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3	Assistant Chief Deputy Attorney General	
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7	555 E. Washington Avenue, #3900 Las Vegas, Nevada 89101	
8	Attorneys for Plaintiff, State of Nevada	
9	DIS	TRICT COURT
10	CLARK	COUNTY, NEVADA
10	STATE OF NEVADA,	
	Plaintiff,	CASE NO. :
12	VS.	DEPT. NO.:
13	GARY TRAFFORD,	
14	GERRI SHEPPARD	
15	DEFENDANTS	
16	/	NDICTMENT
17	<u> </u>	

The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and through her Deputies, JOHN P. KELLEHER, Chief Deputy Attorney General and ROBERT G. GIUNTA, Senior Deputy Attorney General, under penalty of perjury, and within their knowledge, information and belief, complain and charge that the above named Defendants, **GARY TRAFFORD**, (hereinafter "**TRAFFORD**") has committed the offenses of One Hundred Two (102) Counts of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC, (AID AND ABET)**, a gross misdemeanor in violation of NRS 240.155; One Hundred Two (102) Counts of **OFFERING FALSE INSTRUMENTS FOR FILING OR RECORDING**; a category C felony in violation of NRS 239.330; and One Hundred Two (102) Counts of **FALSE CERTIFICATION ON CERTAIN INSTRUMENTS (AID and ABET)**; a category D felony in violation of NRS 205.120; and **GERRI SHEPPARD** (hereinafter "**SHEPPARD**") has committed the offenses of One Hundred (100) Counts of **NOTARIZATION** 

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OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC, (AID AND 1 ABET), a gross misdemeanor in violation of NRS 240.155: One Hundred (100) Counts of 2 OFFERING FALSE INSTRUMENTS FOR FILING OR RECORDING; a category C felony in 3 violation of NRS 239.330; and One Hundred (100) Counts of FALSE CERTIFICATION ON 4 **CERTAIN INSTRUMENTS (AID and ABET)**; a category D felony in violation of NRS 205.120. 5 Said aforementioned crimes constitute **TECHNOLOGICAL CRIMES** as defined in NRS 6 7 205A.030 and property which was derived from, realized through, or used or intended for use in the course of a technological crime is subject to forfeiture pursuant to NRS 179.1219. 8 Said aforementioned crimes have been committed within Clark County, State of 9 Nevada in the following manner: 10

# COUNT 1

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 25, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 25, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003798 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 25, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

### COUNT 2

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING Felony NRS 239.330

On or about September 25, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 25, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003798 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 25, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 3

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) Felony NRS 205.120

On or about September 25, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify

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falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about September 25, 2008, Defendant TRAFFORD planned, directed, and
arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed
by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an
instrument, to forge and willfully certify falsely that the execution of this instrument was
acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND
ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003798 of Official Records
filed in the Office of the County Recorder of Clark County, Nevada dated September 25, 2008.

These actions were performed in a secretive manner in order that the false documents
be given full legal effect and that this criminal activity not be discovered. This activity was
discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 4

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about December 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about December 7, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004388 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 7, 2005, when Defendant **SHEPPARD** was not in Defendant's

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presence and further never signed said document. These actions were performed in a 1 secretive manner in order that the false documents be given full legal effect and that this 2 criminal activity not be discovered. This activity was discovered on or about December of 3 2010 4

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

# COUNT 5

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about December 7, 2005, Defendant SHEPPARD, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

14 On or about December 7, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004388 of Official Records with the Office of the County Recorder of Clark County, Nevada 18 dated December 7, 2005. Said document was forged in that it purported to be signed by 19 Defendant **SHEPPARD** as the agent for the beneficiary of the property listed in said 20 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 22 order that the false documents be given full legal effect and that this criminal activity not be 23 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

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# <u>COUNT 6</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 7, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about December 7, 2005, Defendant **SHEPPARD** planned, directed, and arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004388 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 7

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 4, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit; ///

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On or about February 4, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have MEGHAN BLOECKER, (hereinafter 2 3 "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0001816 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated February 4, 2005, when Defendant **SHEPPARD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# <u>COUNT 8</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 7, 2005 Defendant **SHEPPARD**, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

21 On or about February 7, 2005, Defendant SHEPPARD, within Clark County, State of 22 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 23 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 24 0001816 of Official Records with the Office of the County Recorder of Clark County, Nevada 25 dated February 7, 2005. Said document was forged in that it purported to be signed by 26 Defendant **SHEPPARD** as the agent for the beneficiary of the property listed in said 27 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 28 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 9</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) Felony NRS 205.120

On or about February 4, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 4, 2005, Defendant **SHEPPARD** planned, directed, and arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001816 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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2	COUNT 10		
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET)		
	GROSS MISDEMEANOR NRS 240.155(2)		
4	On or about February 8, 2005, Defendant SHEPPARD, within Clark County, State of		
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,		
6	when said person whose signature was being notarizing was not in the notary's presence, to		
7	wit;		
8	On or about February 8, 2005, Defendant SHEPPARD within Clark County, State of		
9	Nevada, planned, directed, or arranged to have MEGHAN BLOECKER, (hereinafter		
10	"BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to		
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a		
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.		
13	0002553 of Official Records filed in the Office of the County Recorder of Clark County,		
14	Nevada dated February 8, 2005, when Defendant SHEPPARD was not in Defendant's		
15	presence and further never signed said document. These actions were performed in a		
16	secretive manner in order that the false documents be given full legal effect and that this		
17	criminal activity not be discovered. This activity was discovered on or about December of		
18	2010		
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON		
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.		
21	COUNT 11		
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING		
23	<u>(AID &amp;ABET)</u> Felony NRS 239.330		
24	On or about February 8, 2005, Defendant SHEPPARD, in the County of Clark, State of		
25	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public		
26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered		
27	or recorded in a public office under the law of the State of Nevada, to wit:		
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On or about February 8, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002553 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated February 8, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD** as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 12**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 8, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 8, 2005, Defendant **SHEPPARD** planned, directed, and arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002553 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 8, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 13**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 29, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 29, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003615 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 29, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

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

# <u>COUNT 14</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 29, 2005 Defendant **SHEPPARD**, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 29, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003615 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 29, 2005. Said document was forged in that it purported to be signed by 7 Defendant **SHEPPARD** as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of **NRS 239.330**, a category C felony.

# COUNT 15

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 29, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 29, 2005, Defendant **SHEPPARD** planned, directed, and arranged to have MEGHAN BLOECKER, (hereinafter "BLOECKER"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003615 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 29,2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 16</u>

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 9, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about July 9, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004247 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 9, 2007 when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.
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1	<u>COUNT 17</u>	
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING	
3	(AID &ABET) Felony NRS 239.330	
4	On or about July 9, 2007, Defendant TRAFFORD did, in the County of Clark, State of	
5	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public	
6	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered	
7	or recorded in a public office under the law of the State of Nevada, to wit:	
8	On or about July 9, 2007, Defendant TRAFFORD, within Clark County, State of	
9	Nevada, either directly or through an agent or employee, caused to be offered for filing, a	
10	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.	
11	0004247 of Official Records with the Office of the County Recorder of Clark County, Nevada	
12	dated July 9, 2007. Said document was forged in that it purported to be signed by Defendant	
13	TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in	
14	truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant	
15	TRAFFORD well knew. These actions were performed in a secretive manner in order that the	
16	false documents be given full legal effect and that this criminal activity not be discovered.	
17	This activity was discovered on or about December of 2010.	
18	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING	
19	OR RECORDING, a violation of NRS 239.330, a category C felony.	
20	<u>COUNT 18</u>	
21	FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET)	
22	FELONY NRS 205.120	
23	On or about July 9, 2007, Defendant TRAFFORD, within the County of Clark, State of	
24	Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof	
25	or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that	
26	the execution of the instrument was acknowledged by a party thereto or that the execution	
27	thereof was proved, to wit:	
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On or about July 9, 2007, Defendant **TRAFFORD** planned, directed, and arranged to 1 have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0004247 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated July 9, 2007. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

### **COUNT 19**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 2, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

20 On or about August 2, 2007, Defendant **TRAFFORD** within Clark County, State of 21 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 22 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 23 take proof or acknowledgment of an instrument, to forge and notarize his signature on a 24 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 25 0003102 of Official Records filed in the Office of the County Recorder of Clark County, 26 Nevada dated August 2, 2007, when Defendant **TRAFFORD** was not in Defendant's presence 27 and further never signed said document. These actions were performed in a secretive 28

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manner in order that the false documents be given full legal effect and that this criminal 1 activity not be discovered. This activity was discovered on or about December of 2010 2 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 3 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 4 5 **COUNT 20** 6 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) 7 Felony NRS 239.330 8 On or about August 2, 2007, Defendant **TRAFFORD** did, in the County of Clark, State 9 of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public 10 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered 11 or recorded in a public office under the law of the State of Nevada, to wit: 12 On or about August 2, 2007, Defendant **TRAFFORD**, within Clark County, State of 13 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 14 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 15 0003102 of Official Records with the Office of the County Recorder of Clark County, Nevada 16 dated August 2, 2007. Said document was forged in that it purported to be signed by 17 Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said 18 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 19 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 20 order that the false documents be given full legal effect and that this criminal activity not be 21 discovered. This activity was discovered on or about December of 2010 22 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING 23 **OR RECORDING**, a violation of NRS 239.330, a category C felony. 24 **COUNT 21** 25 FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) 26 **FELONY NRS 205.120** On or about August 2, 2007, Defendant TRAFFORD, within the County of Clark, State 27 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take 28 - -

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify 1 falsely that the execution of the instrument was acknowledged by a party thereto or that the 2 3 execution thereof was proved, to wit:

On or about August 2, 2007, Defendant **TRAFFORD** planned, directed, and arranged to 4 have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0003102 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated August 2, 2007. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 22**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about May 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about May 12, 2008, Defendant TRAFFORD within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002798 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated May 12, 2008, when Defendant **TRAFFORD** was not in Defendant's presence
 and further never signed said document. These actions were performed in a secretive
 manner in order that the false documents be given full legal effect and that this criminal
 activity not be discovered. This activity was discovered on or about December of 2010

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

# **COUNT 23**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 12, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002798 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 12, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 24**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 12, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about May 12, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002798 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 12, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 25**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about July 22, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002097 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated July 22, 2008 when Defendant **TRAFFORD** was not in Defendant's presence 7 and further never signed said document. These actions were performed in a secretive 8 manner in order that the false documents be given full legal effect and that this criminal 9 activity not be discovered. This activity was discovered on or about December of 2010 10

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor. 12

# **COUNT 26**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** AID & ABET) Felony NRS 239.330

On or about July 22, 2008, Defendant TRAFFORD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

20 On or about July 22, 2008, Defendant **TRAFFORD**, within Clark County, State of 21 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 22 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 23 0002097 of Official Records with the Office of the County Recorder of Clark County, Nevada 24 dated May 12, 2008. Said document was forged in that it purported to be signed by 25 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 26 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 27 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 28

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010
 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR

**RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 27**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 22, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 22, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002097 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 22, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

**COUNT 28** 

On or about December 2, 2005, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about December 2, 2005, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE") a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004395 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 2, 2005, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

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

# **COUNT 29**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about December 2, 2005, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about December 2, 2005, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0004395 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated December 2, 2005. Said document was forged in that it purported to be signed by 3 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 5 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 30**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 2, 2005, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about, December 2, 2005, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004395 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 2, 2005 These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### <u>COUNT 31</u>

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 12, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about April 12, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003132 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 12, 2006, when Defendant **TRAFFORD/SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 32</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 12, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 12, 2006, Defendant **TRAFFORD**, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003132 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated April 12, 2006. Said document was forged in that it purported to be signed by 7 Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 9 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010 12 All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR** 13 **RECORDING**, a violation of NRS 239.330, a category C felony. 14

### <u>COUNT 33</u>

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 12, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about, April 12, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003132 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 12, 2006. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 34**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 23, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about July 23, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002891 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 23, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

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

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1	COUNT 35
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
3	(AID &ABET) Felony NRS 239.330
4	On or about July 23, 2007, Defendant TRAFFORD did, in the County of Clark, State of
5	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
6	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
7	or recorded in a public office under the law of the State of Nevada, to wit:
8	On or about July 23, 2007, Defendant TRAFFORD, within Clark County, State of
9	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
10	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
11	0002891 of Official Records with the Office of the County Recorder of Clark County, Nevada
12	dated July 23, 2007. Said document was forged in that it purported to be signed by Defendant
13	TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in
14	truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant
15	<b>TRAFFORD</b> well knew. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered.
17	This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING
19	OR RECORDING, a violation of NRS 239.330, a category C felony.
20	COUNT 36
21	FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET)
22	FELONY NRS 205.120
23	On or about July 23, 2007, Defendant <b>TRAFFORD</b> , within the County of Clark, State of
24	Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof
25	or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that
26	the execution of the instrument was acknowledged by a party thereto or that the execution
27	thereof was proved, to wit:

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On or about, July 23, 2007, Defendant **TRAFFORD** planned, directed, and arranged to 1 have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0002891 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated July 23, 2007. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

### <u>COUNT 37</u>

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 8, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about February 8, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003952 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 8, 2008 when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of 1 2010. 2 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 3 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 4 5 **COUNT 38** 6 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) 7 Felony NRS 239.330 8 On or about February 8, 2008, Defendant **TRAFFORD** did, in the County of Clark, 9 State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a 10 public office, a false and/or forged instrument, which instrument, if genuine, might be filed, 11 registered or recorded in a public office under the law of the State of Nevada, to wit: 12 On or about February 8, 2008, Defendant **TRAFFORD**, within Clark County, State of 13 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 14 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 15 0003952 of Official Records with the Office of the County Recorder of Clark County, Nevada 16 dated February 8, 2008. Said document was forged in that it purported to be signed by 17 Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said 18 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 19 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 20 order that the false documents be given full legal effect and that this criminal activity not be 21 discovered. This activity was discovered on or about December of 2010. 22 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING 23 **OR RECORDING,** a violation of NRS 239.330, a category C felony.

### <u>COUNT 39</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 8, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about, February 8, 2008, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0003952 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated February 8, 2008. These actions were 10 11 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 40**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 20, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 20, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003380 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated March 20, 2007, when Defendant **TRAFFORD** was not in Defendant's 1 presence and further never signed said document. These actions were performed in a 2 secretive manner in order that the false documents be given full legal effect and that this 3 criminal activity not be discovered. This activity was discovered on or about December of 4 2010. 5

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

### **COUNT 41**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about March 20, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

15 On or about March 20, 2007, Defendant **TRAFFORD**, within Clark County, State of 16 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 17 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 18 0003380 of Official Records with the Office of the County Recorder of Clark County, Nevada 19 dated March 20, 2007. Said document was forged in that it purported to be signed by 20 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 22 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 23 order that the false documents be given full legal effect and that this criminal activity not be 24 discovered. This activity was discovered on or about December of 2010 25 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 26 **RECORDING**, a violation of NRS 239.330, a category C felony. 27 ///

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### <u>COUNT 42</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 20, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about, March 20, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003380 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 20, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 43**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 29, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 29, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter

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"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized 1 to take proof or acknowledgment of an instrument, to forge and notarize his signature on a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0004600 of Official Records filed in the Office of the County Recorder of Clark County, 4 Nevada dated March 29, 2007, when Defendant **TRAFFORD** was not in Defendant's 5 presence and further never signed said document. These actions were performed in a 6 secretive manner in order that the false documents be given full legal effect and that this 7 criminal activity not be discovered. This activity was discovered on or about December of 8 2010 9

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

### <u>COUNT 44</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 29, 2007, Defendant **TRAFFORD/SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

19 On or about March 29, 2007, Defendant **TRAFFORD**, within Clark County, State of 20 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 21 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 22 0004600 of Official Records with the Office of the County Recorder of Clark County, Nevada 23 dated March 29, 2007. Said document was forged in that it purported to be signed by 24 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 25 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 26 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 27 order that the false documents be given full legal effect and that this criminal activity not be 28 discovered. This activity was discovered on or about December of 2010

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All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 45</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 29, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about, March 29,2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004600 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 29, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120

# **COUNT 46**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 1, 2007, Defendant **TRAFFORD,** within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 1 when said person whose signature was being notarizing was not in the notary's presence, to 2 wit;

On or about May 1, 2007, Defendant **TRAFFORD** within Clark County, State of 3 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 4 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 5 take proof or acknowledgment of an instrument, to forge and notarize his signature on a 6 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 7 8 0004641 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 29,2007, when Defendant **TRAFFORD** was not in Defendant's presence 9 and further never signed said document. These actions were performed in a secretive 10 manner in order that the false documents be given full legal effect and that this criminal 11 activity not be discovered. This activity was discovered on or about December of 2010 12

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

# <u>COUNT 47</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 1, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 1, 2007, Defendant TRAFFORD, within Clark County, State of
 Nevada, either directly or through an agent or employee, caused to be offered for filing, a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0004641 of Official Records with the Office of the County Recorder of Clark County, Nevada
 dated May 1, 2007. Said document was forged in that it purported to be signed by Defendant
 TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in
 truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant

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**TRAFFORD** well knew. These actions were performed in a secretive manner in order that the

2 || false documents be given full legal effect and that this criminal activity not be discovered.

3 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 48**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 1, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about , May 1, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004641 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 29, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	COUNT 49	
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC	
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)	
4	On or about May 31, 2007, Defendant <b>TRAFFORD,</b> within Clark County, State of	
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,	
6	when said person whose signature was being notarizing was not in the notary's presence, to	
7	wit;	
8	On or about May 31, 2007, Defendant TRAFFORD within Clark County, State of	
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter	
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to	
11	take proof or acknowledgment of an instrument, to forge and notarize his signature on a	
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.	
13	0003997 of Official Records filed in the Office of the County Recorder of Clark County,	
14	Nevada dated May 31, 2007, when Defendant TRAFFORD was not in Defendant's presence	
15	and further never signed said document. These actions were performed in a secretive	
16	manner in order that the false documents be given full legal effect and that this criminal	
17	activity not be discovered. This activity was discovered on or about December of 2010	
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON	
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.	
20	COUNT 50	
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING	
22	<u>(AID &amp;ABET)</u> Felony NRS 239.330	
23	On or about May 31, 2007 Defendant TRAFFORD did, in the County of Clark, State of	
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public	
25 26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered	
26	or recorded in a public office under the law of the State of Nevada, to wit:	
27 28	On or about May 31, 2007, Defendant TRAFFORD, within Clark County, State of	
20 	Nevada, either directly or through an agent or employee, caused to be offered for filing, a	
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003997 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 31, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 51**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 31, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about , May 31, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE") , a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003997 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 31, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

2 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 52**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about June 28, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 28, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003131 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 28, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010 All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# <u>COUNT 53</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID &ABET) Felony NRS 239.330

On or about June 28, 2007 Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 28, 2007, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003131 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated June 28, 2007. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 54**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120.

On or about June 28, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 28, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003131 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 28, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to **NRS 205.120**.

# **COUNT 55**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 31, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about July 31, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004126 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 31,2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

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

# <u>COUNT 56</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 31, 2007 Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 31, 2007, Defendant **TRAFFORD**, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0004126 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated July 31, 2007. Said document was forged in that it purported to be signed by Defendant 7 8 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 9 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. 11 This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 57</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 31, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about, July 31,2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004126 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 31,2007, These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 58**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 28, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 28, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003650 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 28, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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COUNT 59 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330 On or about September 28, 2007, Defendant TRAFFORD did, in the County of Clark,

State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 28, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003650 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 28, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING, a violation of NRS 239.330, a category C felony.

# <u>COUNT 60</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about September 28, 2007, Defendant TRAFFORD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 25 falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about September 28, 2007, Defendant **TRAFFORD** planned, directed, and 1 arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed 2 3 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was 4 acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND 5 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003650 of Official Records 6 7 filed in the Office of the County Recorder of Clark County, Nevada dated September 28,2007. These actions were performed in a secretive manner in order that the false documents be 8 given full legal effect and that this criminal activity not be discovered. This activity was 9 discovered on or about December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# **COUNT 61**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 2, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about October 2, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003417 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 2, 2007 when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of 1 2010. 2 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 3

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# **COUNT 62**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about October 2, 2007, Defendant TRAFFORD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

12 On or about October 2, 2007, Defendant TRAFFORD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003417 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 2, 2007. Said document was forged in that it purported to be signed by Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 19 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 63**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about October 2, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about October 2, 2007, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0003417 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated October 2, 2007. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 64**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 29, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about October 29, 2007, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized
 to take proof or acknowledgment of an instrument, to forge and notarize his signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.

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0004106 of Official Records filed in the Office of the County Recorder of Clark County, 1 Nevada dated October 29, 2007, when Defendant **TRAFFORD** was not in Defendant's 2 presence and further never signed said document. These actions were performed in a 3 secretive manner in order that the false documents be given full legal effect and that this 4 criminal activity not be discovered. This activity was discovered on or about December of 5 2010. 6

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

#### **COUNT 65**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about October 29, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

16 On or about October 29, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 19 0004106 of Official Records with the Office of the County Recorder of Clark County, Nevada 20 dated October 29, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 22 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 23 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 24 order that the false documents be given full legal effect and that this criminal activity not be 25 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

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# <u>COUNT 66</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 29, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 29, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004106 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 29, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 67**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 2, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit; ///

On or about November 2, 2007, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003006 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated November 2, 2007, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# **COUNT 68**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 2, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

21 On or about November 2, 2007, Defendant **TRAFFORD** within Clark County, State of 22 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 23 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 24 0003006 of Official Records with the Office of the County Recorder of Clark County, Nevada 25 dated November 2, 2007. Said document was forged in that it purported to be signed by 26 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 27 instrument, when in truth and in fact Defendant TRAFFORD/SHEPPARD did not sign said 28 instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a

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1 secretive manner in order that the false documents be given full legal effect and that this

2 criminal activity not be discovered. This activity was discovered on or about December of
3 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 69</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 2, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 2, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003006 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 2, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 70</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about December 21, 2007, Defendant TRAFFORD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about December 21,2007, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized
11	to take proof or acknowledgment of an instrument, to forge and notarize his signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0002416 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated December 21,2007, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
21	<u>COUNT 71</u>
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
23	<u>(AID &amp;ABET)</u> Felony NRS 239.330
24	On or about December 21, 2007 Defendant <b>TRAFFORD</b> did, in the County of Clark,
25 26	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
26	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
27	registered or recorded in a public office under the law of the State of Nevada, to wit:
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On or about December 21, 2007, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002416 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated December 21, 2007. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 72**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 21, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about December 21, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002416 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 21,2007. These actions were performed in a secretive manner in order that the false documents be

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1 given full legal effect and that this criminal activity not be discovered. This activity was

2 discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 73</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 10, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 10, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003408 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 10, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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1 **COUNT 74** 2 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) 3 Felony NRS 239.330 4 On or about January 10, 2008, Defendant TRAFFORD did, in the County of Clark, 5 State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a 6 public office, a false and/or forged instrument, which instrument, if genuine, might be filed, 7 registered or recorded in a public office under the law of the State of Nevada, to wit: 8 On or about January 10, 2008, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 10 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 11 0003408 of Official Records with the Office of the County Recorder of Clark County, Nevada 12 dated January 10, 2008. Said document was forged in that it purported to be signed by 13 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 14 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 15 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 16 order that the false documents be given full legal effect and that this criminal activity not be 17 discovered. This activity was discovered on or about December of 2010 18 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING 19 OR RECORDING, a violation of NRS 239.330, a category C felony. 20

# <u>COUNT 75</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about January 10, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 25 falsely that the execution of the instrument was acknowledged by a party thereto or that the 26 execution thereof was proved, to wit:

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On or about January 10, 2008, Defendant **TRAFFORD** planned, directed, and arranged 1 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0003408 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated January 10, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# COUNT 76

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 31, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 31, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002435 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 31, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of
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All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# **COUNT 77**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 31, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 31, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002435 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 31, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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# **COUNT 78**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 31, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 31, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002435 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 31,2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to **NRS 205.120.** 

# <u>COUNT 79</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 1, 2008, Defendant **TRAFFORD**, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
wit;
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On or about February 1, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003090 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated February 1, 2008, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# **COUNT 80**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 1, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

21 On or about February 1, 2008, Defendant **TRAFFORD**, within Clark County, State of 22 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 23 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 24 0003090 of Official Records with the Office of the County Recorder of Clark County, Nevada 25 dated February 1, 2008. Said document was forged in that it purported to be signed by 26 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 27 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 28 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 81</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February1, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 1, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003090 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 1, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

**COUNT 82** 

On or about February 29, 2008 February 1, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about February 29, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003340 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 29, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# **COUNT 83**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 29, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about February 29, 2008, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003340 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated February 29, 2008. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 84</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 29, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 29, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003340 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 29, 2008. These actions were performed in a secretive manner in order that the false documents be

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1 given full legal effect and that this criminal activity not be discovered. This activity was

2 discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 85</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 20, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 20, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002227 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 20, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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# **COUNT 86**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 20, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 20, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002227 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 20, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 87**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

23 On or about March 20, 2008, Defendant **TRAFFORD**, within the County of Clark, State 24 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take 25 proof or acknowledgment of an instrument which by law may be recorded, willfully certify 26 falsely that the execution of the instrument was acknowledged by a party thereto or that the 27 execution thereof was proved, to wit:

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On or about March 20, 2008, Defendant **TRAFFORD** planned, directed, and arranged 1 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0002227 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated March 20, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# **COUNT 88**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 15, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about April 15, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002889 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 15, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive

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manner in order that the false documents be given full legal effect and that this criminal 1 activity not be discovered. This activity was discovered on or about December of 2010 2 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 3 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 4 5 **COUNT 89** 6 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) 7 Felony NRS 239.330 8 On or about April 15, 2008, Defendant TRAFFORD did, in the County of Clark, State of 9 Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public 10 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered 11 or recorded in a public office under the law of the State of Nevada, to wit: 12 On or about April 15, 2008, Defendant **TRAFFORD**, within Clark County, State of 13 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 14 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 15 0002889 of Official Records with the Office of the County Recorder of Clark County, Nevada 16 dated April 15, 2008. Said document was forged in that it purported to be signed by 17 Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said 18 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 19 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 20 order that the false documents be given full legal effect and that this criminal activity not be 21 discovered. This activity was discovered on or about December of 2010 22 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 23 **RECORDING**, a violation of NRS 239.330, a category C felony. 24 **COUNT 90** 25 FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) 26 **FELONY NRS 205.120** On or about April 15, 2008, Defendant **TRAFFORD**, within the County of Clark, State of 27 Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof 28 - -

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that 1 the execution of the instrument was acknowledged by a party thereto or that the execution 2 3 thereof was proved, to wit:

On or about April 15, 2008, Defendant **TRAFFORD** planned, directed, and arranged to 4 have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002889 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated April 15, 2008. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 91**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about April 23, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about April 23, 2008, Defendant TRAFFORD within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004100 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated April 23, 2008, when Defendant **TRAFFORD** was not in Defendant's presence
 and further never signed said document. These actions were performed in a secretive
 manner in order that the false documents be given full legal effect and that this criminal
 activity not be discovered. This activity was discovered on or about December of 2010

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

# **COUNT 92**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 23, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

14 On or about April 23, 2008, Defendant TRAFFORD, within Clark County, State of 15 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0004100 of Official Records with the Office of the County Recorder of Clark County, Nevada 18 dated April 23, 2008. Said document was forged in that it purported to be signed by 19 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 20 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 21 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 22 order that the false documents be given full legal effect and that this criminal activity not be 23 discovered. This activity was discovered on or about December of 2010 24 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 25 **RECORDING**, a violation of NRS 239.330, a category C felony. 26 /// 27 /// 28 ///

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# <u>COUNT 93</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 23, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 23, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004100 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 23, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120

# **COUNT 94**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 30, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about May 30, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter

"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 1 take proof or acknowledgment of an instrument, to forge and notarize his signature on a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003596 of Official Records filed in the Office of the County Recorder of Clark County, 4 Nevada dated May 30, 2008, when Defendant **TRAFFORD** was not in Defendant's presence 5 and further never signed said document. These actions were performed in a secretive 6 manner in order that the false documents be given full legal effect and that this criminal 7 activity not be discovered. This activity was discovered on or about December of 2010 8

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# **COUNT 95**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 30, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

18 On or about May 30, 2008, Defendant TRAFFORD, within Clark County, State of 19 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 20 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 21 0003596 of Official Records with the Office of the County Recorder of Clark County, Nevada 22 dated May 30, 2008. Said document was forged in that it purported to be signed by 23 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 24 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 25 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 26 order that the false documents be given full legal effect and that this criminal activity not be 27 discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 96</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 30, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 30, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003596 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 30, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 97</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 3, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 1 when said person whose signature was being notarizing was not in the notary's presence, to 2 wit:

On or about June 3, 2008, Defendant **TRAFFORD** within Clark County, State of 3 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 4 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 5 take proof or acknowledgment of an instrument, to forge and notarize his signature on a 6 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 7 8 0003423 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 3, 2008, when Defendant **TRAFFORD** was not in Defendant's presence 9 and further never signed said document. These actions were performed in a secretive 10 manner in order that the false documents be given full legal effect and that this criminal 11 activity not be discovered. This activity was discovered on or about December of 2010 12

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

# <u>COUNT 98</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 3, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 3, 2008, Defendant TRAFFORD, within Clark County, State of
 Nevada, either directly or through an agent or employee, caused to be offered for filing, a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0003423 of Official Records with the Office of the County Recorder of Clark County, Nevada
 dated June 3, 2008. Said document was forged in that it purported to be signed by Defendant
 TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in
 truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant

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**TRAFFORD** well knew. These actions were performed in a secretive manner in order that the

2 || false documents be given full legal effect and that this criminal activity not be discovered.

3 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 99</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 3, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 3, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003423 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 3, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 100</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about July 28, 2008, Defendant <b>TRAFFORD</b> , within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about July 28, 2008, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize his signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0001968 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated July 28, 2008 when Defendant <b>TRAFFORD</b> was not in Defendant's presence
15	and further never signed said document. These actions were performed in a secretive
16	manner in order that the false documents be given full legal effect and that this criminal
17	activity not be discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	<b>NOT IN PRESENCE NOTARY PUBLIC</b> , a violation of NRS 240.155, a gross misdemeanor.
20 21	<u>COUNT 101</u>
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
23	<u>(AID &amp;ABET)</u> Felony NRS 239.330
24	On or about July 28, 2008 Defendant TRAFFORD did, in the County of Clark, State of
25	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
27	or recorded in a public office under the law of the State of Nevada, to wit:
28	On or about July 28, 2008, Defendant <b>TRAFFORD</b> , within Clark County, State of
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0001968 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated July 28, 2008. Said document was forged in that it purported to be signed by Defendant 3 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 4 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 5 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 6 false documents be given full legal effect and that this criminal activity not be discovered. 7 This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 102**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 28, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 28, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001968 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 28, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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## All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

2 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 103**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about August 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about August 12, 2008, Defendant TRAFFORD within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003668 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 12, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 104**

## **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

27 On or about August 12, 2008, Defendant **TRAFFORD** did, in the County of Clark, State 28 of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public - -

- office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
   or recorded in a public office under the law of the State of Nevada, to wit:
- 3 On or about August 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada,
- 4 either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF
- 5 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003668 of
- 6 || Official Records with the Office of the County Recorder of Clark County, Nevada dated August
- 7 || 12, 2008. Said document was forged in that it purported to be signed by Defendant
- 8 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in
- 9 || truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant
- 10 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the
- 11 false documents be given full legal effect and that this criminal activity not be discovered.
- 12 This activity was discovered on or about December of 2010.
  - All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 105**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 12, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 12, 2008, Defendant TRAFFORD planned, directed, and arranged
 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the
 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument,
 to forge and willfully certify falsely that the execution of this instrument was acknowledged by
 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL
 UNDER DEED OF TRUST, Instrument No. 0003668 of Official Records filed in the Office of

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the County Recorder of Clark County, Nevada dated August 12, 2008. These actions were
 performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 106**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 27, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about August 27, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002879 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 27, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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1	<u>COUNT 107</u>
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
3	(AID &ABET) Felony NRS 239.330
4	On or about August 27, 2008, Defendant <b>TRAFFORD</b> did, in the County of Clark, State
5	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
6	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
7	or recorded in a public office under the law of the State of Nevada, to wit:
8	On or about August 27, 2008, Defendant <b>TRAFFORD</b> , within Clark County, State of Nevada,
9	either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF
10	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002879 of
11	Official Records with the Office of the County Recorder of Clark County, Nevada dated August
12	27, 2008. Said document was forged in that it purported to be signed by Defendant
13	TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in
14	truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant
15	<b>TRAFFORD</b> well knew. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered.
17	This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR
19	RECORDING, a violation of NRS 239.330, a category C felony.
20	COUNT 108
21	FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET)
22	FELONY NRS 205.120
23	On or about August 27, 2008, Defendant <b>TRAFFORD</b> , within the County of Clark, State
24	of Nevada, did then and there plan, direct, and arrange to have a person authorized to take
25	proof or acknowledgment of an instrument which by law may be recorded, willfully certify
26	falsely that the execution of the instrument was acknowledged by a party thereto or that the
27	execution thereof was proved, to wit:
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On or about August 27, 2008, Defendant **TRAFFORD** planned, directed, and arranged 1 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0002879 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated August 27, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 109**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 9, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 9, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002876 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 9, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a Gross misdemeanor.

### **COUNT 110**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 9, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 9, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002876 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 9, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 111</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 9, 2008, Defendant TRAFFORD, within the County of Clark,
 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about September 9, 2008, Defendant **TRAFFORD** planned, directed, and 4 arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed 5 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 6 instrument, to forge and willfully certify falsely that the execution of this instrument was 7 acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND 8 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002876 of Official Records 9 filed in the Office of the County Recorder of Clark County, Nevada dated September 9, 2008. 10 These actions were performed in a secretive manner in order that the false documents be 11 given full legal effect and that this criminal activity not be discovered. This activity was 12 discovered on or about December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 112**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 12, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003598 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated September 12, 2008, when Defendant **TRAFFORD** was not in Defendant's 1 presence and further never signed said document. These actions were performed in a 2 secretive manner in order that the false documents be given full legal effect and that this 3 criminal activity not be discovered. This activity was discovered on or about December of 4 2010. 5

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

### COUNT 113

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about September 12, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

15 On or about September 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 18 0003598 of Official Records with the Office of the County Recorder of Clark County, Nevada 19 dated September 12, 2008. Said document was forged in that it purported to be signed by 20 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 22 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 23 order that the false documents be given full legal effect and that this criminal activity not be 24 discovered. This activity was discovered on or about December of 2010 25 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 26 **RECORDING**, a violation of NRS 239.330, a category C felony. ///

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### COUNT 114

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 12, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about September 12, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003598 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 12, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 115**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 2, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about October 2, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003192 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated October 2, 2008, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

## COUNT 116

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 2, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 2, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003192 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 2, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be 1 discovered. This activity was discovered on or about December of 2010 2

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

## **COUNT 117**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about October 2, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 2, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003192 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 2, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 118</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about October 17, 2008, Defendant TRAFFORD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about October 17, 2008, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize his signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003299 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated October 17, 2008, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
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22	<u>COUNT 119</u>
23 24	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID &ABET) Felony NRS 239.330
25	On or about October 17, 2008, Defendant <b>TRAFFORD</b> did, in the County of Clark,
26	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
27	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
28	registered or recorded in a public office under the law of the State of Nevada, to wit:
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On or about October 17, 2008, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003299 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated October 17, 2008. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010 10 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 11 **RECORDING**, a violation of NRS 239.330, a category C felony. 12

## **COUNT 120**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 17, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 17, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by his signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003299 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 17, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120 4 5 **COUNT 121** 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about October 6, 2006, Defendant SHEPPARD, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit; 12 On or about October 6, 2006, Defendant SHEPPARD within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0004006 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated October 6, 2006, when Defendant SHEPPARD was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -89

and that this criminal activity not be discovered. This activity was discovered on or about

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## **COUNT 122**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 6, 2006, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 6, 2006, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004006 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 6, 2006. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 123**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 6, 2006, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about October 6, 2006, Defendant SHEPPARD planned, directed, and arranged 1 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0004006 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated October 6, 2006. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 124**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about December 29, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about December 29, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003838 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 29, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of 1 2010. 2

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

## **COUNT 125**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about December 29, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about December 29, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003838 of Official Records with the Office of the County Recorder of Clark County, Nevada dated December 29, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

## **COUNT 126**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about December 29, 2005, Defendant SHEPPARD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about December 29, 2005, Defendant SHEPPARD planned, directed, and 4 arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed 5 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 6 instrument, to forge and willfully certify falsely that the execution of this instrument was 7 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 8 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003838 of Official Records 9 filed in the Office of the County Recorder of Clark County, Nevada dated December 29, 2005. 10 These actions were performed in a secretive manner in order that the false documents be 11 given full legal effect and that this criminal activity not be discovered. This activity was 12 discovered on or about December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 127**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 9, 2006, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 9, 2006, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004191 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated January 9, 2006, when Defendant SHEPPARD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### <u>COUNT 128</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 9, 2006, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 9, 2006, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004191 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 9, 2006. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### COUNT 129

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 9, 2006, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 9, 2006, Defendant **SHEPPARD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004191 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 9, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 130**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 26, 2006, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about January 26, 2006, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003396 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated January 26, 2006, when Defendant SHEPPARD was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

## COUNT 131

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 26, 2006, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 26, 2006, Defendant **SHEPPARD** within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003396 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 26, 2006. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be 1 discovered. This activity was discovered on or about December of 2010 2 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR 3 **RECORDING**, a violation of NRS 239.330, a category C felony.

## **COUNT 132**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about January 26, 2006, Defendant SHEPPARD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 26, 2006, Defendant SHEPPARD planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003396 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 26, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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<u>COUNT 133</u>
NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
On or about May 15, 2006, Defendant <b>TRAFFORD,</b> within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
wit;
On or about May 15, 2006, Defendant TRAFFORD, within Clark County, State of
Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
take proof or acknowledgment of an instrument, to forge and notarize her signature on a
NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
0004069 of Official Records filed in the Office of the County Recorder of Clark County,
Nevada dated May 15, 2006, when Defendant TRAFFORD was not in Defendant's presence
and further never signed said document. These actions were performed in a secretive
manner in order that the false documents be given full legal effect and that this criminal
activity not be discovered. This activity was discovered on or about December of 2010.
All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross Misdemeanor.
<u>COUNT 134</u>
OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID &ABET)
Felony NRS 239.330
On or about May 15, 2006, Defendant TRAFFORD did, in the County of Clark, State of
Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
or recorded in a public office under the law of the State of Nevada, to wit:
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On or about May 15, 2006, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 3 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004069 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated May 15, 2006. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 135**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 15, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about , May 15, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004069 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 15, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 136

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 1, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 1, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004484 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 1, 2006, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross Misdemeanor.

# COUNT 137

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 1, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 1, 2006, Defendant **TRAFFORD**, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0004484 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 1, 2006. Said document was forged in that it purported to be signed by Defendant 7 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 8 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 9 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. This 11 activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 138

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 1, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 1, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004484 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 1, 2006. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 139

### <u>NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC</u> (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 20, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 20, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004955 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 20, 2006 when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON** NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross Misdemeanor. /// 27 /// 28 ///

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1	<u>COUNT 140</u>
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
3	<u>(AID &amp;ABET)</u> Felony NRS 239.330
4	On or about June 20, 2006 DEFENDANT <b>TRAFFORD</b> did, in the County of Clark,
5	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
6	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
7	registered or recorded in a public office under the law of the State of Nevada, to wit:
8	On or about June 20, 2006, Defendant <b>TRAFFORD</b> , within Clark County, State of Nevada,
9	either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF
10	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004955 of
11	Official Records with the Office of the County Recorder of Clark County, Nevada dated June
12	20, 2006. Said document was forged in that it purported to be signed by Defendant
13	TRAFFORD, as the agent for the beneficiary of the property listed in said instrument, when in
14	truth and in fact Defendant TRAFFORD did not sign said instrument, as Defendant
15	TRAFFORD well knew. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered.
17	This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING
19	<b>OR RECORDING,</b> a violation of NRS 239.330, a category C felony.
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21	<u>COUNT 141</u>
22 23	FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120
23 24	On or about June 20, 2006, Defendant TRAFFORD, within the County of Clark, State
24	of Nevada, did then and there plan, direct, and arrange to have a person authorized to take
26	proof or acknowledgment of an instrument which by law may be recorded, willfully certify
20	falsely that the execution of the instrument was acknowledged by a party thereto or that the
27	execution thereof was proved, to wit:
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On or about June 20, 2006, Defendant **TRAFFORD** planned, directed, and arranged to 1 have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0004955 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated June 20, 2006. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 142**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 1, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 1, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005675 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 1, 2006, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross Misdemeanor.

## **COUNT 143**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 1, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 1, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005675 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 1, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 144</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 1, 2006, Defendant TRAFFORD, within the County of Clark,
State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about September 1, 2006, Defendant **TRAFFORD** planned, directed, and 4 arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed 5 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 6 instrument, to forge and willfully certify falsely that the execution of this instrument was 7 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 8 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005675 of Official Records 9 filed in the Office of the County Recorder of Clark County, Nevada dated September 1, 2006. 10 These actions were performed in a secretive manner in order that the false documents be 11 given full legal effect and that this criminal activity not be discovered. This activity was 12 13 discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 145**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 2, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about November 2, 2006, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0002981 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated November 2, 2006, when Defendant **TRAFFORD** was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross Misdemeanor.

#### <u>COUNT 146</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 2, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 2, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002981 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 2, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 147**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 2, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 2, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002981 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 2, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 148**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 23, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about May 23, 2007, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002791 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated May 23, 2007, when Defendant **TRAFFORD** was not in Defendant's presence 7 and further never signed said document. These actions were performed in a secretive 8 manner in order that the false documents be given full legal effect and that this criminal 9 activity not be discovered. This activity was discovered on or about December of 2010. 10

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

# COUNT 149

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 23, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 23, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002791 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 23, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 150

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 23, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 23, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002791 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 23, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 151</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about August 14, 2007, Defendant <b>TRAFFORD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about August 14, 2007, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003468 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated August 14, 2007, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	<b>NOT IN PRESENCE NOTARY PUBLIC</b> , a violation of NRS 240.155, a gross misdemeanor.
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22	COUNT 152
23	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID &ABET)
24	Felony NRS 239.330
25	On or about August 14, 2007, Defendant <b>TRAFFORD</b> did, in the County of Clark, State
26	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
27	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
28	or recorded in a public office under the law of the State of Nevada, to wit:
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On or about August 14, 2007, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 3 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003468 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated August 14, 2007. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 153

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 14, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

21 On or about August 14, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have 22 TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada 23 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 24 and willfully certify falsely that the execution of this instrument was acknowledged by her 25 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 26 DEED OF TRUST, Instrument No. 0003468 of Official Records filed in the Office of the 27 County Recorder of Clark County, Nevada dated August 14, 2007. These actions were 28 performed in a secretive manner in order that the false documents be given full legal effect

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1	and that this criminal activity not be discovered. This activity was discovered on or about
2	December of 2010.
3	All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
4	<b>INSTRUMENTS</b> a category D felony pursuant to NRS 205.120.
5	<u>COUNT 154</u>
6	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
7	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
8	On or about September 6, 2007, Defendant TRAFFORD, within Clark County, State of
9	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
10	when said person whose signature was being notarizing was not in the notary's presence, to
11	wit;
12	On or about September 6, 2007, Defendant TRAFFORD within Clark County, State of
13	Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
14	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
15	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
16	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
17	0002816 of Official Records filed in the Office of the County Recorder of Clark County,
18	Nevada dated September 6, 2007, when Defendant TRAFFORD was not in Defendant's
19	presence and further never signed said document. These actions were performed in a
20	secretive manner in order that the false documents be given full legal effect and that this
21	criminal activity not be discovered. This activity was discovered on or about December of
22	2010.
23	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
24	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
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## COUNT 155

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 6, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 6, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002816 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 6, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 156

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 6, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about September 6, 2007, Defendant **TRAFFORD** planned, directed, and 1 arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed 2 3 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was 4 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 5 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002816 of Official Records 6 7 filed in the Office of the County Recorder of Clark County, Nevada dated September 6, 2007. These actions were performed in a secretive manner in order that the false documents be 8 given full legal effect and that this criminal activity not be discovered. This activity was 9 discovered on or about December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT157**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 15, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about October 15, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002596 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 15, 2007 when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

### **COUNT 158**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 15, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 15, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002596 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 15, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 159**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET)

# **FELONY NRS 205.120**

On or about October 15, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about October 15, 2007, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002596 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated October 15, 2007. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 160**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 22, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about October 22, 2007, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0003024 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated October 22, 2007, when Defendant TRAFFORD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### <u>COUNT 161</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 22, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 22, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003024 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 22, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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## **COUNT 162**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 22, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 22, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003024 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 22, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 163

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 7, 2007, Defendant TRAFFORD, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
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On or about November 7, 2007, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002705 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated November 7, 2007, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

## **COUNT 164**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 7, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit: On or about November 7, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002705 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 7, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 165

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 7, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 7, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002705 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 7, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 166**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

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On or about November 28, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about November 28, 2007, Defendant **TRAFFORD** within Clark County, State of 5 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 6 7 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 8 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 9 0003593 of Official Records filed in the Office of the County Recorder of Clark County, 10 Nevada dated November 28, 2007, when Defendant **TRAFFORD** was not in Defendant's 11 presence and further never signed said document. These actions were performed in a 12 secretive manner in order that the false documents be given full legal effect and that this 13 criminal activity not be discovered. This activity was discovered on or about December of 14 15 2010.

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

## COUNT 167

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 28, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 28, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003593 of Official Records with the Office of the County Recorder of Clark County, Nevada

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dated November 28, 2007. Said document was forged in that it purported to be signed by
 Defendant TRAFFORD, as the agent for the beneficiary of the property listed in said
 instrument, when in truth and in fact Defendant TRAFFORD did not sign said instrument, as
 DEFENDANT TRAFFORD well knew. These actions were performed in a secretive manner
 in order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 168**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 28, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 28, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003593 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 28, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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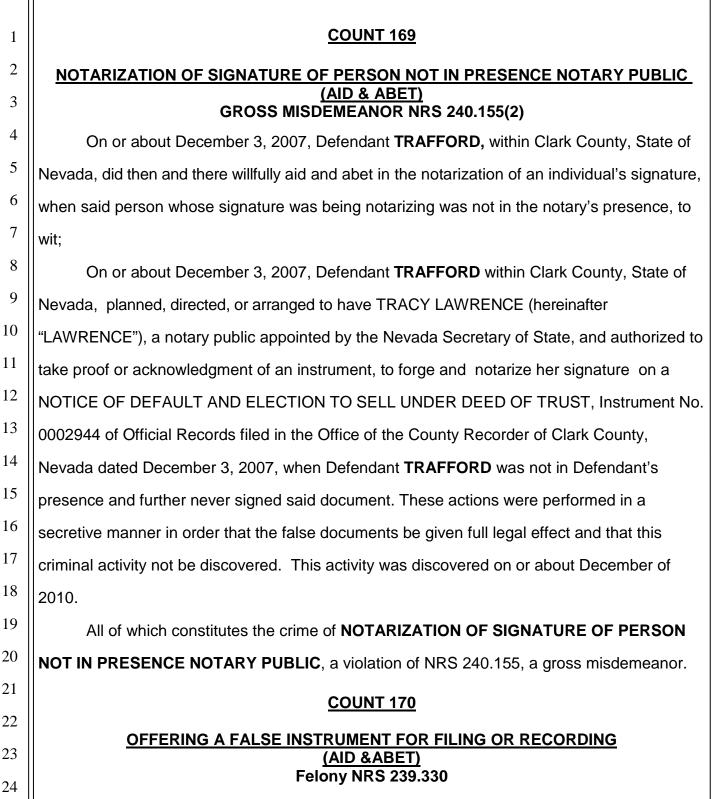
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On or about December 3, 2007, DEFENDANT **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

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On or about December 3, 2007, **DEFENDANT TRAFFORD**, within Clark County, State 1 of Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002944 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated December 3, 2007. Said document was forged in that it purported to be signed by 5 **DEFENDANT TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact **DEFENDANT TRAFFORD** did not sign said instrument, 7 as **DEFENDANT TRAFFORD** well knew. These actions were performed in a secretive 8 manner in order that the false documents be given full legal effect and that this criminal 9 activity not be discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 171**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 3, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about December 3, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002944 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 3, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.
 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### COUNT 172

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about December 11, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about December 11, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004342 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 11, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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## COUNT 173

## **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about December 11, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about December 11, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004342 of Official Records with the Office of the County Recorder of Clark County, Nevada dated December 11, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 174**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

23 On or about December 11, 2007, Defendant **TRAFFORD**, within the County of Clark, 24 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to 25 take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 26 falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about December 11, 2007, Defendant **TRAFFORD** planned, directed, and 1 arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed 2 3 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was 4 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 5 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004342 of Official Records 6 7 filed in the Office of the County Recorder of Clark County, Nevada dated December 11, 2007. These actions were performed in a secretive manner in order that the false documents be 8 given full legal effect and that this criminal activity not be discovered. This activity was 9 discovered on or about December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# **COUNT 175**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 8, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 8, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002980 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 8, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of 1 2010. 2

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

### **COUNT 176**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about January 8, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 8, 2008, Defendant TRAFFORD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002980 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 8, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 177**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about January 8, 2008, **DEFENDANT TRAFFORD**, within the County of Clark, 28 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about January 8, 2008, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002980 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated January 8, 2008. These actions were 10 11 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 13 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 178**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 22, 2008, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0002569 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated January 22, 2008, when Defendant TRAFFORD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### <u>COUNT 179</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 22, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002569 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 22, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### COUNT 180

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 22, 2008, **DEFENDANT TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 22, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002569 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 22, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 181

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about February 22, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003677 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated February 22, 2008, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

## **COUNT 182**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felonv NRS 239.330

On or about February 22, 2008, Defendant **TRAFFORD** did, in the County of Clark, 18 State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a 19 public office, a false and/or forged instrument, which instrument, if genuine, might be filed, 20 registered or recorded in a public office under the law of the State of Nevada, to wit: 21 On or about February 22, 2008, Defendant **TRAFFORD**, within Clark County, State of 22 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 23 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 24 0003677 of Official Records with the Office of the County Recorder of Clark County, Nevada 25 dated February 22, 2008. Said document was forged in that it purported to be signed by 26 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 27 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 28 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 183</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 22, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 22, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003677 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 22, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	COUNT 184
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3	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET)
	GROSS MISDEMEANOR NRS 240.155(2)
4	On or about March 10, 2008, Defendant <b>TRAFFORD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about March 10, 2008, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0002816 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated March 10, 2008, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
21	<u>COUNT 185</u>
22	
23	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET)
24	Felony NRS 239.330
25	On or about March 10, 2008, Defendant <b>TRAFFORD</b> did, in the County of Clark, State

On or about March 10, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

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On or about March 10, 2008, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002816 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated March 10, 2008. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 186**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 10, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 10, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002816 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 10, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 187

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 18, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 18, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002924 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 18, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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## **COUNT 188**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 18, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 18, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002924 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 18, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 189**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 18, 2008, Defendant TRAFFORD, within the County of Clark, State
 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take
 proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about March 18, 2008, Defendant **TRAFFORD** planned, directed, and arranged to 1 have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 2 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 3 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0002924 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated March 18, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 190**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 7, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about April 7, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002584 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 7, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner

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in order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.

# <u>COUNT 191</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 7, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 7, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002584 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 7, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 192

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 7, 2008, Defendant TRAFFORD, within the County of Clark, State of
 Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that 1 the execution of the instrument was acknowledged by a party thereto or that the execution 2 3 thereof was proved, to wit:

On or about April 7, 2008, Defendant **TRAFFORD** planned, directed, and arranged to 4 have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002584 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated April 7, 2008. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 193**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 24, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit:

23 On or about April 24, 2008, Defendant **TRAFFORD** within Clark County, State of 24 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 25 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 26 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 27 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 28 0004042 of Official Records filed in the Office of the County Recorder of Clark County, - -

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Nevada dated April 24, 2008, when Defendant **TRAFFORD** was not in Defendant's presence
 and further never signed said document. These actions were performed in a secretive
 manner in order that the false documents be given full legal effect and that this criminal
 activity not be discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 194**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 24, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 24, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004042 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 24, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 195**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 24, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 24, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004042 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 24, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 196**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about May 22, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0004259 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated May 22, 2008, when Defendant **TRAFFORD** was not in Defendant's presence 7 and further never signed said document. These actions were performed in a secretive manner 8 in order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 12

# **COUNT 197**

# **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about May 22, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 22, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004259 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 22, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant TRAFFORD well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 || discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 198</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 22, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 22, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004259 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 22, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 199</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about June 10, 2008, Defendant TRAFFORD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about June 10, 2008, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003285 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated June 10, 2008, when Defendant <b>TRAFFORD</b> was not in Defendant's presence
15	and further never signed said document. These actions were performed in a secretive
16	manner in order that the false documents be given full legal effect and that this criminal
17	activity not be discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 200</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about June 10, 2008, Defendant <b>TRAFFORD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about June 10, 2008, Defendant <b>TRAFFORD</b> , within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003285 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated June 10, 2008. Said document was forged in that it purported to be signed by 3 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 5 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 201**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 10, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 10, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003285 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 10, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

2 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 202**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about June 23, 2008, Defendant TRAFFORD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit:

On or about June 23, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002355 of Official Records filed in the Office of the County Recorder of Clark County. Nevada dated June 23, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

## **COUNT** 203

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about June 23, 2008, Defendant TRAFFORD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

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On or about June 23, 2008, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002355 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated June 23, 2008. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 204**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 23, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 23, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002355 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 23, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 205** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about July 8, 2008, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about July 8, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, 13 planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a 14 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 15 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 16 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003856 of 17 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 18 8, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never 19 signed said document. These actions were performed in a secretive manner in order that the 20 false documents be given full legal effect and that this criminal activity not be discovered. 21 This activity was discovered on or about December of 2010. 22 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 23 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 24 **COUNT 206** 25 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** 26 (AID & ABET) Felony NRS 239.330 27 On or about July 8, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of 28 Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public - -

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 8, 2008, Defendant **TRAFFORD**, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003856 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated July 8, 2008. Said document was forged in that it purported to be signed by Defendant 7 8 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 9 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. This 11 activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 207

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 8, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 8, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003856 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 8, 2008. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 208

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 1, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about August 1, 2008, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003494 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 1, 2008, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON** 

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

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## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

**COUNT 209** 

On or about August 1, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 1, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003494 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 1, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 210

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 1, 2008, Defendant **TRAFFORD**, within the County of Clark, State
of Nevada, did then and there plan, direct, and arrange to have a person authorized to take
proof or acknowledgment of an instrument which by law may be recorded, willfully certify
falsely that the execution of the instrument was acknowledged by a party thereto or that the
execution thereof was proved, to wit:

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On or about August 1, 2008, Defendant **TRAFFORD** planned, directed, and arranged to 1 have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0003494 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated August 1, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### COUNT 211

#### <u>NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC</u> (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 18, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

20 On or about August 18, 2008, Defendant TRAFFORD within Clark County, State of 21 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 22 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 23 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 24 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 25 0002814 of Official Records filed in the Office of the County Recorder of Clark County. 26 Nevada dated August 18, 2008, when Defendant **TRAFFORD** was not in Defendant's 27 presence and further never signed said document. These actions were performed in a 28 secretive manner in order that the false documents be given full legal effect and that this - -

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

### **COUNT 212**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about August 18, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 18, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002814 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 18, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 213

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 18, 2008, Defendant TRAFFORD, within the County of Clark, State
 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about August 18, 2008, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002814 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated August 18, 2008. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 214**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 4, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about September 4, 2008, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0003371 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated September 4, 2008, when Defendant TRAFFORD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### COUNT 215

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 4, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 4, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003371 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 4, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 216**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 4, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about September 4, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003371 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 4, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 217

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 19, 2008, Defendant TRAFFORD, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
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On or about September 19, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003592 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated September 19, 2008, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

### **COUNT 218**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about September 19, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 19, 2008, Defendant **TRAFFORD**, within Clark County, State 22 of Nevada, either directly or through an agent or employee, caused to be offered for filing, a 23 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 24 0003592 of Official Records with the Office of the County Recorder of Clark County, Nevada 25 dated September 19, 2008. Said document was forged in that it purported to be signed by 26 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 27 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 28 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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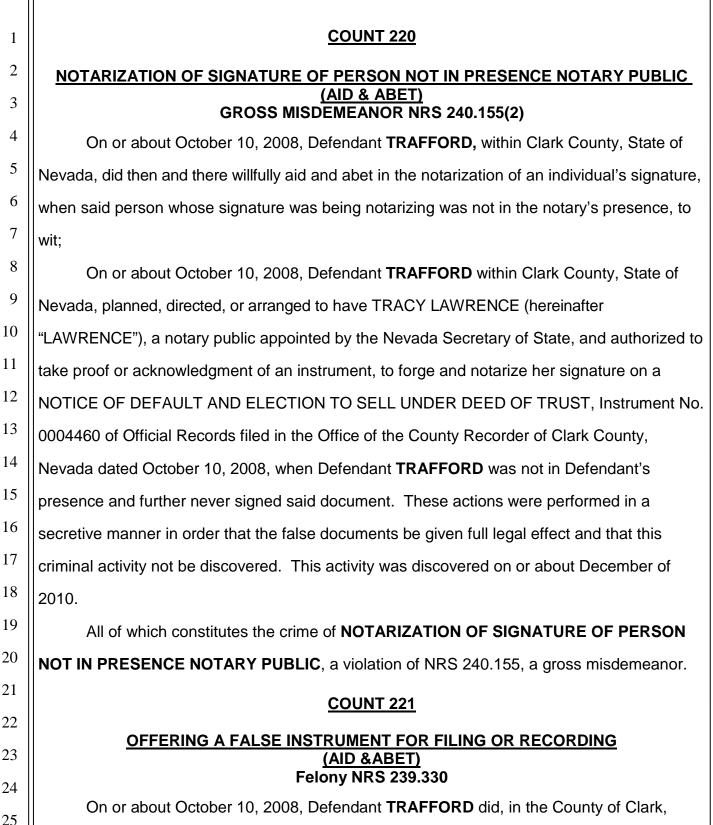
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order that the false documents be given full legal effect and that this criminal activity not be 1 discovered. This activity was discovered on or about December of 2010. 2 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING 3 OR RECORDING, a violation of NRS 239.330, a category C felony. 4 COUNT 219 5 FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) 6 **FELONY NRS 205.120** 7 On or about September 19, 2008, Defendant **TRAFFORD**, within the County of Clark, 8 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to 9 take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 10 falsely that the execution of the instrument was acknowledged by a party thereto or that the 11 execution thereof was proved, to wit: 12 On or about September 19, 2008, Defendant TRAFFORD planned, directed, and 13 arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed 14 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 15 instrument, to forge and willfully certify falsely that the execution of this instrument was 16 17 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003592 of Official Records 18 filed in the Office of the County Recorder of Clark County, Nevada dated September 19, 2008. 19 These actions were performed in a secretive manner in order that the false documents be 20 given full legal effect and that this criminal activity not be discovered. This activity was 21 discovered on or about December of 2010. 22 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 23 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 24 /// 25 /// 26 /// 27 /// 28 - -160

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On or about October 10, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

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On or about October 10, 2008, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0004460 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated October 10, 2008. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 222**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 10, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 10, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004460 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 10, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 223** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about October 27, 2008, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about October 27, 2008, Defendant TRAFFORD within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0003562 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated October 27, 2008, when Defendant **TRAFFORD** was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -

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1	<u>COUNT 224</u>
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID &ABET)
3	Felony NRS 239.330
4	On or about October 27, 2008, Defendant <b>TRAFFORD</b> did, in the County of Clark,
5	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
6	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
7	registered or recorded in a public office under the law of the State of Nevada, to wit:
8	On or about October 27, 2008, Defendant <b>TRAFFORD</b> , within Clark County, State of
9	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
10	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
11	0003562 of Official Records with the Office of the County Recorder of Clark County, Nevada
12	dated October 27, 2008. Said document was forged in that it purported to be signed by
13	Defendant <b>TRAFFORD</b> , as the agent for the beneficiary of the property listed in said
14	instrument, when in truth and in fact Defendant TRAFFORD did not sign said instrument, as
15	Defendant <b>TRAFFORD</b> well knew. These actions were performed in a secretive manner in
16	order that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING
19	OR RECORDING, a violation of NRS 239.330, a category C felony.

## **COUNT 225**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 27, 2008, Defendant TRAFFORD, within the County of Clark,
State of Nevada, did then and there plan, direct, and arrange to have a person authorized to
take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
falsely that the execution of the instrument was acknowledged by a party thereto or that the
execution thereof was proved, to wit:

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On or about October 27, 2008, Defendant **TRAFFORD** planned, directed, and arranged 1 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 2 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 3 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0003562 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated October 27, 2008. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 226**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 3, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

20 On or about November 3, 2008, Defendant TRAFFORD within Clark County, State of 21 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 22 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 23 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 24 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 25 0006070 of Official Records filed in the Office of the County Recorder of Clark County. 26 Nevada dated November 3, 2008, when Defendant **TRAFFORD** was not in Defendant's 27 presence and further never signed said document. These actions were performed in a 28 secretive manner in order that the false documents be given full legal effect and that this - -

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### **COUNT 227**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 3, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 3, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0006070 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 3, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 228**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 3, 2008, Defendant TRAFFORD, within the County of Clark,
 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about November 3, 2008, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0006070 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated November 3, 2008. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 229**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 7, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about November 7, 2008, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0004823 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated November 7, 2008, when Defendant TRAFFORD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### <u>COUNT 230</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 7, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 7, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004823 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 7, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### COUNT 231

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 7, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 7, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004823 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 7, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 232**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about November 12, 2008, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0004356 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated November 12, 2008, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

### **COUNT 233**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felonv NRS 239.330

On or about November 12, 2008, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 12, 2008, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004356 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 12, 2008. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in - -

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 234

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 12, 2008, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 12, 2008, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004356 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 12, 2008. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 235</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about January 3, 2006, Defendant <b>TRAFFORD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about January 3, 2006, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0004595 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated January 3, 2006, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
21	<u>COUNT 236</u>
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
23	(AID & ABET) Felony NRS 239.330
24	On or about January 3, 2006, Defendant <b>TRAFFORD</b> did, in the County of Clark, State
25	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
26 27	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered

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or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 3, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, 1 either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF 2 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004595 of 3 Official Records with the Office of the County Recorder of Clark County, Nevada dated 4 January 3, 2006. Said document was forged in that it purported to be signed by Defendant 5 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 6 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 7 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 237**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 3, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 3, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004595 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 3, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 238** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about January 27, 2006, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about January 27, 2006, Defendant TRAFFORD within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0002999 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated January 27, 2006, when Defendant **TRAFFORD** was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -

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<u>COONT 239</u>
OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
<u>(AID &amp;ABET)</u> Felony NRS 239.330
•
On or about January 27, 2006, Defendant <b>TRAFFORD</b> did, in the County of Clark,
State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
registered or recorded in a public office under the law of the State of Nevada, to wit:
On or about January 27, 2006, Defendant TRAFFORD, within Clark County, State of

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Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002999 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 27, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

## **COUNT 240**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about January 27, 2006, Defendant **TRAFFORD**, within the County of Clark, 24 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to 25 take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 26 falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about January 27, 2006, Defendant **TRAFFORD** planned, directed, and arranged 1 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 2 3 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by 4 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 5 UNDER DEED OF TRUST, Instrument No. 0002999 of Official Records filed in the Office of 6 the County Recorder of Clark County, Nevada dated January 27, 2006. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 241**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 3, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

20 On or about February 3, 2006, Defendant TRAFFORD within Clark County, State of 21 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 22 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 23 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 24 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 25 0002662 of Official Records filed in the Office of the County Recorder of Clark County, 26 Nevada dated February 3, 2006, when Defendant **TRAFFORD** was not in Defendant's 27 presence and further never signed said document. These actions were performed in a 28 secretive manner in order that the false documents be given full legal effect and that this - -

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criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### **COUNT 242**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 3, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 3, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002662 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 3, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 243

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 3, 2006, Defendant TRAFFORD, within the County of Clark,
 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about February 3, 2006, Defendant **TRAFFORD** planned, directed, and arranged 4 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 5 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 6 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 7 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 8 UNDER DEED OF TRUST, Instrument No. 0002662 of Official Records filed in the Office of 9 the County Recorder of Clark County, Nevada dated February 3, 2006. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 244**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 1, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 1, 2006, Defendant TRAFFORD within Clark County, State of
 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
 take proof or acknowledgment of an instrument, to forge and notarize her signature on a
 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
 0002845 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated March 1, 2006, when Defendant **TRAFFORD** was not in Defendant's presence
 and further never signed said document. These actions were performed in a secretive
 manner in order that the false documents be given full legal effect and that this criminal
 activity not be discovered. This activity was discovered on or about December of 2010.

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

### **COUNT 245**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 1, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 1, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada,

either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF

DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002845 of

Official Records with the Office of the County Recorder of Clark County, Nevada dated March

1, 2006. Said document was forged in that it purported to be signed by Defendant

**TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant

**TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered.

This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### **COUNT 246**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 1, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 1, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002845 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 1, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 247**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 6, 2006, Defendant TRAFFORD, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
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On or about March 6, 2006, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002555 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated March 6, 2006, when Defendant **TRAFFORD** was not in Defendant's presence 7 and further never signed said document. These actions were performed in a secretive manner 8 in order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 12

# **COUNT 248**

# **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about March 6, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 6, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002555 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 6, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 249</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 6, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 6, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002555 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 6, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 250</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about April 3, 2006, Defendant <b>TRAFFORD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about April 3, 2006, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003178 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated April 3, 2006, when Defendant TRAFFORD was not in Defendant's presence
15	and further never signed said document. These actions were performed in a secretive
16	manner in order that the false documents be given full legal effect and that this criminal
17	activity not be discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 251</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	<u>(AID &amp;ABET)</u> Felony NRS 239.330
23	On or about April 3, 2006, Defendant <b>TRAFFORD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about April 3, 2006, Defendant <b>TRAFFORD</b> , within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003178 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated April 3, 2006. Said document was forged in that it purported to be signed by Defendant 3 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 4 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 5 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 6 false documents be given full legal effect and that this criminal activity not be discovered. This 7 activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 252**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 3, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 3, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003178 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 3, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

2 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 253**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about May 8, 2006, Defendant TRAFFORD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit:

On or about May 8, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004150 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 8, 2006, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# <u>COUNT 25</u>4

# **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about May 8, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

3 On or about May 8, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada,

4 either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF

5 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004150 of

6 || Official Records with the Office of the County Recorder of Clark County, Nevada dated May 8,

7 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**,

8 || as the agent for the beneficiary of the property listed in said instrument, when in truth and in

9 fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well

10 knew. These actions were performed in a secretive manner in order that the false documents

be given full legal effect and that this criminal activity not be discovered. This activity was
discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 255**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 8, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 8, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004150 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 8, 2006. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 256

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 10, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about July 10, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003399 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 10, 2006, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

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1 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** 2 (AID & ABET) Felony NRS 239.330 3 On or about July 10, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of 4 Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public 5 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered 6 or recorded in a public office under the law of the State of Nevada, to wit: 7 On or about July 10, 2006, Defendant TRAFFORD, within Clark County, State of 8 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 9 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 10 0003399 of Official Records with the Office of the County Recorder of Clark County, Nevada 11 dated July 10, 2006. Said document was forged in that it purported to be signed by Defendant 12 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 13 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 14 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 15 false documents be given full legal effect and that this criminal activity not be discovered. 16 This activity was discovered on or about December of 2010. 17

**COUNT 257** 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 258**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 10, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 10, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the

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Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 1 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 2 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 3 UNDER DEED OF TRUST, Instrument No. 0003399 of Official Records filed in the Office of 4 the County Recorder of Clark County, Nevada dated July 10, 2006. These actions were 5 performed in a secretive manner in order that the false documents be given full legal effect 6 and that this criminal activity not be discovered. This activity was discovered on or about 7 December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 259**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 24, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

18 On or about July 24, 2006, Defendant **TRAFFORD** within Clark County, State of 19 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 20 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 21 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 22 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 23 0003045 of Official Records filed in the Office of the County Recorder of Clark County, 24 Nevada dated July 24, 2006, when Defendant **TRAFFORD** was not in Defendant's presence 25 and further never signed said document. These actions were performed in a secretive 26 manner in order that the false documents be given full legal effect and that this criminal 27 activity not be discovered. This activity was discovered on or about December of 2010. 28

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

# **COUNT 260**

### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about July 24, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 24, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003045 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 24, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 261**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about July 24, 2006, Defendant TRAFFORD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution
 thereof was proved, to wit:

On or about July 24, 2006, Defendant **TRAFFORD** planned, directed, and arranged to 3 have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 4 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 5 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 6 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 7 8 UNDER DEED OF TRUST, Instrument No. 0003045 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 24, 2006. These actions were 9 performed in a secretive manner in order that the false documents be given full legal effect 10 and that this criminal activity not be discovered. This activity was discovered on or about 11 December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 262

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 10, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about August 10, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter

"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to

take proof or acknowledgment of an instrument, to forge and notarize her signature on a

<sup>26</sup> NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.

<sup>27</sup> 0003303 of Official Records filed in the Office of the County Recorder of Clark County,

<sup>28</sup> Nevada dated August 10, 2006, when Defendant **TRAFFORD** was not in Defendant's

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presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

### **COUNT 263**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about August 10, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 10, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003303 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 10, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 264**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 10, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 10, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003303 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 10, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 265

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 11, 2006, Defendant **TRAFFORD**, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
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On or about August 11, 2006, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003473 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated August 11, 2006, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# **COUNT 266**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about August 11, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 11, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003473 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 11, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

3 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR

**RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 267**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 11, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 11, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003473 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 11, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 268</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about August 14, 2006, Defendant <b>TRAFFORD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about August 14, 2006, Defendant <b>TRAFFORD</b> within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003617 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated August 14, 2006, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a Gross Misdemeanor.
21	<u>COUNT 269</u>
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
23	<u>(AID &amp; ABET)</u> Felony NRS 239.330
24	On or about August 14, 2006, Defendant <b>TRAFFORD</b> did, in the County of Clark, State
25	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered

or recorded in a public office under the law of the State of Nevada, to wit:

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On or about August 14, 2006, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003617 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated August 14, 2006. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 270

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 14, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 14, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003617 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 14, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 271** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about September 27, 2006, Defendant TRAFFORD, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about September 27, 2006, Defendant **TRAFFORD** within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0005401 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated September 27, 2006, when Defendant **TRAFFORD** was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -198

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# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

**COUNT 272** 

On or about September 27, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 27, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005401 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 27, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 273**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 27, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about September 27, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed

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by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 1 instrument, to forge and willfully certify falsely that the execution of this instrument was 2 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 3 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005401 of Official Records 4 filed in the Office of the County Recorder of Clark County, Nevada dated September 27, 2006. 5 These actions were performed in a secretive manner in order that the false documents be 6 given full legal effect and that this criminal activity not be discovered. This activity was 7 discovered on or about December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

**COUNT 274** 

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about October 2, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

18 On or about October 2, 2006, Defendant **TRAFFORD** within Clark County, State of 19 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 20 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 21 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 22 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 23 0003934 of Official Records filed in the Office of the County Recorder of Clark County, 24 Nevada dated October 2, 2006, when Defendant **TRAFFORD** was not in Defendant's 25 presence and further never signed said document. These actions were performed in a 26 secretive manner in order that the false documents be given full legal effect and that this 27 criminal activity not be discovered. This activity was discovered on or about December of 28 2010.

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

# **COUNT 275**

### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about October 2, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 2, 2006, Defendant TRAFFORD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003934 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 2, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING, a violation of NRS 239.330, a category C felony.

# **COUNT 276**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about October 2, 2006, **DEFENDANT TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about October 2, 2006, Defendant **TRAFFORD** planned, directed, and arranged 3 to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 4 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 5 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 6 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 7 8 UNDER DEED OF TRUST, Instrument No. 0003934 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 2, 2006. 9 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN INSTRUMENTS a 10

category D felony pursuant to NRS 205.120. These actions were performed in a secretive
 manner in order that the false documents be given full legal effect and that this criminal
 activity not be discovered. This activity was discovered on or about December of 2010.

### **COUNT 277**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET)

#### **GROSS MISDEMEANOR NRS 240.155(2)**

On or about October 11, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about October 11, 2006, Defendant **TRAFFORD** within Clark County, State of 22 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 23 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 24 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 25 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 26 0004068 of Official Records filed in the Office of the County Recorder of Clark County, 27 Nevada dated October 11, 2006, when Defendant TRAFFORD was not in Defendant's 28 presence and further never signed said document. These actions were performed in a - -

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secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

# **COUNT 278**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 11, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 11, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004068 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 11, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 279**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 11, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 11, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004068 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 11, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 280

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 28, 2006, Defendant TRAFFORD, within Clark County, State of
Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
when said person whose signature was being notarizing was not in the notary's presence, to
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On or about November 28, 2006, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0005233 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated November 28, 2006, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# COUNT 281

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 28, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 28, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005233 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 28, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 282**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 28, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 28, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005233 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 28, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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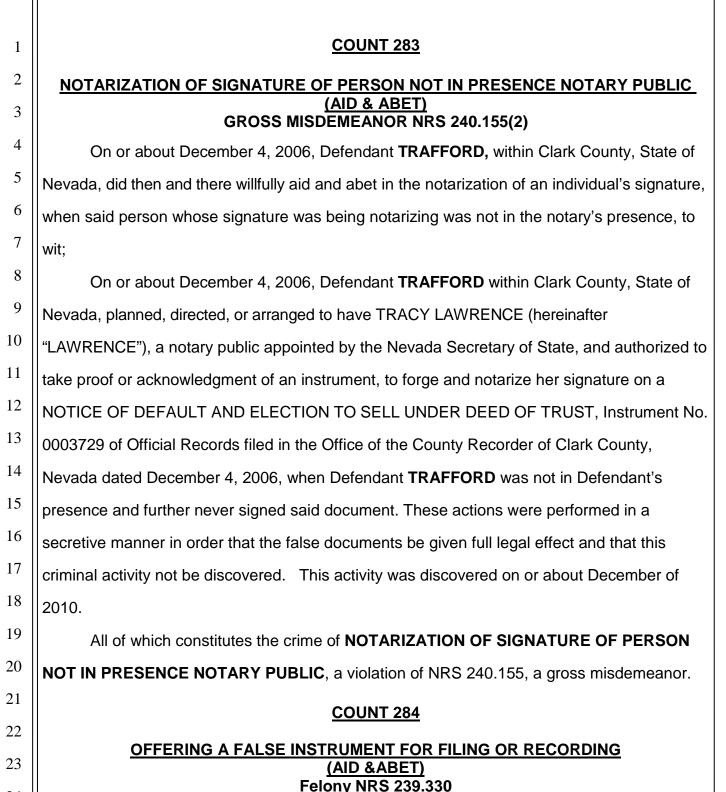
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On or about December 4, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

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On or about December 4, 2006, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003729 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated December 4, 2006. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 285**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 4, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about December 4, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003729 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 4, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 286** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about December 5, 2006, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about December 5, 2006, Defendant TRAFFORD within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0004038 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated December 5, 2006, when Defendant **TRAFFORD** was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -

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# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

**COUNT 287** 

On or about December 5, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about December 5, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004038 of Official Records with the Office of the County Recorder of Clark County, Nevada dated December 5, 2006. Said document was forged in that it purported to be signed by **DEFENDANT TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact **DEFENDANT TRAFFORD** did not sign said instrument, as **DEFENDANT TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of **NRS 239.330**, a category C felony.

# **COUNT 288**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about December 5, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about December 5, 2006, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the

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Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004038 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 5, 2006. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 289**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about December 13, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about December 13, 2006, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003887 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 13, 2006, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# **COUNT 290**

### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about December 13, 2006, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about December 13, 2006, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003887 of Official Records with the Office of the County Recorder of Clark County, Nevada dated December 13, 2006. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 291</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about December 13, 2006, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about December 13, 2006, Defendant **TRAFFORD** planned, directed, and 3 arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed 4 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 5 instrument, to forge and willfully certify falsely that the execution of this instrument was 6 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 7 8 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003887 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated December 13, 2006. 9 These actions were performed in a secretive manner in order that the false documents be 10 given full legal effect and that this criminal activity not be discovered. This activity was 11 discovered on or about December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 292

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 18, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about January 18, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter

"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to

take proof or acknowledgment of an instrument, to forge and notarize her signature on a

<sup>26</sup> NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.

<sup>27</sup> 0003720 of Official Records filed in the Office of the County Recorder of Clark County,

 $^{28}$  Nevada dated January 18, 2007, when Defendant **TRAFFORD** was not in Defendant's

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presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

### **COUNT 293**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 18, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 18, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003720 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 18, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### **COUNT 294**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 18, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 18, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003720 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 18, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 295**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 24, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

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On or about January 24, 2007, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003848 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated January 24, 2007, when Defendant **TRAFFORD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# **COUNT 296**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 24, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 24, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003848 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 24, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### COUNT 297

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 24, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 24, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003848 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 24, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 298</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about February 7, 2007, Defendant TRAFFORD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about February 7, 2007, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0003402 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated February 8, 2007, when Defendant TRAFFORD was not in Defendant's
15	presence and further never signed said document. These actions were performed in a
16	secretive manner in order that the false documents be given full legal effect and that this
17	criminal activity not be discovered. This activity was discovered on or about December of
18	2010.
19	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
20	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
21	<u>COUNT 299</u>
22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
23	<u>(AID &amp;ABET)</u> Felony NRS 239.330
24	On or about February 8, 2007, Defendant <b>TRAFFORD</b> did, in the County of Clark,
25	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
26	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
27	registered or recorded in a public office under the law of the State of Nevada, to wit:
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On or about February 8, 2007, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 3 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003402 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated February 8, 2007. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 300**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 7, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 7, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003402 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 8, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about 1 December of 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 **COUNT 301** 5 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about February 20, 2007, Defendant **TRAFFORD**, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarizing was not in the notary's presence, to 11 wit: 12 On or about February 20, 2007, Defendant **TRAFFORD** within Clark County, State of 13 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 14 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 15 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 16 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 17 0003277 of Official Records filed in the Office of the County Recorder of Clark County, 18 Nevada dated February 20, 2007, when Defendant **TRAFFORD** was not in Defendant's 19 presence and further never signed said document. These actions were performed in a 20 secretive manner in order that the false documents be given full legal effect and that this 21 criminal activity not be discovered. This activity was discovered on or about December of 22 2010. 23 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 24 **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 25 /// 26 /// 27 /// 28 /// - -

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# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

**COUNT 302** 

On or about February 20, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 20, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003277 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 20, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 303

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 20, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 20, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the

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Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 1 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 2 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 3 UNDER DEED OF TRUST, Instrument No. 0003277 of Official Records filed in the Office of 4 the County Recorder of Clark County, Nevada dated February 20, 2007. These actions were 5 performed in a secretive manner in order that the false documents be given full legal effect 6 and that this criminal activity not be discovered. This activity was discovered on or about 7 December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

10 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 304**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 5, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

18 On or about March 5, 2007, Defendant **TRAFFORD** within Clark County, State of 19 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 20 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 21 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 22 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 23 0003645 of Official Records filed in the Office of the County Recorder of Clark County, 24 Nevada dated March 5, 2007, when Defendant TRAFFORD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 305**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about March 5, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 5, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003645 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 5, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 306**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about March 5, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify

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falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about March 5, 2007, Defendant **TRAFFORD** planned, directed, and arranged to 3 have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the 4 Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 5 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 6 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 7 8 UNDER DEED OF TRUST, Instrument No. 0003645 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 5, 2007. These actions were 9 performed in a secretive manner in order that the false documents be given full legal effect 10 and that this criminal activity not be discovered. This activity was discovered on or about 11 December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 307

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 15, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 15, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter

"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to

take proof or acknowledgment of an instrument, to forge and notarize her signature on a

<sup>26</sup> NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.

<sup>27</sup> 0003649 of Official Records filed in the Office of the County Recorder of Clark County,

<sup>28</sup> Nevada dated March 15, 2007, when Defendant **TRAFFORD** was not in Defendant's

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presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### **COUNT 308**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 15, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 15, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003649 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 15, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### **COUNT 309**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about March 15, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 15, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003649 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 15, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 310</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about April 10, 2007, Defendant TRAFFORD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit; ///

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On or about April 10, 2007, Defendant **TRAFFORD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003952 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated April 10, 2007, when Defendant **TRAFFORD** was not in Defendant's presence 7 and further never signed said document. These actions were performed in a secretive 8 manner in order that the false documents be given full legal effect and that this criminal 9 activity not be discovered. This activity was discovered on or about December of 2010. 10

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

## COUNT 311

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 10, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 10, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003952 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 10, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### COUNT 312

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 10, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 10, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003952 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 10, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 313</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about April 18, 2007, Defendant TRAFFORD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarizing was not in the notary's presence, to
7	wit;
8	On or about April 18, 2007, Defendant TRAFFORD within Clark County, State of
9	Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter
10	"LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to
11	take proof or acknowledgment of an instrument, to forge and notarize her signature on a
12	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
13	0004262 of Official Records filed in the Office of the County Recorder of Clark County,
14	Nevada dated April 18, 2007, when Defendant <b>TRAFFORD</b> was not in Defendant's presence
15	and further never signed said document. These actions were performed in a secretive
16	manner in order that the false documents be given full legal effect and that this criminal
17	activity not be discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 314</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about April 18, 2007, Defendant <b>TRAFFORD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about April 18, 2007, Defendant <b>TRAFFORD</b> , within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0004262 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated April 18, 2007. Said document was forged in that it purported to be signed by 3 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 5 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of **NRS 239.330**, a category C felony.

#### **COUNT 315**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 18, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 18, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004262 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 18, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 316**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about May 14, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about May 14, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002812 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 14, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON **NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. <u>COUNT 317</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about May 14, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 14, 2007, Defendant **TRAFFORD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 3 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002812 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated May 14, 2007. Said document was forged in that it purported to be signed by 5 Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as 7 Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 318

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 14, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 14, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002812 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 14, 2007. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 319

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 6, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 6, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002698 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 6, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# **COUNT 320**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 6, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 6, 2007, Defendant **TRAFFORD**, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002698 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 6, 2007. Said document was forged in that it purported to be signed by Defendant 7 **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in 8 truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant 9 **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. 11 This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 321

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 6, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 6, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002698 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 6, 2007. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to **NRS 205.120.** 

## COUNT 322

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 20, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about June 20, 2007, Defendant **TRAFFORD** within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002885 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 20, 2007, when Defendant **TRAFFORD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# <u>OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING</u> <u>(AID &ABET)</u> Felony NRS 239.330

**COUNT 323** 

On or about June 20, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 20, 2007, **DEFENDANT TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002885 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 20, 2007. Said document was forged in that it purported to be signed by **DEFENDANT TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact **DEFENDANT TRAFFORD** did not sign said instrument, as **DEFENDANT TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 324**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 20, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 20, 2007, Defendant **TRAFFORD** planned, directed, and arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed by the

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Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, 1 to forge and willfully certify falsely that the execution of this instrument was acknowledged by 2 her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL 3 UNDER DEED OF TRUST, Instrument No. 0002885 of Official Records filed in the Office of 4 the County Recorder of Clark County, Nevada dated June 20, 2007. These actions were 5 performed in a secretive manner in order that the false documents be given full legal effect 6 and that this criminal activity not be discovered. This activity was discovered on or about 7 December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 325**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 19, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarizing was not in the notary's presence, to wit;

18 On or about September 19, 2007, Defendant **TRAFFORD** within Clark County, State of 19 Nevada, planned, directed, or arranged to have TRACY LAWRENCE (hereinafter 20 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to 21 take proof or acknowledgment of an instrument, to forge and notarize her signature on a 22 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 23 0002494 of Official Records filed in the Office of the County Recorder of Clark County, 24 Nevada dated September 19, 2007, when Defendant TRAFFORD was not in Defendant's 25 presence and further never signed said document. These actions were performed in a 26 secretive manner in order that the false documents be given full legal effect and that this 27 criminal activity not be discovered. This activity was discovered on or about December of 28 2010.

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

## **COUNT 326**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about September 19, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 19, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002494 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 19, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 327</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about September 19, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about September 19, 2007, Defendant **TRAFFORD** planned, directed, and 3 arranged to have TRACY LAWRENCE (hereinafter "LAWRENCE"), a notary public appointed 4 by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an 5 instrument, to forge and willfully certify falsely that the execution of this instrument was 6 acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND 7 ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002494 of Official Records 8 filed in the Office of the County Recorder of Clark County, Nevada dated September 19, 2007. 9 These actions were performed in a secretive manner in order that the false documents be 10 given full legal effect and that this criminal activity not be discovered. This activity was 11 discovered on or about December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to **NRS 205.120**.

## **COUNT 328**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 18, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about February 18, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001840 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 18, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and

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further never signed said document. These actions were performed in a secretive manner in
 order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 329**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 18, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 18, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001840 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 18, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 330

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 18, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 1 falsely that the execution of the instrument was acknowledged by a party thereto or that the 2 3 execution thereof was proved, to wit:

On or about February 18, 2005, Defendant SHEPPARD planned, directed, and arranged 4 to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 5 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 6 and willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0001840 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated February 18, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 331**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about February 23, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about February 23, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003198 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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February 23, 2005 when Defendant SHEPPARD was not in Defendant's presence and further
 never signed said document. These actions were performed in a secretive manner in order
 that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a Gross Misdemeanor.

#### **COUNT 332**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 23, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 23, 2005 Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003198 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 23, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

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#### **COUNT 333**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 23, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 23, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003198 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 23, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 334**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 2, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about March 2, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003220 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 March 2, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 11

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

## **COUNT 335**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 2, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 2, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003220 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 2, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 336</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 2, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 2, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003220 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 2, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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**COUNT 337** 1 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC 2 (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2) 3 On or about March 3, 2005, Defendant SHEPPARD, within Clark County, State of 4 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 5 when said person whose signature was being notarized was not in the notary's presence, to 6 wit; 7 On or about March 3, 2005, Defendant SHEPPARD within Clark County, State of 8 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 9 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 10 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 11 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002596 of 12 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 13 March 3, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further 14 never signed said document. These actions were performed in a secretive manner in order 15 that the false documents be given full legal effect and that this criminal activity not be 16 discovered. This activity was discovered on or about December of 2010. 17 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON NOT IN 18 **PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor. 19 20 **COUNT 338** 21 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) 22 Felony NRS 239.330 23 On or about March 3, 2005, Defendant SHEPPARD did, in the County of Clark, State 24 of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public 25 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered 26 or recorded in a public office under the law of the State of Nevada, to wit: 27 On or about March 3, 2005, Defendant SHEPPARD, within Clark County, State of 28 Nevada, either directly or through an agent or employee, caused to be offered for filing, a

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0002596 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated March 3, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

9 All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR** 

10 **RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 339

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 3, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 3, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002596 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 3, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 340**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about March 7, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 7, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002950 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 7, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## <u>COUNT 341</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about March 7, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 7, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002950 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated March 7, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 342**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 7, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 7, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002950 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 343

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 25, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 25, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003040 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 25, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 344</u>

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 25, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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- office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
   or recorded in a public office under the law of the State of Nevada, to wit:
- 3 On or about March 25, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada,
- 4 either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF
- 5 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003040 of
- 6 || Official Records with the Office of the County Recorder of Clark County, Nevada dated March
- 7 || 25, 2005. Said document was forged in that it purported to be signed by Defendant
- 8 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in
- 9 || truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant
- 10 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the
- 11 false documents be given full legal effect and that this criminal activity not be discovered.

This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 345**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 25, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 25, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003040 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 25, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 346**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 1, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 1, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003572 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 1, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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## **COUNT 347**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 1, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 1, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003572 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 1, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 348**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 1, 2005 Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about April 1, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003572 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 1, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 349**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 6, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002566 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 6, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered.

2 This activity was discovered on or about December of 2010.

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

## **COUNT 350**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 6, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002566 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 6, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 351</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 6, 2005, Defendant SHEPPARD, within the County of Clark, State of
 Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that 1 the execution of the instrument was acknowledged by a party thereto or that the execution 2 3 thereof was proved, to wit:

On or about April 6, 2005, Defendant SHEPPARD planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0002566 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated April 6, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 352**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about April 19, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 19, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003711 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April

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19, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
 signed said document. These actions were performed in a secretive manner in order that the
 false documents be given full legal effect and that this criminal activity not be discovered.
 This activity was discovered on or about December of 2010.

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

## **COUNT 353**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 19, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 19, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003711 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 19, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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## **COUNT 354**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 19, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 19, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003711 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 19, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 355**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 21, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about April 21, 2005, Defendant SHEPPARD within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003134 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 6 21, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never 7 signed said document. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

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

## **COUNT 356**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 21, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 21, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003134 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 21, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 357

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 21, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 21, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003134 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 21, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 358</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about April 27, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about April 27, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003409 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April
14	27, 2005 when Defendant SHEPPARD was not in Defendant's presence and further never
15	signed said document. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered.
17	This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	COUNT 359
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	<u>(AID &amp;ABET)</u> Felony NRS 239.330
23	On or about April 27, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about April 27, 2005, Defendant SHEPPARD, within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003409 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 27, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 360**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 27, 2005 Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 27, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003409 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 27, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 361**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about April 29, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 29, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003452 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 29, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## <u>COUNT 362</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about April 29, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 29, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003452 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 29, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 363**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 29, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 29, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003452 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 29, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.
 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 364**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 2, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 2, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003863 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 2, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# COUNT 365

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 2, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 2, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003863 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated May 2, 2005. Said document was forged in that it purported to be signed by Defendant 7 8 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant 9 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. This 11 activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 366**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 2, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 2, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003863 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 2, 2005. These actions were performed

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in a secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of

3 2010.

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All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 367

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 19, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 19, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004863 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 19, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 368**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 19, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 19, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004863 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 19, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## **COUNT 369**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 19, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about May 19, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0004863 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated May 19, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

## **COUNT 370**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 24, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 24, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003090 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 24, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered.

2 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON NOT

**IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

## COUNT 371

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 24, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 24, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003090 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 24, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 372

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 24, 2005, Defendant SHEPPARD, within the County of Clark, State of
Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that
 the execution of the instrument was acknowledged by a party thereto or that the execution
 thereof was proved, to wit:

On or about May 24, 2005, Defendant SHEPPARD planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003090 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated May 24, 2005. These actions were 10 11 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 373**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 25, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 25, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003978 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May

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25, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
 signed said document. These actions were performed in a secretive manner in order that the
 false documents be given full legal effect and that this criminal activity not be discovered.
 This activity was discovered on or about December of 2010.

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

## **COUNT 374**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 25, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 25, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003978 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 25, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as **DEFENDANT SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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## **COUNT 375**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 25, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 25, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003978 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 25, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 376**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 31, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about May 31, 2005, Defendant SHEPPARD within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004121 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 6 31, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never 7 signed said document. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

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

## **COUNT 377**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 31, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 31, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004121 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 31, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 378</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 31, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 31, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004121 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 31, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 379</u>
1 2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
2	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about June 2, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about June 2, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002962 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	June 2, 2005, when Defendant SHEPPARD was not in Defendant's presence and further
15	never signed said document. These actions were performed in a secretive manner in order
16	that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 380</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about June 2, 2005 Defendant <b>SHEPPARD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about June 2, 2005, Defendant SHEPPARD, within Clark County, State of Nevada,
28	either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF
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DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002962 of 1 Official Records with the Office of the County Recorder of Clark County, Nevada dated June 2 2, 2005. Said document was forged in that it purported to be signed by Defendant 3 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in 4 truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant 5 SHEPPARD well knew. These actions were performed in a secretive manner in order that the 6 false documents be given full legal effect and that this criminal activity not be discovered. 7 This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### <u>COUNT 381</u>

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 2, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 2, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002962 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 2, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 382**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about June 8, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 8, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002759 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 8, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 383</u>

## **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about June 8, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 8, 2005, Defendant SHEPPARD, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002759 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated June 8, 2005. Said document was forged in that it purported to be signed by Defendant 5 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in 6 truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant well knew. 7 These actions were performed in a secretive manner in order that the false documents be 8 given full legal effect and that this criminal activity not be discovered. This activity was 9 discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 384

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 8, 2005 Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 8, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002759 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 8, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 385

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 10, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 10, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003013 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 10, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 386</u>

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 10, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 10, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003013 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 10, 2005. Said document was forged in that it purported to be signed by 7 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 387

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 10, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 10, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003013 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 10, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 388**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 13, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 13, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003545 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 13, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## COUNT 389

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 13, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 13, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003545 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 13, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 390 FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 13, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 13, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary

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of State, and authorized to take proof or acknowledgment of an instrument, to forge and 1 willfully certify falsely that the execution of this instrument was acknowledged by her 2 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 3 DEED OF TRUST, Instrument No. 0003545 of Official Records filed in the Office of the 4 County Recorder of Clark County, Nevada dated June 13, 2005. These actions were 5 performed in a secretive manner in order that the false documents be given full legal effect 6 and that this criminal activity not be discovered. This activity was discovered on or about 7 December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 391

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 14, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 14, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003649 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 14, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 392**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about June 14, 2005 Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 14, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003649 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 14, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 393</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about June 14, 2005, Defendant SHEPPARD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify

falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about June 14, 2005, Defendant SHEPPARD planned, directed, and arranged to 3 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 4 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 5 willfully certify falsely that the execution of this instrument was acknowledged by her 6 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 7 DEED OF TRUST, Instrument No. 0003649 of Official Records filed in the Office of the 8 County Recorder of Clark County, Nevada dated June 14, 2005. These actions were 9 performed in a secretive manner in order that the false documents be given full legal effect 10 and that this criminal activity not be discovered. This activity was discovered on or about 11 December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## <u>COUNT 394</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 21, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 21, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003758 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 21, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further

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never signed said document. These actions were performed in a secretive manner in order
 that the false documents be given full legal effect and that this criminal activity not be

discovered. This activity was discovered on or about December of 2010.

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

## **COUNT 395**

## OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 21, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 21, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003758 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 21, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### COUNT 396

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 21, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 21, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003758 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 21, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## **COUNT 397**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about July 28, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003610 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 6 28, 2005 when Defendant SHEPPARD was not in Defendant's presence and further never 7 signed said document. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

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

### **COUNT 398**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 28, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003610 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 28, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the

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1 false documents be given full legal effect and that this criminal activity not be discovered.

2 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 399</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 28, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 28, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003610 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 28, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 400</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
2	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about August 2, 2005, Defendant SHEPPARD, within Clark County, State of
4 5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about August 2, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003577 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	August 2, 2005, when Defendant SHEPPARD was not in Defendant's presence and further
15	never signed said document. These actions were performed in a secretive manner in order
16	that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 401</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about August 2, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark, State
24	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about August 2, 2005, Defendant SHEPPARD, within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003577 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated August 2, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 402**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 2, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 2, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003577 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 2, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 403**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about August 5, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about August 5, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002420 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 5, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 404</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about August 5, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 5, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002420 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated August 5, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 405**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 5, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 5, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002420 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 5, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 406**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 11, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about August 11, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003341 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 11, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# COUNT 407

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about August 11, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 11, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003341 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated August 11, 2005. Said document was forged in that it purported to be signed by 7 Defendant SHEPPARD, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 408**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 11, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 11, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003341 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 11, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### <u>COUNT 409</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 14, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about September 14, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003653 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 14, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.
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#### <u>COUNT 410</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 14, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 14, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003653 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 14, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

# COUNT 411

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 14, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about September 14, 2005, Defendant SHEPPARD planned, directed, and 1 arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 2 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 3 and willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0003653 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated September 14, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 412**

#### <u>NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC</u> (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 23, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about September 23, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005066 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 23, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

#### **COUNT 413**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about September 23, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 23, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0005066 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 23, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR** 

**RECORDING**, a violation of **NRS 239.330**, a category C felony.

# COUNT 414

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about September 23, 2005, Defendant SHEPPARD, within the County of Clark,
 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about September 23, 2005, Defendant SHEPPARD planned, directed, and 4 arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 5 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 6 and willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0005066 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated September 23, 2005. These actions were 10 11 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 415**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 13, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 13, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003514 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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1 January 13, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further

2 || never signed said document. These actions were performed in a secretive manner in order

3 || that the false documents be given full legal effect and that this criminal activity not be

4 discovered. This activity was discovered on or about December of 2010.

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

#### **COUNT 416**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 13, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 13, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003514 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 13, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

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### <u>COUNT 417</u>

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 13, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 13, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003514 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 13, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### COUNT 418

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 6, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a

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notary public appointed by the Nevada Secretary of State, and authorized to take proof or 1 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 2 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003905 of 3 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 4 January 6, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further 5 never signed said document. These actions were performed in a secretive manner in order 6 that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

#### **COUNT 419**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 6, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003905 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 6, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 420

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 6, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 6, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003905 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 6, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 421</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 7, 2005, Defendant **SHEPPARD,** within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 1 when said person whose signature was being notarized was not in the notary's presence, to 2 wit:

On or about January 7, 2005, Defendant SHEPPARD within Clark County, State of 3 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 4 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 5 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 6 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002574 of 7 8 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 7, 2005, when Defendant SHEPPARD was not in Defendant's presence and further 9 never signed said document. These actions were performed in a secretive manner in order 10 that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

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

# **COUNT 422**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 7, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002574 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 7, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as

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Defendant SHEPPARD well knew. These actions were performed in a secretive manner in
 order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 423

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 7, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 7, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002574 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 424</u>
1 2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
2	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about January 20, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about January 20, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003267 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	January 20, 2005, when Defendant SHEPPARD was not in Defendant's presence and further
15	never signed said document. These actions were performed in a secretive manner in order
16	that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 425</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about January 20, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark,
24	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
25	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
26	registered or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about January 20, 2005, Defendant SHEPPARD, within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003267 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated January 20, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 426**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 20, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 20, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003267 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 20, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 427**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about January 24, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 24, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002737 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 24, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT428</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about January 24, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 24, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002737 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated January 24, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 429**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 24, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 24, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002737 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 24, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### COUNT 430

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 27, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 27, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002456 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 27, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.
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#### <u>COUNT 431</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 27, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 27, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002456 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 27, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

#### **COUNT 432**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 27, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about January 27, 2005, Defendant **SHEPPARD** planned, directed, and arranged 1 to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 2 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 3 and willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0002456 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated January 27, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 433**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 31, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 31, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003173 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 31, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order

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that the false documents be given full legal effect and that this criminal activity not be

2 || discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# <u>COUNT 434</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about January 31, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 31, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003173 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 31, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 435

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 31, 2005, Defendant SHEPPARD, within the County of Clark,
 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 1 falsely that the execution of the instrument was acknowledged by a party thereto or that the 2 3 execution thereof was proved, to wit:

On or about January 31, 2005, Defendant SHEPPARD planned, directed, and arranged 4 to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 5 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 6 and willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003173 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated January 31, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 436**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about February 1, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about February 1, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003489 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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February 1, 2005, when Defendant SHEPPARD was not in Defendant's presence and further
 never signed said document. These actions were performed in a secretive manner in order
 that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

#### **COUNT 437**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 1, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 1, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003489 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 1, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING, a violation of NRS 239.330, a category C felony.

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#### COUNT 438

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 1, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 1, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003489 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 1, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 439**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 10, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about February 10, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003362 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 February 10, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10 All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON 11

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# **COUNT 440**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 10, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 10, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003362 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 10, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### <u>COUNT 441</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 10, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 10, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003362 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 10, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 442</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
2	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about February 14, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about February 14, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001818 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	February 14, 2005, when Defendant SHEPPARD was not in Defendant's presence and
15	further never signed said document. These actions were performed in a secretive manner in
16	order that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 443</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID & ABET) Felony NRS 239.330
23	On or about February 14, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark,
24	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a
25	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,
26	registered or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about February 14, 2005, Defendant SHEPPARD, within Clark County, State of

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 Nevada, either directly or through an agent or employee, caused to be offered for filing, a

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0001818 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated February 14, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 444**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 14, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 14, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0001818 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 14, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 445**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about February 28, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about February 28, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003790 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 28, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 446</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about February 28, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 28, 2005, Defendant SHEPPARD, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003790 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated February 28, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 447**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 28, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 28, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003790 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 28, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 448**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 8, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 8, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003527 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 8, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 449</u>

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 8, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 8, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003527 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated March 8, 2005. Said document was forged in that it purported to be signed by 7 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 450

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 8, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 8, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003527 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 8, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### <u>COUNT 451</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 10, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 10, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002855 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 10, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
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#### **COUNT 452**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about March 10, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 10, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002855 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 10, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 453**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

23 On or about March 10, 2005, Defendant SHEPPARD, within the County of Clark, State 24 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take 25 proof or acknowledgment of an instrument which by law may be recorded, willfully certify 26 falsely that the execution of the instrument was acknowledged by a party thereto or that the 27 execution thereof was proved, to wit:

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On or about March 10, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0002855 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated March 10, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 454**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 18, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 18, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002869 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 18, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order

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that the false documents be given full legal effect and that this criminal activity not be

2 || discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

### **COUNT 455**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 18, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 18, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002869 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 18, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 456

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 18, 2005, Defendant SHEPPARD, within the County of Clark, State
 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify 1 falsely that the execution of the instrument was acknowledged by a party thereto or that the 2 3 execution thereof was proved, to wit:

On or about March 18, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0002869 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated March 18, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 457**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about March 31, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 31, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004973 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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March 31, 2005, when Defendant SHEPPARD was not in Defendant's presence and further
 never signed said document. These actions were performed in a secretive manner in order
 that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

#### **COUNT 458**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 31, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 31, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004973 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 31, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### COUNT 459

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 31, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 31, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004973 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 31, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 460**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about April 7, 2005, Defendant SHEPPARD within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002792 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 6 7, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never 7 signed said document. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. This 9 activity was discovered on or about December of 2010. 10

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

# COUNT 461

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 7, 2005 Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002792 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 7, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered. This
 activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 462**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 7, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 7, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002792 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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	<u>COUNT 463</u>
	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
	On or about April 12, 2005, Defendant SHEPPARD, within Clark County, State of
	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
	when said person whose signature was being notarized was not in the notary's presence, to
	wit;
	On or about April 12, 2005, Defendant SHEPPARD within Clark County, State of
	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002752 of
,	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated Apri
	12, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
ę	signed said document. These actions were performed in a secretive manner in order that the
fa	alse documents be given full legal effect and that this criminal activity not be discovered.
Т	This activity was discovered on or about December of 2010.
	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
I	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
	COUNT 464
	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
	<u>(AID &amp;ABET)</u> Felony NRS 239.330
	On or about April 12, 2005, Defendant SHEPPARD did, in the County of Clark, State of
	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
,	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
	or recorded in a public office under the law of the State of Nevada, to wit:
	On or about April 12, 2005, Defendant SHEPPARD, within Clark County, State of
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002752 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 12, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 465**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 12, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 12, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002752 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 12, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 466**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about April 14, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 14, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002310 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 14, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 467</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about April 14, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 14, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002310 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 14, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 468**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 14, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 14, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002310 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 14, 2005. hese actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

criminal activity not be discovered. This activity was discovered on or about December of
 2010.
 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# <u>COUNT 469</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 18, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 18, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002534 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 18, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 470</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 18, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 18, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0002534 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated April 18, 2005. Said document was forged in that it purported to be signed by 7 Defendant SHEPPARD, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 471</u>

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 18, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 18, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002534 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 18, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### COUNT 472

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 22, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 22, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003515 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 22, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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1	<u>COUNT 473</u>
2	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
3	(AID &ABET)
4	Felony NRS 239.330
5	On or about April 22, 2005, Defendant SHEPPARD did, in the County of Clark, State of
6	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
7	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
8	or recorded in a public office under the law of the State of Nevada, to wit:
9	On or about April 22, 2005, Defendant SHEPPARD, within Clark County, State of
10	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
11	NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
12	0003515 of Official Records with the Office of the County Recorder of Clark County, Nevada
13	dated April 22, 2005. Said document was forged in that it purported to be signed by
14	Defendant SHEPPARD, as the agent for the beneficiary of the property listed in said
15	instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as
16	Defendant SHEPPARD well knew. These actions were performed in a secretive manner in
17	order that the false documents be given full legal effect and that this criminal activity not be
18	discovered. This activity was discovered on or about December of 2010.
19	All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING
20	OR RECORDING, a violation of NRS 239.330, a category C felony.
21	<u>COUNT 474</u>
22	FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET)
23	FELONY NRS 205.120
24	On or about April 22, 2005, Defendant <b>SHEPPARD</b> , within the County of Clark, State of
25	Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof
26	or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that
27	the execution of the instrument was acknowledged by a party thereto or that the execution
28	thereof was proved, to wit:
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of

On or about April 22, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0003515 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated April 22, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 475**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 25, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 25, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003260 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 25, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered.

This activity was discovered on or about December of 2010. 2

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

# **COUNT 476**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about April 25, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 25, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003260 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 25, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 477**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about April 25, 2005, Defendant SHEPPARD, within the County of Clark, State of 28 Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that
 the execution of the instrument was acknowledged by a party thereto or that the execution
 thereof was proved, to wit:

On or about April 25, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003260 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated April 25, 2005. These actions were 10 11 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 478**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 28, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003469 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April

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28, 2005 when Defendant SHEPPARD was not in Defendant's presence and further never
 signed said document. These actions were performed in a secretive manner in order that the
 false documents be given full legal effect and that this criminal activity not be discovered.
 This activity was discovered on or about December of 2010.

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

#### <u>COUNT 479</u>

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about April 28, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003469 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 28, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

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#### <u>COUNT 480</u>

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about April 28, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about April 28, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003469 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 28, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 481

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 3, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a

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notary public appointed by the Nevada Secretary of State, and authorized to take proof or 1 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 2 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004058 of 3 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 4 5, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never 5 signed said document. These actions were performed in a secretive manner in order that the 6 false documents be given full legal effect and that this criminal activity not be discovered. This 7 activity was discovered on or about December of 2010. 8

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

#### **COUNT 482**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 3, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004058 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 3, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 483</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 3, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 3, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004058 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 3, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 484</u>

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 1 when said person whose signature was being notarized was not in the notary's presence, to 2 wit:

On or about May 6, 2005, Defendant SHEPPARD within Clark County, State of 3 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 4 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 5 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 6 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002741 of 7 8 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 6, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never 9 signed said document. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. 11 This activity was discovered on or about December of 2010. 12

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

# **COUNT 485**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about May 6, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 6, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002741 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 6, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant

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SHEPPARD well knew. These actions were performed in a secretive manner in order that the
 false documents be given full legal effect and that this criminal activity not be discovered. This
 activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 486**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 6, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 6, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002741 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 6, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 487</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about May 11, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about May 11, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002850 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May
14	11, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
15	signed said document. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered. This
17	activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	<b>NOT IN PRESENCE NOTARY PUBLIC</b> , a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 488</u>
21 22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	( <u>AID &amp;ABET)</u> Felony NRS 239.330
23	On or about May 11, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark, State of
25	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
27	or recorded in a public office under the law of the State of Nevada, to wit:
28	On or about May 11, 2005, Defendant SHEPPARD, within Clark County, State of
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0002850 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated May 11, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

#### **COUNT 489**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 11, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 11, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002850 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 11, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 490**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about May 13, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 13, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004130 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 13, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 491</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about May 13, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 13, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 3 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004130 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated May 13, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 492**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 13, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 13, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004130 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 13, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 493

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 16, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 16, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002761 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 16, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330 On or about May 16, 2005, Defendant SHEPPARD did, in the County of Clark, State of

**COUNT 494** 

Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 16, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002761 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 16, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 495**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about May 16, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about May 16, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary

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of State, and authorized to take proof or acknowledgment of an instrument, to forge and 1 willfully certify falsely that the execution of this instrument was acknowledged by her 2 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 3 DEED OF TRUST, Instrument No. 0002761 of Official Records filed in the Office of the 4 County Recorder of Clark County, Nevada dated May 16, 2005. These actions were 5 performed in a secretive manner in order that the false documents be given full legal effect 6 and that this criminal activity not be discovered. This activity was discovered on or about 7 December of 2010. 8

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

#### **COUNT 496**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about May 23, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about May 23, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003208 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated May 23, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# **COUNT 497**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about May 23, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about May 23, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003208 of Official Records with the Office of the County Recorder of Clark County, Nevada dated May 23, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 498**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about May 23, 2005, Defendant SHEPPARD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution
 thereof was proved, to wit:

On or about May 23, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 3 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 4 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 5 willfully certify falsely that the execution of this instrument was acknowledged by her 6 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 7 DEED OF TRUST, Instrument No. 0003208 of Official Records filed in the Office of the 8 County Recorder of Clark County, Nevada dated May 23, 2005. These actions were 9 performed in a secretive manner in order that the false documents be given full legal effect 10 and that this criminal activity not be discovered. This activity was discovered on or about 11 December of 2010. 12

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### <u>COUNT 499</u>

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 3, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003919 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 3, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further

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never signed said document. These actions were performed in a secretive manner in order

2 || that the false documents be given full legal effect and that this criminal activity not be

3 discovered. This activity was discovered on or about December of 2010.

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

### **COUNT 500**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 3, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003919 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 3, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### COUNT 501

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 3, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 3, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003919 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 3, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

<u>COUNT 502</u>

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about June 7, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003461 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 June 7, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

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

### **COUNT 503**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 7, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 7, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003461 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 7, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the

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1 false documents be given full legal effect and that this criminal activity not be discovered.

2 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 504</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 7, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 7, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003461 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 7, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 505</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about June 15, 2005, Defendant <b>SHEPPARD,</b> within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about June 15, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003893 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	June 15, 2005 when Defendant SHEPPARD was not in Defendant's presence and further
15	never signed said document. These actions were performed in a secretive manner in order
16	that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	COUNT 506
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	<u>(AID &amp;ABET)</u> Felony NRS 239.330
23 24	On or about June 15, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
27	or recorded in a public office under the law of the State of Nevada, to wit:
28	On or about June 15, 2005, Defendant SHEPPARD, within Clark County, State of
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003893 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated June 15, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 507**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 15, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 15, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003893 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 15, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 508**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about June 16, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 16, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003531 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 16, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

### <u>COUNT 509</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about June 16, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 16, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003531 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated June 16, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 510

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 16, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 16, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003531 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 16, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

## COUNT 511

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 17, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 17, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003155 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 17, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

## COUNT 512

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 17, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 17, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003155 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 17, 2005. Said document was forged in that it purported to be signed by 7 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 8 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 9 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 10 order that the false documents be given full legal effect and that this criminal activity not be 11 discovered. This activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 513

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 17, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 17, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003155 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 17, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect
 and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### COUNT 514

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 20, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 20, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002661 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 20, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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### **COUNT 515**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 20, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 20, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002661 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 20, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 516**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 20, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about June 20, 2005, Defendant SHEPPARD planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0002661 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated June 20, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

### **COUNT 517**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 22, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 22, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003927 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 22, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order

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that the false documents be given full legal effect and that this criminal activity not be

2 || discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

### COUNT 518

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 22, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 22, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003927 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 22, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 519

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 22, 2005, Defendant SHEPPARD, within the County of Clark, State
 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about June 22, 2005, Defendant SHEPPARD planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003927 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated June 22, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 520**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 24, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 24, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003237 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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June 24, 2005 when Defendant SHEPPARD was not in Defendant's presence and further
 never signed said document. These actions were performed in a secretive manner in order
 that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

### COUNT 521

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 24, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 24, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003237 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 24, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### **COUNT 522**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 24, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 24, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003237 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 24, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 523**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about June 28, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002960 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 June 28, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10 11

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

### COUNT 524

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 28, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 28, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002960 of Official Records with the Office of the County Recorder of Clark County, Nevada dated June 28, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## COUNT 525

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 28, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 28, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002960 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 28, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	COUNT 526
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	(AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)
4	On or about June 30, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about June 30, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004586 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated
14	June 30, 2005 when Defendant SHEPPARD was not in Defendant's presence and further
15	never signed said document. These actions were performed in a secretive manner in order
16	that the false documents be given full legal effect and that this criminal activity not be
17	discovered. This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 527</u>
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about June 30, 2005, Defendant SHEPPARD did, in the County of Clark, State of
24	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
26	or recorded in a public office under the law of the State of Nevada, to wit:
27	On or about June 30, 2005, Defendant SHEPPARD, within Clark County, State of
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0004586 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated June 30, 2005. Said document was forged in that it purported to be signed by 3 **DEFENDANT SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact **DEFENDANT SHEPPARD** did not sign said instrument, 5 as **DEFENDANT SHEPPARD** well knew. These actions were performed in a secretive 6 manner in order that the false documents be given full legal effect and that this criminal 7 activity not be discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 528**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 30, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 30, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004586 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 30, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 529**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about July 5, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 5, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003046 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 5, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

### <u>COUNT 530</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about July 5, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 5, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003046 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated July 5, 2005. Said document was forged in that it purported to be signed by Defendant 5 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in 6 truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant 7 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. This 9 activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### COUNT 531

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 5, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 5, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003046 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 5, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this

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criminal activity not be discovered. This activity was discovered on or about December of 1 2010. 2 All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN 3 **INSTRUMENTS** a category D felony pursuant to NRS 205.120. 4 5 **COUNT 532** 6 NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) 7 **GROSS MISDEMEANOR NRS 240.155(2)** 8 On or about July 6, 2005, Defendant SHEPPARD, within Clark County, State of 9 Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, 10 when said person whose signature was being notarized was not in the notary's presence, to 11 wit: 12 On or about July 6, 2005, Defendant SHEPPARD within Clark County, State of 13 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 14 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 15 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 16 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004142 of 17 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 18 6, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never 19 signed said document. These actions were performed in a secretive manner in order that the 20 false documents be given full legal effect and that this criminal activity not be discovered. This 21 activity was discovered on or about December of 2010.

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

### **COUNT 533**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 6, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

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office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 6, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0004142 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated July 6, 2005. Said document was forged in that it purported to be signed by Defendant 7 8 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant 9 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. This 11 activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### <u>COUNT 534</u>

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 6, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 6, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004142 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 6, 2005. These actions were performed

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in a secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of

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All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### COUNT 535

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 11, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 11, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003256 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 11, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

### COUNT 536

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 11, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 11, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003256 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 11, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 537**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 11, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about July 11, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0003256 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated July 11, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

### **COUNT 538**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 12, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 12, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003068 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 12, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered. This
 activity was discovered on or about December of 2010.

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

#### **COUNT 539**

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 12, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 12, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003068 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 12, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

### **COUNT 540**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 12, 2005, Defendant SHEPPARD, within the County of Clark, State of
 Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof

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or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that 1 the execution of the instrument was acknowledged by a party thereto or that the execution 2 3 thereof was proved, to wit:

On or about July 12, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003068 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated July 12, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 541**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about July 13, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 13, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003491 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July

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13, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
 signed said document. These actions were performed in a secretive manner in order that the
 false documents be given full legal effect and that this criminal activity not be discovered. This
 activity was discovered on or about December of 2010.

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

### **COUNT 542**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 13, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 13, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003491 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 13, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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#### COUNT 543

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 13, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 13, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003491 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 13, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 544**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 20, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 On or about July 20, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002999 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 6 20, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never 7 signed said document. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

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

### **COUNT 545**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about July 20, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 20, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002999 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 20, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the

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1 false documents be given full legal effect and that this criminal activity not be discovered.

2 || This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

## <u>COUNT 546</u>

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 20, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 20, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002999 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 20, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 547</u>
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)
4	On or about July 21, 2005, Defendant SHEPPARD, within Clark County, State of
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,
6	when said person whose signature was being notarized was not in the notary's presence, to
7	wit;
8	On or about July 21, 2005, Defendant SHEPPARD within Clark County, State of
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003384 of
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July
14	21, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never
15	signed said document. These actions were performed in a secretive manner in order that the
16	false documents be given full legal effect and that this criminal activity not be discovered.
17	This activity was discovered on or about December of 2010.
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.
20	<u>COUNT 548</u>
21 22	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
22	(AID &ABET) Felony NRS 239.330
23	On or about July 21, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark, State of
25	Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public
26	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
20	or recorded in a public office under the law of the State of Nevada, to wit:
28	On or about July 21, 2005, Defendant SHEPPARD, within Clark County, State of
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003384 of Official Records with the Office of the County Recorder of Clark County, Nevada dated July 21, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant SHEPPARD well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010. 

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 549**

#### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 21, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 21, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003384 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 21, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 550**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about July 22, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 22, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004117 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 22, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 551</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about July 22, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about July 22, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0004117 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated July 22, 2005. Said document was forged in that it purported to be signed by Defendant 5 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in 6 truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant 7 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 8 false documents be given full legal effect and that this criminal activity not be discovered. 9 This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 552**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about July 22, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about July 22, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004117 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 22, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 553

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about July 29, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about July 29, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003681 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated July 29, 2005 when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

**COUNT 554** 1 **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** 2 (AID & ABET) Felony NRS 239.330 3 On or about July 29, 2005, Defendant SHEPPARD did, in the County of Clark, State of 4 Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public 5 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered 6 or recorded in a public office under the law of the State of Nevada, to wit: 7 On or about July 29, 2005, Defendant SHEPPARD, within Clark County, State of 8 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 9 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 10 0003681 of Official Records with the Office of the County Recorder of Clark County, Nevada 11 dated July 29, 2005. Said document was forged in that it purported to be signed by Defendant 12 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in 13 truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant 14 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 15 false documents be given full legal effect and that this criminal activity not be discovered. 16 This activity was discovered on or about December of 2010. 17 All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING 18 **OR RECORDING**, a violation of NRS 239.330, a category C felony. 19 20

# <u>COUNT 555</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about July 29, 2005, Defendant SHEPPARD, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about July 29, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 2 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0003681 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated July 29, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# **COUNT 556**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about August 3, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003322 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 3, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order

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that the false documents be given full legal effect and that this criminal activity not be

discovered. This activity was discovered on or about December of 2010. 2

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

**NOT IN PRESENCE NOTARY PUBLIC**, a violation of NRS 240.155, a gross misdemeanor.

# **COUNT 557**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about August 3, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 3, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003322 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 3, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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### COUNT 558

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 3, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 3, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003322 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 3, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 559**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about August 4, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about August 4, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004201 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 August 4, 2005, when Defendant SHEPPARD was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

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

# **COUNT 560**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about August 4, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 4, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004201 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 4, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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1 order that the false documents be given full legal effect and that this criminal activity not be

2 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 561</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 4, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 4, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004201 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 4, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	COUNT 562					
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC					
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)					
4	On or about August 8, 2005, Defendant SHEPPARD, within Clark County, State of					
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,					
6	when said person whose signature was being notarized was not in the notary's presence, to					
7	wit;					
8	On or about August 8, 2005, Defendant SHEPPARD within Clark County, State of					
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a					
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or					
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF					
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003061 of					
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated					
14	August 8, 2005, when Defendant SHEPPARD was not in Defendant's presence and further					
15	never signed said document. These actions were performed in a secretive manner in order					
16	that the false documents be given full legal effect and that this criminal activity not be					
17	discovered. This activity was discovered on or about December of 2010.					
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON					
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.					
20	COUNT 563					
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING					
22	(AID &ABET)					
23	Felony NRS 239.330 On or about August 8, 2005, Defendant SHEPPARD did, in the County of Clark, State					
24	of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public					
25	office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered					
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27	or recorded in a public office under the law of the State of Nevada, to wit:					
28	On or about August 8, 2005, Defendant <b>SHEPPARD</b> , within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a					

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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003061 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated August 8, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 564**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about August 8, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about August 8, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003061 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 8, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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# All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

2 **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 565**

# NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about August 9, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about August 9, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004408 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated August 9, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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# **COUNT 566**

# **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about August 9, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about August 9, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004408 of Official Records with the Office of the County Recorder of Clark County, Nevada dated August 9, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 567**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

23 On or about August 9, 2005, Defendant SHEPPARD, within the County of Clark, State 24 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take 25 proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about August 9, 2005, Defendant **SHEPPARD** planned, directed, and arranged to 1 2 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and 3 willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0004408 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated August 9, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

# **COUNT 568**

#### <u>NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC</u> (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about September 29, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about September 29, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004179 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated September 29, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be 1 discovered. This activity was discovered on or about December of 2010. 2

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

### **COUNT 569**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID &ABET) Felony NRS 239.330

On or about September 29, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about September 29, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0004179 of Official Records with the Office of the County Recorder of Clark County, Nevada dated September 29, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 570**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about September 29, 2005, Defendant SHEPPARD, within the County of Clark, 28 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to

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take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 1 falsely that the execution of the instrument was acknowledged by a party thereto or that the 2 3 execution thereof was proved, to wit:

On or about September 29, 2005, Defendant SHEPPARD planned, directed, and 4 arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 5 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 6 and willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0004179 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated September 29, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 571**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about October 3, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about October 3, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003111 of Official Records filed in the Office of the County Recorder of Clark County,

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Nevada dated October 3, 2005, when Defendant SHEPPARD was not in Defendant's
 presence and further never signed said document. These actions were performed in a
 secretive manner in order that the false documents be given full legal effect and that this
 criminal activity not be discovered. This activity was discovered on or about December of
 2010.

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

#### COUNT 572

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about October 3, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about October 3, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003111 of Official Records with the Office of the County Recorder of Clark County, Nevada dated October 3, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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# **COUNT 573**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about October 3, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about October 3, 2005, Defendant **SHEPPARD** planned, directed, and arranged to TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003111 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated October 3, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# COUNT 574

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about November 4, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about November 4, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter 2 3 "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003651 of Official Records filed in the Office of the County Recorder of Clark County, 6 Nevada dated November 4, 2005, when Defendant **SHEPPARD** was not in Defendant's 7 presence and further never signed said document. These actions were performed in a 8 secretive manner in order that the false documents be given full legal effect and that this 9 criminal activity not be discovered. This activity was discovered on or about December of 10 2010. 11

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

# COUNT 575

#### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about November 4, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about November 4, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003651 of Official Records with the Office of the County Recorder of Clark County, Nevada dated November 4, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# <u>COUNT 576</u>

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about November 4, 2005, Defendant **SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about November 4, 2005, Defendant **SHEPPARD** planned, directed, and arranged to TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003651 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated November 4, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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	<u>COUNT 577</u>					
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC					
	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)					
	On or about January 12, 2005, Defendant SHEPPARD, within Clark County, State of					
	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,					
	when said person whose signature was being notarized was not in the notary's presence, to					
,	wit;					
	On or about January 12, 2005, Defendant SHEPPARD within Clark County, State of					
	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a					
1	notary public appointed by the Nevada Secretary of State, and authorized to take proof or					
ł	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF					
	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003044 of					
0	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated					
,	January 12, 2005, when Defendant SHEPPARD was not in Defendant's presence and further					
I	never signed said document. These actions were performed in a secretive manner in order					
1	that the false documents be given full legal effect and that this criminal activity not be					
(	discovered. This activity was discovered on or about December of 2010.					
	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON					
I	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.					
	<u>COUNT 578</u>					
	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING					
	<u>(AID &amp; ABET)</u> Felony NRS 239.330					
	On or about January 12, 2005, Defendant SHEPPARD did, in the County of Clark,					
•,	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a					
	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,					
	registered or recorded in a public office under the law of the State of Nevada, to wit:					
	On or about January 12, 2005, Defendant SHEPPARD, within Clark County, State of					
	Nevada, either directly or through an agent or employee, caused to be offered for filing, a					
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003044 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated January 12, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

#### **COUNT 579**

### FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 12, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 12, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003044 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 12, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 580**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about January 21, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 21, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002855 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 21, 2005, when Defendant SHEPPARD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# <u>COUNT 581</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about January 21, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 21, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0002855 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated January 21, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 582**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about January 21, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about January 21, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002855 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 21, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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and that this criminal activity not be discovered. This activity was discovered on or about
 December of 2010.

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

### **COUNT 583**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about January 26, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about January 26, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002548 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated January 26, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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#### **COUNT 584**

## **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about January 26, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about January 26, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002548 of Official Records with the Office of the County Recorder of Clark County, Nevada dated January 26, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 585**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

23 On or about January 26, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, 24 State of Nevada, did then and there plan, direct, and arrange to have a person authorized to 25 take proof or acknowledgment of an instrument which by law may be recorded, willfully certify 26 falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

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On or about January 26, 2005, Defendant **SHEPPARD** planned, directed, and arranged 1 to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada 2 Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge 3 and willfully certify falsely that the execution of this instrument was acknowledged by her 4 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 5 DEED OF TRUST, Instrument No. 0002548 of Official Records filed in the Office of the 6 County Recorder of Clark County, Nevada dated January 26, 2005. These actions were 7 performed in a secretive manner in order that the false documents be given full legal effect 8 and that this criminal activity not be discovered. This activity was discovered on or about 9 December of 2010. 10

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN
 INSTRUMENTS a category D felony pursuant to NRS 205.120.

#### **COUNT 586**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about April 5, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about April 5, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003282 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated April 5, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the

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false documents be given full legal effect and that this criminal activity not be discovered. This 1 activity was discovered on or about December of 2010. 2

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

# **COUNT 587**

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about April 5, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about April 5, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003282 of Official Records with the Office of the County Recorder of Clark County, Nevada dated April 5, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of OFFERING A FALSE INSTRUMENT FOR FILING **OR RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 588**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) **FELONY NRS 205.120**

On or about April 5, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State 28 of Nevada, did then and there plan, direct, and arrange to have a person authorized to take

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proof or acknowledgment of an instrument which by law may be recorded, willfully certify
 falsely that the execution of the instrument was acknowledged by a party thereto or that the
 execution thereof was proved, to wit:

On or about April 5, 2005, Defendant SHEPPARD planned, directed, and arranged to 4 JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary 5 of State, and authorized to take proof or acknowledgment of an instrument, to forge and 6 willfully certify falsely that the execution of this instrument was acknowledged by her 7 signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER 8 DEED OF TRUST, Instrument No. 0003282 of Official Records filed in the Office of the 9 County Recorder of Clark County, Nevada dated April 5, 2005. These actions were 10 performed in a secretive manner in order that the false documents be given full legal effect 11 and that this criminal activity not be discovered. This activity was discovered on or about 12 December of 2010. 13

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 589**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about February 15, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about February 15, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003733 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated

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February 15, 2005, when Defendant SHEPPARD was not in Defendant's presence and
 further never signed said document. These actions were performed in a secretive manner in
 order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

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

#### **COUNT 590**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about February 15, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about February 15, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003733 of Official Records with the Office of the County Recorder of Clark County, Nevada dated February 15, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

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### COUNT 591

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 15, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 15, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003733 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 15, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 592**

#### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about March 11, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

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On or about March 11, 2005, Defendant **SHEPPARD** within Clark County, State of 1 Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a 2 notary public appointed by the Nevada Secretary of State, and authorized to take proof or 3 acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF 4 DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002179 of 5 Official Records filed in the Office of the County Recorder of Clark County, Nevada dated 6 March 11, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further 7 never signed said document. These actions were performed in a secretive manner in order 8 that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10 11

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

# **COUNT 593**

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about March 11, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 11, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002179 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 11, 2005. Said document was forged in that it purported to be signed by Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in

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order that the false documents be given full legal effect and that this criminal activity not be
 discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 594**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 11, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 11, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002179 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 11, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **FALSE CERTIFICATE TO CERTAIN INSTRUMENTS** a category D felony pursuant to NRS 205.120.

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1	<u>COUNT 595</u>					
2	NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC					
3	<u>(AID &amp; ABET)</u> GROSS MISDEMEANOR NRS 240.155(2)					
4	On or about February 24, 2005, Defendant <b>SHEPPARD</b> , within Clark County, State of					
5	Nevada, did then and there willfully aid and abet in the notarization of an individual's signature,					
6	when said person whose signature was being notarized was not in the notary's presence, to					
7	wit;					
8	On or about February 24, 2005, Defendant SHEPPARD within Clark County, State of					
9	Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a					
10	notary public appointed by the Nevada Secretary of State, and authorized to take proof or					
11	acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF					
12	DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003024 of					
13	Official Records filed in the Office of the County Recorder of Clark County, Nevada dated					
14	February 24, 2005, when Defendant SHEPPARD was not in Defendant's presence and					
15	further never signed said document. These actions were performed in a secretive manner in					
16	order that the false documents be given full legal effect and that this criminal activity not be					
17	discovered. This activity was discovered on or about December of 2010.					
18	All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON					
19	NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.					
20	<u>COUNT 596</u>					
21	OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING					
22	(AID & ABET) Felony NRS 239.330					
23	On or about February 24, 2005, Defendant <b>SHEPPARD</b> did, in the County of Clark,					
24	State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a					
25	public office, a false and/or forged instrument, which instrument, if genuine, might be filed,					
26	registered or recorded in a public office under the law of the State of Nevada, to wit:					
27	On or about February 24, 2005, Defendant <b>SHEPPARD</b> , within Clark County, State of					
28	Nevada, either directly or through an agent or employee, caused to be offered for filing, a					
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NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 1 0003024 of Official Records with the Office of the County Recorder of Clark County, Nevada 2 dated February 24, 2005. Said document was forged in that it purported to be signed by 3 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 4 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 5 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 6 order that the false documents be given full legal effect and that this criminal activity not be 7 discovered. This activity was discovered on or about December of 2010. 8

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

#### **COUNT 597**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about February 24, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about February 24, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003024 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated February 24, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 598**

## NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about March 21, 2005, Defendant SHEPPARD, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about March 21, 2005, Defendant SHEPPARD within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003202 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 21, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of NOTARIZATION OF SIGNATURE OF PERSON

NOT IN PRESENCE NOTARY PUBLIC, a violation of NRS 240.155, a gross misdemeanor.

# <u>COUNT 599</u>

#### **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING** (AID & ABET) Felony NRS 239.330

On or about March 21, 2005, Defendant SHEPPARD did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 21, 2005, Defendant **SHEPPARD**, within Clark County, State of 1 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 2 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 3 0003202 of Official Records with the Office of the County Recorder of Clark County, Nevada 4 dated March 21, 2005. Said document was forged in that it purported to be signed by 5 Defendant **SHEPPARD**, as the agent for the beneficiary of the property listed in said 6 instrument, when in truth and in fact Defendant **SHEPPARD** did not sign said instrument, as 7 Defendant **SHEPPARD** well knew. These actions were performed in a secretive manner in 8 order that the false documents be given full legal effect and that this criminal activity not be 9 discovered. This activity was discovered on or about December of 2010. 10

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# **COUNT 600**

## FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about March 21, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 21, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003202 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 21, 2005. These actions were performed in a secretive manner in order that the false documents be given full legal effect

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1 and that this criminal activity not be discovered. This activity was discovered on or about

2 December of 2010.

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All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN

**INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# <u>COUNT 601</u>

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) GROSS MISDEMEANOR NRS 240.155(2)

On or about June 9, 2005, Defendant **SHEPPARD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature, when said person whose signature was being notarized was not in the notary's presence, to wit;

On or about June 9, 2005, Defendant **SHEPPARD** within Clark County, State of Nevada, planned, directed, or arranged to have JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize her signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003482 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 9, 2005, when Defendant **SHEPPARD** was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

# COUNT 602

# OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING (AID & ABET) Felony NRS 239.330

On or about June 9, 2005, Defendant **SHEPPARD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public

Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101 office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered
 or recorded in a public office under the law of the State of Nevada, to wit:

On or about June 9, 2005, Defendant SHEPPARD, within Clark County, State of 3 Nevada, either directly or through an agent or employee, caused to be offered for filing, a 4 NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 5 0003482 of Official Records with the Office of the County Recorder of Clark County, Nevada 6 dated June 9, 2005. Said document was forged in that it purported to be signed by Defendant 7 8 **SHEPPARD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant SHEPPARD did not sign said instrument, as Defendant 9 **SHEPPARD** well knew. These actions were performed in a secretive manner in order that the 10 false documents be given full legal effect and that this criminal activity not be discovered. This 11 activity was discovered on or about December of 2010. 12

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING,** a violation of NRS 239.330, a category C felony.

# COUNT 603

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) FELONY NRS 205.120

On or about June 9, 2005, **DEFENDANT SHEPPARD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about June 9, 2005, Defendant **SHEPPARD** planned, directed, and arranged to JENNIFER LOWE, (hereinafter "LOWE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and willfully certify falsely that the execution of this instrument was acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0003482 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated June 9, 2005. These actions were

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performed in a secretive manner in order that the false documents be given full legal effect 1 and that this criminal activity not be discovered. This activity was discovered on or about 2 December of 2010. 3

All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN **INSTRUMENTS** a category D felony pursuant to NRS 205.120.

# **COUNT 604**

### NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC (AID & ABET) **GROSS MISDEMEANOR NRS 240.155(2)**

On or about March 16, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, did then and there willfully aid and abet in the notarization of an individual's signature. when said person whose signature was being notarizing was not in the notary's presence, to wit;

On or about March 16, 2007, Defendant TRAFFORD within Clark County, State of Nevada, planned, directed, or arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an instrument, to forge and notarize his signature on a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002956 of Official Records filed in the Office of the County Recorder of Clark County, Nevada dated March 16, 2007, when Defendant TRAFFORD was not in Defendant's presence and further never signed said document. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

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

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# **COUNT 605**

### OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING Felony NRS 239.330

On or about March 16, 2007, Defendant **TRAFFORD** did, in the County of Clark, State of Nevada, then and there, knowingly and feloniously, cause to be offered for filing in a public office, a false and/or forged instrument, which instrument, if genuine, might be filed, registered or recorded in a public office under the law of the State of Nevada, to wit:

On or about March 16, 2007, Defendant **TRAFFORD**, within Clark County, State of Nevada, either directly or through an agent or employee, caused to be offered for filing, a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002956 of Official Records with the Office of the County Recorder of Clark County, Nevada dated March 16, 2007. Said document was forged in that it purported to be signed by Defendant **TRAFFORD**, as the agent for the beneficiary of the property listed in said instrument, when in truth and in fact Defendant **TRAFFORD** did not sign said instrument, as Defendant **TRAFFORD** well knew. These actions were performed in a secretive manner in order that the false documents be given full legal effect and that this criminal activity not be discovered. This activity was discovered on or about December of 2010.

All of which constitutes the crime of **OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING**, a violation of NRS 239.330, a category C felony.

# **COUNT 606**

# FALSE CERTIFICATE TO CERTAIN INSTRUMENTS (AID & ABET) Felony NRS 205.120

On or about March 16, 2007, Defendant **TRAFFORD**, within the County of Clark, State of Nevada, did then and there plan, direct, and arrange to have a person authorized to take proof or acknowledgment of an instrument which by law may be recorded, willfully certify falsely that the execution of the instrument was acknowledged by a party thereto or that the execution thereof was proved, to wit:

On or about March 16, 2007, Defendant **TRAFFORD** planned, directed, and

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1	arranged to have TRACY LAWRENCE, (hereinafter "LAWRENCE"), a notary public appointed						
2	by the Nevada Secretary of State, and authorized to take proof or acknowledgment of an						
3	instrument, to forge and willfully certify falsely that the execution of this instrument was						
4	acknowledged by her signature, on a document entitled NOTICE OF DEFAULT AND						
5	ELECTION TO SELL UNDER DEED OF TRUST, Instrument No. 0002956 of Official Records						
6	filed in the Office of the County Recorder of Clark County, Nevada dated March 16, 2007.						
7	These actions were performed in a secretive manner in order that the false documents						
8	be given full legal effect and that this criminal activity not be discovered. This activity was						
9	discovered on or about December of 2010.						
10	All of which constitutes the crime of FALSE CERTIFICATE TO CERTAIN						
11	<b>INSTRUMENTS</b> a category D felony pursuant to NRS 205.120.						
12	All of which is contrary to the form, force and effect of the statutes in such cases made						
13	and provided, and against the peace and dignity of the State of Nevada.						
14	DATED thisday of November, 2011						
15	SUBMITTED BY:						
16	CATHERINE CORTEZ MASTO Attorney General						
17	By:						
18	JOHN P. KELLEHER Chief Deputy Attorney General						
19	Nevada Bar No. 005387						
20	555 E. Washington Avenue, #3900 Las Vegas, Nevada 89101 702-486-3396						
21	Attorneys for Plaintiff, State of Nevada						
22							
23							
24	ENDORSEMENT: A True Bill						
25	By:						
26	Foreperson, Clark County Grand Jury 11AGJ037AB						
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	1	WITNESS LIST						
Las Vegas, NV 89101	2 3 4	1.	Tracy Lawrence 4650 N. Rainbow, #1130 Las Vegas, NV 89108	7.	Debra Watkins 3335 Hauck St., Apt 1016 Las Vegas, NV 89146			
	5 6	2.	Meghan Shaw 485 West 175 North Morgan, Utah 84050	8.	Romy Ashjian 1221 West Coast Hwy, #A-324 Newport Beach, CA 92663			
	7 8	3.	Joseph Noel 3117 Oceanview Dr. Las Vegas, NV 89117	9.	Jennifer Bloecker 6500 Folkstone Ave., Unit 101A Las Vegas, NV 89108			
	9 10 11 12	4.	Bru Ethridge Nevada Secretary of State Office Nevada State Capital Building 101 N. Carson St., Suite 3 Carson City, NV 89701	10.	Todd Grosz, Investigator Nevada Attorney General Fraud unit 555 E. Washington Ave., #3900 Las Vegas, NV 89101			
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