 properties' titles were not encumbered by liens or other security interests, or directed agents
2 of PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS) to make said
3 misrepresentations.

4 **Racketeering Activity**

5 12. As described in greater detail in Counts Two through Eight, which charge the defendants
6 with multiple counts of theft constituting a technological crime, all of the defendants, either
7 personally or by and through their agent(s), fraudulently obtained thousands of dollars from
8 numerous individuals by means of knowingly and falsely representing to said individuals
9 that the titles to the properties being sold by the defendants were not encumbered by liens or
10 other security interests.

11 13. Each of the properties named herein were, at the time the defendants sold said properties to
12 the victims named herein, encumbered with liens and/or other security interests.

13 14. As a result of said misrepresentations, each of the victims named herein suffered losses of
14 \$25,000.00 or more.

15 15. Defendants, either personally or by and through their agent(s), perpetrated said fraudulent
16 acts on LoryLee Plancarte, Edelyn Rubin, Chatty Becker, Irene Segura, Lih-Ling Yang,
17 Lina Palafox, Juan Eloy Ramirez, Pham Delaware Realty, Catherine Wyngarden, Shahram
18 Bozorgnia, Tat Lam, and Adilson Gibellato.

19 **Property Derived from, Realized through, or Used or Intended to Be Used in the Course of the**
20 **Unlawful Acts**

21 As a result of said acts, the defendants unlawfully obtained \$886,800.00 from their victims.

22 **COUNT 2**
23 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
24 **Category "B" Felony - NRS 205.0832; 205A.030**

25 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
26 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
27 obtain property or services of another person by a material misrepresentation with intent to deprive that
28 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
that involved, directly or indirectly, any component, device, equipment, system or network that, alone

1 or in conjunction with any other component, device, equipment, system or network, is designed or has
2 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
3 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
4 technological format, including, without limitation, a format that involves analog, digital, electronic,
5 electromagnetic, magnetic or optical technology, to wit:

6 On or about June 1, 2015 through August 7, 2015, Defendants knowingly obtained \$3,500 or more
7 from LoryLee Plancarte by personally, or through an agent acting at Defendants' direction, selling
8 Plancarte a home located at 8109 Jo Mary Drive, Las Vegas, Nevada, by either personally or through
9 an agent acting at Defendants' direction, falsely representing to Plancarte that, at the time of said sale,
10 Defendants possessed title to said property, which was free and clear of existing liens and all other
11 security interests; Defendants utilized the website Zillow.com to advertise the sale of said property to
12 Plancarte. The allegations contained in Count One are hereby incorporated herein as if fully set forth in
13 this count.

14 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
15 "B" felony, in violation NRS 205.0832; 205A.030.

16 **COUNT 3**
17 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
18 **Category "B" Felony - NRS 205.0832; 205A.030**

19 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL,
20 and JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority,
21 knowingly obtain property or services of another person by a material misrepresentation with intent to
22 deprive that person of the property or services, with the value of said property being \$3,500 or more, by
23 way of acts that involved, directly or indirectly, any component, device, equipment, system or network
24 that, alone or in conjunction with any other component, device, equipment, system or network, is
25 designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey,
26 emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or
27 sound in a technological format, including, without limitation, a format that involves analog, digital,
28 electronic, electromagnetic, magnetic or optical technology, to wit:

///

1 On or about September 20, 2015 through September 21, 2015, Defendants knowingly obtained
2 \$3,500 or more from Edelyn Rubin by personally, or through an agent acting at Defendants' direction,
3 selling Rubin a home located at 4018 Cotton Seed Court, Las Vegas, Nevada, by either personally or
4 through an agent acting at Defendants' direction, falsely representing to Rubin that, at the time of said
5 sale, Defendants possessed title to said property, which was free and clear of existing liens and all other
6 security interests; Defendants utilized the website Zillow.com to advertise the sale of said property to
7 Rubin. The allegations contained in Count One are hereby incorporated herein as if fully set forth in
8 this count.

9 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
10 "B" felony, in violation NRS 205.0832; 205A.030.

11 **COUNT 4**
12 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
13 **Category "B" Felony - NRS 205.0832; 205A.030**

14 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
15 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
16 obtain property or services of another person by a material misrepresentation with intent to deprive that
17 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
18 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
19 or in conjunction with any other component, device, equipment, system or network, is designed or has
20 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
21 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
22 technological format, including, without limitation, a format that involves analog, digital, electronic,
23 electromagnetic, magnetic or optical technology, to wit:

24 On or about August 1, 2015 through September 30, 2015, Defendants knowingly obtained \$3,500
25 or more from Chatty Becker by personally, or through an agent acting at Defendants' direction, selling
26 Becker a home located at 9816 Eagle Rock Court, Las Vegas, Nevada, by either personally or through
27 an agent acting at Defendants' direction, falsely representing to Becker that, at the time of said sale,
28 Defendants possessed title to said property, which was free and clear of existing liens and all other
security interests; Defendants utilized the website Craigslist.org to advertise the sale of said property to

1 Becker. The allegations contained in Count One are hereby incorporated herein as if fully set forth in
2 this count.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
4 "B" felony, in violation NRS 205.0832; 205A.030.

5 **COUNT 5**
6 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
7 **Category "B" Felony - NRS 205.0832; 205A.030**

8 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
9 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
10 obtain property or services of another person by a material misrepresentation with intent to deprive that
11 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
12 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
13 or in conjunction with any other component, device, equipment, system or network, is designed or has
14 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
15 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
16 technological format, including, without limitation, a format that involves analog, digital, electronic,
17 electromagnetic, magnetic or optical technology, to wit:

18 On or about August 1, 2015 through August 30, 2015, Defendants knowingly obtained \$3,500 or
19 more from Irene Segura by personally, or through an agent acting at Defendants' direction, selling
20 Segura a home located at 4824 Morning Falls Avenue, Las Vegas, Nevada, by either personally or
21 through an agent acting at Defendants' direction, falsely representing to Segura that, at the time of said
22 sale, Defendants possessed title to said property, which was free and clear of existing liens; Defendants
23 utilized the website Zillow.com to advertise the sale of said property to Segura. The allegations
24 contained in Count One are hereby incorporated herein as if fully set forth in this count.

25 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
26 "B" felony, in violation NRS 205.0832; 205A.030.

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28 ///

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1 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
2 or in conjunction with any other component, device, equipment, system or network, is designed or has
3 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
4 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
5 technological format, including, without limitation, a format that involves analog, digital, electronic,
6 electromagnetic, magnetic or optical technology, to wit:

7 On or about August 1, 2015 through March 21, 2016, Defendants knowingly obtained \$3,500 or
8 more from Lina Palafox by personally, or through an agent acting at Defendants' direction, selling
9 Palafox a home located at 6213 Lawton Avenue, Las Vegas, Nevada and/or 2005 Aquarius Drive, by
10 either personally or through an agent acting at Defendants' direction, falsely representing to Palafox
11 that, at the time of said sale, Defendants possessed title to said property, which was free and clear of
12 existing liens and all other security interests, with the exception of possible sewer or trash liens;
13 Defendants utilized the website Zillow.com to advertise the sale of said property to Palafox. The
14 allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

15 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
16 "B" felony, in violation NRS 205.0832; 205A.030.

17 **COUNT 8**
18 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
19 **Category "B" Felony - NRS 205.0832; 205A.030**

20 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
21 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
22 obtain property or services of another person by a material misrepresentation with intent to deprive that
23 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
24 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
25 or in conjunction with any other component, device, equipment, system or network, is designed or has
26 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
27 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
28 technological format, including, without limitation, a format that involves analog, digital, electronic,
electromagnetic, magnetic or optical technology, to wit:

1 On or about September 21, 2015, Defendants knowingly obtained \$3,500 or more from Adilson
2 Gibellato by personally, or through an agent acting at Defendants' direction, selling Gibellato a home
3 located at 4701 Wandering Way, Tampa, Florida, by either personally or through an agent acting at
4 Defendants' direction, falsely representing to Gibellato that, at the time of said sale, Defendants
5 possessed title to said property, which was free and clear of existing liens and all other security
6 interests; Defendants utilized the website Zillow.com to advertise the sale of said property to Gibellato.
7 The allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

8 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
9 "B" felony, in violation NRS 205.0832; 205A.030.

10 **COUNT 9**
11 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
12 **Category "B" Felony - NRS 205.0832; 205A.030**

13 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
14 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
15 obtain property or services of another person by a material misrepresentation with intent to deprive that
16 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
17 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
18 or in conjunction with any other component, device, equipment, system or network, is designed or has
19 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
20 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
21 technological format, including, without limitation, a format that involves analog, digital, electronic,
22 electromagnetic, magnetic or optical technology, to wit:

23 On or about March 5, 2015, Defendants knowingly obtained \$3,500 or more from Juan Eloy
24 Ramirez by personally, or through an agent acting at Defendants' direction, selling Ramirez a home
25 located at 8628 Catalonia Drive, Las Vegas, Nevada, by either personally or through an agent acting at
26 Defendants' direction, falsely representing to Ramirez that, at the time of said sale, Defendants
27 possessed title to said property, which was free and clear of existing liens and all other security
28 interests; Defendants utilized a website to advertise the sale of said property to Ramirez. The
allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

1 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
2 "B" felony, in violation NRS 205.0832; 205A.030.

3 **COUNT 10**
4 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
5 **Category "B" Felony - NRS 205.0832; 205A.030**

6 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
7 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
8 obtain property or services of another person by a material misrepresentation with intent to deprive that
9 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
10 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
11 or in conjunction with any other component, device, equipment, system or network, is designed or has
12 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
13 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
14 technological format, including, without limitation, a format that involves analog, digital, electronic,
15 electromagnetic, magnetic or optical technology, to wit:

16 On or about April 13, 2016, Defendants knowingly obtained \$3,500 or more from Pham Delaware
17 Realty by personally, or through an agent acting at Defendants' direction, selling Pham Delaware
18 Realty a home located at 7159 Iron Oak Avenue, Las Vegas, Nevada 89113, by either personally or
19 through an agent acting at Defendants' direction, falsely representing to Pham Delaware Realty that, at
20 the time of said sale, Defendants possessed title to said property, which was free and clear of existing
21 liens and all other security interests; Defendants utilized a website to advertise the sale of said property
22 to Pham Delaware Realty. The allegations contained in Count One are hereby incorporated herein as if
23 fully set forth in this count.

24 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
25 "B" felony, in violation NRS 205.0832; 205A.030.

26 **COUNT 11**
27 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
28 **Category "B" Felony - NRS 205.0832; 205A.030**

The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly

1 obtain property or services of another person by a material misrepresentation with intent to deprive that
2 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
3 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
4 or in conjunction with any other component, device, equipment, system or network, is designed or has
5 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
6 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
7 technological format, including, without limitation, a format that involves analog, digital, electronic,
8 electromagnetic, magnetic or optical technology, to wit:

9 On or about September 28, 2015, Defendants knowingly obtained \$3,500 or more from Catherine
10 Wyngarden by personally, or through an agent acting at Defendants' direction, selling Wyngarden a
11 home located at 9816 Eagle Rock Court, Las Vegas, Nevada, by either personally or through an agent
12 acting at Defendants' direction, falsely representing to Wyngarden that, at the time of said sale,
13 Defendants possessed title to said property, which was free and clear of existing liens and all other
14 security interests; Defendants utilized a website to advertise the sale of said property to Wyngarden.
15 The allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

16 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
17 "B" felony, in violation NRS 205.0832; 205A.030.

18 **COUNT 12**
19 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
20 **Category "B" Felony - NRS 205.0832; 205A.030**

21 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
22 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
23 obtain property or services of another person by a material misrepresentation with intent to deprive that
24 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
25 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
26 or in conjunction with any other component, device, equipment, system or network, is designed or has
27 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
28 receive, relay, record or reproduce any data, information, image, program, signal or sound in a

1 technological format, including, without limitation, a format that involves analog, digital, electronic,
2 electromagnetic, magnetic or optical technology, to wit:

3 On or about March 9, 2015, Defendants knowingly obtained \$3,500 or more from Shahram
4 Bozorgnia by personally, or through an agent acting at Defendants' direction, selling Bozorgnia a home
5 located at 2730 Sandy Lane, Las Vegas, Nevada, by either personally or through an agent acting at
6 Defendants' direction, falsely representing to Bozorgnia that, at the time of said sale, Defendants
7 possessed title to said property, which was free and clear of existing liens and all other security
8 interests; Defendants utilized a website to advertise the sale of said property to Bozorgnia. The
9 allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

10 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
11 "B" felony, in violation NRS 205.0832; 205A.030.

12 **COUNT 13**
13 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
14 **Category "B" Felony - NRS 205.0832; 205A.030**

15 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
16 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
17 obtain property or services of another person by a material misrepresentation with intent to deprive that
18 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
19 that involved, directly or indirectly, any component, device, equipment, system or network that, alone
20 or in conjunction with any other component, device, equipment, system or network, is designed or has
21 the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit,
22 receive, relay, record or reproduce any data, information, image, program, signal or sound in a
23 technological format, including, without limitation, a format that involves analog, digital, electronic,
24 electromagnetic, magnetic or optical technology, to wit:

25 On or about April 16, 2015, Defendants knowingly obtained \$3,500 or more from Tat Lam by
26 personally, or through an agent acting at Defendants' direction, selling Lam a home located at 556
27 Liverpool Avenue, Henderson, Nevada, by either personally or through an agent acting at Defendants'
28 direction, falsely representing to Lam that, at the time of said sale, Defendants possessed title to said
property, which was free and clear of existing liens and all other security interests; Defendants utilized

1 the website Zillow.com to advertise the sale of said property to Lam. The allegations contained in
2 Count One are hereby incorporated herein as if fully set forth in this count.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
4 "B" felony, in violation NRS 205.0832; 205A.030.

5
6 **COUNT 14**
7 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**
8 **ENTERPRISE OR OCCUPATION**
9 **Category "B" Felony - NRS 205.377**

10 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
11 JESSICA GARCIA, in the County of Clark, State of Nevada, did, in the course of an enterprise or
12 occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of business
13 or employed a device, scheme or artifice which operated or would have operated as a fraud or deceit
14 upon a person by means of a false representation or omission of a material fact that: (a) the person
15 knew to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any
16 person who relied on the false representation or omission, in at least two transactions that had the same
17 or similar pattern, intents, results, accomplices, victims or methods of commission, or were otherwise
18 interrelated by distinguishing characteristics and were not isolated incidents within 4 years and in
19 which the aggregate loss or intended loss was more than \$650, to wit:

20 On or about March 1, 2015 through March 31, 2016, in and through the course of a real estate
21 enterprise known as PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), Defendants knowingly
22 and with the intent to defraud, obtained thousands of dollars from LoryLee Plancarte, Edelyn Rubin,
23 Chatty Becker, Irene Segura, Lih-Ling Yang, Lina Palafox, Juan Eloy Ramirez, Pham Delaware
24 Realty, Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson Gibellato by means of
25 knowingly and falsely representing to said individuals that the titles to properties being sold to them by
26 the defendants were not encumbered by liens or other security interests, intending that said individuals
27 rely on said misrepresentations, and resulting in a loss of more than \$650.00. The allegations contained
28 in counts one through 13 are hereby repeated and incorporated herein as if fully set forth in this count.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 1**

2 **NRS 207.420(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 1, the State of Nevada will seek forfeiture of property, namely \$886,800.00, pursuant
5 to NRS 207.420(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a violation of NRS
7 207.400.

8 In the event that any of the above-described forfeitable property:

9 (a) Cannot be located;

10 (b) Has been sold to a purchaser in good faith for value;

11 (c) Has been placed beyond the jurisdiction of the court;

12 (d) Has been substantially diminished in value by the conduct of the defendant;

13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or

15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

19 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 2**

20 **NRS 179.1219(1)**

21 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
22 charged in Count 2, the State of Nevada will seek forfeiture of property, namely \$70,000, pursuant to
23 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
24 through, or used or intended for use in the course of an unlawful act that constitutes a technological
25 crime under NRS 205A.030.

26 In the event that any of the above-described forfeitable property:

27 (a) Cannot be located;

28 (b) Has been sold to a purchaser in good faith for value;

- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
6 forfeiture of other property of the defendants, including but not limited to real property located
7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 3**
10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
12 charged in Count 3, the State of Nevada will seek forfeiture of property, namely \$75,000, pursuant to
13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
14 through, or used or intended for use in the course of an unlawful act that constitutes a technological
15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
24 forfeiture of other property of the defendants, including but not limited to real property located
25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
26 unreachable.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 4**
2 **NRS 179.1219(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 4, the State of Nevada will seek forfeiture of property, namely \$87,500, pursuant to
5 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a technological
7 crime under NRS 205A.030.

8 In the event that any of the above-described forfeitable property:

- 9 (a) Cannot be located;
10 (b) Has been sold to a purchaser in good faith for value;
11 (c) Has been placed beyond the jurisdiction of the court;
12 (d) Has been substantially diminished in value by the conduct of the defendant;
13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or
15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

19 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 5**
20 **NRS 179.1219(1)**

21 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
22 charged in Count 5, the State of Nevada will seek forfeiture of property, namely \$57,000, pursuant to
23 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
24 through, or used or intended for use in the course of an unlawful act that constitutes a technological
25 crime under NRS 205A.030.

26 In the event that any of the above-described forfeitable property:

- 27 (a) Cannot be located;
28 (b) Has been sold to a purchaser in good faith for value;

- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 6 forfeiture of other property of the defendants, including but not limited to real property located
- 7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 6**
10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

12 charged in Count 6, the State of Nevada will seek forfeiture of property, namely \$98,620, pursuant to

13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

14 through, or used or intended for use in the course of an unlawful act that constitutes a technological

15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 24 forfeiture of other property of the defendants, including but not limited to real property located
- 25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 26 unreachable.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 7**
2 **NRS 179.1219(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 7, the State of Nevada will seek forfeiture of property, namely \$90,300, pursuant to
5 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a technological
7 crime under NRS 205A.030.

8 In the event that any of the above-described forfeitable property:

- 9 (a) Cannot be located;
- 10 (b) Has been sold to a purchaser in good faith for value;
- 11 (c) Has been placed beyond the jurisdiction of the court;
- 12 (d) Has been substantially diminished in value by the conduct of the defendant;
- 13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or
- 15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

19 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 8**
20 **NRS 179.1219(1)**

21 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
22 charged in Count 8, the State of Nevada will seek forfeiture of property, namely \$85,000, pursuant to
23 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
24 through, or used or intended for use in the course of an unlawful act that constitutes a technological
25 crime under NRS 205A.030.

26 In the event that any of the above-described forfeitable property:

- 27 (a) Cannot be located;
- 28

- 1 (b) Has been sold to a purchaser in good faith for value;
2 (c) Has been placed beyond the jurisdiction of the court;
3 (d) Has been substantially diminished in value by the conduct of the defendant;
4 (e) Has been commingled with other property which cannot be divided without difficulty or undue
5 injury to innocent persons; or
6 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
7 forfeiture of other property of the defendants, including but not limited to real property located
8 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
9 unreachable.

10 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 9**
11 **NRS 179.1219(1)**

12 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
13 charged in Count 9, the State of Nevada will seek forfeiture of property, namely \$50,000, pursuant to
14 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
15 through, or used or intended for use in the course of an unlawful act that constitutes a technological
16 crime under NRS 205A.030.

17 In the event that any of the above-described forfeitable property:

- 18 (a) Cannot be located;
19 (b) Has been sold to a purchaser in good faith for value;
20 (c) Has been placed beyond the jurisdiction of the court;
21 (d) Has been substantially diminished in value by the conduct of the defendant;
22 (e) Has been commingled with other property which cannot be divided without difficulty or undue
23 injury to innocent persons; or
24 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
25 forfeiture of other property of the defendants, including but not limited to real property located
26 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
27 unreachable.
28

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 10
NRS 179.1219(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 10, the State of Nevada will seek forfeiture of property, namely \$90,000, pursuant to NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a technological crime under NRS 205A.030.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value by the conduct of the defendant;
- (e) Has been commingled with other property which cannot be divided without difficulty or undue injury to innocent persons; or
- (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek forfeiture of other property of the defendants, including but not limited to real property located at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is unreachable.

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 11
NRS 179.1219(1)

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 11, the State of Nevada will seek forfeiture of property, namely \$115,000, pursuant to NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized through, or used or intended for use in the course of an unlawful act that constitutes a technological crime under NRS 205A.030.

In the event that any of the above-described forfeitable property:

- (a) Cannot be located;
- (b) Has been sold to a purchaser in good faith for value;

- 1 (c) Has been placed beyond the jurisdiction of the court;
- 2 (d) Has been substantially diminished in value by the conduct of the defendant;
- 3 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 4 injury to innocent persons; or
- 5 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 6 forfeiture of other property of the defendants, including but not limited to real property located
- 7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

9 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 12**

10 **NRS 179.1219(1)**

11 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense

12 charged in Count 12, the State of Nevada will seek forfeiture of property, namely \$25,000, pursuant to

13 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized

14 through, or used or intended for use in the course of an unlawful act that constitutes a technological

15 crime under NRS 205A.030.

16 In the event that any of the above-described forfeitable property:

- 17 (a) Cannot be located;
- 18 (b) Has been sold to a purchaser in good faith for value;
- 19 (c) Has been placed beyond the jurisdiction of the court;
- 20 (d) Has been substantially diminished in value by the conduct of the defendant;
- 21 (e) Has been commingled with other property which cannot be divided without difficulty or undue
- 22 injury to innocent persons; or
- 23 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
- 24 forfeiture of other property of the defendants, including but not limited to real property located
- 25 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 26 unreachable.

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1 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 13**
2 **NRS 179.1219(1)**

3 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
4 charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, pursuant to
5 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
6 through, or used or intended for use in the course of an unlawful act that constitutes a technological
7 crime under NRS 205A.030.

8 In the event that any of the above-described forfeitable property:

- 9 (a) Cannot be located;
- 10 (b) Has been sold to a purchaser in good faith for value;
- 11 (c) Has been placed beyond the jurisdiction of the court;
- 12 (d) Has been substantially diminished in value by the conduct of the defendant;
- 13 (e) Has been commingled with other property which cannot be divided without difficulty or undue
14 injury to innocent persons; or
- 15 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
16 forfeiture of other property of the defendants, including but not limited to real property located
17 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
18 unreachable.

19 **CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 14**
20 **NRS 179.1219(1)**

21 The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense
22 charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, pursuant to
23 NRS 179.1219(1), which provides for the forfeiture of real or personal property derived from, realized
24 through, or used or intended for use in the course of an unlawful act that constitutes a technological
25 crime under NRS 205A.030.

26 In the event that any of the above-described forfeitable property:

- 27 (a) Cannot be located;
- 28

- 1 (b) Has been sold to a purchaser in good faith for value;
2 (c) Has been placed beyond the jurisdiction of the court;
3 (d) Has been substantially diminished in value by the conduct of the defendant;
4 (e) Has been commingled with other property which cannot be divided without difficulty or undue
5 injury to innocent persons; or
6 (f) Is otherwise unreachable without undue injury to other persons, the State of Nevada will seek
7 forfeiture of other property of the defendants, including but not limited to real property located
8 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
9 unreachable.

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

12 The Complainant requests a Summons be issued at this time pursuant to NRS 171.106.

13 DATED this 21st day of November, 2016.

14 SUBMITTED BY

15 ADAM PAUL LAXALT
16 Attorney General

17 By: Michael C. Kovac
18 Michael C. Kovac (Bar. No. 11177)
19 Senior Deputy Attorney General
20 Attorneys for the State of Nevada
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27
28

Justice Court, Las Vegas Township
Clark County, Nevada

Court Minutes

Department: 07



L007440974

16F19220B State of Nevada vs. LEAL, JACK

Lead Atty: Jason G. Weiner

12/27/2016 7:30:00 AM Initial Appearance (No bail posted)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Attorney Kallas, Chelsea Weiner, Jason G.
Judge: Pro Tempore, Judge
Court Reporter: O'Neill, Jennifer
Court Clerk: Meccia, Cherie
Pro Tempore: Hua, Jeannie

PROCEEDINGS

Hearings: 2/7/2017 8:00:00 AM: Negotiations

Added

Events: **Counsel Confirms as Attorney of Record**

J. Weiner, Esq

Amended Criminal Complaint

Filed in open court

Initial Appearance Completed

Defense Advised of Charges on Criminal Complaint, Waives Reading of Criminal Complaint

Motion to Continue - Defense

for negotiations - Motion granted

FILED IN OPEN
COURT ON
DEC 27 2016

C. Meenan
Court Clerk

1 **ACOM**
2 **ADAM PAUL LAXALT**
3 Attorney General
4 Michael C. Kovac (Bar. No. 11177)
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12 Attorneys for the State of Nevada

13 JUSTICE COURT, LAS VEGAS TOWNSHIP
14 CLARK COUNTY, NEVADA

15 STATE OF NEVADA,) Case No. 16F19220A/B/C
16)
17 Plaintiff,) Dept. No. 7
18)
19 v.)
20)
21 PARCELNOMICS, LLC (d/b/a)
22 INVESTMENT DEALS); JACK LEAL;)
23 and JESSICA GARCIA,)
24)
25 Defendant(s).)

26 **AMENDED CRIMINAL COMPLAINT**

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

28 The above-named defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); JACK
LEAL; and JESSICA GARCIA, have committed the following crimes: one count of RACKETEERING,
a category "B" felony, in violation of NRS 207.400(1)(c); 12 counts of THEFT IN THE AMOUNT OF
\$3,500 OR MORE, a technological crime under NRS 205A.030 and a category "B" felony, in violation
of NRS 205.0832; and one count of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT
IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of NRS
205.377.

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16F19220A
ACRM
Amended Criminal Complaint
7440963



1 All of the acts alleged herein have been committed or completed on or about March 1, 2015
2 through March 31, 2016, by the above-named Defendant, within the County of Clark, State of Nevada,
3 in the following manner:

4 **COUNT 1**
5 **RACKETEERING**
6 **Category "B" Felony - NRS 207.400(1)(c)**

7 On or about March 1, 2015 through March 31, 2016, the Defendant(s), PARCELNOMICS, LLC
8 (d/b/a INVESTMENT DEALS), JACK LEAL, and JESSICA GARCIA, in the County of Clark, State of
9 Nevada, while employed by or associated with an enterprise, conducted or participated, directly or
10 indirectly, in: (i) the affairs of the enterprise through racketeering activity, and/or (ii) racketeering activity
11 through the affairs of the enterprise, to wit:

- 12 1. The allegations contained in Counts Two through 13 are hereby incorporated herein as if fully
13 set forth in this count.

14 **The Enterprise**

- 15 2. During all relevant times, Defendants PARCELNOMICS, LLC (d/b/a INVESTMENT
16 DEALS), JACK LEAL, and JESSICA GARCIA carried out business activities conducted
17 within Clark County, Nevada, through companies doing business as PARCELNOMICS,
18 LLC, and/or INVESTMENT DEALS.
- 19 3. During all relevant times, Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
20 DEALS) was registered with the Nevada Secretary of State's Office as a Nevada Limited
21 Liability Company.
- 22 4. During all relevant times, Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
23 DEALS) maintained a bank account with Bank of America, with said account ending in 9635,
24 for the purpose of receiving deposits unlawfully obtained from those victimized by the
25 unlawful acts of Defendants described herein.
- 26 5. During all relevant times, Defendant PARCELNOMICS, LLC, maintained a bank account
27 with Bank of America, with said account ending in 5085, for the purpose of receiving deposits
28 unlawfully obtained from those victimized by the unlawful acts of Defendants described
herein.

- 1 6. During all relevant times, Defendant JACK LEAL: (i) acted as a managing member of
2 Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); (ii) opened and
3 maintained a post office box located in Clark County, Nevada, and used by Defendants to
4 conduct the unlawful activities described herein; (iii) was a signor on the Bank of America
5 accounts established in Clark County, Nevada, and ending in 9635 and 5085 that were
6 instruments of the unlawful acts described herein; and (iv) personally conducted, and/or
7 directed other agents of Defendants to conduct, the sales of properties described in Counts
8 Two through Eight contained herein, knowingly, falsely representing to the purchasers that
9 said properties were not encumbered by liens or other security interests.
- 10 7. During all relevant times, Defendant JESSICA GARICA: (i) acted as a managing member of
11 Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); (ii) opened and
12 maintained a post office box located in Clark County, Nevada, and used by Defendants to
13 conduct the unlawful activities described herein; (iii) was a signor on the Bank of America
14 accounts established in Clark County, Nevada, and ending in 9635 and 5085 that were
15 instruments of the unlawful acts described herein; and (iv) personally conducted, and/or
16 directed other agents of Defendants to conduct, the sales of properties described in Counts
17 Two through Eight contained herein, knowingly, falsely representing to the purchasers that
18 said properties were not encumbered by liens or other security interests.
- 19 8. Defendant LEAL, through Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT
20 DEALS), purchased the properties named herein through a bankruptcy trustee sale, knowing
21 that said properties were encumbered by liens and/or other security interests.
- 22 9. Through Defendant PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), all of the
23 Defendants, either personally or by and through their agent(s), solicited through internet
24 advertisements prospective purchasers of real property, including the properties Defendant
25 LEAL purchased at the bankruptcy trustee sale described herein.
- 26 10. Said advertisements were placed on Zillow.com, Craigslist.org, and eBay.com.
- 27 11. Defendants LEAL and GARCIA, through Defendant PARCELNOMICS, LLC (d/b/a
28 INVESTMENT DEALS), personally misrepresented to the prospective purchasers that the

1 properties' titles were not encumbered by liens or other security interests, or directed agents
2 of PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS) to make said misrepresentations.

3 **Racketeering Activity**

4 12. As described in greater detail in Counts Two through Eight, which charge the defendants with
5 multiple counts of theft constituting a technological crime, all of the defendants, either
6 personally or by and through their agent(s), fraudulently obtained thousands of dollars from
7 numerous individuals by means of knowingly and falsely representing to said individuals that
8 the titles to the properties being sold by the defendants were not encumbered by liens or other
9 security interests.

10 13. Each of the properties named herein were, at the time the defendants sold said properties to
11 the victims named herein, encumbered with liens and/or other security interests.

12 14. As a result of said misrepresentations, each of the victims named herein suffered losses of
13 \$25,000.00 or more.

14 15. Defendants, either personally or by and through their agent(s), perpetrated said fraudulent acts
15 on LoryLee Plancarte, Edelyn Rubin, Chatty Becker, Irene Segura, Liih-Ling Yang, Lina
16 Palafox, Juan Eloy Ramirez, Pham Delaware Realty, Catherine Wyngarden, Shahram
17 Bozorgnia, Tat Lam, and Adilson Gibellato.

18 **Property Derived from, Realized through, or Used or Intended to Be Used in the Course of the**
19 **Unlawful Acts**

20 As a result of said acts, the defendants unlawfully obtained \$846,300 from their victims.

21 **COUNT 2**
22 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
23 **Category "B" Felony - NRS 205.0832; 205A.030**

24 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
25 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
26 obtain property or services of another person by a material misrepresentation with intent to deprive that
27 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
28 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
in conjunction with any other component, device, equipment, system or network, is designed or has the

1 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
2 relay, record or reproduce any data, information, image, program, signal or sound in a technological
3 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
4 magnetic or optical technology, to wit:

5 On or about June 1, 2015 through August 7, 2015, Defendants knowingly obtained \$3,500 or more
6 from LoryLee Plancarte by personally, or through an agent acting at Defendants' direction, selling
7 Plancarte a home located at 8109 Jo Mary Drive, Las Vegas, Nevada, by either personally or through an
8 agent acting at Defendants' direction, falsely representing to Plancarte that, at the time of said sale,
9 Defendants possessed title to said property, which was free and clear of existing liens and all other
10 security interests; Defendants utilized the website Zillow.com to advertise the sale of said property to
11 Plancarte. The allegations contained in Count One are hereby incorporated herein as if fully set forth in
12 this count.

13 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
14 "B" felony, in violation NRS 205.0832; 205A.030.

15 **COUNT 3**
16 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
17 **Category "B" Felony - NRS 205.0832; 205A.030**

18 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
19 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
20 obtain property or services of another person by a material misrepresentation with intent to deprive that
21 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
22 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
23 in conjunction with any other component, device, equipment, system or network, is designed or has the
24 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
25 relay, record or reproduce any data, information, image, program, signal or sound in a technological
26 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
27 magnetic or optical technology, to wit:

28 ///

1 On or about September 20, 2015 through September 21, 2015, Defendants knowingly obtained
2 \$3,500 or more from Edelyn Rubin by personally, or through an agent acting at Defendants' direction,
3 selling Rubin a home located at 4018 Cotton Seed Court, Las Vegas, Nevada, by either personally or
4 through an agent acting at Defendants' direction, falsely representing to Rubin that, at the time of said
5 sale, Defendants possessed title to said property, which was free and clear of existing liens and all other
6 security interests; Defendants utilized the website Zillow.com to advertise the sale of said property to
7 Rubin. The allegations contained in Count One are hereby incorporated herein as if fully set forth in this
8 count.

9 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
10 "B" felony, in violation NRS 205.0832; 205A.030.

11 **COUNT 4**
12 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
13 **Category "B" Felony - NRS 205.0832; 205A.030**

14 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
15 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
16 obtain property or services of another person by a material misrepresentation with intent to deprive that
17 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
18 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
19 in conjunction with any other component, device, equipment, system or network, is designed or has the
20 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
21 relay, record or reproduce any data, information, image, program, signal or sound in a technological
22 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
23 magnetic or optical technology, to wit:

24 On or about August 1, 2015 through September 30, 2015, Defendants knowingly obtained \$3,500 or
25 more from Chatty Becker by personally, or through an agent acting at Defendants' direction, selling
26 Becker a home located at 9816 Eagle Rock Court, Las Vegas, Nevada, by either personally or through
27 an agent acting at Defendants' direction, falsely representing to Becker that, at the time of said sale,
28 Defendants possessed title to said property, which was free and clear of existing liens and all other
security interests; Defendants utilized the website Craigslist.org to advertise the sale of said property to

1 Becker. The allegations contained in Count One are hereby incorporated herein as if fully set forth in this
2 count.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
4 "B" felony, in violation NRS 205.0832; 205A.030.

5 **COUNT 5**
6 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
7 **Category "B" Felony - NRS 205.0832; 205A.030**

8 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
9 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
10 obtain property or services of another person by a material misrepresentation with intent to deprive that
11 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
12 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
13 in conjunction with any other component, device, equipment, system or network, is designed or has the
14 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
15 relay, record or reproduce any data, information, image, program, signal or sound in a technological
16 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
17 magnetic or optical technology, to wit:

18 On or about August 1, 2015 through August 30, 2015, Defendants knowingly obtained \$3,500 or
19 more from Irene Segura by personally, or through an agent acting at Defendants' direction, selling Segura
20 a home located at 4824 Morning Falls Avenue, Las Vegas, Nevada, by either personally or through an
21 agent acting at Defendants' direction, falsely representing to Segura that, at the time of said sale,
22 Defendants possessed title to said property, which was free and clear of existing liens; Defendants utilized
23 the website Zillow.com to advertise the sale of said property to Segura. The allegations contained in
24 Count One are hereby incorporated herein as if fully set forth in this count.

25 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
26 "B" felony, in violation NRS 205.0832; 205A.030.

27 ///

28 ///

///

COUNT 6
THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "B" Felony - NRS 205.0832; 205A.030

The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and JESSICA GARCIA, 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, with the value of said property being \$3,500 or more, by way of acts that involved, directly or indirectly, any component, device, equipment, system or network that, alone or in conjunction with any other component, device, equipment, system or network, is designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, to wit:

On or about March 1, 2015 through April 30, 2015, Defendants knowingly obtained \$3,500 or more from Lih-Ling Yang by personally, or through an agent acting at Defendants' direction, selling Yang a home located at 2051 Donna Street, North Las Vegas, Nevada, 6360 Katella Avenue, Las Vegas, NV, and/or 4326 Oasis Plains Avenue, Las Vegas, Nevada by either personally or through an agent acting at Defendants' direction, falsely representing to Yang that, at the time of said sale, Defendants possessed title to said property, which was free and clear of existing liens and all other security interests; Defendants utilized the website eBay.com to advertise the sale of said property to Yang. The allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B" felony, in violation NRS 205.0832; 205A.030.

COUNT 7
THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "B" Felony - NRS 205.0832; 205A.030

The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and JESSICA GARCIA, 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, with the value of said property being \$3,500 or more, by way of acts

1 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
2 in conjunction with any other component, device, equipment, system or network, is designed or has the
3 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
4 relay, record or reproduce any data, information, image, program, signal or sound in a technological
5 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
6 magnetic or optical technology, to wit:

7 On or about August 1, 2015 through March 21, 2016, Defendants knowingly obtained \$3,500 or more
8 from Lina Palafox by personally, or through an agent acting at Defendants' direction, selling Palafox a
9 home located at 6213 Lawton Avenue, Las Vegas, Nevada and/or 2005 Aquarius Drive, by either
10 personally or through an agent acting at Defendants' direction, falsely representing to Palafox that, at the
11 time of said sale, Defendants possessed title to said property, which was free and clear of existing liens
12 and all other security interests, with the exception of possible sewer or trash liens; Defendants utilized
13 the website Zillow.com to advertise the sale of said property to Palafox. The allegations contained in
14 Count One are hereby incorporated herein as if fully set forth in this count.

15 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
16 "B" felony, in violation NRS 205.0832; 205A.030.

17 **COUNT 8**
18 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
19 **Category "B" Felony - NRS 205.0832; 205A.030**

20 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
21 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
22 obtain property or services of another person by a material misrepresentation with intent to deprive that
23 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
24 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
25 in conjunction with any other component, device, equipment, system or network, is designed or has the
26 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
27 relay, record or reproduce any data, information, image, program, signal or sound in a technological
28 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
magnetic or optical technology, to wit:

1 On or about September 21, 2015, Defendants knowingly obtained \$3,500 or more from Adilson
2 Gibellato by personally, or through an agent acting at Defendants' direction, selling Gibellato a home
3 located at 4701 Wandering Way, Tampa, Florida, by either personally or through an agent acting at
4 Defendants' direction, falsely representing to Gibellato that, at the time of said sale, Defendants
5 possessed title to said property, which was free and clear of existing liens and all other security interests;
6 Defendants utilized the website Zillow.com to advertise the sale of said property to Gibellato. The
7 allegations contained in Count One are hereby incorporated herein as if fully set forth in this count.

8 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
9 "B" felony, in violation NRS 205.0832; 205A.030.

10 **COUNT 9**
11 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
12 **Category "B" Felony - NRS 205.0832; 205A.030**

13 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
14 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
15 obtain property or services of another person by a material misrepresentation with intent to deprive that
16 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
17 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
18 in conjunction with any other component, device, equipment, system or network, is designed or has the
19 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
20 relay, record or reproduce any data, information, image, program, signal or sound in a technological
21 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
22 magnetic or optical technology, to wit:

23 On or about March 5, 2015, Defendants knowingly obtained \$3,500 or more from Juan Eloy Ramirez
24 by personally, or through an agent acting at Defendants' direction, selling Ramirez a home located at
25 8628 Catalonia Drive, Las Vegas, Nevada, by either personally or through an agent acting at Defendants'
26 direction, falsely representing to Ramirez that, at the time of said sale, Defendants possessed title to said
27 property, which was free and clear of existing liens and all other security interests; Defendants utilized a
28 website to advertise the sale of said property to Ramirez. The allegations contained in Count One are
hereby incorporated herein as if fully set forth in this count.

1 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
2 "B" felony, in violation NRS 205.0832; 205A.030.

3 **COUNT 10**
4 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
5 **Category "B" Felony - NRS 205.0832; 205A.030**

6 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
7 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
8 obtain property or services of another person by a material misrepresentation with intent to deprive that
9 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
10 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
11 in conjunction with any other component, device, equipment, system or network, is designed or has the
12 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
13 relay, record or reproduce any data, information, image, program, signal or sound in a technological
14 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
15 magnetic or optical technology, to wit:

16 On or about April 13, 2016, Defendants knowingly obtained \$3,500 or more from Pham Delaware
17 Realty by personally, or through an agent acting at Defendants' direction, selling Pham Delaware Realty
18 a home located at 7159 Iron Oak Avenue, Las Vegas, Nevada 89113, by either personally or through an
19 agent acting at Defendants' direction, falsely representing to Pham Delaware Realty that, at the time of
20 said sale, Defendants possessed title to said property, which was free and clear of existing liens and all
21 other security interests; Defendants utilized a website to advertise the sale of said property to Pham
22 Delaware Realty. The allegations contained in Count One are hereby incorporated herein as if fully set
23 forth in this count.

24 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
25 "B" felony, in violation NRS 205.0832; 205A.030.

26 **COUNT 11**
27 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
28 **Category "B" Felony - NRS 205.0832; 205A.030**

The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly

1 obtain property or services of another person by a material misrepresentation with intent to deprive that
2 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
3 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
4 in conjunction with any other component, device, equipment, system or network, is designed or has the
5 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
6 relay, record or reproduce any data, information, image, program, signal or sound in a technological
7 format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic,
8 magnetic or optical technology, to wit:

9 On or about September 28, 2015, Defendants knowingly obtained \$3,500 or more from Catherine
10 Wyngarden by personally, or through an agent acting at Defendants' direction, selling Wyngarden a home
11 located at 9816 Eagle Rock Court, Las Vegas, Nevada, by either personally or through an agent acting at
12 Defendants' direction, falsely representing to Wyngarden that, at the time of said sale, Defendants
13 possessed title to said property, which was free and clear of existing liens and all other security interests;
14 Defendants utilized a website to advertise the sale of said property to Wyngarden. The allegations
15 contained in Count One are hereby incorporated herein as if fully set forth in this count.

16 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
17 "B" felony, in violation NRS 205.0832; 205A.030.

18 **COUNT 12**
19 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
20 **Category "B" Felony - NRS 205.0832; 205A.030**

21 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and
22 JESSICA GARCIA, in the County of Clark, State of Nevada, did without lawful authority, knowingly
23 obtain property or services of another person by a material misrepresentation with intent to deprive that
24 person of the property or services, with the value of said property being \$3,500 or more, by way of acts
25 that involved, directly or indirectly, any component, device, equipment, system or network that, alone or
26 in conjunction with any other component, device, equipment, system or network, is designed or has the
27 capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive,
28 relay, record or reproduce any data, information, image, program, signal or sound in a technological

IN THE SUPREME COURT OF THE STATE OF NEVADA

JACK LEAL,

Appellant,

vs.

STATE OF NEVADA,

Respondent.

S. CT. CASE NO.: 74050
DIST. CT. CASE NO.: C322564

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**APPELLANT'S APPENDIX
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