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FOR IMMEDIATE RELEASE
DATE: November 16, 2011

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**OFFICE OF THE ATTORNEY GENERAL ANNOUNCES INDICTMENT IN MASSIVE
CLARK COUNTY ROBO-SIGNING SCHEME**
***Defendants to be Held Criminally Accountable for Filing Tens of Thousands of
Fraudulent Foreclosure Documents***

Carson City, NV – The Office of the Nevada Attorney General announced today that the Clark County grand jury has returned a 606 count indictment against two title officers, Gary Trafford and Gerri Sheppard, who directed and supervised a robo-signing scheme which resulted in the filing of tens of thousands of fraudulent documents with the Clark County Recorder's Office between 2005 and 2008.

According to the indictment, defendant Gary Trafford, a California resident, is charged with 102 counts of offering false instruments for recording (category C felony); false certification on certain instruments (category D felony); and notarization of the signature of a person not in the presence of a notary public (a gross misdemeanor). The indictment charges defendant Gerri Sheppard, also a California resident, with 100 counts of offering false instruments for recording (category C felony); false certification on certain instruments (category D felony); and notarization of the signature of a person not in the presence of a notary public (a gross misdemeanor).

"The grand jury found probable cause that there was a robo-signing scheme which resulted in the filing of tens of thousands of fraudulent documents with the Clark County Recorder's Office between 2005 and 2008," said Chief Deputy Attorney General John Kelleher.

The indictment alleges that both defendants directed the fraudulent notarization and filing of documents which were used to initiate foreclosure on local homeowners. The State alleges that these documents, referred to as Notices of Default, or "NODs", were prepared locally. The State alleges that the defendants directed employees under their supervision, to forge their names on foreclosure documents, then notarize the

signatures they just forged, thereby fraudulently attesting that the defendants actually signed the documents, which was untrue and in violation of State law. The defendants then allegedly directed the employees under their supervision to file the fraudulent documents with the Clark County Recorder's office, to be used to start foreclosures on homes throughout the County.

The indictment alleges that these crimes were done in secret in order to avoid detection. The fraudulent NODs were allegedly forged locally to allow them to be filed at the Clark County Recorder's office on the same day they were prepared.

District Court Judge Jennifer Togliatti has set bail in the amount of \$500,000 for Sheppard and \$500,000 for Trafford. The case has been assigned to Department 5 District Court Judge Carolyn Ellsworth who will preside over the case.

Anyone who has information regarding this case is asked to contact the Attorney General's Office at 702-486-3777 in Las Vegas or 775-684-1180 in Carson City.



TRAFFORD, GARY



SHEPPARD, GERRI

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IND
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FILED

Nov 16 12 17 PM '11

Ann D. Johnson
CLERK OF THE COURT

**DISTRICT COURT
CLARK COUNTY, NEVADA**

STATE OF NEVADA,

Plaintiff,

vs.

**GARY RANDALL TRAFFORD,
GERALDINE ANN SHEPPARD,
aka Gerri Sheppard**

Defendants

**CASE NO. : C-11-277573-1
DEPT. NO.: V**

INDICTMENT

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



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FOR IMMEDIATE RELEASE
DATE: November 17, 2011

Contact: Jennifer Lopez
702.486.3782

OFFICE OF THE ATTORNEY GENERAL ANNOUNCES NOTARY IN ROBO-SIGNING SCHEME PLEADS GUILTY

Carson City, NV – The Office of the Nevada Attorney General announced today that Tracy Lawrence, 43, a local notary, has pled guilty to one count of notarizing the signature of an individual not in her presence, a gross misdemeanor in violation of NRS 240.155.

Notary fraud carries a potential jail sentence of one year and/or a fine of up to \$2,000.

“The case against Lawrence was based on an investigation by the Attorney General’s mortgage fraud task force which revealed that between 2005 and 2008, tens of thousands of fraudulent documents were filed with the Clark County Recorder’s office”, said Chief Deputy Attorney General John Kelleher.

Lawrence pled guilty on November 14, 2011. A sentencing date has been scheduled for November 28, 2011, in front of District Court Judge Jesse Walsh.

Anyone who has information regarding loan modification or mortgage fraud scams should contact the Attorney General’s Office at 702-486-3132.

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1 **INFO**

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

NOV 14 2011

BY: _____
PHYLLIS IRBY, DEPUTY

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

12 STATE OF NEVADA,

13 Plaintiff,

14 vs.

15 TRACY LAWRENCE

16 Defendant

CASE NO.: C-11-277290-1
DEPT. NO.: X

17 **CRIMINAL INFORMATION**

18 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
19 Nevada, by and through her deputies, JOHN P. KELLEHER, Chief Deputy Attorney General
20 and ROBERT G. GIUNTA, Senior Deputy Attorney General, under penalty of perjury, who
21 within their knowledge, information and belief, complain and charge that the above-named
22 Defendant, TRACY LAWRENCE (hereinafter "LAWRENCE"), has committed the following
23 offense:

24 Defendant LAWRENCE has committed the crime of one (1) Count of **NOTARIZATION**
25 **OF SIGNATURE OF PERSON NOT IN PRESENCE OF NOTARY PUBLIC**, a gross
26 misdemeanor in violation of NRS 240.155. Said aforementioned crimes constitute
27 **TECHNOLOGICAL CRIMES** as defined in NRS 205A.030 and property which was derived
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1 from, realized through, or used or intended for use in the course of a technological crime is
2 **subject to forfeiture** pursuant to **NRS 179.1219**. The acts alleged herein have been
3 committed on or about October 6, 2008, committed by **LAWRENCE**, at and within the City of
4 Las Vegas, County of Clark, State of Nevada in the following manner:

5 **COUNT I**

6 **NOTARIZATION OF SIGNATURE OF PERSON NOT IN PRESENCE NOTARY PUBLIC**
7 **GROSS MISDEMEANOR NRS 240.155**

8 On or about October 6, 2008, Defendant **LAWRENCE**, a notary public, who is
9 authorized to notarize an individual's signature, did then and there, willfully notarize the
10 signature of a person when said person whose signature the defendant was notarizing was
11 not in her presence, to wit;

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1 On or about October 6, 2008, Defendant **LAWRENCE**, a notary public appointed by the
2 Nevada Secretary of State, and authorized to take a proof or acknowledgment of an
3 instrument, willfully notarized the signature of an individual named Gary Trafford on a NOTICE
4 OF DEFAULT AND ELECTION TO SELL UNDER DEED OF TRUST, Instrument No.
5 0004017 of Official Records filed in the Office of the County Recorder of Clark County, Nevada
6 dated October 6, 2008, when Gary Trafford was not in Defendant's presence. These actions
7 were performed in a secretive manner in order that the false documents be given full legal
8 effect and that this criminal activity not be discovered. This activity was discovered on or
9 about December of 2010.

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

12 All of which is contrary to the form, force and effect of the statutes in such cases made
13 and provided, and against the peace and dignity of the State of Nevada. Said complainants
14 make this declaration subject to the penalty of perjury.

15 DATED this 14th day of November, 2011

16 SUBMITTED BY:

17 CATHERINE CORTEZ MASTO
18 Attorney General

19 By: 

20 SAMUEL KERN
21 Deputy Attorney General
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25 702-486-3799
26 Attorneys for Plaintiff, State of Nevada

23 11F16164/rjh
24 AG # 13821-104
25 Notarization Fraud
26 JC 2
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