



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

1 JASON M. FRIERSON
United States Attorney
2 District of Nevada
Nevada Bar Number 7709
3 STEVEN J. ROSE
Assistant United States Attorney
4 Nevada Bar Number 13575
DANIEL R. SCHIESS
5 Assistant United States Attorney
Nevada Bar Number 5483
6 501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
7 (702) 388-6336
steven.rose@usdoj.gov
8 dan.schiess@usdoj.gov

9 *Attorneys for the United States of America*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 AURORA PHELPS,
aka "Aurora Flores,"
16 aka "Aurora Flores-Velasco,"
aka "Aurora Alvarez,"

17 Defendant.



18 **SEALED**
19 **SUPERSEDING INDICTMENT**

20 Case No. 2:23-cr-0167-CDS-DJA

21 **VIOLATIONS:**

22 **Counts One through Seven**
18 U.S.C. § 1343 – Wire Fraud

23 **Counts: Eight through Ten**
18 U.S.C. § 1341 – Mail Fraud

24 **Counts: Eleven through Sixteen**
18 U.S.C. § 1344(a) – Bank Fraud

Counts: Seventeen through Nineteen
18 U.S.C. § 1028A(a)(1) – Identity Theft

Counts: Twenty and Twenty-One
18 U.S.C. § 1201(a)(1) – Kidnapping

1 **THE GRAND JURY CHARGES THAT:**

2 **COUNTS ONE THROUGH SEVEN**

3 **Wire Fraud**
4 **18 U.S.C. § 1343**

5 1. From on or about July 1, 2021, to on or about December 9, 2022, in the State
6 and Federal District of Nevada, and elsewhere,

7 **AURORA PHELPS,**
8 **aka "Aurora Flores,"**
9 **aka "Aurora Flores-Velasco,"**
10 **aka "Aurora Alvarez,"**

11 defendant herein, knowingly and intentionally devised and intended to devise and
12 participated in a scheme and artifice to defraud and for obtaining money and property by
13 means of false and fraudulent pretenses, representations, and promises.

14 2. The objective of the scheme was for Phelps to gain unauthorized access to the
15 financial and other accounts of others, usually older men (the "Victims"), then to use the
16 accounts to personally benefit herself and her family members.

17 3. Phelps carried out her scheme by meeting Victims on online dating services
18 and in person, sometimes drugging them, then accessing their financial and other accounts
19 without their knowledge and consent and without the knowledge and consent of the
20 financial institutions and other entities that held their accounts.

21 4. It was part of the scheme and artifice that Phelps made materially false and
22 fraudulent pretenses, representations, and promises to the Victims and to the financial
23 institutions and entities that held their accounts.

24 5. It was further part of the scheme and artifice that Phelps performed and
caused to be performed the following acts, among others:

1 **Defendant Perpetrates the Scheme Against Victim-1 and His Financial**
2 **Institutions**

3 6. On or about July 1, 2021, defendant met Victim-1, an elderly man, on an
4 online dating service, and over the next two months, she met him for lunch dates and
5 attempted to persuade him to travel with her to Mexico.

6 7. On or about November 1, 2021, defendant met Victim-1 at his house, caused
7 lunch to be delivered to his house, then caused him to consume a prescription drug without
8 his knowledge and consent, leaving him mostly unconscious for the next five or so days.

9 8. During the five days, defendant stole Victim-1's iPhone, iPads, driver's
10 license, and bank cards; gained access to his financial accounts and conducted financial
11 transactions using his financial accounts without his knowledge and consent, including
12 transferring money from his accounts, and using his accounts to make online purchases
13 from retailers.

14 9. During the five days, defendant also gained access to Victim-1's E-Trade
15 account, sold his Apple stock worth approximately \$3.3 million, and unsuccessfully
16 attempted to remove the \$3.3 million from Victim-1's E-Trade account.

17 **Defendant Perpetrates the Scheme Against Victim-2 and His Financial**
18 **Institutions**

19 10. On or about November 3, 2022, defendant met Victim-2, an elderly man, on
20 an online dating service.

21 11. On or about November 4, 2022, defendant met Victim-2 at a restaurant in Las
22 Vegas, and shortly thereafter she caused him to consume a medication and other substances
23 that caused him to become lethargic and confused.

1 12. Beginning on or about November 4, 2022, defendant gained unauthorized
2 access to Victim-2's financial and other accounts.

3 13. On or about November 4, 2022, defendant used Victim-2's American Express
4 credit card without Victim-2's knowledge and consent, and caused Victim-2 to use his
5 American Express credit card in a drugged state, to make several purchases that were
6 declined by American Express, and to cause-Victim-2 to speak with American Express to
7 authorize the purchases.

8 14. On or about November 4, 2022, while Victim-2 was apparently under the
9 influence of a drug and other substances, defendant caused him to travel with her and her
10 daughter to Mexico City, Mexico.

11 15. In Mexico City, defendant used and caused to be used Victim-2's Wells Fargo
12 credit card to rent a hotel room.

13 16. Several days later, defendant returned to Nevada without Victim-2, who had
14 died in the hotel room in Mexico City.

15 17. In or about November and December 2022, defendant conducted numerous
16 transactions using Victim-2's financial accounts, including transferring money from Victim-
17 2's account to her account and her husband's account, making ATM withdrawals, and
18 making online purchases of items including retail goods, airline tickets, hotel rooms, and a
19 motorcycle.

20 18. On or about November 25, 2022, defendant changed the password to Victim-
21 2's Social Security account by requesting from the Social Security Administration a
22 temporary password as part of a password reset.

1 **Defendant Perpetrates the Scheme Against Victim-3 and His Financial**
2 **Institutions**

3 19. On or about December 11, 2021, defendant met Victim-3 at the Hard Rock
4 hotel in Guadalajara, Mexico, left the hotel with him, and caused him to disappear.

5 20. From on or about December 11, 2021, to on or about December 9, 2022,
6 defendant conducted financial transactions using Victim-3's financial accounts, including
7 transferring money from Victim-3's account and making purchases and ATM withdrawals,
8 without Victim-3's knowledge and consent.

9 21. Among other unauthorized financial activities, defendant opened an account
10 at Wells Fargo Bank on or about December 13, 2021, in Victim-3's name without
11 authorization, caused money to be transferred into the account from an account belonging
12 to Victim-3, including Victim-3's monthly social security payments, and over the next
13 several months steadily took money from the account by making purchases and ATM
14 withdrawals.

15 22. Additionally, in or about November 2021, defendant attempted to change
16 Victim-3's beneficiary designation on his union retirement account and took Victim-3's
17 BMW automobile, all without his knowledge and consent.

18 **Defendant Perpetrates the Scheme Against Victim-4 and His Financial**
19 **Institutions**

20 23. On or about May 30, 2022, defendant went on a date with Victim-4 in the
21 Guadalajara region of Mexico, and when Victim-4's daughter called him without response
22 the following day, the Mexican police were contacted and went to Victim-4's house where
23 they found him dead on his bathroom floor.

1 24. Over the next several days, defendant conducted or attempted to conduct
2 transactions using Victim-4's financial accounts, including using Victim-4's financial
3 account to purchase a gold coin that defendant caused to be mailed to her house.

4 **The Misrepresentations**

5 25. In furtherance of the scheme and artifice, the defendant knowingly made
6 materially false and fraudulent pretenses, representations, and promises, including material
7 omissions, among others, as follows:

8 a. defendant knowingly represented to the Victims that she wanted to
9 date them but knowingly omitted to disclose that she intended to conduct financial
10 transactions with their accounts without their knowledge and consent and that she may
11 drug them to do so; and

12 b. defendant knowingly misrepresented to the financial institutions and
13 entities holding the Victims' accounts and to retailers when she conducted financial and
14 other transactions that she was authorized by the Victims to conduct the transactions and
15 that she was the Victims.

16 **The Wire Communications**

17 26. On or about the dates set forth below, for purpose of executing the scheme
18 and artifice, defendant transmitted and caused to be transmitted by means of wire
19 communication in interstate and foreign commerce, the wire communications identified
20 below, with each wire communication constituting a separate violation of Title 18, United
21 States Code, Section 1343.

Count	Date	Transaction
Victim-1		
1	11/2/2021	Defendant placed and caused to be placed a food delivery order through DoorDash (a food delivery service), causing a wire communication to be sent from the state of Nevada to another state as part of the transaction.
2	11/2/2021	Defendant caused a wire communication to be sent from Nevada to a location outside the state of Nevada initiating a wire transfer of approximately \$64,000 from a USAA bank account opened in Victim-1's name to an account belonging to her husband.
Victim-2		
3	11/11/2022	Defendant caused a wire transfer communication to be sent from Mexico to Nevada, causing \$7,000 to be transferred from Victim-2's Capital One account to Carter Powersports' account for the purchase of a motorcycle
4	11/14/2022	Defendant caused a wire transfer communication to be sent from Nevada to Mexico initiating a wire transfer of approximately \$1,530 from a Wells Fargo Bank account opened in Victim-2's name to a Scotiabank account belonging to defendant.
5	12/13/2022	Defendant caused a wire communication to be sent from Nevada to a location outside the state of Nevada initiating a wire transfer of approximately \$2319 from a Wells Fargo Bank account opened in Victim-2's name to a Scotiabank account belonging to defendant.
Victim-3		
6	11/4/2022	Defendant caused a wire communication to be sent from Nevada to a location outside the state of Nevada by initiating an ATM withdrawal from a Wells Fargo Bank account opened in Victim-3's name.

7	12/2/2022	Defendant caused a wire communication to be sent from Nevada to a location outside the state of Nevada by purchasing an item at a McDonald's restaurant in Las Vegas, Nevada using a bank card issued by Wells Fargo Bank in Victim-3's name.
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COUNTS EIGHT THROUGH TEN

Mail Fraud

18 U.S.C. § 1341

1. Paragraphs 1 through 26 are incorporated herein as if set forth in full.

On or about the dates set forth below, in the for purpose of executing the scheme and artifice,

AURORA PHELPS,
aka "Aurora Flores,"
aka "Aurora Flores-Velasco,"
aka "Aurora Alvarez,"

defendant herein, knowingly caused to be delivered by commercial interstate carrier a matter and thing according to the direction thereon, that is, defendant caused a commercial interstate carrier to deliver the items described below to defendant's residence in Las Vegas, Nevada, with each delivery constituting a separate violation of Title 18, United States Code, Section 1341.

Count	Date	Description of Matter or Thing
Victim-2		
8	11/11/2022	A purchase from DIOR, a retailer
9	11/21/2022	A purchase from DIOR, a retailer
Victim-4		
10	6/2/2022	A purchase from APMEX, a retailer

Count	Date	Description of Transaction
Victim-2		
11	11/4/2022	An ATM withdrawal
Victim-3		
12	11/4/2022	An ATM withdrawal
13	12/2/2022	An ATM withdrawal
14	12/3/2022	An ATM withdrawal
15	12/7/2022	An ATM withdrawal
16	12/9/2022	A purchase

COUNTS SEVENTEEN THROUGH NINETEEN
Aggravated Identity Theft
18 U.S.C. § 1028A(a)(1)

On or about the dates set forth below, in the State and Federal District of Nevada,

AURORA PHELPS,
aka "Aurora Flores,"
aka "Aurora Flores-Velasco,"
aka "Aurora Alvarez,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, as specified below, defendant used the Victim's name and bank account number in relation to the commission an offense under 18 U.S.C. § 1343, with each count constituting a separate violation of Title 18, United States Code, Section 1028A(a)(1).

Count	Date	Victim
17	11/2/2021	Victim-1's name and bank account number in connection with a violation of 18 U.S.C. § 1343
18	11/11/2022	Victim-2's name and bank account number in connection with a violation of 18 U.S.C. § 1343
19	11/4/2022	Victim-3's name, bank account number, and PIN in connection with a violation of 18 U.S.C. § 1343

COUNT TWENTY
Kidnapping (Victim-1)
18 U.S.C. § 1201(a)(1)

From on or about November 1, 2021, to on or about November 6, 2021, in the State and Federal District of Nevada,

AURORA PHELPS,
aka "Aurora Flores,"
aka "Aurora Flores-Velasco,"
aka "Aurora Alvarez,"

defendant herein, knowingly and willfully seized, confined, inveigled, kidnapped, abducted, and carried away Victim-1 and held him for ransom, reward, and otherwise and did use a means, facility, and instrumentality of interstate and foreign commerce, namely a cellular telephone, the internet, and a motor vehicle in committing and in furtherance of such offense. All in violation of Title 18, United States Code, Section 1201(a)(1).

