

CLERK OF THE COURT

1 **IND**
2 **STEVEN B. WOLFSON**
3 **Clark County District Attorney**
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5 **JAY P. RAMAN**
6 **Chief Deputy District Attorney**
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10 **(702) 671-2500**
11 **Attorney for Plaintiff**

DISTRICT COURT
CLARK COUNTY, NEVADA

9 **THE STATE OF NEVADA,**

10 **Plaintiff,**

CASE NO: C-14-299537-1

11 **-vs-**

DEPT NO: II

12 **PRISCILLA ROCHA, #1374052**
13 **JAIME ESPITIA,**
14 **DONNIE PLACENCIA,**
15 **ANDRES MENDOZA, #1596745**
16 **JEROME ROCHA,**

17 **Defendant(s).**

INDICTMENT

16 **STATE OF NEVADA** }
17 **COUNTY OF CLARK** } ss.

18 The Defendant(s) above named, PRISCILLA ROCHA, JAIME ESPITIA, DONNIE
19 PLACENCIA, ANDRES MENDOZA and JEROME ROCHA, accused by the Clark County
20 Grand Jury of the crime(s) of THEFT (Category B Felony - NRS 205.0832, 205.0835.4 –
21 55991, 195.020); UNLAWFUL USE OF PUBLIC MONEY (Category D Felony – NRS
22 204.020, 195.020); POSSESSION OF STOLEN PROPERTY (Category C Felony - NRS
23 205.275 – 56057, 195.020); BURGLARY (Category B Felony - NRS 205.060 - 50424),
24 committed at and within the County of Clark, State of Nevada, on or between October 7, 2005
25 and March 31, 2014, as follows:

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1 COUNT 1 - THEFT

2 Defendant Priscilla Rocha did on or between September 1, 2011 and November 30,
3 2011 then and there wilfully, knowingly, feloniously, and without lawful authority, convert,
4 make an unauthorized transfer of an interest in, or without authorization control property,
5 having a value of \$3,500.00, or more, belonging to CLARK COUNTY SCHOOL DISTRICT,
6 in the following manner, to-wit: by having staff purchase twenty (20) Dell Computers with
7 school district money at a price of \$13,600.00, one (1) Apple iPad 64 GB, three (3) Apple
8 iPads 32 GB, one (1) Hitachi projector, one (1) LCD TV 40" 1080P, five (5) Coby CD players,
9 and five (5) Asus laptops paid for by Clark County School District money and thereafter taking
10 possession of said property and without lawful authority transporting the computers to donate
11 them to schools in Ensenada, Mexico.

12 COUNT 2 – UNLAWFUL USE OF PUBLIC MONEY

13 Defendant Priscilla Rocha did on or between September 1, 2011 and November 30,
14 2011 then and there wilfully, knowingly, feloniously, and without lawful authority, being a
15 public officer or other person who has in her possession, control, or custody any public money
16 belonging to this state or any county, town, city, district, or municipal corporation within this
17 state, or to whom any such public money is entrusted for safekeeping or for transmission to
18 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
19 money for his or her own private purposes, or for any purpose other than one authorized by
20 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
21 her position of Director of the AELAS program for the Clark County School District by having
22 staff purchase twenty (20) Dell Computers with school district money at a price of \$13,600.00,
23 one (1) Apple iPad 64 GB, three (3) Apple iPads 32 GB, one (1) Hitachi projector, one (1)
24 LCD TV 40" 1080P, five (5) Coby CD players, and five (5) Asus laptops paid for by Clark
25 County School District money and transporting the computers to donate them to schools in
26 Ensenada, Mexico.

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1 COUNT 3 – THEFT

2 Defendants Priscilla Rocha and Jaime Espitia did on or between September 23, 2013
3 and December 31, 2013 then and there wilfully, knowingly, feloniously, and without lawful
4 authority, convert, make an unauthorized transfer of an interest in, or without authorization
5 control property, having a value of \$3,500.00, or more, belonging to the Clark County School
6 District, in the following manner, to-wit: by Defendant Priscilla Rocha directing Renee
7 Romero to a submit a request for payment of an out of district consultant “C. Diaz” and
8 submitting other paperwork to substantiate an employee being paid by the name of Cesar Diaz-
9 Villanueva, and through timesheets representing that Cesar Diaz-Villanueva worked for the
10 AELAS program in the Clark County School District when in truth and in fact he did not,
11 where Defendant Jaime Espitia had convinced Cesar Diaz-Villanueva to open a bank account
12 for this purpose and Cesar Diaz-Villanueva receive nominal compensation, Defendants Rocha
13 and Espitia’s combined actions resulted in submission to the Clark County School District that
14 Cesar Diaz-Villanueva worked as a tutor for 480 hours between September 10, 2013 and
15 December 31, 2013 which sent payments totaling the amount of \$8,640.00 of Clark County
16 School District Money to a bank account where the signers to the account were Cesar Diaz-
17 Villanueva and Defendant Jaime Espitia, that money going for the personal gain of Jaime
18 Espitia, the Defendants being criminally liable under one or more of the following principles
19 of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by
20 aiding or abetting in the commission of this crime, with the intent that this crime be committed
21 by entering into a course of conduct whereby Defendant Priscilla Rocha and signed
22 employment paperwork and timesheets which allowed for the unlawful transfer of money to
23 Defendant Jaime Espitia which he then used for his own personal benefit and/or (3) pursuant
24 to a conspiracy to commit this crime.

25 COUNT 4 – UNLAWFUL USE OF PUBLIC MONEY

26 Defendant Priscilla Rocha did on or between September 23, 2013 and December 31,
27 2013 then and there wilfully, knowingly, feloniously, and without lawful authority being a
28 public officer or other person who has in her possession, control, or custody any public money

1 belonging to this state or any county, town, city, district, or municipal corporation within this
2 state, or to whom any such public money is entrusted for safekeeping or for transmission to
3 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
4 money for his or her own private purposes, or for any purpose other than one authorized by
5 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
6 her position of Director of the AELAS program for the Clark County School District
7 Defendant Priscilla Rocha directing Renee Romero to submit a request for payment of an
8 out of district consultant "C. Diaz" and submitting other paperwork to substantiate an
9 employee being paid by the name of Cesar Diaz-Villanueva, and through timesheets
10 representing that Cesar Diaz-Villanueva worked for the AELAS program in the Clark County
11 School District when in truth and in fact he did not, where Defendant Jaime Espitia had
12 convinced Cesar Diaz-Villanueva to open a bank account for this purpose and Cesar Diaz-
13 Villanueva receive nominal compensation, Defendants Rocha and Espitia's combined actions
14 resulted in submission to the Clark County School District that Cesar Diaz-Villanueva worked
15 as a tutor for 480 hours between September 10, 2013 and December 31, 2013 which sent
16 payments totaling the amount of \$8,640.00 of Clark County School District Money to a bank
17 account where the signers to the account were Cesar Diaz-Villanueva and Defendant Jaime
18 Espitia, that money going for the personal gain of Jaime Espitia, the Defendants being
19 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
20 by directly committing this crime as stated; and/or (2) by aiding or abetting in the commission
21 of this crime, with the intent that this crime be committed by entering into a course of conduct
22 whereby Defendant Priscilla Rocha signed employment paperwork and timesheets which
23 allowed for the unlawful transfer of money to Defendant Jaime Espitia which he then used for
24 his own personal benefit and/or (3) pursuant to a conspiracy to commit this crime.

25 COUNT 5 – THEFT

26 Defendants Priscilla Rocha and Jaime Espitia did on or between January 1, 2014 and
27 March 31, 2014 then and there wilfully, knowingly, feloniously, and without lawful authority,
28 convert, make an unauthorized transfer of an interest in, or without authorization control

1 property, having a value of \$3,500.00, or more, belonging to the Clark County School District,
2 in the following manner, to-wit: by Defendant Priscilla Rocha directing Renee Romero to a
3 submit a request for payment of an out of district consultant "C. Diaz" and submitting other
4 paperwork to substantiate an employee being paid by the name of Cesar Diaz-Villanueva, and
5 through timesheets representing that Cesar Diaz-Villanueva worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, where Defendant
7 Jaime Espitia had convinced Cesar Diaz-Villanueva to open a bank account for this purpose
8 and Cesar Diaz-Villanueva receive nominal compensation, Defendants Rocha and Espitia's
9 combined actions resulted in submission to the Clark County School District that Cesar Diaz-
10 Villanueva worked as a tutor for 256 hours between January 1, 2014 and March 31, 2014
11 which sent payments totaling the amount of \$4,608.00 of Clark County School District Money
12 to a bank account where the signers to the account were Cesar Diaz-Villanueva and Jaime
13 Espitia, that money going for the personal gain of Defendant Jaime Espitia, the Defendants
14 being criminally liable under one or more of the following principles of criminal liability, to-
15 wit: (1) by directly committing this crime as stated; and/or (2) by aiding or abetting in the
16 commission of this crime, with the intent that this crime be committed by entering into a course
17 of conduct whereby Defendant Priscilla Rocha signed employment paperwork and timesheets
18 which allowed for the unlawful transfer of money to Defendant Jaime Espitia which he then
19 used for his own personal benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 6 – UNLAWFUL USE OF PUBLIC MONEY

21 Defendant Priscilla Rocha did on or between January 1, 2014 and March 31, 2014 then
22 and there wilfully, knowingly, feloniously, and without lawful authority being a public officer
23 or other person who has in her possession, control, or custody any public money belonging to
24 this state or any county, town, city, district, or municipal corporation within this state, or to
25 whom any such public money is entrusted for safekeeping or for transmission to any treasurer
26 or other officer, or other person entitled to receive it, who uses any of the public money for his
27 or her own private purposes, or for any purpose other than one authorized by law, the amount
28 unlawfully used being \$650.00 or more, in the following manner, to wit: in her position of

1 Director of the AELAS program for the Clark County School District Defendant Priscilla
2 Rocha directing Renee Romero to submit a request for payment of an out of district
3 consultant "C. Diaz" and submitting other paperwork to substantiate an employee being paid
4 by the name of Cesar Diaz-Villanueva, and through timesheets representing that Cesar Diaz-
5 Villanueva worked for the AELAS program in the Clark County School District when in truth
6 and in fact he did not, where Defendant Jaime Espitia had convinced Cesar Diaz-Villanueva
7 to open a bank account for this purpose and Cesar Diaz-Villanueva receive nominal
8 compensation, Defendants Rocha and Espitia's combined actions resulted in submission to the
9 Clark County School District that Cesar Diaz-Villanueva worked as a tutor for 256 hours
10 between January 1, 2014 and March 31, 2014 which sent payments totaling the amount of
11 \$4,608.00 of Clark County School District Money to a bank account where the signers to the
12 account were Cesar Diaz-Villanueva and Jaime Espitia, that money going for the personal gain
13 of Defendant Jaime Espitia, the Defendants being criminally liable under one or more of the
14 following principles of criminal liability, to-wit: (1) by directly committing this crime as
15 stated; and/or (2) by aiding or abetting in the commission of this crime, with the intent that
16 this crime be committed by entering into a course of conduct whereby Defendant Priscilla
17 Rocha signed employment paperwork and timesheets which allowed for the unlawful transfer
18 of money to Defendant Jaime Espitia which he then used for his own personal benefit and/or
19 (3) pursuant to a conspiracy to commit this crime.

20 COUNT 7 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 October 7, 2005 and December 31, 2005 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for "open ended tutorial services for Donnie Placencia" and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$2,900.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 8 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between October 7, 2005 and December 31, 2005
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$2,900.00 of Clark
10 County School District Money to a bank account where the signers to the account were Donnie
11 Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome
12 Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 9 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2006 and December 31, 2006 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$7,950.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 10 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2006 and December 31, 2006
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$7,950.00 of Clark
10 County School District Money to a bank account where the signers to the account were Donnie
11 Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome
12 Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 11 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2007 and December 31, 2007 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$9,880.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 12 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2007 and December 31, 2007
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$9,880.00 of Clark
10 County School District Money to a bank account where the signers to the account were Donnie
11 Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome
12 Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 13 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2008 and December 31, 2008 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$10,570.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 14 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2008 and December 31, 2008
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$10,570.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 15 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2009 and December 31, 2009 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$11,880.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 16 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2009 and December 31, 2009
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District by
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$11,880.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 17 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2010 and December 31, 2010 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$2,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$17,720.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime. COUNT 18 – UNLAWFUL USE OF
18 PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2010 and December 31, 2010
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$250.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$17,720.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 19 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2011 and December 31, 2011 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$3,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$23,040.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 20 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2011 and December 31, 2011
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$23,040.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 21 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2012 and December 31, 2012 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$3,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$ \$21,210.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 22 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2012 and December 31, 2012
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$ \$21,210.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 23 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2013 and December 31, 2013 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$3,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$19,425.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 24 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2013 and December 31, 2013
20 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
21 officer or other person who has in her possession, control, or custody any public money
22 belonging to this state or any county, town, city, district, or municipal corporation within this
23 state, or to whom any such public money is entrusted for safekeeping or for transmission to
24 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
25 money for his or her own private purposes, or for any purpose other than one authorized by
26 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
27 her position of Director of the AELAS program for the Clark County School District by
28 Defendant Priscilla Rocha submitting request for payment for "open ended tutorial services

1 for Donnie Placencia” and submitting other paperwork to substantiate an employee being paid
2 by the name of Donnie Placencia and through timesheets representing that Defendant Donnie
3 Placencia worked for the AELAS program in the Clark County School District when in truth
4 and in fact he did not, where Defendant Priscilla Rocha had conspired with Defendant Donnie
5 Placencia and Defendant Jerome Rocha to open a bank account for this purpose, Defendants
6 Priscilla Rocha, Defendant Jerome Rocha and Defendant Donnie Placencia’s combined
7 actions resulted in submission to the Clark County School District that Placencia worked for
8 the AELAS program in the Clark County School District when in truth and in fact he did not,
9 and submitting false time sheets which sent payments in the total amount of \$19,425.00 of
10 Clark County School District Money to a bank account where the signers to the account were
11 Donnie Placencia and Defendant Jerome Rocha, for the personal gain of Donnie Placencia and
12 Jerome Rocha, without authorization to make payments to people who did not actually do the
13 represented work, the Defendants being criminally liable under one or more of the following
14 principles of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or
15 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed by entering into a course of conduct whereby Defendant Priscilla Rocha signed
17 employment paperwork and timesheets which allowed for the unlawful transfer of money to
18 Defendants Jerome Rocha and Donnie Placencia which they then used for his own personal
19 benefit and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 25 – THEFT

21 Defendants Priscilla Rocha, Donnie Placencia, and Jerome Rocha did on or between
22 January 1, 2014 and March 31, 2014 then and there wilfully, knowingly, feloniously, and
23 without lawful authority, convert, make an unauthorized transfer of an interest in, or without
24 authorization control property, having a value of \$3,500.00, or more, belonging to the Clark
25 County School District, in the following manner, to-wit: by Defendant Priscilla Rocha
26 submitting request for payment for “open ended tutorial services for Donnie Placencia” and
27 submitting other paperwork to substantiate an employee being paid by the name of Donnie
28 Placencia and through timesheets representing that Defendant Donnie Placencia worked for

1 the AELAS program in the Clark County School District when in truth and in fact he did not,
2 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
3 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
4 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
5 submission to the Clark County School District that Placencia worked for the AELAS program
6 in the Clark County School District when in truth and in fact he did not, and submitting false
7 time sheets which sent payments in the total amount of \$3,885.00 of Clark County School
8 District Money to a bank account where the signers to the account were Donnie Placencia and
9 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
10 without authorization to make payments to people who did not actually do the represented
11 work, the Defendants being criminally liable under one or more of the following principles of
12 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
13 or abetting in the commission of this crime, with the intent that this crime be committed by
14 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
15 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
16 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
17 (3) pursuant to a conspiracy to commit this crime.

18 COUNT 26 – UNLAWFUL USE OF PUBLIC MONEY

19 Defendant Priscilla Rocha did on or between January 1, 2014 and March 31, 2014 then
20 and there wilfully, knowingly, feloniously, and without lawful authority being a public officer
21 or other person who has in her possession, control, or custody any public money belonging to
22 this state or any county, town, city, district, or municipal corporation within this state, or to
23 whom any such public money is entrusted for safekeeping or for transmission to any treasurer
24 or other officer, or other person entitled to receive it, who uses any of the public money for his
25 or her own private purposes, or for any purpose other than one authorized by law, the amount
26 unlawfully used being \$650.00 or more, in the following manner, to wit: in her position of
27 Director of the AELAS program for the Clark County School District Defendant Priscilla
28 Rocha submitting request for payment for "open ended tutorial services for Donnie Placencia"

1 and submitting other paperwork to substantiate an employee being paid by the name of Donnie
2 Placencia and through timesheets representing that Defendant Donnie Placencia worked for
3 the AELAS program in the Clark County School District when in truth and in fact he did not,
4 where Defendant Priscilla Rocha had conspired with Defendant Donnie Placencia and
5 Defendant Jerome Rocha to open a bank account for this purpose, Defendants Priscilla Rocha,
6 Defendant Jerome Rocha and Defendant Donnie Placencia's combined actions resulted in
7 submission to the Clark County School District that Placencia worked for the AELAS program
8 in the Clark County School District when in truth and in fact he did not, and submitting false
9 time sheets which sent payments in the total amount of \$3,885.00 of Clark County School
10 District Money to a bank account where the signers to the account were Donnie Placencia and
11 Defendant Jerome Rocha, for the personal gain of Donnie Placencia and Jerome Rocha,
12 without authorization to make payments to people who did not actually do the represented
13 work, the Defendants being criminally liable under one or more of the following principles of
14 criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by aiding
15 or abetting in the commission of this crime, with the intent that this crime be committed by
16 entering into a course of conduct whereby Defendant Priscilla Rocha signed employment
17 paperwork and timesheets which allowed for the unlawful transfer of money to Defendants
18 Jerome Rocha and Donnie Placencia which they then used for his own personal benefit and/or
19 (3) pursuant to a conspiracy to commit this crime.

20 COUNT 27 - THEFT

21 Defendants Priscilla Rocha and Andres Mendoza did on or between November 8, 2011
22 and January 1, 2013 then and there wilfully, knowingly, feloniously, and without lawful
23 authority, convert, make an unauthorized transfer of an interest in, or without authorization
24 control property, having a value of \$650.00, or more, belonging to the Clark County School
25 District, in the following manner, to-wit: by Defendant Priscilla Rocha having Clark County
26 School District employee Manuel Ramirez purchase a Dell computer, four (4) Foscam security
27 cameras and an Apple iPad 64 GB that cost \$2,099.55 and provide and install said items at the
28 residence and business of Defendant Andres Mendoza, for his personal benefit, Defendants

1 knowing that the items were unlawfully obtained, the Defendants being criminally liable under
2 one or more of the following principles of criminal liability, to-wit: (1) by directly committing
3 this crime as stated; and/or (2) by aiding or abetting in the commission of this crime, with the
4 intent that this crime be committed by entering into a course of conduct whereby Defendant
5 Priscilla Rocha directed Manuel Ramirez to procure and deliver the aforementioned CCSD
6 property to Defendant Andres Mendoza which he then used for his own personal benefit, not
7 for the benefit of CCSD and/or (3) pursuant to a conspiracy to commit this crime.

8 COUNT 28 - POSSESSION OF STOLEN PROPERTY

9 Defendant Andres Mendoza did on or did on or between November 8, 2011 and
10 January 28, 2014 between wilfully, unlawfully, and feloniously, for his own gain, possess
11 stolen property, to wit: a Dell computer, four (4) Foscam security cameras and an Apple iPad
12 64 GB that cost \$2,099.55 by the Clark County School District, having a value of \$650.00 or
13 more, said Defendant knew it was stolen property and/or did possess it under circumstances
14 which would have caused a reasonable person to know that it was stolen property.

15 COUNT 29 - BURGLARY

16 Defendant Andres Mendoza did on January 28, 2014 then and there wilfully,
17 unlawfully, and feloniously enter, with intent to commit a felony or to obtain money under
18 false pretenses, to-wit: by entering that certain building occupied by EZ PAWN, located at
19 1501 E. Charleston Ave., Las Vegas, Clark County, Nevada with the intent to pawn an IPAD
20 that belonged to the Clark County School District, under the pretense that he had the right to
21 pawn the item.

22 COUNT 30 – UNLAWFUL USE OF PUBLIC MONEY

23 Defendant Priscilla Rocha did on or between November 8, 2011 and January 1, 2013
24 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
25 officer or other person who has in her possession, control, or custody any public money
26 belonging to this state or any county, town, city, district, or municipal corporation within this
27 state, or to whom any such public money is entrusted for safekeeping or for transmission to
28 any treasurer or other officer, or other person entitled to receive it, who uses any of the public

1 money for his or her own private purposes, or for any purpose other than one authorized by
2 law, the amount unlawfully used being \$650 or more, in the following manner, to wit: in her
3 position of Director of the AELAS program for the Clark County School District by Defendant
4 Priscilla Rocha having Clark County School District employee Manuel Ramirez purchase a
5 Dell computer, four (4) Foscam security cameras and an Apple iPad 64 GB that cost \$2,099.55
6 and provide and install said items at the residence of Defendant Andres Mendoza, for his
7 personal benefit, Defendants knowing that the items were unlawfully obtained, the Defendants
8 being criminally liable under one or more of the following principles of criminal liability, to-
9 wit: (1) by directly committing this crime as stated; and/or (2) by aiding or abetting in the
10 commission of this crime, with the intent that this crime be committed by entering into a course
11 of conduct whereby Defendant Priscilla Rocha directed Manuel Ramirez to procure and
12 deliver the aforementioned CCSD property to Defendant Andres Mendoza which he then used
13 for his own personal benefit, not for the benefit of CCSD and/or (3) pursuant to a conspiracy
14 to commit this crime.

15 COUNT 31 - THEFT

16 Defendant Priscilla Rocha did on or between June 6, 2013 to March 19, 2014 then and
17 there wilfully, knowingly, feloniously, and without lawful authority, convert, make an
18 unauthorized transfer of an interest in, or without authorization control services, having a value
19 of \$650.00, or more, belonging to the Clark County School District, in the following manner,
20 to-wit: by Defendant Priscilla Rocha without authorization directing Clark County School
21 District Employee Ana Soto work for Defendant Priscilla Rocha at Yamilex Beauty Salon
22 when it was represented through time card that Ana Soto was working at the school district as
23 a tutor, yielding payments from the Clark County School District to Ana Soto for work not
24 actually performed, in the amount of \$2,483.01, the Defendant being criminally liable under
25 one or more of the following principles of criminal liability, to-wit: (1) by directly committing
26 this crime as stated; and/or (2) by aiding or abetting in the commission of this crime, with the
27 intent that this crime be committed by entering into a course of conduct whereby Defendant
28

1 Priscilla Rocha directed and encouraged Ana Soto to work at Yamilex Beauty Salon, which
2 benefited Defendant Priscilla Rocha, not for the benefit of CCSD.

3 COUNT 32 – UNLAWFUL USE OF PUBLIC MONEY

4 Defendant Priscilla Rocha did on or between June 6, 2013 to March 19, 2014 then and
5 there wilfully, knowingly, feloniously, and without lawful authority being a public officer or
6 other person who has in her possession, control, or custody any public money belonging to
7 this state or any county, town, city, district, or municipal corporation within this state, or to
8 whom any such public money is entrusted for safekeeping or for transmission to any treasurer
9 or other officer, or other person entitled to receive it, who uses any of the public money for his
10 or her own private purposes, or for any purpose other than one authorized by law, the amount
11 unlawfully used being \$650.00 or more, in the following manner, to wit: in her position of
12 Director of the AELAS program for the Clark County School District by Defendant Priscilla
13 Rocha without authorization having Clark County School District Employee Ana Soto work
14 for Defendant Priscilla Rocha at Yamilex Beauty Salon when it was represented through time
15 card that Ana Soto was working at the school district as a tutor, yielding payments from the
16 Clark County School District to Ana Soto for work not actually performed, in the amount of
17 \$2,483.01, the Defendant being criminally liable under one or more of the following principles
18 of criminal liability, to-wit: (1) by directly committing this crime as stated; and/or (2) by
19 aiding or abetting in the commission of this crime, with the intent that this crime be committed
20 by entering into a course of conduct whereby Defendant Priscilla Rocha directed and
21 encouraged Ana Soto to work at Yamilex Beauty Salon, which benefited Defendant Priscilla
22 Rocha, not for the benefit of CCSD.

23 COUNT 33 - THEFT

24 Defendant Priscilla Rocha did on or between July 20, 2010 and March 14, 2014 then
25 and there wilfully, knowingly, feloniously, and without lawful authority, use the property of
26 another person entrusted to her, or placed in her possession for a limited, authorized period of
27 determined or prescribed duration or for a limited use, having a value of \$3,500.00 or more,
28 belonging to the Clark County School District, in the following manner, to-wit: by requiring

1 that a fee be charged to students of the AELAS program for dictionaries that were purchased
2 with CCSD funds, and that the money collected from the dictionary fees be delivered to
3 Defendant Priscilla Rocha, in cash, in envelopes without authorization for her own personal
4 gain, the amount of cash Defendant Priscilla Rocha received was \$34,590.00.

5 COUNT 34 – UNLAWFUL USE OF PUBLIC MONEY

6 Defendant Priscilla Rocha did on or between July 20, 2010 and March 14, 2014 then
7 and there wilfully, knowingly, feloniously, and without lawful authority being a public officer
8 or other person who has in her possession, control, or custody any public money belonging to
9 this state or any county, town, city, district, or municipal corporation within this state, or to
10 whom any such public money is entrusted for safekeeping or for transmission to any treasurer
11 or other officer, or other person entitled to receive it, who uses any of the public money for his
12 or her own private purposes, or for any purpose other than one authorized by law, the amount
13 unlawfully used being \$650.00 or more, in the following manner, to wit: in her position of
14 Director of the AELAS program for the Clark County School District by requiring that a fee
15 be charged to students of the AELAS program for dictionaries that were purchased with CCSD
16 funds, and that the money collected from the dictionary fees be delivered to Defendant Priscilla
17 Rocha, in cash, in envelopes without authorization for her own personal gain, the amount of
18 cash Defendant Priscilla Rocha received was \$34,590.00.

19 COUNT 35 - THEFT

20 Defendant Priscilla Rocha did on or between January 1, 2010 and December 31, 2010
21 then and there wilfully, knowingly, feloniously, and without lawful authority, obtain lawful
22 money of the United States in the amount of \$2,500.00 or more, belonging to the CLARK
23 COUNTY SCHOOL DISTRICT, by a material misrepresentation with intent to deprive that
24 entity of the property, in the following manner, to-wit: by directing and authorizing Clark
25 County School District employee Renee Romero to create checks #1154, 1161, 1165, 1169,
26 1173, 1175, and 1178 from Bank of America account ending in #8801, made payable to
27 Olverita's Village, 648 N. Main St, Los Angeles, CA, totaling \$31,151.00, and then Defendant
28 Priscilla Rocha depositing the checks into a bank account attributed to Olverita's Tradition &

1 Folklore, LLC, of which Defendant Priscilla Rocha is sole owner, thereby misrepresenting
2 the recipient of the money, and using said deposit for her own personal benefit without
3 authorization from the Clark County School District.

4 COUNT 36 – UNLAWFUL USE OF PUBLIC MONEY

5 Defendant Priscilla Rocha did on or between January 1, 2010 and December 31, 2010
6 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
7 officer or other person who has in her possession, control, or custody any public money
8 belonging to this state or any county, town, city, district, or municipal corporation within this
9 state, or to whom any such public money is entrusted for safekeeping or for transmission to
10 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
11 money for his or her own private purposes, or for any purpose other than one authorized by
12 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
13 her position of Director of the AELAS program for the Clark County School District by
14 directing and authorizing Clark County School District employee Renee Romero to create
15 checks #1154, 1161, 1165, 1169, 1173, 1175, and 1178 from Bank of America account ending
16 in #8801 which is funded with "Lab" fees collected from the students of the AELAS program,
17 made payable to Olverita's Village, 648 N. Main St, Los Angeles, CA, totaling \$31,151.00,
18 and then Defendant Priscilla Rocha depositing the checks into a bank account attributed to
19 Olverita's Tradition & Folklore, LLC, of which Defendant Priscilla Rocha is sole owner,
20 thereby misrepresenting the recipient of the money, and using said deposit for her own
21 personal benefit without authorization from the Clark County School District.

22 COUNT 37 - THEFT

23 Defendant Priscilla Rocha did on or between January 1, 2011 and December 31, 2011
24 then and there wilfully, knowingly, feloniously, and without lawful authority, obtain lawful
25 money of the United States in the amount of \$650.00 or more, belonging to the CLARK
26 COUNTY SCHOOL DISTRICT, by a material misrepresentation with intent to deprive that
27 entity of the property, in the following manner, to-wit: by directing and authorizing Clark
28 County School District employee Renee Romero to create check #1195 from Bank of America

1 account ending in #8801, made payable to Olverita's Village, 648 N. Main St, Los Angeles,
2 CA, in the amount of \$3,000.00, and then Defendant Priscilla Rocha depositing the check into
3 a bank account attributed to Olverita's Tradition & Folklore, LLC, of which Defendant
4 Priscilla Rocha is sole owner, thereby misrepresenting the recipient of the money, and using
5 said deposit for her own personal benefit without authorization from the Clark County School
6 District.

7 COUNT 38 – UNLAWFUL USE OF PUBLIC MONEY

8 Defendant Priscilla Rocha did on or between January 1, 2011 and December 31, 2011
9 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
10 officer or other person who has in her possession, control, or custody any public money
11 belonging to this state or any county, town, city, district, or municipal corporation within this
12 state, or to whom any such public money is entrusted for safekeeping or for transmission to
13 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
14 money for his or her own private purposes, or for any purpose other than one authorized by
15 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
16 her position of Director of the AELAS program for the Clark County School District by
17 directing and authorizing Clark County School District employee Renee Romero to create
18 check #1195 from Bank of America account ending in #8801 which is funded with "Lab" fees
19 collected from the students of the AELAS program, made payable to Olverita's Village, 648
20 N. Main St, Los Angeles, CA, in the amount of \$3,000.00 and then Defendant Priscilla Rocha
21 depositing the check into a bank account attributed to Olverita's Tradition & Folklore, LLC,
22 of which Defendant Priscilla Rocha is sole owner, thereby misrepresenting the recipient of the
23 money, and using said deposit for her own personal benefit without authorization from the
24 Clark County School District.

25 COUNT 39 - THEFT

26 Defendant Priscilla Rocha did on or between January 1, 2012 and December 31, 2012
27 then and there wilfully, knowingly, feloniously, and without lawful authority, obtain lawful
28 money of the United States in the amount of \$3,500.00 or more, belonging to the CLARK

1 COUNTY SCHOOL DISTRICT, by a material misrepresentation with intent to deprive that
2 entity of the property, in the following manner, to-wit: by directing and authorizing Clark
3 County School District employee Renee Romero to create checks #1199, 1201, 1205, 1210,
4 and 1211 from Bank of America account ending in #8801, made payable to Olverita's Village,
5 648 N. Main St, Los Angeles, CA, totaling \$18,760.00, and then Defendant Priscilla Rocha
6 depositing the checks into a bank account attributed to Olverita's Tradition & Folklore, LLC,
7 of which Defendant Priscilla Rocha is sole owner, thereby misrepresenting the recipient of the
8 money, and using said deposit for her own personal benefit without authorization from the
9 Clark County School District.

10 COUNT 40 – UNLAWFUL USE OF PUBLIC MONEY

11 Defendant Priscilla Rocha did on or between January 1, 2012 and December 31, 2012
12 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
13 officer or other person who has in her possession, control, or custody any public money
14 belonging to this state or any county, town, city, district, or municipal corporation within this
15 state, or to whom any such public money is entrusted for safekeeping or for transmission to
16 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
17 money for his or her own private purposes, or for any purpose other than one authorized by
18 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
19 her position of Director of the AELAS program for the Clark County School District by
20 directing and authorizing Clark County School District employee Renee Romero to create
21 checks #1199, 1201, 1205, 1210, and 1211 from Bank of America account ending in #8801
22 which is funded with "Lab" fees collected from the students of the AELAS program, made
23 payable to Olverita's Village, 648 N. Main St, Los Angeles, CA, totaling \$18,760.00, and then
24 Defendant Priscilla Rocha depositing the checks into a bank account attributed to Olverita's
25 Tradition & Folklore, LLC, of which Defendant Priscilla Rocha is sole owner, thereby
26 misrepresenting the recipient of the money, and using said deposit for her own personal benefit
27 without authorization from the Clark County School District.

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1 COUNT 41 - THEFT

2 Defendant Priscilla Rocha did on or between January 1, 2013 and December 31, 2013
3 then and there wilfully, knowingly, feloniously, and without lawful authority, obtain lawful
4 money of the United States in the amount of \$3,500.00 or more, belonging to the CLARK
5 COUNTY SCHOOL DISTRICT, by a material misrepresentation with intent to deprive that
6 entity of the property, in the following manner, to-wit: by directing and authorizing Clark
7 County School District employee Renee Romero to create checks #1214, 1220, 1222, 1223,
8 1225, 1232, and 1235 from Bank of America account ending in #8801, made payable to
9 Olverita's Village, 648 N. Main St, Los Angeles, CA, totaling \$27,707.00, and then Defendant
10 Priscilla Rocha depositing the checks into a bank account attributed to Olverita's Tradition &
11 Folklore, LLC, of which Defendant Priscilla Rocha is sole owner, thereby misrepresenting
12 the recipient of the money, and using said deposit for her own personal benefit without
13 authorization from the Clark County School District.

14 COUNT 42 – UNLAWFUL USE OF PUBLIC MONEY

15 Defendant Priscilla Rocha did on or between January 1, 2013 and December 31, 2013
16 then and there wilfully, knowingly, feloniously, and without lawful authority being a public
17 officer or other person who has in her possession, control, or custody any public money
18 belonging to this state or any county, town, city, district, or municipal corporation within this
19 state, or to whom any such public money is entrusted for safekeeping or for transmission to
20 any treasurer or other officer, or other person entitled to receive it, who uses any of the public
21 money for his or her own private purposes, or for any purpose other than one authorized by
22 law, the amount unlawfully used being \$650.00 or more, in the following manner, to wit: in
23 her position of Director of the AELAS program for the Clark County School District by
24 directing and authorizing Clark County School District employee Renee Romero to create
25 checks #1214, 1220, 1222, 1223, 1225, 1232, and 1235 from Bank of America account ending
26 in #8801 which is funded with "Lab" fees collected from the students of the AELAS program,
27 made payable to Olverita's Village, 648 N. Main St, Los Angeles, CA, totaling \$27,707.00,
28 and then Defendant Priscilla Rocha depositing the checks into a bank account attributed to

1 Olverita's Tradition & Folklore, LLC, of which Defendant Priscilla Rocha is sole owner,
2 thereby misrepresenting the recipient of the money, and using said deposit for her own
3 personal benefit without authorization from the Clark County School District.

4 COUNT 43 - THEFT

5 Defendant Priscilla Rocha did on or about February 27, 2013 then and there wilfully,
6 knowingly, feloniously, and without lawful authority, use the property of another person
7 entrusted to her, or placed in her possession for a limited, authorized period of determined or
8 prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to the
9 Clark County School District, in the following manner, to-wit: by using money from Bank of
10 America account ending in #8801, which contained money collected from students of the
11 AELAS program paid in exchange for "Lab" fees, having Clark County School District
12 employee Renee Romero author check #1217 made payable to the League of United Latin
13 American Citizens (LULAC) for \$3,011.80 not for official or authorized uses, but for her own
14 personal gain or reasons.

15 COUNT 44 – UNLAWFUL USE OF PUBLIC MONEY

16 Defendant Priscilla Rocha did on or about February 27, 2013 then and there wilfully,
17 knowingly, feloniously, and without lawful authority being a public officer or other person who
18 has in her possession, control, or custody any public money belonging to this state or any
19 county, town, city, district, or municipal corporation within this state, or to whom any such
20 public money is entrusted for safekeeping or for transmission to any treasurer or other officer,
21 or other person entitled to receive it, who uses any of the public money for his or her own
22 private purposes, or for any purpose other than one authorized by law, the amount unlawfully
23 used being \$650.00 or more, in the following manner, to wit: in her position of Director of the
24 AELAS program for the Clark County School District by using money from Bank of America
25 account ending in #8801, which contained money collected from students of the AELAS
26 program paid in exchange for "Lab" fees, having Clark County School District employee
27 Renee Romero author check #1217 made payable to the League of United Latin American
28

1 Citizens (LULAC) for \$3,011.80 not for official or authorized uses, but for her own personal
2 gain or reasons.

3 COUNT 45 - THEFT

4 Defendant Priscilla Rocha did on or about February 11, 2014 then and there wilfully,
5 knowingly, feloniously, and without lawful authority, use the property of another person
6 entrusted to her, or placed in her possession for a limited, authorized period of determined or
7 prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to the
8 Clark County School District, in the following manner, to-wit: by using money from Bank of
9 America account ending in #8801, which contained money collected from students of the
10 AELAS program paid in exchange for "Lab" fees, having Clark County School District
11 employee Renee Romero author check #1240 made payable to the League of United Latin
12 American Citizens (LULAC) for \$708.00 not for official or authorized uses, but for her own
13 personal gain or reasons.

14 COUNT 46 – UNLAWFUL USE OF PUBLIC MONEY

15 Defendant Priscilla Rocha did on or about February 11, 2014 then and there wilfully,
16 knowingly, feloniously, and without lawful authority being a public officer or other person who
17 has in her possession, control, or custody any public money belonging to this state or any
18 county, town, city, district, or municipal corporation within this state, or to whom any such
19 public money is entrusted for safekeeping or for transmission to any treasurer or other officer,
20 or other person entitled to receive it, who uses any of the public money for his or her own
21 private purposes, or for any purpose other than one authorized by law, the amount unlawfully
22 used being \$650.00 or more, in the following manner, to wit: in her position of Director of the
23 AELAS program for the Clark County School District by using money from Bank of America
24 account ending in #8801, which contained money collected from students of the AELAS
25 program paid in exchange for "Lab" fees, having Clark County School District employee
26 Renee Romero author check #1240 made payable to the League of United Latin American
27 Citizens (LULAC) for \$708.00 not for official or authorized uses, but for her own personal
28 gain or reasons.

1 COUNT 47 - THEFT

2 Defendant Priscilla Rocha did on or about May 30, 2013 then and there wilfully,
3 knowingly, feloniously, and without lawful authority, use the property of another person
4 entrusted to her, or placed in her possession for a limited, authorized period of determined or
5 prescribed duration or for a limited use, having a value of \$3,500.00 or more, belonging to the
6 Clark County School District, in the following manner, to-wit: by using money from Wells
7 Fargo Checking account number 6981, which contained money collected from students of the
8 AELAS program paid in exchange for ID Cards made by Clark County School District
9 Employees during working hours, having Renee Romero author check #1091 from this
10 account for \$5000.00 to Alfonso Acosta, not for official or authorized uses, but for the
11 purchase of the Yamilex Beauty Salon for Defendant Priscilla Rocha's own personal gain.

12 COUNT 48 – UNLAWFUL USE OF PUBLIC MONEY

13 Defendant Priscilla Rocha did on or about May 30, 2013 then and there wilfully,
14 knowingly, feloniously, and without lawful authority being a public officer or other person who
15 has in her possession, control, or custody any public money belonging to this state or any
16 county, town, city, district, or municipal corporation within this state, or to whom any such
17 public money is entrusted for safekeeping or for transmission to any treasurer or other officer,
18 or other person entitled to receive it, who uses any of the public money for his or her own
19 private purposes, or for any purpose other than one authorized by law, the amount unlawfully
20 used being \$650.00 or more, in the following manner, to wit: in her position of Director of the
21 AELAS program for the Clark County School District by using money from Wells Fargo
22 Checking account number 6981, which contained money collected from students of the
23 AELAS program paid in exchange for ID Cards made by Clark County School District
24 Employees during working hours, having Renee Romero author check #1091 from this
25 account for \$5000.00 to Alfonso Acosta, not for official or authorized uses, but for the
26 purchase of the Yamilex Beauty Salon for Defendant Priscilla Rocha's own personal gain.

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1 COUNT 49 - THEFT

2 Defendant Priscilla Rocha did on or about July 8, 2013 then and there wilfully,
3 knowingly, feloniously, and without lawful authority; use the property of another person
4 entrusted to her, or placed in her possession for a limited, authorized period of determined or
5 prescribed duration or for a limited use, having a value of \$650.00 or more, belonging to the
6 Clark County School District, in the following manner, to-wit: by using money from Wells
7 Fargo Checking account number 6981, which contained money collected from students of the
8 AELAS program paid in exchange for ID Cards made by Clark County School District
9 Employees during working hours, having Renee Romero author check #1098 from this
10 account for \$2,500.00 to Priscilla Rocha, not for official or authorized uses, but for her own
11 personal gain.

12 COUNT 50 – UNLAWFUL USE OF PUBLIC MONEY

13 Defendant Priscilla Rocha did on or about July 8, 2013 then and there wilfully,
14 knowingly, feloniously, and without lawful authority being a public officer or other person who
15 has in her possession, control, or custody any public money belonging to this state or any
16 county, town, city, district, or municipal corporation within this state, or to whom any such
17 public money is entrusted for safekeeping or for transmission to any treasurer or other officer,
18 or other person entitled to receive it, who uses any of the public money for his or her own
19 private purposes, or for any purpose other than one authorized by law, the amount unlawfully
20 used being \$650.00 or more, in the following manner, to wit: in her position of Director of the
21 AELAS program for the Clark County School District by using money from Wells Fargo
22 Checking account number 6981, which contained money collected from students of the
23 AELAS program paid in exchange for ID Cards made by Clark County School District
24 Employees during working hours, having Renee Romero author check #1098 from this
25 account for \$2,500.00 to Priscilla Rocha, not for official or authorized uses, but for her own
26 personal gain.

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1 COUNT 51 - THEFT

2 Defendant Priscilla Rocha did on or between June 18, 2013 and June 20, 2013 then and
3 there wilfully, knowingly, feloniously, and without lawful authority, use the property of
4 another person entrusted to her, or placed in her possession for a limited, authorized period of
5 determined or prescribed duration or for a limited use, having a value of \$650.00 or more,
6 belonging to the Clark County School District, in the following manner, to-wit: by using
7 money from Wells Fargo Checking account number 6981, which contained money collected
8 from students of the AELAS program paid in exchange for ID Cards made by Clark County
9 School District Employees during working hours, having Renee Romero author check #1093
10 for \$964 made payable to Lois Toney for "LULAC Shirts", check #1096 for \$960.00 made
11 payable to Priscilla Rocha for "Lulac Delegates" and check #1095 for \$1,140.00 made payable
12 to Lulac for "presentations", totaling \$3,064.00 not for official or authorized uses, but for her
13 own personal gain or reasons.

14 COUNT 52 – UNLAWFUL USE OF PUBLIC MONEY

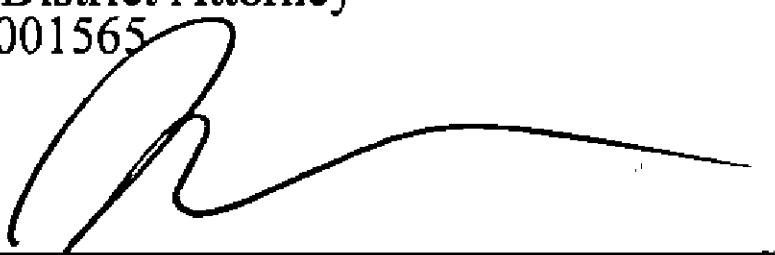
15 Defendant Priscilla Rocha did on or about June 20, 2013 then and there wilfully,
16 knowingly, feloniously, and without lawful authority being a public officer or other person who
17 has in her possession, control, or custody any public money belonging to this state or any
18 county, town, city, district, or municipal corporation within this state, or to whom any such
19 public money is entrusted for safekeeping or for transmission to any treasurer or other officer,
20 or other person entitled to receive it, who uses any of the public money for his or her own
21 private purposes, or for any purpose other than one authorized by law, the amount unlawfully
22 used being \$650.00 or more, in the following manner, to wit: in her position of Director of the
23 AELAS program for the Clark County School District by using money from Wells Fargo
24 Checking account number 6981, which contained money collected from students of the
25 AELAS program paid in exchange for ID Cards made by Clark County School District
26 Employees during working hours, having Renee Romero author check #1093 for \$964 made
27 payable to Lois Toney for "LULAC Shirts", check #1096 for \$960.00 made payable to
28 Priscilla Rocha for "Lulac Delegates" and check #1095 for \$1,140.00 made payable to Lulac

1 for "presentations", totaling \$3,064.00 not for official or authorized uses, but for her own
2 personal gain or reasons.

3 DATED this 10th day of July, 2014.

4 STEVEN B. WOLFSON
5 Clark County District Attorney
6 Nevada Bar #001565

7 BY


8 JAY P. RAMAN
9 Chief Deputy District Attorney
10 Nevada Bar #10193

11 ENDORSEMENT: A True Bill

12 
13 Foreperson, Clark County Grand Jury
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Names of witnesses testifying before the Grand Jury:

DIAZ, CESAR, UNKNOWN ADDRESS

ESPITIA, JAIME, UNKNOWN ADDRESS

FAILEY, NICK, UNKNOWN ADDRESS

HAYNES, COLIN, LVMPD

LIZOTTE, DENNIS, UNKNOWN ADDRESS

MALICH, TAMMY, UNKNOWN ADDRESS

MENDOZA, ANDRES, UNKNOWN ADDRESS

RAMIREZ, MANUEL, UNKNOWN ADDRESS

REYNOLDS, ROSA, UNKNOWN ADDRESS

RIVERA, MARIA, UNKNOWN ADDRESS

ROMERO, RENEE, UNKNOWN ADDRESS

SCHOEN, WILLIAM, LVMPD

SOTO, ANNA, UNKNOWN ADDRESS

TSETHLIKAI-NATEWA, VERLANDA, ALBUQUERQUE POLICE DEPT.

VARGAS, ESTHER, UNKNOWN ADDRESS

WHITELEY, ROBERT, LVMPD

ZAPATA, CLAUDIA, UNKNOWN ADDRESS

Additional witnesses known to the District Attorney at time of filing the Indictment:

13BGJ113ABCDE/dd-GJ

LVMPD EV# N/A

(TK)