

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

Electronically Filed  
Sep 10 2019 06:53 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

JACK LEAL,  
Appellant(s),

vs.

THE STATE OF NEVADA,  
Respondent(s),

Case No: C-17-322664-2

Docket No: 79243

**RECORD ON APPEAL  
VOLUME**

**1**

**ATTORNEY FOR APPELLANT**

JACK LEAL #1183500,  
PROPER PERSON  
P.O. BOX 208  
INDIAN SPRINGS, NV 89070

**ATTORNEY FOR RESPONDENT**

AARON D. FORD  
ATTORNEY GENERAL  
555 E. WASHINGTON AVE., STE. 3900  
LAS VEGAS, NV 89101

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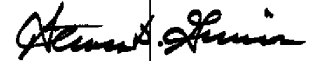
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CLERK OF THE COURT

**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

**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



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.:

Justice Court Case No.: 16F19220B

9  
10 **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]**  
committed in said Township and County, on March 01, 2015 .

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

21 Dated this 11th day of April, 2017

22 

23  
24 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  
9 (702) 486-3420 (phone)  
10 (702) 486-3768 (fax)  
11 MKovac@ag.nv.gov

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 **CRIMINAL COMPLAINT**

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

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  
CRM  
Criminal Complaint  
7327956





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.

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

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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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**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  
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**

29 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and  
30 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.

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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 7, the State of Nevada will seek forfeiture of property, namely \$90,300, 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 8**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 8, the State of Nevada will seek forfeiture of property, namely \$85,000, 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;

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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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 14**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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;

- 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 21<sup>st</sup> 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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**Justice Court, Las Vegas Township  
Clark County, Nevada**

Department: 07

**Court Minutes**



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*



1 **ACOM**  
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  
9 (702) 486-3420 (phone)  
10 (702) 486-3768 (fax)  
11 MKovac@ag.nv.gov

FILED IN OPEN  
COURT ON  
DEC 27 2016

*C. Meem*  
Court Clerk

7 Attorneys for the State of Nevada

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

10 STATE OF NEVADA, ) Case No. 16F19220A/B/C  
11 Plaintiff, ) Dept. No. 7  
12 v. )  
13 PARCELNOMICS, LLC (d/b/a )  
14 INVESTMENT DEALS); JACK LEAL; )  
15 and JESSICA GARCIA, )  
16 Defendant(s). )

17 **AMENDED CRIMINAL COMPLAINT**

18 ADAM PAUL LAXALT, Attorney General for the State of Nevada, complains and charges that:  
19 The above-named defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); JACK  
20 LEAL; and JESSICA GARCIA, have committed the following crimes: one count of RACKETEERING,  
21 a category "B" felony, in violation of NRS 207.400(1)(c); 12 counts of THEFT IN THE AMOUNT OF  
22 \$3,500 OR MORE, a technological crime under NRS 205A.030 and a category "B" felony, in violation  
23 of NRS 205.0832; and one count of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECET  
24 IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of NRS  
25 205.377.

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Amended Criminal Complaint  
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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, Lih-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:

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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.

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**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

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 by distinguishing characteristics and were not isolated incidents within 4 years and in which the aggregate  
19 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 Realty,  
24 Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson Gibellato by means of knowingly and  
25 falsely representing to said individuals that the titles to properties being sold to them by the defendants  
26 were not encumbered by liens or other security interests, intending that said individuals rely on said  
27 misrepresentations, and resulting in a loss of more than \$650.00. The allegations contained in counts one  
28 through 13 are hereby repeated and incorporated herein as if fully set forth in this count.

27 ///

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.

27 ///

28 ///





- 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.

27 ///

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 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;

- (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 12**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 12, the State of Nevada will seek forfeiture of property, namely \$25,000, 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 13**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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.

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

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

DATED this 20<sup>th</sup> day of December, 2016.

SUBMITTED BY

ADAM PAUL LAXALT  
Attorney General

By: Michael C. Kovac  
Michael C. Kovac (Bar. No. 11177)  
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**

Department: 07

**Court Minutes**



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**

Review Date: 3/8/2017

*Attorney General/clm via email*

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  
C. Mecca  
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


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


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.

OFFICE OF THE DISTRICT ATTORNEY

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

  
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



1 STATE OF NEVADA vs. JESSICA GARCIA Case No. 16F19220C

3 ORDER

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

8 Dated this 7th day of March, 2017.

14 *Karen Bennett Haron*

15 DISTRICT COURT JUDGE

16 Justice

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

# 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**

Department: 07

**Court Minutes**



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

**Las Vegas Justice Court: Department 07**

LVJC\_RW\_Criminal\_MinuteOrderByEventCode

4/11/2017 1:33 PM

**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

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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

JUSTICE COURT  
LAS VEGAS, NEVADA  
JSM

SUMMONS

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



Revised on December 10, 2012



CC: Attorney

Dated this 29th day of November, 2016

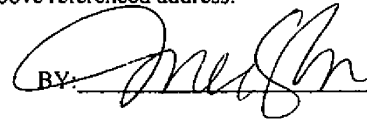


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KAREN BENNETT-HARON  
JUSTICE OF THE PEACE

**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 37

ADAM PAUL LAXALT  
*Attorney General*  
JUDICIAL 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](mailto:mlandreth@ag.nv.gov) and Julie Fox-McCullough, Supervising Legal Secretary, at [jfox@ag.nv.gov](mailto: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,

A handwritten signature in cursive script that reads "Marsha Landreth".

**Marsha Landreth**  
**Legal Secretary II**

JUSTICE COURT, LAS VEGAS TOWNSHIP  
CLARK COUNTY, NEVADA

\*\*\*

FILED

THE STATE OF NEVADA,  
Plaintiff  
VS  
JACK LEAL  
Defendant

CASE NO: 16F19220B  
DEPT NO: JC Department 7

2016 NOV 29 P 3:30

JUSTICE COURT  
LAS VEGAS, NEVADA, JSM

SUMMONS

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  
7383886

Summons JC7



Revised on December 10, 2012

CC: Attorney

Dated this 29th day of November, 2016



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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: \_\_\_\_\_



7



# 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/>

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DEC 19 10 28 AM '16

JUSTICE COURT  
LAS VEGAS NEVADA

## 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: <b>16F19220B</b>		DEFENDANT'S ID NUMBER	
DEFENDANT'S FIRST NAME <b>JACK</b>	MIDDLE INITIAL:	LAST NAME <b>LEAL</b>	

### ATTORNEY OF RECORD INFORMATION:

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

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

**E-Mail: [lvicounselconfirmation@clarkcountynv.gov](mailto:lvicounselconfirmation@clarkcountynv.gov)**

Alternative methods:

**Fax To: (702) 671-3183**

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

16F19220B  
ACOM  
Notice of Confirmation of Counsel  
7411813



*Alvin L. Lewis*  
CLERK OF THE COURT

**JUSTICE COURT, LAS VEGAS TOWNSHIP**  
CLARK COUNTY, NEVADA

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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  
9 (702) 486-3420 (phone)  
10 (702) 486-3768 (fax)  
11 MKovac@ag.nv.gov

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 **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.

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

29 The Defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS), JACK LEAL, and  
30 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.

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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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**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
- 7 at 1024 Santa Helena Avenue, Henderson, Nevada, up to the value of the property that is
- 8 unreachable.

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

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

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

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

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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 4, the State of Nevada will seek forfeiture of property, namely \$87,500, 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 5**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 5, the State of Nevada will seek forfeiture of property, namely \$57,000, 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 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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**CRIMINAL FORFEITURE ALLEGATION AS TO COUNT 7**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 7, the State of Nevada will seek forfeiture of property, namely \$90,300, 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 8**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 8, the State of Nevada will seek forfeiture of property, namely \$85,000, 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;

- 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.



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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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 14**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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;



- 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 21<sup>st</sup> 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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28

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

Department: 07

**Court Minutes**



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*

1 **ACOM**  
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  
9 (702) 486-3420 (phone)  
10 (702) 486-3768 (fax)  
11 MKovac@ag.nv.gov

FILED IN OPEN  
COURT ON  
DEC 27 2016

*C. Meem*  
Court Clerk

7 Attorneys for the State of Nevada

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

10 STATE OF NEVADA, ) Case No. 16F19220A/B/C  
11 Plaintiff, ) Dept. No. 7  
12 v. )  
13 PARCELNOMICS, LLC (d/b/a )  
14 INVESTMENT DEALS); JACK LEAL; )  
15 and JESSICA GARCIA, )  
16 Defendant(s). )

17 **AMENDED CRIMINAL COMPLAINT**

18 ADAM PAUL LAXALT, Attorney General for the State of Nevada, complains and charges that:  
19 The above-named defendant(s), PARCELNOMICS, LLC (d/b/a INVESTMENT DEALS); JACK  
20 LEAL; and JESSICA GARCIA, have committed the following crimes: one count of RACKETEERING,  
21 a category "B" felony, in violation of NRS 207.400(1)(c); 12 counts of THEFT IN THE AMOUNT OF  
22 \$3,500 OR MORE, a technological crime under NRS 205A.030 and a category "B" felony, in violation  
23 of NRS 205.0832; and one count of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECET  
24 IN COURSE OF ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of NRS  
25 205.377.

26 ///

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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, Lih-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:

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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.

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**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

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 by distinguishing characteristics and were not isolated incidents within 4 years and in which the aggregate  
19 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 Realty,  
24 Catherine Wyngarden, Shahram Bozorgnia, Tat Lam, and Adilson Gibellato by means of knowingly and  
25 falsely representing to said individuals that the titles to properties being sold to them by the defendants  
26 were not encumbered by liens or other security interests, intending that said individuals rely on said  
27 misrepresentations, and resulting in a loss of more than \$650.00. The allegations contained in counts one  
28 through 13 are hereby repeated and incorporated herein as if fully set forth in this count.

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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 4, the State of Nevada will seek forfeiture of property, namely \$37,000, 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 5**  
**NRS 179.1219(1)**

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 5, the State of Nevada will seek forfeiture of property, namely \$57,500, 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 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 (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.

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

The State of Nevada hereby gives notice to the defendants that, upon their conviction of the offense charged in Count 13, the State of Nevada will seek forfeiture of property, namely \$53,500, 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.

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

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

DATED this 20<sup>th</sup> day of December, 2016.

SUBMITTED BY

ADAM PAUL LAXALT  
Attorney General

By: Michael C. Kovac  
Michael C. Kovac (Bar. No. 11177)  
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**

Department: 07

**Court Minutes**



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**

Review Date: 3/8/2017

*Attorney General/clm via email*

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  
C. Mecca  
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

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

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   
26 JASON G. WEINER, ESQ.  
Nevada State Bar No. 7555  
27 2820 W. Charleston Blvd., Suite D35  
Las Vegas, Nevada 89102  
Attorney for the Defendant  
28 JESSICA GARCIA

OFFICE OF THE DISTRICT ATTORNEY  
  
  
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



1 STATE OF NEVADA vs. JESSICA GARCIA Case No. 16F19220C

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**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 Bennett Haron*

DISTRICT COURT JUDGE

*Justice*

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

# 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
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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**

Department: 07

**Court Minutes**



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

**Las Vegas Justice Court: Department 07**

LVJC\_RW\_Criminal\_MinuteOrderByEventCode

4/11/2017 1:33 PM



**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

JUSTICE COURT  
LAS VEGAS, NEVADA  
JSM

SUMMONS

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



Revised on December 10, 2012

CC: Attorney

Dated this 29th day of November, 2016

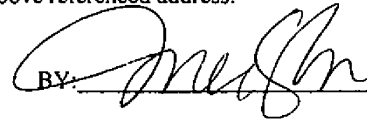


---

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 37

ADAM PAUL LAXALT  
*Attorney General*  
JUDICIAL 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](mailto:mlandreth@ag.nv.gov) and Julie Fox-McCullough, Supervising Legal Secretary, at [jfox@ag.nv.gov](mailto: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,

A handwritten signature in cursive script that reads "Marsha Landreth".

**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

JUSTICE COURT  
LAS VEGAS, NEVADA, <sup>JSM</sup>  
DEPUTY

SUMMONS

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  
7383886

Summons JC7



Revised on December 10, 2012

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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JUSTICE COURT  
LAS VEGAS NEVADA

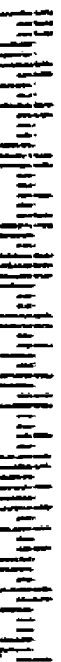
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# Las Vegas Justice Court

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

## 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: <b>16F19220B</b>		DEFENDANT'S ID NUMBER	
DEFENDANT'S FIRST NAME <b>JACK</b>	MIDDLE INITIAL:	LAST NAME <b>LEAL</b>	

### ATTORNEY OF RECORD INFORMATION:

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

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

**E-Mail: [lvicounselconfirmation@clarkcountynv.gov](mailto:lvicounselconfirmation@clarkcountynv.gov)**

Alternative methods:

**Fax To: (702) 671-3183**

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

16F19220B  
ACOM  
Notice of Confirmation of Counsel  
7411813



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  
7854926



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 UNCONDITIONAL WAIVER OF PRELIMINARY HEARING

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

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

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. #315  
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:

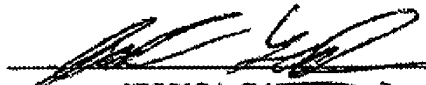
1. Preliminary Hearing before the Court;
2. Right to cross examine witnesses;
3. Right to compulsory service of process to subpoena witnesses on my behalf;
4. Right to testify or not testify on my behalf at a Preliminary Hearing;
5. That I have been offered no awards, immunities or promises, other than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

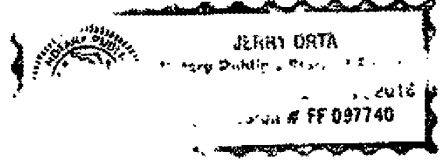
I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-10-2017  
(Date)

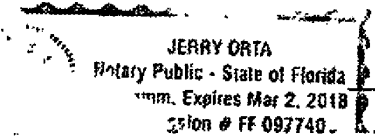
  
JESSICA GARCIA  
Jack Leal

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  
Commission # FF 097740

  
Notary Public

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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

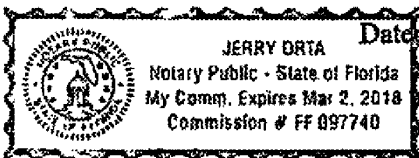
By: \_\_\_\_\_

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

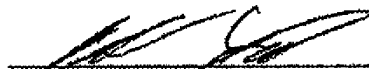
**CONFLICT-OF-INTEREST WAIVER**

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 10<sup>th</sup> 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:

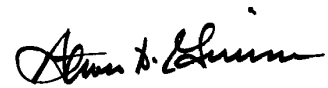
(1) The lawyer reasonably believes that the lawyer will be able to provide competent and diligent representation to each affected client;

(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



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 crime(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 Wyngarden, 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**.

25 ///

26 ///

27 ///

28 ///



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 18<sup>th</sup> day of April, 2017.

4  
5 SUBMITTED BY  
6 ADAM PAUL LAXALT  
7 Attorney General

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

**FILED IN OPEN COURT**  
STEVEN D. GRIERSON  
CLERK OF THE COURT

APR 24 2017

BY Kristen Brown  
KRISTEN BROWN, DEPUTY

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

11 STATE OF NEVADA,  
12  
13 Plaintiff,

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

13 v.

14 JACK LEAL,  
15  
16 Defendant.

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  
4643783



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- 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 24<sup>th</sup> day of April, 2017

15


16

17

  
JACK LEAL, Defendant

18 AGREED TO BY:

19

  
Michael C. Kovac  
Senior Deputy Attorney General

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**CERTIFICATE OF DEFENSE COUNSEL**

1  
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:

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

DATED this 27<sup>th</sup> day of April, 2017

  
JASON G. WEINER  
*Attorney for JACK LEAL*

# EXHIBIT 1

  
CLERK OF THE COURT

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

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

11  
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

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 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 18<sup>th</sup> day of April, 2017.

4 SUBMITTED BY

5 ADAM PAUL LAXALT  
6 Attorney General

7  
8 By: /s/ MICHAEL C. KOVAC  
9 Michael C. Kovac (Bar No. 11177)  
10 Senior Deputy Attorney General  
11 *Attorneys for the State of Nevada*  
12  
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### **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 20<sup>th</sup> 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



**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
156 - 166  
WILL FOLLOW VIA  
U.S. MAIL**



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,

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

11 Plaintiff,

Dept. No.: 17

12 vs.

13 JACK LEAL and JESSICA GARCIA,

14 Defendant.

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

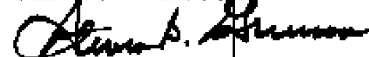
16 The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and  
17 through Senior Deputy Attorney General MICHAEL C. KOVAC, informs the Court, the Defendant,  
18 and counsel that the named victims in the above captioned matter, LoryLee Plancarte, Irene Segura, and  
19 Chatty 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





1 JOCP  
2  
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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

15 Defendant.

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 17<sup>th</sup> 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 Lih-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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22 MICHAEL VILLANI <sup>015</sup>  
23 DISTRICT COURT JUDGE  
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DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

STATE OF NEVADA

CASE NO.: C-17-322664-2

VS

DEPARTMENT 17

JACK LEAL

**CRIMINAL ORDER TO STATISTICALLY CLOSE CASE**

Upon review of this matter and good cause appearing,

IT IS HEREBY ORDERED that the Clerk of the Court is hereby directed to statistically close this case for the following reason:

**DISPOSITIONS:**

- Nolle Prosequi (before trial)
- Dismissed (after diversion)
- Dismissed (before trial)
- Guilty Plea with Sentence (before trial)
- Transferred (before/during trial)
- Bench (Non-Jury) Trial
  - Dismissed (during trial)
  - Acquittal
  - Guilty Plea with Sentence (during trial)
  - Conviction
- Jury Trial
  - Dismissed (during trial)
  - Acquittal
  - Guilty Plea with Sentence (during trial)
  - Conviction
- Other Manner of Disposition

DATED this 18th day of August, 2017.



MICHAEL VILLANI  
DISTRICT COURT JUDGE



CLERK OF THE COURT

SEP 05 2017

RECEIVED



1 **ORDR**  
2 JASON G. WEINER, ESQ.  
3 Nevada Bar No. 7555  
4 WEINER LAW GROUP, LLC.  
5 2820 W. Charleston Blvd., Suite 35  
6 Las Vegas, NV 89102  
7 Telephone: (702) 202-0500  
8 Facsimile: (702) 202-4999  
9 jweiner@weinerlawnevada.com  
10 Attorneys for Defendant

11 **DISTRICT COURT**  
12 **CLARK COUNTY, NEVADA**

13 STATE OF NEVADA, CASE NO. C-17-322664-2  
14 Plaintiffs, DEPT. NO. 17  
15 vs.

16 JACK LEAL,  
17 OFFENDER ID# 1183500  
18 Defendant.

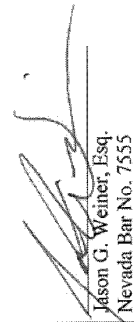
19 **ORDER**

20 **IT IS HEREBY ORDERED** that NEVADA DEPARTMENT OF CORRECTIONS, HIGH  
21 DESERT STATE PRISON shall either provide a Notary Public or allow a Notary Public to accompany  
22 Defendant's counsel for an in person visit with Defendant to notarize a Power of Attorney. The Power  
23 of Attorney is necessary to obtain necessary records for Defendant's defense. The State has been  
24 contacted and has no objection to said notarized documents being obtained.

25 DATED this 6 day of Sept, 2017.

26 Respectfully submitted:

27 WEINER LAW GROUP, LLC

  
Jason G. Weiner, Esq.  
Nevada Bar No. 7555

DISTRICT COURT JUDGE

RECEIVED BY  
DISTRICT CLERK  
SEP 11 2017

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

Search By Offender ID  
 Offender ID: 1183500  
 or  
 Search By Demographics  
 First Name: \_\_\_\_\_  
 Last Name: \_\_\_\_\_

Wildcard %  
 Wildcard %

**NOTICE:**

The information provided here represents raw data. As such, the Nevada Department of Corrections makes no warranty as to the accuracy of the information. The information should not be used as an official record by any law enforcement agency or any other entity.  
 Any questions regarding an inmate, please call Family Services at (775) 887-3387. Victims of inmate information please contact Victim Services at (775) 887-3389. For more information on how to request a law enforcement access to inmate information should be referred to PIO Brooke Forast, email: bkeast@nvcnv.gov or (775) 887-3309

Currently the following web browsers are supported for the Inmate Search: Internet Explorer 11, Chrome, Firefox and Opera. If you are unable to view inmate photos, please use a supported browser.

Download Offender Data  
 Demographic, Alias, Booking, Parole, Release

Up to date as of 2017-08-31

**Identification and Demographics**


Name	Offender ID	Gender	Ethnic	Age	Height	Weight	Build	Complexion	Hair	Eyes	Institution	Custody Level	Aliases	Prior Felonies
2008 1183500 0000	1183500	Male	Hispanic/Latino	37	5'10"	170lb	Thin	Fair	Black	Brown	State Prison	Level 1	None	None

Booking Information Unavailable

Inmate Photo Unavailable

Parole Hearing Details Unavailable





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, ) Case No.: C-17-322664-2  
11 vs. ) Dept. No: 17  
12 JACK LEAL; ) **NOTICE OF APPEAL**  
13 Appellant-Defendant. )

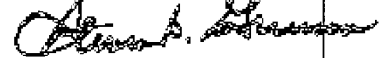
14  
15 Notice is hereby given that JACK LEAL, defendant above named, hereby appeals to the  
16 Supreme Court of Nevada from the final judgment entered in this action on the 23<sup>rd</sup> day of August  
17 2017.

18 DATED this 14<sup>th</sup> day of September 2017.

19  
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 **COM**  
2 MUELLER, HINDS & ASSOCIATES  
3 CRAIG A. MUELLER, ESQ.  
4 Nevada Bar No.4703  
5 600 S. Eighth Street  
6 Las Vegas, Nevada 89101  
7 (702) 382-1200  
8 Attorney for Appellant  
9 JACK LEAL

6 **DISTRICT COURT**  
7 **CLARK COUNTY, NEVADA**

8 THE STATE OF NEVADA,

9 Respondent-Plaintiff,

10 vs.

11 JACK LEAL,

12 Appellant-Defendant.

Case No. C-17-322664-2

Dept No. 17

13 **CERTIFICATE OF MAILING**

14 I do hereby certify that I am an employee of MUELLER, HINDS & ASSOCIATES and that  
15 on the 14<sup>th</sup> day of September 2017, I placed a true and correct copy of the Appellant-Defendant's  
16 NOTICE OF APEAL in the United States mail, First Class, Postage pre-paid, certified, return receipt  
17 requested, and addressed to the following:

18 Steve Wolfson, Esq.  
19 Clark County District Attorney  
20 200 Lewis Ave.  
21 Las Vegas, Nevada 89101

22 Adam Paul Laxalt, Esq.  
23 Attorney General  
24 555 E. Washington Ave., #3900  
25 Las Vegas, Nevada 89101

26   
27 An employee of  
28 MUELLER, HINDS & ASSOCIATES, CHTD.



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

DISTRICT COURT  
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

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 23<sup>rd</sup> day of August  
17 2017.

18 DATED this 14<sup>th</sup> 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

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**CERTIFICATE OF SERVICE**

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

Steve Wolfson, Esq.  
Clark County District Attorney  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89101

/s/ David Barragan  
Employee of  
MUELLER, HINDS & ASSOCIATES, CHTD.



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

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

9 THE STATE OF NEVADA ) Case No.: C-17-322664-2  
10 Respondent-Plaintiff, ) Dept. No: 17  
11 vs. ) **CASE APPEAL STATEMENT**  
12 JACK LEAL )  
13 Appellant-Defendant. )

14 Comes now, JACK LEAL, by and through his attorneys of the firm Mueller Hinds &  
15 Associates, Chtd., and hereby files this Case Appeal Statement.

16  
17 DATED this 3rd day of October 2017.

18  
19 MUELLER, HINDS & ASSOCIATES, CHTD.

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

- 1 1. Name of appellant filing this case appeal statement:  
2 Jack Leal
- 3 2. Identify the judge issuing the decision, judgment, or order appealed from:  
4 Hon. M. Villani
- 5 3. Identify each appellant and the name and address of counsel for each appellant:  
6 Jack Leal, Appellant  
7 Craig A. Mueller, Esq., Counsel for Appellant  
8 Mueller Hinds & Associates, CHTD  
9 600 S. Eighth St.  
10 Las Vegas, NV 89101
- 11 4. Identify each respondent and the name and address of appellate counsel, if known, for each  
12 respondent (if the name of a respondent's appellate counsel is unknown, indicate as much and  
13 provide the name and address of that respondent's trial counsel):  
14  
15 State of Nevada, Respondent  
16 Adam P. Laxalt, Esq.  
17 Michael C. Kovac, Esq.  
18 Office of the Attorney General  
19 555 E. Washington Ave, Suite 3900  
20 Las Vegas, NV 89101
- 21 5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed  
22 to practice law in Nevada and, if so, whether the district court granted that attorney permission to  
23 appear under SCR 42 (attach a copy of any district court order granting such permission):  
24 NA
- 25 6. Indicate whether appellant was represented by appointed or retained counsel in the district  
26 court:  
27 Appointed Counsel
- 28 7. Indicate whether appellant is represented by appointed or retained counsel on appeal:  
Retained Counsel

1 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date of  
2 entry of the district court order granting such leave:

3 NA

4 9. Indicate the date the proceedings commenced in the district court (e.g., date complaint,  
5 indictment, information, or petition was filed):

6 The Information was filed on April 18, 2017 in district court.

7 10. Provide a brief description of the nature of the action and result in the district court, including  
8 the type of judgment or order being appealed and the relief granted by the district court:

9 Appellant was convicted pursuant to a guilty plea agreement of Multiple Transactions  
10 Involving Fraud or Deceit in the Course of an Enterprise and Occupation under NRS 205.377.  
11 Appellant was sentenced to a maximum of 180 months with a minimum parole eligibility of 72  
12 months and \$757,420.00 in restitution. The Judgment of Conviction was entered on August 23,  
13 2017. The judgment of conviction and sentence are being appealed.

14 11. Indicate whether the case has previously been the subject of an appeal to or original writ  
15 proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the  
16 prior proceeding:

17 NA

18 12. Indicate whether this appeal involves child custody or visitation:

19 NA

20 13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

21 NA

22 Dated this 3<sup>rd</sup> day of October, 2017. MUELLER, HINDS & ASSOCIATES, CHTD.

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



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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of October 2017, I served a true and correct copy of this Case Appeal Statement via the Odyssey/Wiznet service list to:

State of Nevada, Respondent  
Adam P. Laxalt, Esq.  
Michael C. Kovac, Esq.  
Office of the Attorney General  
555 E. Washington Ave, Suite 3900  
Las Vegas, NV 89101  
wiznetfilings@ag.nv.gov

/s/ Giselle D. Villa  
Employee of Mueller Hinds & Associates, Chtd.



1 I recognize that I must personally serve a copy of this form on the above named  
2 court reporter and opposing counsel, and that the above named court reporter shall  
3 have ten (10) days from the receipt of this notice to prepare and submit to the  
4 district court the rough draft transcript requested herein.  
5  
6

7 Dated this 10 day of October, 2017.  
8

9 MUELLER, HINDS & ASSOCIATES.

10   
11  
12

13 CRAIG A. MUELLER, ESQ.  
14 Nevada Bar No. 4703  
15 600 S. Eighth Street  
16 Las Vegas, Nevada 89101  
17 (702) 382-1200  
18 Attorney for Petitioner  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10th day of October, 2017, I deposited a true and correct copy of the Request for Transcript of Proceedings, U.S. Mail, and postage fully pre-paid to the following:

State of Nevada, Respondent  
Adam P. Laxalt, Esq.  
Michael C. Kovac, Esq.  
Office of the Attorney General  
555 E. Washington Ave, Suite 3900  
Las Vegas, NV 89101  
[wiznetfilings@ag.nv.gov](mailto:wiznetfilings@ag.nv.gov)

Cynthia Georgilas  
Eighth Judicial District Court, Department 17  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101  
F: (702) 382-5178

/s/ Giselle D. Villa  
An employee of Mueller Hinds & Associates, Chtd.



1 **RTRAN**

2

3

4

DISTRICT COURT  
CLARK COUNTY, NEVADA

5

6

7 THE STATE OF NEVADA,

8

Plaintiff,

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

9

vs.

10

JACK LEAL, and JESSICA GARCIA

DEPT. XVII

11

Defendant.

**TRANSCRIPT OF PROCEEDINGS**

12

13

14

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

15

16

**SENTENCING (BOTH)**

17

18

**APPEARANCES:**

19

For the State:

MICHAEL C. KOVAC, ESQ.  
Senior Deputy Attorney General

20

21

For the Defendant:

JASON G. WEINER, ESQ.

22

Victim Impact Speakers:

IRENE SEGURA  
LUIS PALAFOX  
LORYLEE PLANCARTE

23

24

25

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 11<sup>th</sup>. 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.

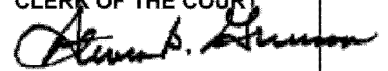
19 [Colloquy between Court and clerk]

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



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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

9

Plaintiff,

) DEPT. XVII

10

vs.

) (ARRAIGNMENT HELD IN DEPT. LLA)

11

JACK LEAL,

12

13

Defendant.

14

BEFORE THE HONORABLE JENNIFER L. HENRY, HEARING MASTER

15

THURSDAY, APRIL 20, 2017

16

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

17

18

APPEARANCES:

19

20

For the State:

MICHAEL KOVAC, ESQ.,

Senior Deputy Attorney General

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For the Defendant:

JASON WEINER, ESQ.,

Attorney at Law

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RECORDED BY: KIARA SCHMIDT, COURT RECORDER

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THURSDAY, APRIL 20, 2017

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P R O C E E D I N G S

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

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

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

THE COURT: Thank you.

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

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

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

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

THE DEFENDANT: Yes.

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

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

THE COURT: You said you wanted a one o'clock 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 24<sup>th</sup>, 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.

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Kiara Schmidt, Court Recorder/Transcriber

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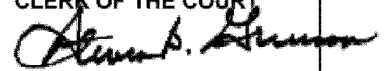
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DISTRICT COURT

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CLARK COUNTY, NEVADA

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THE STATE OF NEVADA,

) CASE NO. C-17-322664-2

9

Plaintiff,

) DEPT. XVII

10

vs.

) (ARRAIGNMENT HELD IN DEPT. LLA)

11

JACK LEAL,

12

13

Defendant.

14

BEFORE THE HONORABLE JENNIFER L. HENRY, HEARING MASTER

15

MONDAY, APRIL 24, 2017

16

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

17

18

APPEARANCES:

19

20

For the State:

MICHAEL KOVAC, ESQ.,

Senior Deputy Attorney General

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For the Defendant:

JASON WEINER, ESQ.,

Attorney at Law

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RECORDED BY: KIARA SCHMIDT, COURT RECORDER

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MONDAY, APRIL 24, 2017

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P R O C E E D I N G S

THE CLERK: Jack Leal, C322664-2.

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

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

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

THE COURT: Thank you.

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

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

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

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 1<sup>st</sup> of the year 2015 and March the 31<sup>st</sup> 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 1<sup>st</sup> of 2015 and March the 31<sup>st</sup> 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, Lih-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 15<sup>th</sup>, 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 15<sup>th</sup> you want the 17<sup>th</sup> 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 17<sup>th</sup>, 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



1 Craig A. Mueller, Esq.  
Nevada Bar No. 4703  
2 Lester M. Paredes III, Esq.  
Nevada Bar No. 11236  
3 **MUELLER HINDS & ASSOOCIATES, CHTD.**  
4 600 S. Eighth St.  
Las Vegas, NV 89101  
5 (702) 940-1234  
6 *Attorneys for JACK LEAL*

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

9 STATE OF NEVADA, )  
 )  
10 Plaintiff, )  
 ) CASE NO.: C-17-322664-2  
11 -vs- )  
 ) DEPT NO: XVII  
12 JACK LEAL, )  
13 )  
14 Defendant. )

15 **APPLICATION FOR BAIL PENDING APPEAL**

16 Defendant, JACK LEAL, by and through the law firm of MUELLER, HINDS &  
17 ASSOC., CHTD., hereby applies to the District Court for bail pending appeal of his conviction  
18 and sentence based on the fact that Defendant is not a flight risk, is not a danger to the  
19 community, and the appeal in this matter is meritorious. NRS 178.488 grants that "Bail may be  
20 allowed pending appeal unless it appears that the appeal is frivolous or taken for delay." NRS  
21 178.488(1) (2015).

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**NOTICE OF MOTION**

TO: CLARK COUNTY DISTRICT ATTORNEY

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing APPLICATION FOR BAIL PENDING REVIEW for hearing before the District Court Dept. XVII on the **26** day of **APRIL** 2018, at **8:30 a**.m.

DATED: April 13, 2018

Respectfully Submitted By:

MUELLER HINDS & ASSOCIATES



---

Craig A. Mueller, Esq.  
NV Bar No. 4703  
Attorney for Defendant

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 NRS 178.488 (1) provides: "Bail may be allowed pending appeal or certiorari unless it  
3 appears that the appeal is frivolous or taken for delay." See NRS 178.488(1) (2015). Under  
4 Bergna v. State, 120 Nev. 869, 874 (2004), the Nevada Supreme Court recommended  
5 considering whether the appeal was taken frivolously, taken for delay, the applicant's danger to  
6 the community and flight risk, seriousness or violence of the crime, term of imprisonment, etc.  
7 Id. at 874, 877.

8 Defendant is asking this court to admit him to bail based on the following information  
9 and legitimate questions raised by Defendant's appeal.

10 **I. FACTS AND PROCEDURAL HISTORY**

11 Applicant made a huge mistake and took responsibility for selling the properties,  
12 but added that he "didn't explain it correctly, I guess, what we were selling. We did transfer title  
13 to them. We did sell them the properties. It wasn't as if we just took their money and ran and -."  
14 Applicant essentially sold the properties as is and did not tell them that they were encumbered, as  
15 opposed to misrepresenting them as unencumbered.

16 The first Criminal Complaint was filed Sep. 30, 2016, alleging fourteen counts of  
17 criminal conduct ranging from theft to racketeering, and 14 courts of criminal forfeiture.  
18 Applicant waived his right to a preliminary hearing on April 11, 2017, an Information was filed  
19 on April 18, 2017, charging one count of Multiple Transactions Involving Fraud or Deceit in  
20 Course of Enterprise or Occupation, NRS 205.377, and filed a GPA on April 24, 2017.

21 The GPA set forth eleven victims that were owed restitution totaling \$694,420,  
22 excluding anything already recovered which would be forfeited to the State. Applicant was  
23 required to pay restitution in full prior to sentencing, jointly and severally with codefendant  
24 Jessica Garcia. The State would not oppose probation and a suspended sentence of 36 to 90  
25 months in prison if the restitution was paid, but would regain the right to argue if not. The

1 \$157,105.17 the State seized was to be applied to the restitution balance. Applicant also agreed  
2 to execute and file a lien in favor of the State of Nevada, Office of the Attorney General in the  
3 amount of \$600,314.83 against the home located at 1024 Santa Helena Ave., Henderson, NV  
4 89002, with the proceeds of the sale to be applied against the restitution requirements.

5 The GPA signed by Applicant purported to waive the right to appeal except based  
6 on “reasonable constitutional, jurisdictional or other grounds that challenge the legality of the  
7 proceedings and except as otherwise provided in subsection 3 of NRS 174.035.” Attached to the  
8 GPA was a Conflict-of-Interest Waiver, signed by Applicant and his attorney and a copy of  
9 “Rule 1.7. Conflict of Interest: Current Clients.”

10 **a. Sentencing Hearing**

11 At the first setting for the sentencing hearing on August 17, 2017 the State argued  
12 to the court for a sentence of imprisonment of 60 to 180 months in prison. The facts according to  
13 the State was that Applicant and his codefendant bought encumbered properties and then  
14 fraudulently sold them to the victims by misrepresenting them as unencumbered. The State also  
15 argued that Applicant had done nothing until a week before sentencing and that the property is  
16 valued at \$580,000 but on the market for 1.2 million dollars. (See AA at 120-121.)

17 **i. Conflict of Interest**

18 At the beginning of the sentencing hearing, Mr. Weiner, then-attorney for  
19 Applicant and his codefendant Jessica Garcia, raised a conflict of interest issue at a bench  
20 conference and on the record:

21 The – well, as an initial matter, Your Honor, just to address what we discussed at  
22 the bench, the ongoing conflict waivers – the dispute between [the codefendants]  
23 began after the change of plea but before sentencing. If you want to put on the  
24 record, I contacted the bar ethics hotline. They recommended that I withdraw  
25 based on what’s going on here. I did. I will make that motion. I do undersand that  
the Court’s going to insist that we go forward today and that’s certainly the  
Court’s right to do but –

1 The Court: Well, is the conflict the fact that your client thought that Ms. Garcia  
was going to pay this off? Is that the conflict?

2 Mr. Wiener: Well, no, it wasn't that they were paying it off. They were supposed  
3 to be working together. Then they had a no contact order so they couldn't. So  
4 they're now basically pointing at each other saying this is – she's saying this is his  
5 fault, he's saying that's her fault. That's an antagonistic defense. I mean I should  
6 not be –

7 The Court: Well, it's – that related – it's not a defense to the case –

8 Mr. Weiner: Well—

9 The Court: - because if it says why –

10 Mr. Weiner: - in terms of sentencing.

11 The Court: -- restitution wasn't paid and this is joint and several which means if  
12 one –

13 Mr. Weiner: Correct.

14 The Court: doesn't pay the other owes the full amount. ...

15 (AA at 124-1125.)

16 **b. Applicant's Good Faith Efforts to Pay Restitution**

17 With respect to Applicant's good faith efforts to pay restitution, there was no  
18 dispute that Applicant had recorded a lien in the State's favor for over \$600,000. (AA at 121.)  
19 Applicant had relied on his codefendant to work on selling the property at first, but had since  
20 intervened, the home was valued by the assessor at over one-million dollars. (*Id.*) Further,  
21 codefendant Jessica Garcia was subject to a domestic violence no contact order with respect to  
22 Applicant and that was the cause for the delay. (AA at 121-122, 124.) Applicant had even  
23 presented the State with a letter from the real estate agent showing that the property had been  
24 actively marketed. (AA at 126.)

25 **c. Victim Impact Statements and Court's Reaction**

The victim impact statements were powerful and moving given the absence of the  
restitution. For example, Irene Segura testified that the money taken was for her orphaned  
grandson's college fund. (AA at 128.) Ms. Segura explained to the court that twelve years ago  
she gave a victim impact statement at the sentencing of the murderers of her son and the father of  
her grandson. (AA at 128.) The money was saved for her grandson's college fund because she

1 “scrimped and saved and cut back on every possible expense” she could think of including  
2 dining out, vacations and getting a new car. (AA at 129.)

3 It is apparent from the transcript that the Court became angry with Applicant. The  
4 court informed a representative from the Department of Parole and Probation, “P &P,” that the  
5 program they use to make recommendation was “broken,” that Applicant had time to sell the  
6 house but they “stabbed [the victims] in the back and I’m not standing for it.” (AA at 137-138.)  
7 The court then pronounced the sentence against codefendant Garcia for whom he issued a no bail  
8 bench warrant for failing to appear, “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 me she’s not  
10 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 to 1 so  
13 I mean you should be commended because you did a good job for them but these  
14 people need to pay the price.

(AA at 138-139.)

15 The Court entered a Judgment of Conviction, AA at 140-141, sentencing Applicant to 72-  
16 180 months in prison with zero days credit for time served. (AA at 141.) This appeal follows.

## 17 **II. ARGUMENT**

### 18 **a. Applicant is a Good Candidate for Supervised Release**

19 If permitted by the Court, Applicant would testify that he moved to Clark County in 2013  
20 and has lived here since. Applicant has been in real estate since 2009 and completed 350 real  
21 estate transactions without problems before these types of caveat emptor transactions. Admission  
22 to bail would also help Applicant pay restitution. Finally, Applicant is not a threat to the  
23 community or flight risk or the State would have never conditionally agreed to probation for  
24 Applicant. If the Court desires to inquire further, Applicant welcomes the opportunity to prove  
25 his bail worthiness. Therefore, the Court should admit Applicant to bail.

1           **b. Applicant's Appeal is not Frivolous**

2                   **i. The District Court Erred by Sentencing Applicant to Prison without**  
3                   **Holding a Hearing Under Gamble v. State, 95 Nev. 904 (1979)**

4           The first issue Applicant raised in his appeal was that Applicant had the right to show the  
5           Court he was not at fault for the purported breach of the guilty plea agreement under Gamble v.  
6           State, 95 Nev. 904 (1979).

7           The State and Applicant entered into an agreement which contained the following  
8           clauses:

9           6.       Should I, Jack Leal, pay restitution in full at or before the time I am sentenced in  
10           the present case, the State will not oppose the imposition of a term or probation not to  
11           exceed a term of five years, with a suspended 36-to-90 month term of imprisonment;

12           7.       Should I, Jack Leal, fail to pay restitution in full at or before the time I am  
13           sentenced in the present case, the State will retain the right to argue for the imposition of  
14           imprisonment.

15           (AA at 89:18-22.)

16           At the first sentencing hearing, the State argued for imprisonment, falsely accusing  
17           Applicant of doing nothing to pay the restitution when in fact Applicant had been trying to sell a  
18           piece of property that the State had already tied up the property in civil litigation. See supra.

19           This Court held in Gamble v. State, 95 Nev. 905 (1979) and Villalpando v. State, 107  
20           Nev. 465 (1991), held that an evidentiary hearing is required where the State alleges a defendant  
21           breached the agreement unless the defendant is "obviously to blame" for the breach of the  
22           agreement. See Sparks v. State, 121 Nev. 107, 111 (2005) (citations omitted). "When the State  
23           enters into a plea agreement, it is held to the most meticulous standards of both promise and  
24           performance with respect to both the terms and the spirit of the plea bargain." See Sparks v.  
25           State, 121 Nev. 107, 110 (2005) (citations omitted).

          In Sparks, the defendant entered into a guilty plea agreement that gave the State the full  
right to argue if he either committed a new criminal offense or failed to appear at his sentencing

1 hearing. Id. The defendant in Sparks did not offer a reason for the apparent breach of the  
2 agreement, instead argued that the clause was unenforceable; the Supreme Court of Nevada  
3 disagreed and affirmed the judgment of conviction.

4 Here and unlike in Sparks, Applicant made good faith efforts to pay the restitution before  
5 the imposition of sentence, gave reasons why the sale of the property had not been completed to  
6 that end and rebutted the State's claim that Applicant was not asking a good faith asking price  
7 for the home valued at seven figures. (See, generally, AA at 118-139.) Applicant complied with  
8 all the terms as best as he could and was hindered by his co-defendant and the actions of the  
9 State, i.e., requiring the placement of the lien on the property and the initiation of the lawsuit.  
10 (Id.)

11 The State's actions in this case are particularly troubling. To both require the sale of a  
12 property to pay restitution and at the same time require that a lien be placed on the same property  
13 is akin to requiring a defendant to appear at a sentencing hearing while blockading them in their  
14 home.

15 The case should be remanded for an evidentiary hearing to determine whether Applicant  
16 is to blame for the failure to pay the restitution and whether that constitutes a material breach.  
17 The State could have given Applicant more time, removed the lien or offered to allow Applicant  
18 to transfer title under the civil case that the State had started and noticed a lis pendens. Instead,  
19 the State misrepresented to the court the reasons for failing to pay the restitution and insisted on  
20 imposing a prison sentence. (Compare AA at 121 ("And the house is on the market. It's valued  
21 about [sic] \$580,000. That's what the last recorder entry notes and they have it on the market for  
22 1.2 million dollars. Now they dropped it to one million dollars. There's no real effort to make  
23 restitution in this case."), and AA at 122 ("Defense counsel sent me the title assessment just  
24 yesterday and it shows a bunch of liens on this property."), with AA at 125 ("We have a print out  
25 from the Clark County Assessor's website for the 2017-2018 year that values the property at



1 \$1,032,044.00), and AA at 122 (“There’s two Republic garbage -- Republic Waste  
2 [indiscernable] for \$256.00 each. I have a copy of it right here from Fidelity Title.”) The lower  
3 court, perhaps blinded by its anger, (see AA at 139 “I’m not mad --... at you Counsel. You did  
4 your job. ... These people need to pay the price.”), did not meticulously hold the State to its end  
5 of the bargain and require them to make a showing that Applicant’s good faith efforts were  
6 insufficient under the letter or spirit of the guilty plea agreement.

7 **ii. The District Court Erred by Denying Motion to Withdraw Counsel with**  
8 **an Unwaivable Conflict under Clark v. State, 108 Nev. 324 (1992)**

9 Counsel for Applicant moved the court to withdraw based on a conflict of interest at the  
10 sentencing hearing. (AA at 124.) At the time, counsel for Applicant was also counsel for his  
11 codefendant. (Id.) Given that Applicant and his codefendant were accused as coconspirators in a  
12 fraudulent scheme, it is not apparent how such a conflict could have been waived in the first  
13 place, much less at sentencing after Applicant’s codefendant failed to cooperate to pay the  
14 restitution and had a been involved in a domestic violence incident with Applicant.

15 Nevada Rules of Professional Conduct, Rule 1.7, provides:

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

- 18 (1) The representation of one client will be directly adverse to another client; or  
19 (2) There is a significant risk that the representation of one or more clients will be  
20 materially limited by the lawyer’s responsibilities to another client, a former client or a  
21 third person or by a personal interest of the lawyer.

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

- 21 (1) The lawyer reasonably believes that the lawyer will be able to provide competent  
22 and diligent representation to each affected client;  
23 (2) The representation is not prohibited by law;  
24 (3) The representation does not involve the assertion of a claim by one client against  
25 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.

1  
2 NRPC 1.7 (2006).

3       Here, under NRPC 1.7(a), the conflict of interest clearly existed prior to and through  
4 sentencing. The concurrent conflict of interest existed from the inception of the case because  
5 there was a “significant risk the representation” of Applicant would be materially limited by the  
6 lawyer’s responsibilities to Applicant’s codefendant, i.e., Applicant and Applicant’s codefendant  
7 could at trial point the finger at the other as to who misrepresented unencumbered status of the  
8 properties that were sold.

9       Whether the waiver was proper prior to sentencing turns on the actual defenses of the  
10 parties, but by the time Applicant was sentenced, the conflict had ripened into an unwaivable  
11 conflict under NRPC 1.7(b)(3). At sentencing, Applicant and his codefendant had been required  
12 to pay restitution, but it was not paid due to Applicant’s codefendant’s malfeasance and domestic  
13 violence restraining order against her. In order to explain why he could not pay restitution,  
14 Applicant needed zealous counsel to point out that the failure was due to circumstances outside  
15 of his control including the actions of his codefendant. However, he did not have unconflicted  
16 counsel and zealous representation.

17       At sentencing, counsel for Applicant and his codefendant, was in an awkward place. He  
18 could not throw Applicant’s codefendant under the proverbial bus by, for instance, showing the  
19 court evidence of that codefendant’s domestic violence against Applicant. Counsel was told by  
20 bar counsel to move to withdraw but the court ignored the mandate of bar counsel and  
21 substituted its own flawed judgment for that of experienced ethics professionals. This was an  
22 abuse of discretion. See Wilmes v. Reno Mun. Ct., 59 P.3d 1197, 118 Nev. 831 (2002) (district  
23 attorney representing municipal court in mandamus action not an abuse of discretion).

24       Every defendant has the constitutional right to assistance of counsel unhindered by  
25 conflicting interests. U.S. Const. Amend. VI; Holloway v. Arkansas, 435 U.S. 475, 98 S.Ct. 1173

1 (1978); Clark v. State, 108 Nev. 324, 326 (1992). In Clark, the Court found that where an actual  
2 conflict of interest which adversely affects a lawyer's performance will result in a presumption  
3 of prejudice to the defendant. Id. (citations omitted). The Clark, the court found that the lower  
4 court erred by requiring the Applicant to show he was prejudiced by his lawyer's conflict of  
5 interest.

6 **III. CONCLUSION**

7 For the foregoing reasons, Applicant should be admitted to a reasonable bail pending  
8 appeal.

9  
10 DATED: April 13, 2018

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Craig A. Mueller, Esq.  
15 NV Bar No. 4703  
16 Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 13th day of April, 2018 I served a true and correct copy of the foregoing APPLICATION FOR BAIL PENDING APPEAL, upon each of the parties by electronic service through Wiznet, the Eighth Judicial District Court's e-filing/e-service system, pursuant to N.E.F.C.R.9; and by depositing a copy of the same in a sealed envelope in the United States mail, Postage Pre-Paid, addressed as follows:

State of Nevada, Respondent  
Adam P. Laxalt, Esq.  
Michael C. Kovac, Esq.  
Office of the Attorney General  
555 E. Washington Ave, Suite 3900  
Las Vegas, NV 89101  
wiznetfilings@ag.nv.gov

/s/ Giselle D. Villa  
Employee of Mueller Hinds & Associates, Chtd.

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**EXHIBIT A**

**Appellant's Appendix**

**EXHIBIT A**



1 Craig A. Mueller, Esq.  
Nevada Bar No. 4703  
2 Lester M. Paredes III, Esq.  
Nevada Bar No. 11236  
3 **MUELLER HINDS & ASSOCIATES, CHTD.**  
4 600 S. Eighth St.  
Las Vegas, NV 89101  
5 (702) 940-1234  
6 *Attorneys for JACK LEAL*

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

9 STATE OF NEVADA, )  
 )  
10 Plaintiff, )  
 )  
11 -vs- )  
 )  
12 JACK LEAL, )  
 )  
13 Defendant. )  
14 )

CASE NO.: C-17-322664-2  
DEPT NO: XVII

15 **APPLICATION FOR BAIL PENDING APPEAL**

16 **Exhibit A**

17 **Appendix Part 1**

18  
19  
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DISTRICT COURT CIVIL COVER SHEET

County, Nevada

X I

Case No.

(Assigned by Clerk's Office)

<b>I. Party Information</b> (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
<small>1200 NORTH HELENA AVENUE, HENDERSON, NEVADA 89011, MORE PARTICULARLY DESCRIBED AS FOLLOWS LOT 330 OF AMENDED MERRICK HILLS ESTATE, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 17 OF PLATS, PAGE</small>	
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):

<b>II. Nature of Controversy</b> (please select the one most applicable filing type below)		
<b>Civil Case Filing Types</b>		
<b>Real Property</b> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<b>Negligence</b> <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <b>Malpractice</b> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<b>Torts</b> <b>Other Torts</b> <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
<b>Probate</b> <b>Probate</b> (select case type and estate value) <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 <b>Estate Value</b> <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	<b>Construction Defect &amp; Contract</b> <b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <b>Contract Case</b> <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	<b>Judicial Review/Appeal</b> <b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
<b>Civil Writ</b> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrantum <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	<b>Other Civil Filing</b> <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.

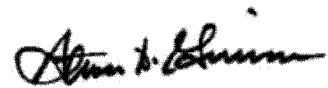
09/29/16

Date

*Michael Kovac*

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

1 **COMP**  
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 Nevada 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](mailto: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,

Case No.: A-16-744347-C

Dept. No.: XI

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  
20 OF CLARK COUNTY, NEVADA,  
21 TOGETHER WITH A PORTION OF  
22 VACATED ROAD KNOWN AS LOT 223-A  
23 AND APPURTENANCES THEREON; APN:  
24 179-33-710-056,

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

20 Defendant(s).

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:

26 ///

27 ///

28 ///



I.

**PARTIES AND JURISDICTION**

1  
2  
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

**PLEADING  
CONTINUES  
IN NEXT  
VOLUME**