

ROSS C. SANCHEZ

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT COURT

FILED
SECOND JUDICIAL DISTRICT

2013 JUN 11 PM 12:01

D 0202 CR 2013002754
CR No.

Henry T. ...
NM SEC # 10-005

No. MS 2006-0001

BRITNEY MUNOZ

STATE OF NEW MEXICO,
Plaintiff.

vs.

CHRISTINA COOMBS,
Defendant.

CRIMES CHARGED

GRAND JURY INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1: FRAUD OVER \$20,000.00

On or about March 3, 2008, in Bernalillo County, State of New Mexico, the above named defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), did intentionally misappropriate or take money which had a market value of \$180,000.00 belonging to Paul Cheng, by means of fraudulent conduct, practices or representations; contrary to NMSA 1978 § 30-16-6(F).

COUNT 2: FRAUD OVER \$20,000.00

On or about April 13, 2008, in Bernalillo County, State of New Mexico, the above named defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), did

intentionally misappropriate or take money which had a market value of \$100,000.00 belonging to Paul Cheng (d/b/a Sohom Investing, L.L.C.), by means of fraudulent conduct, practices or representations; contrary to NMSA 1978 § 30-16-6(F).

COUNT 3: FRAUD OVER \$20,000.00

On or about April 30, 2008, in Bernalillo County, State of New Mexico, the above named defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), did intentionally misappropriate or take money which had a market value of \$120,000.00 belonging to Ann Knight, by means of fraudulent conduct, practices or representations; contrary to NMSA 1978 § 30-16-6(F).

COUNT 4. CONSPIRACY TO COMMIT FRAUD OVER \$20,000.00

In and between March 3, 2008 and continuing to on or about August 18, 2009, in Bernalillo County, State of New Mexico, the above named defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), along with codefendant John Perea, by words or acts, agreed together to commit fraud over \$20,000.00; contrary to NMSA 1978 §§ 30-28-2 and 30-16-6(F) (as amended).

COUNT 5. FRAUDULENT SALE OF A SECURITY (SECURITIES FRAUD)

On or about June 26, 2008, in Bernalillo County, State of New Mexico, the above named defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), did commit the crime of securities fraud. CHRISTINA COOMBS offered to sell and sold to Thomas Stark a

security, to wit; that on or about June 26, 2008, Thomas Stark gave CHRISTINA COOMBS \$40,000.00 for a real estate investment in exchange for a Promissory Note, which promised a return of \$55,000.00 on August 26, 2008.

In connection with this offer to sell or offer to purchase a security, directly or indirectly, the defendant:

- A. Employed a device, scheme or artifice to defraud; and/or
- B. Made an untrue statement of material fact or failed to state a necessary material fact where such omission would be misleading; and/or
- C. Engaged in an act practice or course of business which operates or would operate as a fraud or deceit upon a person;

The fraudulent practices, material misrepresentations and material omissions by defendant include, but are not limited to:

- 1. Failed to disclose that she does not possess a securities license as a broker-dealer and/or a sales representative;
- 2. Failed to disclose the existence of pending civil claims and / or judgments filed against CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), by prior investors and contractors;
- 3. Failed to disclose her course of dealings with John Perea and Don Juan Construction, L.L.C.; contrary to NMSA 1978 § 58-13B-30, and 39 (as amended).

COUNT 6: SALE OR OFFER TO SALE AN UNREGISTERED SECURITY

On or about June 26, 2008, in Bernalillo County, State of New Mexico, the above name defendant, CHRISTINA COOMBS (d/b/a Creative Mortgage Solutions, L.L.C.), offered to sell and sold to Thomas Stark an investment for \$40,000 in exchange for a Promissory Note, promising a return of \$55,000 on August 26, 2008, that was required to be registered with the New Mexico Securities Division pursuant to the New Mexico Securities Act of 1986; contrary to NMSA 1978 § 58-13B-20, and 39 (as amended).

The names of the witnesses upon whose testimony this Indictment is based are as follows:

Carolyn Miller

I hereby certify that the foregoing Indictment is a True Bill/No True Bill.

6/10/13
Date

Brenda Martinez
Foreperson

APPROVED AS TO FORM:

Scott L. Mullins
Scott L. Mullins
Special Assistant District Attorney
Senior Prosecuting Attorney – NM/RLD

6.7.2013
Date

CASE INFORMATION

NO. NMSEC #11-058

NAME: Christina May Coombs

DOB:

SSN:

Address: 1005 Waterford Road
Waxahachie, TX 75167

BOOKING/ARREST DATE:

BOOKING/ARREST#:

DEF. ATTY:

PHYSICAL DESCRIPTION OF DEFENDANT:

Height: 5-09

Weight: 280

Race:

Eye Color: Blue

Hair Color: Brown

Other:

PENALTIES

COUNTS: 1, 2, 3, 2nd Degree Felonies
COUNTS: 4, 5, 6 3rd Degree Felonies

4th Degree Felony: Basic sentence of 18 months imprisonment and not more than \$5,000 fine.

3rd Degree Felony: Basic sentence of 3 years imprisonment and not more than \$5,000 fine.

2nd Degree Felony: Basic sentence of 9 years imprisonment and not more than \$10,000 fine.

1st Degree Felony: Basic sentence of 18 months imprisonment and not more than \$5,000 fine.

USE OF FIREARM ALTERATION TO BASIC SENTENCE (FE): Basic sentence of imprisonment increased by 1 year for first offense in which a firearm is used and 3 years for subsequent offenses in which a firearm is used.

USE OF HATE CRIME ENHANCEMENT: Basic sentence of imprisonment is increased by one (1) year, unless second offense, then the basic sentence is increased by two (2) years..

Special Penalty: (Receiving or Transferring a Stolen Vehicle (Possession) only) Basic sentence of one year and/or \$5,000 fine.

Misdemeanor: Less than 1 year in the County Jail and/or not more than \$1,000 fine.

Petty Misdemeanor: Not more than 6 months in the County Jail and/or not more than \$500 fine.

Penalty for Driving While Under the Influence, Felony Offense:(4th or Subsequent Offense): Basic sentence of 18 months and not more than \$5,000 fine, including a mandatory jail term of not less than 6 months.

Penalty for Driving While Under the Influence - Misdemeanor: If 1st Offense, basic sentence is maximum 90 days jail and \$500 fine, and if aggravated an additional 48 hours jail time; if 2nd Offense, basic sentence is mandatory 72 hours in jail and \$500 fine to maximum of 364 days and

\$1,000 fine, and if aggravated an additional 96 hours jail time; if 3rd Offense, basic sentence is a mandatory 30 days in jail and \$750 fine to maximum of 364 days and \$1,000 fine, and if aggravated an additional mandatory 60 days jail time.

Penalty for Driving While License Suspended or Revoked: Traffic Code Misdemeanor, Special Penalty: not less than 4 days nor more than 364 days and fine up to \$1,000 (non-DWI related suspension/revocation); or not less than 7 consecutive days imprisonment and mandatory fine not less than \$300 nor more than \$1,000 (DWI revocation).

Penalty for Reckless Driving: Upon first conviction, basic sentence of 5 days to 90 days imprisonment, and/or \$25 to \$100 fine. Upon a second or subsequent conviction, basic sentence of 10 days to 6 months imprisonment, and/or \$50 to \$1,000 fine.

Penalty for Traffic Code Misdemeanor: fine of not more than \$300 or imprisonment for not more than 90 days or both.

Penalty Assessment Misdemeanor: See Schedule in Traffic Code, Section 66-8-116.

1st Degree Felony for Child Abuse (Intentionally Caused) (Resulting in Death) (Child Under 12): Life imprisonment.

2nd Degree Felony Resulting in the Death of a Human Being: Basic sentence of 15 years but not less than 10 years nor more than 20 years imprisonment and not more than \$12,500 fine.

3rd Degree Felony Resulting in the Death of a Human Being: Basic sentence of 6 years but not less than 4 years nor more than 8 years imprisonment and not more than \$15,000 fine.

2nd Degree Felony, Sexual Offense Against A Child: Basic sentence of 15 years imprisonment and not more than \$12,500 fine.

3rd Degree Felony, Sexual Offense Against A Child: Basic sentence of 6 years imprisonment and not more than \$5,000 fine.

OPEN CHARGE OF MURDER

Penalty for FIRST DEGREE MURDER (Willful and Deliberate) or (Depraved Mind)

CAPITAL FELONY: Life Imprisonment

SECOND DEGREE MURDER: Basic sentence of 15 years imprisonment and not more than \$12,500 fine.

VOLUNTARY MANSLAUGHTER: Basic sentence of 6 years imprisonment and not more than \$15,000 fine.

INVOLUNTARY MANSLAUGHTER: 4th Degree Felony: Basic sentence of 18 months imprisonment and not more than \$5,000 fine.

Penalty for FIRST DEGREE MURDER (Felony Murder):

CAPITAL FELONY: Life Imprisonment