The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and through her deputies, Jeffrey H. Segal and Adriana Escobar, under penalty of perjury, and within their knowledge and upon information and belief, complain and charge that the above named Defendants have committed the offenses as follows:

LAWRENCE FOSTER d/b/a WEST COAST MANAGEMENT LLC and/or WORLD GROUP SECURITIES, INC. (hereinafter "FOSTER") has committed seven (7) counts of THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

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All the above-described acts alleged herein have been committed on or between January 15, 2008 and March 11, 2009, by the above-named Defendant, within the County of Clark, State of Nevada, in the following manner:

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about April 17, 2008, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to George Doty (hereinafter, "Doty") for the amount of \$80,000.00, and in so doing FOSTER falsely claimed to own and pledged as collateral Transamerica IDEX Mutual funds 771, 773, 737, 727, 728, 732, 736 and 733 (hereinafter, "mutual funds"). Furthermore, FOSTER converted Doty's money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

COUNT II THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an

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interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about October 20, 2008, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to Julia Dziegelewski (hereinafter, "Dziegelewski") for the amount of \$80,000.00, and in so doing FOSTER falsely claimed to own and pledged as collaterrall, Transamerica IDEX Mutual funds 771, 773, 737, 727, 728, 732, 736 and 733 (hereinafter, "mutual funds"). Furthermore, FOSTER converted Dziegelewski's money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. FOSTER did not refund any of the money to Dziegelewski.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

COUNT III

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about January 20, 2009, FOSTER offered till and/or sold a security in the form of loan agreement, (investment contract), to Shawn Thomas (hereinafter, "Thomas") for the amount of \$30,000.00, and in so doing FOSTER falsely claimed to own and pledged as collateral,

Transamerica IDEX Mutual funds 771, 773, 737, 724, 728, 732, 736 and 733 (hereinafter, "mutual funds"). Furthermore, FOSTER converted Thomas' money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. **FOSTER** did not refund any of the money to Thomas.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

COUNT IV

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about January 20, 2009, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to Andrew Tedesco (hereinafter, "Tedesco") for the amount of \$30,000.00, and in so doing FOSTER falsely claimed to own and pledged as collaraterall, Transamerica IDEX Mutual funds 771, 773, and 737 (hereinafter, "mutual funds"). Furthermore, FOSTER converted Tedesco's' money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. FOSTER did not refund any of the money to Tedesco.

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These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

COUNT V

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about March 11, 2009, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to Connie Gandulla (hereinafter, "Gandulla") for the amount of \$10,000.00, and in so doing FOSTER falsely claimed to own and pledged as collaterall Transamerica IDEX Mutual funds 771, 773 did not refund any of the money to Gandulla. Furthermore, FOSTER converted Gandulla's money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. and 737, (hereinafter, "mutual funds"). FOSTER did not refund any of the money to Gandulla.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

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Attorney General's Office 555 E. Washington, Suite 3900 Las Vegas, NV 89101

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COUNT VI

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500.00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That in or about December 2008, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to Jage Larch (hereinafter, "Larch") for the amount of \$20,000.00, and in so doing FOSTER falsely told Larch that his initial investment would be invested into a company he operated that purchased structured settlements at a discount. FOSTER also falsely claimed that he owned and pledged as collaterall a \$400,000.00 policy or annuity. Furthermore, FOSTER converted Larch's money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. FOSTER did not refund any of the money to Larch.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

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COUNT VII

THEFT- OBTAINING MONEY IN THE AMOUNT OF \$2,500 (A Category B Felony – NRS 205.0832, NRS 205.0833, NRS 205.0835(4)

That Defendant, FOSTER, in Clark County, State of Nevada, did knowingly and intentionally, without lawful authority, obtain personal property of another person having a value of \$2,500,00 or more by material misrepresentation(s) with the intent to deprive that person of the property or services, and/or did convert, make an unauthorized transfer of an interest in or without authorization control any property of another person, or use the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or proscribed duration or for a limited use, a Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4), to wit: That on or about December 29, 2008, FOSTER offered to sell and/or sold a security in the form of loan agreement, (investment contract), to Dempsey Lauderdale (hereinafter, "Lauderdale") for the amount of \$10,000.00, and in so doing FOSTER falsely claimed to own and pledged as collaterall on the contract a ING Variable annuity Account #10908370X claiming to be his when in fact the ING account belongs to Mr. George Moore, a client of FOSTER'S in an attempt to obtain Lauderdale's \$10,000.00. Furthermore, FOSTER converted Lauderdale's money which was supposed to be used for investment to unauthorized purposes, including payment of his personal expenses. FOSTER did not refund any of the money to Lauderdale.

These actions of FOSTER constitute the crime THEFT-OBTAINING MONEY IN THE AMOUNT OF \$2,500.00 OR MORE, a Class B Felony in violation of NRS 205.0832, NRS 205.0833 and NRS 205.0835(4).

The Complainant requests an *Arrest Warrant* be issued at this time pursuant to NRS 171.106.

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All of which is contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Nevada. Furthermore, Complainant makes this declaration upon information and belief and subject to the penalty of perjury.

Dated this 22nd day of November, 2011.

SUBMITTED BY:

CATHERINE CORTEZ MASTO

Attorney General

By:

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