

SECOND JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF BERNALILLO

No. D C CR 2017 2423

Judge:

CINDY LEOS

STATE OF NEW MEXICO,

Plaintiff.

vs.

RANDOLPH VELARDE AKA RANDY VELARDE

DOB: XX/XX/1971

SSN: XXX-XX-0907

Defendant.

CHARGES: Fraud, Embezzlement

GRAND JURY INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1: FRAUD (EXCEEDS \$20,000) (0556), in that on, or about or between the 23rd day of March, 2012 and the 5th day of April, 2012, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct make a promise he had no intention of keeping and/or misrepresented a fact to Louis Peralta, with the intention to deceive or cheat Louis Peralta, or another, and because of Louis Peralta's reliance on the promise and/or misrepresentation, the defendant obtained over \$20,000, contrary to Section 30-16-6(F), NMSA 1978.

TB JJ

OR IN THE ALTERNATIVE:

COUNT 1: EMBEZZLEMENT (EXCEEDS \$20,000) (0605), in that on, or about or between the 5th day of April, 2012 and the 10th day of August, 2012, in Bernalillo County, New Mexico, the above-named defendant did convert to his own use money exceeding \$20,000, and with which defendant had been entrusted, with intent at the time of the said conversion to fraudulently deprive the owner of his property, contrary to Section 30-16-8(F), NMSA 1978.

TB JJ

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

- Carolyn L. Hernandez
- Darla Brewer
- Louis Peralta

I hereby certify that the foregoing is a true bill.

Lydie Hernandez
Foreperson

7/13/17
Date

APPROVED:

Benjamin R. Schrope

Benjamin R. Schrope
Senior Prosecuting Attorney
Securities Division
New Mexico Regulation and Licensing Department