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FILED

Oct 26 8 40 AM '11

JUSTICE DEPT  
LAS VEGAS, NEVADA

BY JA DEPUTY

8  
9 JUSTICE COURT OF LAS VEGAS TOWNSHIP  
10 IN THE COUNTY OF CLARK, STATE OF NEVADA

11 STATE OF NEVADA, )

12 Plaintiff, )

13 vs. )

14 ALEX SORIA, ID #1961240 )  
d/b/a BIOGREEN TECK, LLC and )  
15 SONIA RODIS, )  
d/b/a BIOGREEN TECK, LLC and )  
16 HANS JOHNS, ID # 1596623 )  
d/b/a BIOGREEN TECK and )

17 Defendant )  
18

CASE NO. : 11F18815ABC  
DEPT. NO. : 2

CRIMINAL COMPLAINT

19 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of  
20 Nevada, by and through her deputies, JOHN P. KELLEHER, Chief Attorney General and  
21 ROBERT G. GIUNTA, Senior Deputy Attorney General, complains and charges  
22 that the above-named Defendants, **ALEX SORIA** (hereinafter "**SORIA**"), **d/b/a BIOGREEN**  
23 **TECK, LLC** (hereinafter "**BIOGREEN**"), **SONIA RODIS** (hereinafter "**RODIS**") **d/b/a BIOGREEN**  
24 **TECK, LLC** (hereinafter "**BIOGREEN**"), and **HANS JOHNS** (hereinafter "**JOHNS**") **d/b/a**  
25 **BIOGREEN TECK, LLC** (hereinafter "**BIOGREEN**"), have committed the following offenses:  
26 Defendant **SORIA** has committed the crimes of one(1) Count of **THEFT-OBTAINING MONEY IN**  
27 **EXCESS OF \$2,500 BY A MATERIAL REPRESENTATION AGAINST A PERSON 60 YEARS**  
28 **OF AGE OR OLDER**, a class B felony, in violation of NRS 205.0832(1)(c), NRS 205.0835(4),

1 and NRS 193.167(2); one (1) Count of **THEFT – OBTAINING MONEY IN EXCESS OF \$2500**  
2 **BY MATERIAL MISREPRESENTATION**, a class B felony in violation of NRS 205.0832(1)( c)  
3 and NRS 205.0835; one (1) Count of **MORTGAGE FRAUD AGAINST A PERSON 60 YEARS**  
4 **OF AGE OR OLDER**, a class C felony, in violation of NRS 193.167(2) and NRS 193.167(2); and  
5 one (1) Count of **MORTGAGE FRAUD**, a class C felony in violation of NRS 205.372. Defendant  
6 **RODIS** has committed the crimes of one(1) Count of **THEFT-OBTAINING MONEY IN EXCESS**  
7 **OF \$2,500 BY A MATERIAL REPRESENTATION AGAINST A PERSON 60 YEARS OF AGE**  
8 **OR OLDER**, a class B felony, in violation of NRS 205.0832(1)(c), NRS 205.0835(4), and NRS  
9 193.167(2); one (1) Count of **THEFT – OBTAINING MONEY IN EXCESS OF \$2500 BY**  
10 **MATERIAL MISREPRESENTATION**, a class B felony in violation of NRS 205.0832(1)( c) and  
11 NRS 205.0835; one (1) Count of **MORTGAGE FRAUD AGAINST A PERSON 60 YEARS OF**  
12 **AGE OR OLDER**, a class C felony, in violation of NRS 193.167(2) and NRS 193.167(2); and  
13 one (1) Count of **MORTGAGE FRAUD**, a class C felony in violation of NRS 205.372. Defendant  
14 **JOHNS** has committed the crimes of one(1) Count of **THEFT-OBTAINING MONEY IN EXCESS**  
15 **OF \$2,500 BY A MATERIAL REPRESENTATION AGAINST A PERSON 60 YEARS OF AGE**  
16 **OR OLDER**, a class B felony, in violation of NRS 205.0832(1)(c), NRS 205.0835(4), and NRS  
17 193.167(2); one (1) Count of **THEFT – OBTAINING MONEY IN EXCESS OF \$2500 BY**  
18 **MATERIAL MISREPRESENTATION**, a class B felony in violation of NRS 205.0832(1)( c) and  
19 NRS 205.0835; one (1) Count of **MORTGAGE FRAUD AGAINST A PERSON 60 YEARS OF**  
20 **AGE OR OLDER**, a class C felony, in violation of NRS 193.167(2) and NRS 193.167(2); and  
21 one (1) Count of **MORTGAGE FRAUD**, a class C felony in violation of NRS 205.372.

22 **COUNT I**  
23 **(SORIA, RODIS, JOHNS)**

24 **THEFT- OBTAINING MONEY IN EXCESS OF \$2500 FROM A PERSON BY A MATERIAL**  
25 **MISREPRESENTATION AGAINST A PERSON 60 YEARS OF AGE OR OLDER**  
26 **FELONY-NRS 205.0832(1)(c),NRS 205.0835(4), NRS193.167(2)**

27 In or about July, 2011, the above named Defendants, **ALEX SORIA, SONIA RODIS, and**  
28 **HANS JOHNS**, (hereinafter “**SORIA, RODIS and JOHNS**”), d/b/a **BIOGREEN TECK, LLC**

1 (hereinafter "**BIOTECK**"), within the city of Las Vegas, Clark County, State of Nevada,  
2 committed the crime of **THEFT - OBTAINING MONEY IN EXCESS OF \$2500 BY MATERIAL**  
3 **MISREPRESENTATION AGAINST A PERSON 60 YEARS OF AGE OR OLDER**, a category B  
4 felony, in violation of NRS 205.0832(1)(c), NRS 205.0835(4), and NRS 193.167(2); by, without  
5 lawful authority, knowingly, obtaining personal property of another person by material  
6 misrepresentation with intent to deprive that person of the property, a felony in violation of NRS  
7 205.0832(1)(c), NRS 205.0835(3), to wit:

8 On or about July 2011, **SORIA, RODIS** and **JOHNS** , doing business as **BIOTECK**, either  
9 on their own or through their agents or employees, met with NESTOR NEBAB (hereinafter  
10 "NEBAB") (Age 69; dob 09/26/1942), at their office located at 3481 E. Sunset Road in Las  
11 Vegas, Nevada. **SORIA RODIS** and **JOHNS**, in their positions as **Officer, Agents or**  
12 **employees** of **BIOTECK** advised NEBAB that they could provide him with a ZERO MORTGAGE  
13 PROGRAM, under which NEBAB would either receive a reduced or eliminated mortgage  
14 payment on his property located at 200 W. Sahara in Las Vegas, Nevada and on a second  
15 property located at 2075 Cambridge Springs Drive, Henderson, Nevada. NEBAB accepted this  
16 offer and provided **SORIA** with two checks made out to **BIOTECK GREEN** totaling Five  
17 Thousand Dollars (\$5,000.00) dated July 8, 2011. At **SORIA, RODIS** and **JOHNS'** directions,  
18 NEBAB filed several documents with the Clark County Recorder's Office. In addition, NEBAB  
19 was advised by **RODIS** that he would need to file Bankruptcy in order to obtain his mortgage  
20 reduction and Defendants charged NEBAB an additional Five Hundred Dollars to assist filing his  
21 Bankruptcy pleadings.

22 Although NEBAB has fulfilled his obligations under the agreement made with the  
23 Defendants, **SORIA, RODIS** and **JOHNS**, the Defendants, never provided the services as  
24 promised on the properties located at 200 W. Sahara Avenue and 2075 Cambridge Springs  
25 despite their representations to do so, but rather converted the Five Thousand Dollars obtained  
26 from NEBAB for their own uses. Further NEBAB has not received a refund of his Five Thousand  
27 Dollars (\$5,000.00) from **SORIA, RODIS** and **JOHNS**, although he has requested said refund.  
28



1 out to BIOTECK GREEN totaling Five Thousand Dollars (\$5,000.00) dated July 8, 2011. At  
2 **SORIA, RODIS** and **JOHNS'** directions, NEBAB filed several documents with the Clark County  
3 Recorder's Office. In addition, NEBAB was advised by **RODIS** that he would need to file  
4 Bankruptcy in order to obtain his mortgage reduction and Defendants charged NEBAB an  
5 additional Five Hundred Dollars to assist filing his Bankruptcy pleadings. Said representations  
6 were material to the terms of the agreement between **BIOTECK** and NEBAB, and were false as  
7 Defendants well knew.

8 Although NEBAB has fulfilled his obligations under the agreement made with the  
9 Defendants, **SORIA, RODIS** and **JOHNS**, the Defendants never provided the services as  
10 promised on the properties located at 200 W. Sahara Avenue and 2075 Cambridge Springs.

11 All of which constitutes the crime of **MORTGAGE FRAUD AGAINST A PERSON 60**  
12 **YEARS OF AGE OR OLDER**, a class C felony, in violation of NRS 193.167(2) and NRS  
13 193.167(2)

14 **COUNT III**  
15 **(SORIA, RODIS, JOHNS)**

16 **THEFT- OBTAINING MONEY IN EXCESS OF \$2500 FROM A PERSON BY A MATERIAL**  
17 **MISREPRESENTATION**  
18 **FELONY-NRS 205.0832(1)(c) ,NRS 205.0835(4)**

19 In or about July, 2011, the above named Defendants, **ALEX SORIA, SONIA RODIS**, and  
20 **HANS JOHNS**, (hereinafter "**SORIA, RODIS** and **JOHNS**"), d/b/a **BIOGREEN TECK, LLC**  
21 (hereinafter "**BIOTECK**"), within the city of Las Vegas, Clark County, State of Nevada,  
22 committed the crime of **THEFT - OBTAINING MONEY IN EXCESS OF \$2500 FROM A**  
23 **PERSON BY MATERIAL MISREPRESENTATION** by, without lawful authority, knowingly,  
24 obtaining personal property of another person by material misrepresentation with intent to  
25 deprive that person of the property, a felony in violation of NRS 205.0832(1)(c), NRS  
26 205.0835(3) and NRS 193.167, to wit:

27 On or about July 2011, **SORIA, RODIS** and **JOHNS** , d/b/a **BIOTECK**, either on their own  
28 or through their agents or employees, met with ARACELI MARIANO (hereinafter "**MARIANO**"),  
at their office located at 3481 E. Sunset Road in Las Vegas, Nevada. **SORIA, RODIS** and  
**JOHNS** in their positions as employees, agents or officers of **BIOTECK** advised MARIANO that

1 they could provide her with a ZERO MORTGAGE PROGRAM under which MARIANO would  
2 either receive a reduced or eliminated mortgage payment on her property located at 4462  
3 Farmcrest Drive in Las Vegas, Nevada. MARIANO accepted this offer and provided SORIA with  
4 several checks made out to BIOTECK GREEN totaling Two Thousand Six Hundred Sixty Five  
5 Dollars (\$2,665.00). At SORIA, RODIS and JOHNS' directions, MARIANO filed several  
6 documents with the Clark County Recorder's Office.

7 Although MARIANO has fulfilled her obligations under the agreement made with the  
8 Defendants, SORIA, RODIS and JOHNS, and despite their representations that they would do  
9 so, Defendants never provided the services as promised on the properties located at 4462  
10 Farmcrest Drive, but rather converted the Two Thousand Six Hundred Sixty Five Dollars  
11 (\$2,665.00) obtained from MARIANO for their own uses. Further MARIANO has not received a  
12 refund of her Two Thousand Six Hundred Sixty Five Dollars (\$2,665.00) from SORIA, RODIS  
13 and JOHNS, although he has requested said refund.

14 SORIA, RODIS and JOHNS misrepresentations, promises and representations were  
15 material, false and deceptive and instrumental in causing the wrongful obtaining of MARIANO'S  
16 property.

17 All of which constitutes the crime of THEFT - OBTAINING MONEY IN EXCESS OF  
18 \$2500 BY MATERIAL MISREPRESENTATION a felony in violation of NRS 205.0832(1)(C)  
19 and 205.0835(4).

20 **COUNT IV**  
**(SORIA, RODIS, JOHNS)**

21 **MORTGAGE FRAUD**  
22 **FELONY-NRS 205.372**

23 In or about July, 2011, the above named Defendants, ALEX SORIA, SONIA RODIS, and  
24 HANS JOHNS, (hereinafter "SORIA, RODIS and JOHNS"), d/b/a BIOGREEN TECK, LLC  
25 (hereinafter "BIOTECK"), within the city of Las Vegas, Clark County, State of Nevada,  
26 committed the crime of MORTGAGE FRAUD by, with intent to defraud a participant in a  
27 mortgage lending transaction, knowingly making a false statement or misrepresentation  
28 concerning a material fact or deliberately concealing or failing to disclose a material fact; to wit,

1 On or about July 2011, **SORIA, RODIS** and **JOHNS** , d/b/a **BIOTECK**, either on their own  
2 or through their agents or employees, met with ARACELI MARIANO(hereinafter "MARIANO") at  
3 their office located at 3481 E. Sunset Road in Las Vegas, Nevada. **SORIA, RODIS** and **JOHNS**,  
4 in their positions as employees or agents or officers of **BIOTECK** advised MARIANO, a  
5 participant in a mortgage lending transaction as defined by NRS 598D.020, that they could  
6 provide her with a ZERO MORTGAGE PROGRAM under which MARIANO would either receive  
7 a reduced or eliminated mortgage payment on her property located at 4462 Farmcrest Drive in  
8 Las Vegas, Nevada. MARIANO accepted this offer and provided **SORIA** with two checks made  
9 out to **BIOTECK GREEN** totaling Two Thousand Six Hundred Sixty Five Dollars (\$2,665.00). At  
10 **SORIA, RODIS** and **JOHNS'** directions, MARIANO filed several documents with the Clark  
11 County Recorder's Office which the Defendants told MARIANO would eliminate her existing  
12 Mortgage on her property. Said representations were material to the terms of the agreement  
13 between **BIOTECK** and MARIANO, and were false as Defendants well knew.

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1 Although MARIANO has fulfilled her obligations under the agreement made with the  
2 Defendants, to date the Defendants never provided the services as promised on MARIANO'S  
3 property, despite the representations of **SORIA, RODIS** and **JOHNS** that they would provide  
4 such services.

5 All of which constitutes the crime of **MORTGAGE FRAUD** a Class C felony in violation of  
6 NRS 205.372(1)(a).

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

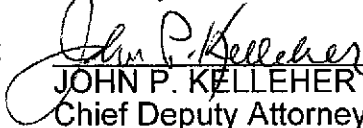
9 Based on the foregoing violations of Nevada law, the State respectfully requests that a  
10 warrant be issued for the arrest of **ALEX SORIA, SONIA RODIS, and HANS JOHNS**, in order  
11 that they may be dealt with according to the laws of the State of Nevada. Said complainant  
12 makes this declaration subject to the penalty of perjury.

13 DATED this 25 day of October, 2011.

14 SUBMITTED BY:

15 CATHERINE CORTEZ MASTO  
16 Attorney General

17 By:

  
18 **JOHN P. KELLEHER**  
19 Chief Deputy Attorney General  
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