

1 BEFORE THE STATE BOARD OF EDUCATION

2
3 JHONE EBERT, SUPERINTENDENT OF)
4 PUBLIC INSTRUCTION, DEPARTMENT)
5 OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2023-07

6 Petitioner,

7 v.

8 ANDREA FUENTES-SOTO,

9 Respondent.

10 **DECLARATION OF MICHAEL ARAKAWA**

11 I, MICHAEL ARAKAWA, declare that the following is true.

12 1. I am over the age of twenty-one (21) and competent to testify to the facts in this
13 Declaration.

14 2. I am employed by the State of Nevada, Department of Education, as a Teacher
15 Licensing Analyst. I have been employed by the Department of Education since
16 July, 2014.

17 3. Attached hereto as Exhibit "2A" is a true and correct copy of Respondent's
18 License.

19 4. Attached hereto as Exhibit "2B" is a true and correct copy of the Amended
20 Information.

21 5. Attached hereto as Exhibit "2C" is a true and correct copy of the Guilty
22 Plea Agreement.

23 6. Attached hereto as Exhibit "2D" is a true and correct copy of the Order.

24 7. These documents are kept by the Department of Education in the normal course
25 of business.

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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on this 13 day of September, 2023.

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5 MICHAEL ARAKAWA
6 Declarant

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EXHIBIT LIST

Exhibit No.	Title	Pages
2A	Respondent's License	1
2B	Amended Information	3
2C	Guilty Plea Agreement	7
2D	Order	1

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EXHIBIT “2A”

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EXHIBIT “2A”

State of Nevada

License for Educational Personnel

License No. 114178

This License Certifies That

Andrea C Fuentes-Soto

Has complied with the prescribed rules and regulations of the Commission on Professional Standards in Education and that the Superintendent of Public Instruction has granted this license which authorizes the holder to provide service in the schools of the State of Nevada in the following areas :

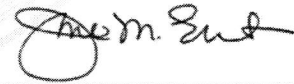
License	Grade Level	Original Endorsement Issue Date	Endorsements	License Issue Date	Expiration Date
Standard - Elementary	K-8	07/10/2018	All Elementary Subjects	07/10/2018	05/23/2023

Provisions to be satisfied

Provisions	Required Due Date
All provisions have been satisfied.	

Renewal Requirements

Renewal Requirements	Required Due Date
Must complete six (6) semester credits of college/university coursework, or the equivalent in professional development, which is related to the licensee's area of endorsement.	05/23/2023



State Superintendent of Public Instruction

EXHIBIT “2B”

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EXHIBIT “2B”

1 **INFM**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 COLLEEN BAHARAV
6 Chief Deputy District Attorney
7 Nevada Bar #011777
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

JAN 19 2023

BY: 
PATIA CUNNINGHAM, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 ANDREA FUENTES-SOTO, aka,
13 Andrea Carolyn Fuentes Soto, #8612358

14 Defendant.

CASE NO: C-22-366547-2

DEPT NO: XXVIII

AMENDED
INFORMATION

15 STATE OF NEVADA)
16 COUNTY OF CLARK) ss.

17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That ANDREA FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto, the
20 Defendant(s) above named, having committed the crime of **THEFT (Category C Felony -**
21 **NRS 205.0832, 205.0835 - NOC 61958)**, on or between October 1, 2021 and December 31,
22 2021, within the County of Clark, State of Nevada, contrary to the form, force and effect of
23 statutes in such cases made and provided, and against the peace and dignity of the State of
24 Nevada, Defendant ANDREA FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto and
25 Defendant VICTORIA WELLING, aka, Victoria Sloane Welling did willfully, knowingly,
26 feloniously, and without lawful authority commit theft of property having a value of \$5,000
27 or more, to wit: various iPads, tablets, laptops, electronics, cleaning products, household
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C-22-366547-2
AINF
Amended Information
5019580

V:\2022\288\30\202228830C-A11

X



1 goods, and/or toys, belonging to DONORSCHOOSE and/or LEGACY TRADITIONAL
2 CHARTER SCHOOL, under one or more of the following theories, to wit: 1) controlling the
3 property with the intent to deprive DONORSCHOOSE and/or LEGACY TRADITIONAL
4 CHARTER SCHOOL of the property, 2) converting, making an unauthorized transfer of an
5 interest in, and/or, without authorization, controlling or using the services or property entrusted
6 to him or her and/or placed in his or her possession for a limited, authorized period of
7 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal
8 or intangible property or the services by a material misrepresentation with intent to deprive
9 DONORSCHOOSE and/or LEGACY TRADITIONAL CHARTER SCHOOL of the property
10 or services; the Defendants being criminally liable under one or more of the following
11 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
12 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
13 by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the
14 other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the
15 intent that this crime be committed, Defendants aiding or abetting and/or conspiring in the
16 following manner, to wit: by entering into a course of conduct whereby Defendant ANDREA
17 FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto signed up for multiple accounts with
18 DONORSCHOOSE using various fictitious names in violation of the policies and procedures
19 of the DONORSCHOOSE program including that the said Defendant ANDREA FUENTES-
20 SOTO, aka, Andrea Carolyn Fuentes Soto not impersonate another use or provide false
21 information, thereafter, once the request for funding was submitted using the fictitious name
22 and/or accounts Defendant VICTORIA WELLING, aka, Victoria Sloane Welling, who was

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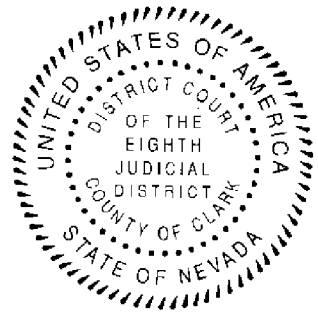
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1 required to identify any fictitious names or accounts failed to do so until confronted by
2 DONORSCHOOSE and therefore aided and abetted in the commission of the thefts,
3 Defendants acting in concert throughout.

4
5 STEVEN B. WOLFSON
6 Clark County District Attorney
7 Nevada Bar #001565

8 BY /s/ Colleen Baharav
9 COLLEEN BAHARAV
10 Chief Deputy District Attorney
11 Nevada Bar #011777

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22 May 8, 2023



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28 LVMPD EV#211200005950
(TK13)

CERTIFIED COPY
ELECTRONIC SEAL (NRS 1.190(3))

EXHIBIT “2C”

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EXHIBIT “2C”

1 **GPA**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 COLLEEN R. BAHARAV
6 Chief Deputy District Attorney
7 Nevada Bar #11777
8 200 Lewis Avenue
9 Las Vegas, NV 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

JAN 19 2023

BY, 
PATIA CUNNINGHAM, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

11 -vs-

12 ANDREA FUENTES-SOTO, aka Andrea
13 Carolyn Fuentes Soto,
14 #8612358

Defendant.

CASE NO: C-22-366547-2

DEPT NO: XXVII

GUILTY PLEA AGREEMENT

16 I hereby agree to plead guilty to: **THEFT (Category C Felony - NRS 205.0832,**
17 **205.0835 - NOC 61958)**, as more fully alleged in the charging document attached hereto as
18 Exhibit "1".

19 My decision to plead guilty is based upon the plea agreement in this case which is as
20 follows:

21 The State agrees to probation. Defendant agrees to forfeit the \$3,604.48 in cash bail
22 she has already posted to satisfy the restitution. If Defendant receives an honorable discharge
23 from probation and the following requirements are met, then she can withdraw her plea and
24 plead guilty instead to CONSPIRACY TO COMMIT THEFT (Gross Misdemeanor - NRS
25 205.0832, 205.0835, 199.480 - NOC 50456) and receive credit for time served. Defendant
26 agrees and understands that she is ineligible for the reduction in her sentence if one or more of
27 the following events occur:

28 1. Defendant fails to interview for the presentence investigation;

C-22-366547-2
GPA
Guilty Plea Agreement
5019679



- 1 2. Defendant fails to make any subsequent court appearance;
- 2 3. Defendant fails to pay all restitution ordered;
- 3 4. Defendant is arrested on any new charges prior to actually receiving the sentence
- 4 reduction; or
- 5 5. Defendant has been found by the Court to be in violation of his probation, regardless
- 6 of whether the Defendant is revoked or not. All remaining counts contained in the
- 7 Criminal Complaint which were bound over to District Court shall be dismissed when
- 8 Defendant is adjudged guilty and sentenced.

9 I agree to the forfeiture of any and all weapons or any interest in any weapons seized
10 and/or impounded in connection with the instant case and/or any other case negotiated in
11 whole or in part in conjunction with this plea agreement.

12 I understand and agree that, if I fail to interview with the Department of Parole and
13 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,
14 by affidavit review, confirms probable cause against me for new criminal charges including
15 reckless driving or DUI, but excluding minor traffic violations, the State will have the
16 unqualified right to argue for any legal sentence and term of confinement allowable for the
17 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have
18 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without
19 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite
20 twenty-five (25) year term with the possibility of parole after ten (10) years.

21 Otherwise I am entitled to receive the benefits of these negotiations as stated in this
22 plea agreement.

23 CONSEQUENCES OF THE PLEA

24 I understand that by pleading guilty I admit the facts which support all the elements of
25 the offense(s) to which I now plead as set forth in Exhibit "1".

26 I understand that as a consequence of my plea of guilty tthe Court must sentence me to
27 imprisonment in the Nevada Department of Corrections for a minimum term of not less than
28 one (1) year and a maximum term of not more than five (5) years. The minimum term of

1 imprisonment may not exceed forty percent (40%) of the maximum term of imprisonment. I
2 understand that I may also be fined up to \$10,000.00.

3 I understand that as a consequence of this plea, I will not ask for nor receive any
4 diversion through NRS Chapter 458 or NRS Chapter 458A et seq. I understand that the law
5 requires me to pay an Administrative Assessment Fee.

6 I understand that, if appropriate, I will be ordered to make restitution to the victim of
7 the offense(s) to which I am pleading guilty and to the victim of any related offense which is
8 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to
9 reimburse the State of Nevada for any expenses related to my extradition, if any.

10 I understand that I am eligible for probation for the offense(s) to which I am pleading
11 guilty. I understand that, except as otherwise provided by statute, the question of whether I
12 receive probation is in the discretion of the sentencing judge.

13 I understand that I must submit to blood and/or saliva tests under the Direction of the
14 Division of Parole and Probation to determine genetic markers and/or secretor status.

15 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,
16 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or
17 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation
18 and may receive a higher sentencing range.

19 I understand that if more than one sentence of imprisonment is imposed and I am
20 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order
21 the sentences served concurrently or consecutively.

22 I understand that information regarding charges not filed, dismissed charges, or charges
23 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

24 I have not been promised or guaranteed any particular sentence by anyone. I know that
25 my sentence is to be determined by the Court within the limits prescribed by statute.

26 I understand that if my attorney or the State of Nevada or both recommend any specific
27 punishment to the Court, the Court is not obligated to accept the recommendation.

28 I understand that if the offense(s) to which I am pleading guilty was committed while I

1 was incarcerated on another charge or while I was on probation or parole that I am not eligible
2 for credit for time served toward the instant offense(s).

3 I understand that if I am not a United States citizen, any criminal conviction will likely
4 result in serious negative immigration consequences including but not limited to:

- 5 1. The removal from the United States through deportation;
- 6 2. An inability to reenter the United States;
- 7 3. The inability to gain United States citizenship or legal residency;
- 8 4. An inability to renew and/or retain any legal residency status; and/or
- 9 5. An indeterminate term of confinement, with the United States Federal
10 Government based on my conviction and immigration status.

11 Regardless of what I have been told by any attorney, no one can promise me that this
12 conviction will not result in negative immigration consequences and/or impact my ability to
13 become a United States citizen and/or a legal resident.

14 I understand that the Division of Parole and Probation will prepare a report for the
15 sentencing judge prior to sentencing. This report will include matters relevant to the issue of
16 sentencing, including my criminal history. This report may contain hearsay information
17 regarding my background and criminal history. My attorney and I will each have the
18 opportunity to comment on the information contained in the report at the time of sentencing.
19 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also
20 comment on this report.

21 WAIVER OF RIGHTS

22 By entering my plea of guilty, I understand that I am waiving and forever giving up the
23 following rights and privileges:

- 24 1. The constitutional privilege against self-incrimination, including the right
25 to refuse to testify at trial, in which event the prosecution would not be
allowed to comment to the jury about my refusal to testify.
- 26 2. The constitutional right to a speedy and public trial by an impartial jury,
27 free of excessive pretrial publicity prejudicial to the defense, at which
trial I would be entitled to the assistance of an attorney, either appointed
28 or retained. At trial the State would bear the burden of proving beyond
a reasonable doubt each element of the offense(s) charged.

- 1 3. The constitutional right to confront and cross-examine any witnesses who
2 would testify against me.
- 3 4. The constitutional right to subpoena witnesses to testify on my behalf.
- 4 5. The constitutional right to testify in my own defense.
- 5 6. The right to appeal the conviction with the assistance of an attorney,
6 either appointed or retained, unless specifically reserved in writing and
7 agreed upon as provided in NRS 174.035(3). I understand this means I
8 am unconditionally waiving my right to a direct appeal of this conviction,
9 including any challenge based upon reasonable constitutional,
10 jurisdictional or other grounds that challenge the legality of the
11 proceedings as stated in NRS 177.015(4). However, I remain free to
12 challenge my conviction through other post-conviction remedies
13 including a habeas corpus petition pursuant to NRS Chapter 34.

10 VOLUNTARINESS OF PLEA

11 I have discussed the elements of all of the original charge(s) against me with my
12 attorney and I understand the nature of the charge(s) against me.

13 I understand that the State would have to prove each element of the charge(s) against
14 me at trial.

15 I have discussed with my attorney any possible defenses, defense strategies and
16 circumstances which might be in my favor.

17 All of the foregoing elements, consequences, rights, and waiver of rights have been
18 thoroughly explained to me by my attorney.

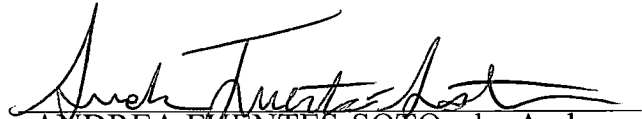
19 I believe that pleading guilty and accepting this plea bargain is in my best interest, and
20 that a trial would be contrary to my best interest.

21 I am signing this agreement voluntarily, after consultation with my attorney, and I am
22 not acting under duress or coercion or by virtue of any promises of leniency, except for those
23 set forth in this agreement.

24 I am not now under the influence of any intoxicating liquor, a controlled substance or
25 other drug which would in any manner impair my ability to comprehend or understand this
26 agreement or the proceedings surrounding my entry of this plea.

27 My attorney has answered all my questions regarding this guilty plea agreement and its
28 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

1 DATED this 19 day of January, 2023.

2
3 
4 ANDREA FUENTES-SOTO, aka Andrea
Carolyn Fuentes Soto
5 Defendant

6 AGREED TO BY:

7 

8 _____
COLLEEN R. BAHARAV
9 Chief Deputy District Attorney
Nevada Bar #11777

1 CERTIFICATE OF COUNSEL:

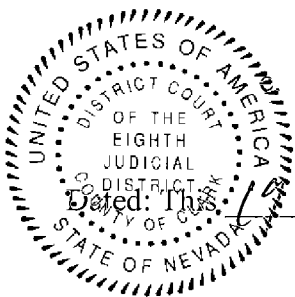
2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the
5 charge(s) to which guilty pleas are being entered.
6 2. I have advised the Defendant of the penalties for each charge and the restitution
7 that the Defendant may be ordered to pay.
8 3. I have inquired of Defendant facts concerning Defendant's immigration status
9 and explained to Defendant that if Defendant is not a United States citizen any
10 criminal conviction will most likely result in serious negative immigration
11 consequences including but not limited to:
12 a. The removal from the United States through deportation;
13 b. An inability to reenter the United States;
14 c. The inability to gain United States citizenship or legal residency;
15 d. An inability to renew and/or retain any legal residency status; and/or
16 e. An indeterminate term of confinement, by with United States Federal
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been
19 told by any attorney, no one can promise Defendant that this conviction will not
20 result in negative immigration consequences and/or impact Defendant's ability
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are
23 consistent with the facts known to me and are made with my advice to the
24 Defendant.
25 5. To the best of my knowledge and belief, the Defendant:
26 a. Is competent and understands the charges and the consequences of
27 pleading guilty as provided in this agreement,
28 b. Executed this agreement and will enter all guilty pleas pursuant hereto
voluntarily, and

May 8, 2023



Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

day of January, 2023.


MATTHEW SIBERT

27 CERTIFIED COPY
ELECTRONIC SEAL (NRS 1.190(3))
28 cb/FRAUD

EXHIBIT “2D”

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EXHIBIT “2D”

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

April 19, 2023

C-22-366547-2 State of Nevada
vs
Andrea Fuentes-Soto

April 19, 2023 10:00 AM Sentencing

HEARD BY: Israel, Ronald J. COURTROOM: RJC Courtroom 15C

COURT CLERK: Cunningham, Patia

RECORDER: Chappell, Judy

REPORTER:

PARTIES PRESENT:

Andrea Fuentes-Soto	Defendant
Colleen Baharav	Attorney for Plaintiff
Matthew B. Sibert, ESQ	Attorney for Defendant
State of Nevada	Plaintiff

JOURNAL ENTRIES

Conference at the Bench.

COURT ADMONISHED the media to serves requests on time and notify both parties. There being no objection from either party, COURT ALLOWED the media presence to remain.

DEFT. FUENTES-SOTO ADJUDGED GUILTY of THEFT (F). COURT ORDERED, in addition to the \$25.00 Administrative Assessment fee, \$150.00 DNA Analysis fee including testing to determine genetic markers, and \$3.00 DNA Collection Fee, Deft. SENTENCED to a MINIMUM of TWELVE (12) MONTHS and a MAXIMUM of SIXTY (60) MONTHS in the Nevada Department of Corrections (NDC), with SIXTEEN (16) DAYS credit for time served, SUSPENDED; placed on PROBATION for an indeterminate period not to exceed TWO (2) YEARS. In addition to the Standard Conditions of the Division of Parole and Probation (P & P), which are IMPOSED, Deft. must comply with the following SPECIAL CONDITIONS:

1. You shall submit your digital storage media or any digital storage media that you have access or use, including computers, handheld communication devices and any network applications associated with those devices, including social media and remote storage services to a search and shall provide all passwords, unlock codes and account information associated with those items, with or without a search warrant, by the Division of Parole and Probation or its agent.

COURT ADVISED, that upon successful completion of probation, Deft. will be able to withdraw her plea and enter a plea to a lesser charge. FURTHER, Cash Bail of \$3,604.48 FORFEITED to satisfy Restitution to Legacy Traditional Charter School. Deft to report to P&P within 48 May 8, 2023 hours.

NIC



1 BEFORE THE STATE BOARD OF EDUCATION

2
3 JHONE EBERT, SUPERINTENDENT OF)
4 PUBLIC INSTRUCTION, DEPARTMENT)
5 OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2023-07

6 Petitioner,

7 v.

8 ANDREA FUENTES-SOTO,

9 Respondent.

10 **DECLARATION OF MARTHA WARACHOWSKI**

11 I, MARTHA WARACHOWSKI, declare that the following is true.

12 1. I am over the age of twenty-one (21) and competent to testify to the facts in
13 this Declaration.

14 2. I am employed by the State of Nevada, Department of Education as an
15 Administrative Assistant IV, and I am assigned as the assistant to the State Board of
16 Education. I have been employed by the Department of Education since October, 2019.

17 3. Attached hereto are true and correct copies of the following Board of
18 Education documents as kept in the normal course of business: the Petition and
19 Recommendation for Revocation of License and Notice of Right to Hearing (“Petition and
20 Notice”), submitted as Exhibit “1A”; the certified mail receipt for service of the Petition
21 and Notice, submitted as Exhibit “1B”; the Notice of Intent to Consider Character,
22 Misconduct, Competence or Health of a Person (“Open Meeting Law Notice”), submitted
23 as Exhibit “1C”; and the certified mail receipt for service of the Open Meeting Law Notice,
24 submitted as Exhibit “1D”.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on this 13 day of September, 2023.

27
28 
MARTHA WARACHOWSKI
Declarant

EXHIBIT LIST

Exhibit No.	Title	Pages
1A	Petition and Notice	21
1B	Certified Mail Receipt for service of the Petition and Notice	1
1C	Open Meeting Law Notice	2
1D	Certified Mail Receipt for service of the Open Meeting Law Notice	1

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EXHIBIT “1A”

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EXHIBIT “1A”

1 BEFORE THE STATE BOARD OF EDUCATION

2
3 JHONE EBERT, SUPERINTENDENT OF)
PUBLIC INSTRUCTION, DEPARTMENT)
4 OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2023-07

5 Petitioner,

6 v.

7 ANDREA FUENTES-SOTO,

8 Respondent.
9

10 **PETITION AND RECOMMENDATION FOR REVOCATION OF LICENSE AND**
11 **NOTICE OF RIGHT TO HEARING**

12 Jhone Ebert, Superintendent of Public Instruction, Department of Education, State of Nevada
13 ("Petitioner"), hereby petitions the State Board of Education for the revocation of the teacher license
14 held by ANDREA FUENTES-SOTO ("Respondent"), issued by the Nevada Department of
15 Education. This Petition and Recommendation for Revocation of License and Notice of Right to
16 Hearing ("Petition and Recommendation") is supported by NRS 391.320, NRS 391.330, and the
17 following allegations:
18

19 **I. Jurisdiction**

20 Respondent was, at the relevant times mentioned in this Petition and Recommendation, the
21 holder of License No. 114178 issued by the Superintendent of Public Instruction, Department of
22 Education, State of Nevada, pursuant to the provisions of Chapter 391 of the Nevada Revised Statutes
23 (the "License"). Such License is as follows: K-8 Standard – Elementary (all subjects). The License
24 expired on May 23, 2023. (A true and correct copy of the License is attached as Exhibit A).
25

26 Petitioner hereby files this Petition and Recommendation in her official capacity as
27 Superintendent of Public Instruction, Department of Education, State of Nevada. See NRS 391.322.
28

1 The State Board of Education may revoke or suspend Respondent's license, if recommended by the
2 Superintendent of Public Instruction or the Board of Trustees of a School District, after notice and
3 opportunity for hearing, based upon the NRS 391.330 grounds for suspension and revocation. See also
4 NRS 391.320; NRS 391.322; NRS 391.330.

5 **II. Factual Allegations**

6 According to the Amended Information filed in the Eighth Judicial Court of the State of
7 Nevada, in and for Clark County, (a true and correct copy of which is attached as Exhibit B) between
8 the dates of October 1, 2021 and December 31, 2021, Respondent did commit the crime of Theft
9 (Category C Felony – NRS 205.0832, 205.0835 – NOC 61958). This crime was committed by
10 Respondent as she willfully, knowingly, feloniously, and without lawful authority did commit theft of
11 property having a value of \$5,000 or more, to wit: various iPads, tablets, laptops, electronics, cleaning
12 products, household goods, and/or toys.
13

14 On or about January 19, 2023, Respondent entered into a Guilty Plea Agreement (a true and
15 correct copy of which is attached as Exhibit C) pleading guilty to the crime of Theft (Category C
16 Felony – NRS 205.0832, 205.0835 – NOC 61958).
17

18 On or about April 19, 2023, the Eighth Judicial Court of the State of Nevada, in and for Clark
19 County, adjudged Respondent guilty, convicting Respondent of the crime of Theft (Category C Felony
20 – NRS 205.0832, 205.0835 – NOC 61958). (A true and correct copy of the Order is attached hereto as
21 Exhibit D).
22

23 According to the Order, the Court sentenced Respondent to imprisonment in the Nevada
24 Department of Corrections for a maximum of sixty (60) months and a minimum of twelve (12) months
25 for the crime of Theft (Category C Felony – NRS 205.0832, 205.0835 – NOC 61958).
26

27 In addition, according to the Order, the Court credited Respondent with sixteen (16) days for
28 time served, suspended the prison sentence and admitted Respondent to probation for a period not to

1 exceed two (2) years and included the following special conditions:

- 2 1. Respondent must submit her digital storage media or any digital storage media that she has
3 access or use, including computers, handheld communication device and any network
4 applications associated with those devices, including social media and remote storage
5 services to a search and shall provide all passwords, unlock codes and account information
6 associated with those items, with or without a search warrant, by the Division of Parole and
7 Probation or its agents,
8
9 2. Respondent must report to Parole and Probation immediately with 48 hours.

10 **III. Legal Allegations**

11 NRS391.330(1), states as follows in pertinent part:

12 (a) Unprofessional conduct.

13 ...

14 (c) Evident unfitness for service.

15
16 By committing the acts that constituted the crime of Theft (Category C Felony – NRS
17 205.0832, 205.0835 – NOC 61958) and being convicted of said offense, Respondent has subjected her
18 license to revocation or suspension by violation of the following:

19 (1) NRS 391.330(1)(a) Unprofessional conduct; and

20 (2) NRS 391.330(1)(c) evident unfitness for service.

21
22 **IV. Notice of Right to Hearing**

23 Respondent is hereby given notice of the recommendation by the Superintendent of Public
24 Instruction for the revocation of her license. The protocol and procedure for the suspension or
25 revocation of a license are set forth in NRS 391.320 to 391.361, inclusive. Respondent has the right to a
26 hearing on this Petition and Recommendation before a hearing officer, who will be selected pursuant to
27 NRS 391.322, to answer the allegations of the Petition and Recommendation and to present evidence
28

1 and argument on all issues involved, either personally or through an attorney.

2 If Respondent desires a hearing before a hearing officer, she must file a written request within
3 **fifteen (15) days** from the receipt of this Petition and Recommendation as provided in NRS 391.322.

4 Respondent's request should be addressed to the Superintendent of Public Instruction, Nevada
5 Department of Education, 700 East 5th Street, Carson City, Nevada, 89701-5096. If Respondent
6 requests a hearing, a hearing officer will be selected pursuant to NRS 391.322, and that hearing officer
7 will notify Respondent, in writing, of the time and location of the hearing not less than ten (10) days
8 before the hearing. If Respondent requests a hearing and a hearing officer is selected, the procedures for
9 the suspension or revocation of licenses found in NAC 391.500 to 391.555, inclusive, will be followed
10 as appropriate. Pursuant to NAC 391.507, "[n]ot later than ten (10) days after a hearing officer is
11 selected pursuant to NRS 391.322, the holder of the license shall submit to the hearing officer an
12 answer to the allegations set forth" in this Petition and Recommendation. If no request for a hearing is
13 filed within the time specified, the State Board of Education may suspend or revoke Respondent'
14 license or take no action on the recommendation.
15
16

17 WHEREFORE, Petitioner prays that the State Board of Education issue its decision to revoke
18 Respondent' license.

19 DATED: June 9, 2023

20
21 AARON D. FORD
22 Attorney General

23 By: /s/ David M. Gardner
24 DAVID M. GARDNER
25 Senior Deputy Attorney General
26 555 E. Washington Ave., Suite 3900
27 Las Vegas, Nevada 89101
28 (702) 486-5714
Attorneys for the State of Nevada,
Department of Education

EXHIBIT LIST

Exhibit No.	Title	Pages
A	Respondent's License	1
B	Amended Information	3
C	Guilty Plea Agreement	7
D	Order	1

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EXHIBIT “A”

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EXHIBIT “A”

State of Nevada
License for Educational Personnel

License No. 114178

This License Certifies That

Andrea C Fuentes-Soto

Has complied with the prescribed rules and regulations of the Commission on Professional Standards in Education and that the Superintendent of Public Instruction has granted this license which authorizes the holder to provide service in the schools of the State of Nevada in the following areas :

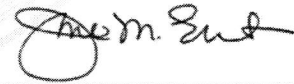
License	Grade Level	Original Endorsement Issue Date	Endorsements	License Issue Date	Expiration Date
Standard - Elementary	K-8	07/10/2018	All Elementary Subjects	07/10/2018	05/23/2023

Provisions to be satisfied

Provisions	Required Due Date
All provisions have been satisfied.	

Renewal Requirements

Renewal Requirements	Required Due Date
Must complete six (6) semester credits of college/university coursework, or the equivalent in professional development, which is related to the licensee's area of endorsement.	05/23/2023



State Superintendent of Public Instruction

EXHIBIT “B”

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EXHIBIT “B”

1 **INFM**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 COLLEEN BAHARAV
6 Chief Deputy District Attorney
7 Nevada Bar #011777
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

JAN 19 2023

BY: 
PATIA CUNNINGHAM, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 ANDREA FUENTES-SOTO, aka,
13 Andrea Carolyn Fuentes Soto, #8612358

14 Defendant.

CASE NO: C-22-366547-2

DEPT NO: XXVIII

A M E N D E D
I N F O R M A T I O N

15 STATE OF NEVADA)
16 COUNTY OF CLARK) ss.

17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That ANDREA FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto, the
20 Defendant(s) above named, having committed the crime of **THEFT (Category C Felony -**
21 **NRS 205.0832, 205.0835 - NOC 61958)**, on or between October 1, 2021 and December 31,
22 2021, within the County of Clark, State of Nevada, contrary to the form, force and effect of
23 statutes in such cases made and provided, and against the peace and dignity of the State of
24 Nevada, Defendant ANDREA FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto and
25 Defendant VICTORIA WELLING, aka, Victoria Sloane Welling did willfully, knowingly,
26 feloniously, and without lawful authority commit theft of property having a value of \$5,000
27 or more, to wit: various iPads, tablets, laptops, electronics, cleaning products, household
28

C-22-366547-2
AINF
Amended Information
5019580

V:\2022\288\30\202228830C-A11

X



1 goods, and/or toys, belonging to DONORSCHOOSE and/or LEGACY TRADITIONAL
2 CHARTER SCHOOL, under one or more of the following theories, to wit: 1) controlling the
3 property with the intent to deprive DONORSCHOOSE and/or LEGACY TRADITIONAL
4 CHARTER SCHOOL of the property, 2) converting, making an unauthorized transfer of an
5 interest in, and/or, without authorization, controlling or using the services or property entrusted
6 to him or her and/or placed in his or her possession for a limited, authorized period of
7 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal
8 or intangible property or the services by a material misrepresentation with intent to deprive
9 DONORSCHOOSE and/or LEGACY TRADITIONAL CHARTER SCHOOL of the property
10 or services; the Defendants being criminally liable under one or more of the following
11 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by
12 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
13 by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the
14 other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the
15 intent that this crime be committed, Defendants aiding or abetting and/or conspiring in the
16 following manner, to wit: by entering into a course of conduct whereby Defendant ANDREA
17 FUENTES-SOTO, aka, Andrea Carolyn Fuentes Soto signed up for multiple accounts with
18 DONORSCHOOSE using various fictitious names in violation of the policies and procedures
19 of the DONORSCHOOSE program including that the said Defendant ANDREA FUENTES-
20 SOTO, aka, Andrea Carolyn Fuentes Soto not impersonate another use or provide false
21 information, thereafter, once the request for funding was submitted using the fictitious name
22 and/or accounts Defendant VICTORIA WELLING, aka, Victoria Sloane Welling, who was

23 //

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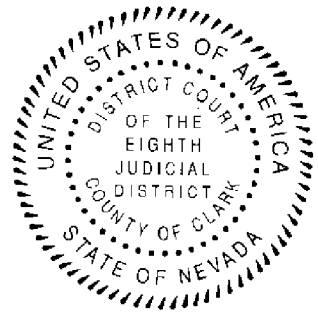
28

1 required to identify any fictitious names or accounts failed to do so until confronted by
2 DONORSCHOOSE and therefore aided and abetted in the commission of the thefts,
3 Defendants acting in concert throughout.

4
5 STEVEN B. WOLFSON
6 Clark County District Attorney
7 Nevada Bar #001565

8 BY /s/ Colleen Baharav
9 COLLEEN BAHARAV
10 Chief Deputy District Attorney
11 Nevada Bar #011777

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22 May 8, 2023



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26 22CR022953/ed - FRAUD
27 LVMPD EV#211200005950
28 (TK13)

CERTIFIED COPY
ELECTRONIC SEAL (NRS 1.190(3))

EXHIBIT “C”

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EXHIBIT “C”

1 **GPA**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 COLLEEN R. BAHARAV
6 Chief Deputy District Attorney
7 Nevada Bar #11777
8 200 Lewis Avenue
9 Las Vegas, NV 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

JAN 19 2023

BY, 
PATIA CUNNINGHAM, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

11 -vs-

12 ANDREA FUENTES-SOTO, aka Andrea
13 Carolyn Fuentes Soto,
14 #8612358

Defendant.

CASE NO: C-22-366547-2

DEPT NO: XXVII

GUILTY PLEA AGREEMENT

16 I hereby agree to plead guilty to: **THEFT (Category C Felony - NRS 205.0832,**
17 **205.0835 - NOC 61958)**, as more fully alleged in the charging document attached hereto as
18 Exhibit "1".

19 My decision to plead guilty is based upon the plea agreement in this case which is as
20 follows:

21 The State agrees to probation. Defendant agrees to forfeit the \$3,604.48 in cash bail
22 she has already posted to satisfy the restitution. If Defendant receives an honorable discharge
23 from probation and the following requirements are met, then she can withdraw her plea and
24 plead guilty instead to CONSPIRACY TO COMMIT THEFT (Gross Misdemeanor - NRS
25 205.0832, 205.0835, 199.480 - NOC 50456) and receive credit for time served. Defendant
26 agrees and understands that she is ineligible for the reduction in her sentence if one or more of
27 the following events occur:

28 1. Defendant fails to interview for the presentence investigation;

C-22-366547-2
GPA
Guilty Plea Agreement
5019679



- 1 2. Defendant fails to make any subsequent court appearance;
- 2 3. Defendant fails to pay all restitution ordered;
- 3 4. Defendant is arrested on any new charges prior to actually receiving the sentence
- 4 reduction; or
- 5 5. Defendant has been found by the Court to be in violation of his probation, regardless
- 6 of whether the Defendant is revoked or not. All remaining counts contained in the
- 7 Criminal Complaint which were bound over to District Court shall be dismissed when
- 8 Defendant is adjudged guilty and sentenced.

9 I agree to the forfeiture of any and all weapons or any interest in any weapons seized
10 and/or impounded in connection with the instant case and/or any other case negotiated in
11 whole or in part in conjunction with this plea agreement.

12 I understand and agree that, if I fail to interview with the Department of Parole and
13 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,
14 by affidavit review, confirms probable cause against me for new criminal charges including
15 reckless driving or DUI, but excluding minor traffic violations, the State will have the
16 unqualified right to argue for any legal sentence and term of confinement allowable for the
17 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have
18 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without
19 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite
20 twenty-five (25) year term with the possibility of parole after ten (10) years.

21 Otherwise I am entitled to receive the benefits of these negotiations as stated in this
22 plea agreement.

23 CONSEQUENCES OF THE PLEA

24 I understand that by pleading guilty I admit the facts which support all the elements of
25 the offense(s) to which I now plead as set forth in Exhibit "1".

26 I understand that as a consequence of my plea of guilty tthe Court must sentence me to
27 imprisonment in the Nevada Department of Corrections for a minimum term of not less than
28 one (1) year and a maximum term of not more than five (5) years. The minimum term of

1 imprisonment may not exceed forty percent (40%) of the maximum term of imprisonment. I
2 understand that I may also be fined up to \$10,000.00.

3 I understand that as a consequence of this plea, I will not ask for nor receive any
4 diversion through NRS Chapter 458 or NRS Chapter 458A et seq. I understand that the law
5 requires me to pay an Administrative Assessment Fee.

6 I understand that, if appropriate, I will be ordered to make restitution to the victim of
7 the offense(s) to which I am pleading guilty and to the victim of any related offense which is
8 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to
9 reimburse the State of Nevada for any expenses related to my extradition, if any.

10 I understand that I am eligible for probation for the offense(s) to which I am pleading
11 guilty. I understand that, except as otherwise provided by statute, the question of whether I
12 receive probation is in the discretion of the sentencing judge.

13 I understand that I must submit to blood and/or saliva tests under the Direction of the
14 Division of Parole and Probation to determine genetic markers and/or secretor status.

15 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,
16 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or
17 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation
18 and may receive a higher sentencing range.

19 I understand that if more than one sentence of imprisonment is imposed and I am
20 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order
21 the sentences served concurrently or consecutively.

22 I understand that information regarding charges not filed, dismissed charges, or charges
23 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

24 I have not been promised or guaranteed any particular sentence by anyone. I know that
25 my sentence is to be determined by the Court within the limits prescribed by statute.

26 I understand that if my attorney or the State of Nevada or both recommend any specific
27 punishment to the Court, the Court is not obligated to accept the recommendation.

28 I understand that if the offense(s) to which I am pleading guilty was committed while I

1 was incarcerated on another charge or while I was on probation or parole that I am not eligible
2 for credit for time served toward the instant offense(s).

3 I understand that if I am not a United States citizen, any criminal conviction will likely
4 result in serious negative immigration consequences including but not limited to:

- 5 1. The removal from the United States through deportation;
- 6 2. An inability to reenter the United States;
- 7 3. The inability to gain United States citizenship or legal residency;
- 8 4. An inability to renew and/or retain any legal residency status; and/or
- 9 5. An indeterminate term of confinement, with the United States Federal
10 Government based on my conviction and immigration status.

11 Regardless of what I have been told by any attorney, no one can promise me that this
12 conviction will not result in negative immigration consequences and/or impact my ability to
13 become a United States citizen and/or a legal resident.

14 I understand that the Division of Parole and Probation will prepare a report for the
15 sentencing judge prior to sentencing. This report will include matters relevant to the issue of
16 sentencing, including my criminal history. This report may contain hearsay information
17 regarding my background and criminal history. My attorney and I will each have the
18 opportunity to comment on the information contained in the report at the time of sentencing.
19 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also
20 comment on this report.

21 WAIVER OF RIGHTS

22 By entering my plea of guilty, I understand that I am waiving and forever giving up the
23 following rights and privileges:

- 24 1. The constitutional privilege against self-incrimination, including the right
25 to refuse to testify at trial, in which event the prosecution would not be
allowed to comment to the jury about my refusal to testify.
- 26 2. The constitutional right to a speedy and public trial by an impartial jury,
27 free of excessive pretrial publicity prejudicial to the defense, at which
trial I would be entitled to the assistance of an attorney, either appointed
28 or retained. At trial the State would bear the burden of proving beyond
a reasonable doubt each element of the offense(s) charged.

3. The constitutional right to confront and cross-examine any witnesses who would testify against me.
4. The constitutional right to subpoena witnesses to testify on my behalf.
5. The constitutional right to testify in my own defense.
6. The right to appeal the conviction with the assistance of an attorney, either appointed or retained, unless specifically reserved in writing and agreed upon as provided in NRS 174.035(3). I understand this means I am unconditionally waiving my right to a direct appeal of this conviction, including any challenge based upon reasonable constitutional, jurisdictional or other grounds that challenge the legality of the proceedings as stated in NRS 177.015(4). However, I remain free to challenge my conviction through other post-conviction remedies including a habeas corpus petition pursuant to NRS Chapter 34.

VOLUNTARINESS OF PLEA

I have discussed the elements of all of the original charge(s) against me with my attorney and I understand the nature of the charge(s) against me.

I understand that the State would have to prove each element of the charge(s) against me at trial.

I have discussed with my attorney any possible defenses, defense strategies and circumstances which might be in my favor.

All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly explained to me by my attorney.

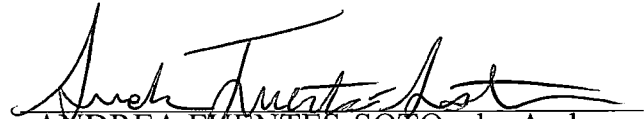
I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial would be contrary to my best interest.

I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting under duress or coercion or by virtue of any promises of leniency, except for those set forth in this agreement.

I am not now under the influence of any intoxicating liquor, a controlled substance or other drug which would in any manner impair my ability to comprehend or understand this agreement or the proceedings surrounding my entry of this plea.

My attorney has answered all my questions regarding this guilty plea agreement and its consequences to my satisfaction and I am satisfied with the services provided by my attorney.

1 DATED this 19 day of January, 2023.

2
3 
4 ANDREA FUENTES-SOTO, aka Andrea
5 Carolyn Fuentes Soto
6 Defendant

7 AGREED TO BY:

8 

9 COLLEEN R. BAHARAV
10 Chief Deputy District Attorney
11 Nevada Bar #11777

1 CERTIFICATE OF COUNSEL:

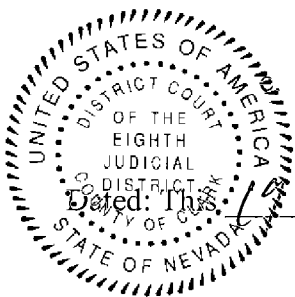
2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the
5 charge(s) to which guilty pleas are being entered.
6 2. I have advised the Defendant of the penalties for each charge and the restitution
7 that the Defendant may be ordered to pay.
8 3. I have inquired of Defendant facts concerning Defendant's immigration status
9 and explained to Defendant that if Defendant is not a United States citizen any
10 criminal conviction will most likely result in serious negative immigration
11 consequences including but not limited to:
12 a. The removal from the United States through deportation;
13 b. An inability to reenter the United States;
14 c. The inability to gain United States citizenship or legal residency;
15 d. An inability to renew and/or retain any legal residency status; and/or
16 e. An indeterminate term of confinement, by with United States Federal
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been
19 told by any attorney, no one can promise Defendant that this conviction will not
20 result in negative immigration consequences and/or impact Defendant's ability
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are
23 consistent with the facts known to me and are made with my advice to the
24 Defendant.
25 5. To the best of my knowledge and belief, the Defendant:
26 a. Is competent and understands the charges and the consequences of
27 pleading guilty as provided in this agreement,
28 b. Executed this agreement and will enter all guilty pleas pursuant hereto
voluntarily, and

May 8, 2023



Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

day of January, 2023.


MATTHEW SIBERT

27 CERTIFIED COPY
ELECTRONIC SEAL (NRS 1.190(3))
28 cb/FRAUD

EXHIBIT “D”

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EXHIBIT “D”

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

April 19, 2023

C-22-366547-2 State of Nevada
vs
Andrea Fuentes-Soto

April 19, 2023 10:00 AM Sentencing

HEARD BY: Israel, Ronald J. COURTROOM: RJC Courtroom 15C

COURT CLERK: Cunningham, Patia

RECORDER: Chappell, Judy

REPORTER:

PARTIES PRESENT:

Andrea Fuentes-Soto	Defendant
Colleen Baharav	Attorney for Plaintiff
Matthew B. Sibert, ESQ	Attorney for Defendant
State of Nevada	Plaintiff

JOURNAL ENTRIES

Conference at the Bench.

COURT ADMONISHED the media to serves requests on time and notify both parties. There being no objection from either party, COURT ALLOWED the media presence to remain.

DEFT. FUENTES-SOTO ADJUDGED GUILTY of THEFT (F). COURT ORDERED, in addition to the \$25.00 Administrative Assessment fee, \$150.00 DNA Analysis fee including testing to determine genetic markers, and \$3.00 DNA Collection Fee, Deft. SENTENCED to a MINIMUM of TWELVE (12) MONTHS and a MAXIMUM of SIXTY (60) MONTHS in the Nevada Department of Corrections (NDC), with SIXTEEN (16) DAYS credit for time served, SUSPENDED; placed on PROBATION for an indeterminate period not to exceed TWO (2) YEARS. In addition to the Standard Conditions of the Division of Parole and Probation (P & P), which are IMPOSED, Deft. must comply with the following SPECIAL CONDITIONS:

1. You shall submit your digital storage media or any digital storage media that you have access or use, including computers, handheld communication devices and any network applications associated with those devices, including social media and remote storage services to a search and shall provide all passwords, unlock codes and account information associated with those items, with or without a search warrant, by the Division of Parole and Probation or its agent.

COURT ADVISED, that upon successful completion of probation, Deft. will be able to withdraw her plea and enter a plea to a lesser charge. FURTHER, Cash Bail of \$3,604.48 FORFEITED to satisfy Restitution to Legacy Traditional Charter School. Deft to report to P&P within 48 May 8, 2023 hours.

NIC



EXHIBIT “1B”

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EXHIBIT “1B”

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Andrea Fuentes -soto
 6228 Casada Way
 Las Vegas, NV 89107-3574



9590 9402 7573 2098 1974 55

2. Article Number (Transfer from service label)

7020 2450 0001 1950 7092

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt



7020 2450 0001 1950 7092

1950 7092



ZIP 89101 \$009.72⁰
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0000391000 JUN 17 2023

U.S. POSTAGE
CERTIFIED
Domestic
For delivery
Guaranteed

Gardner

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STATE OF NEVADA

OFFICE OF THE ATTORNEY GENERAL

555 E. Washington Avenue, Suite 3900

Las Vegas, Nevada 89101-1068



Return Service Requested

JD 7/18/23

-R-T-S- 891072003-1N 07/18/23

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER

OFFICE OF THE ATTORNEY GENERAL
LAS VEGAS, NEVADA

JUL 24 2023

ADMINISTRATION



EXHIBIT “1C”

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EXHIBIT “1C”

**NOTICE OF INTENT TO CONSIDER CHARACTER, MISCONDUCT,
COMPETENCE OR HEALTH OF A PERSON. NRS 241.033**

STATE BOARD OF EDUCATION

700 E. Fifth Street
Carson City, NV 89701
Phone: (775) 687-9115

August 31, 2023

Via U.S. and Certified Mail

Andrea Fuentes-Soto
6228 Casada Way
Las Vegas, NV 89107

**Re: Notice of meeting of the State Board of Education to consider
your character, alleged misconduct, competence, or health.**

Dear Ms. Fuentes-Soto:

In connection with your teacher license, a Petition and Recommendation for Revocation of License and Notice of Right to Hearing (“Petition and Notice”) was filed with the State Board of Education (“Board”) and mailed to you via certified mail. The Petition and Notice informed you of your right to request a hearing before a hearing officer by filing a written request within fifteen days from receipt of the Petition and Notice. Enclosed for your convenience is a copy of the Petition and Recommendation for Revocation of License.

As you have failed to request such a hearing, the Board will be requested to move forward with revocation of your license and may consider your character, alleged misconduct, competence, or health at its meeting on October 4, 2023. **The meeting will begin at 2:00 p.m. at 700 E. Fifth Street in Carson City, Nevada and 2080 E. Flamingo Rd, Las Vegas, Nevada.** The meeting is a public meeting, and you and/or your legal counsel are welcome to attend at either location. The Board may go into closed session or remain in an open meeting to consider the following general topics: your teacher license; the Petition and Notice; the Judgment of Conviction; and matters properly related thereto. You are welcome to attend the closed session and/or open meeting, have an attorney or other representative of your choosing present during the closed session and/or open meeting and present written evidence, provide testimony, and present witnesses relating to your character, alleged misconduct, professional competence, or physical or mental health.

Andrea Fuentes-Soto
August 31, 2023
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If the Board determines it necessary, after considering your character, alleged misconduct, professional competence, or physical or mental health, whether in a closed meeting or open meeting, it may also take administrative action against you at this meeting, which could include suspending or revoking your teacher license. This informational statement is in lieu of any notice that may be required pursuant to NRS 241.034.

This notice is provided to you under NRS 241.033 and NRS 241.034.

Sincerely,

/s/ Martha Warachowski

Martha Warachowski
Board Secretary

Enc.

EXHIBIT “1D”

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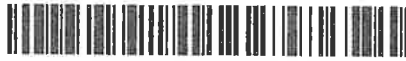
EXHIBIT “1D”

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Andrea Fuentes-Soto
6228 Casada Way
Las Vegas, NV 89107



9590 9402 8154 3030 9435 70

2. Article Number (Transfer from service label)

7020 2450 0001 1950 7436

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Andrea Fuentes

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®

Priority Mail Express®

Registered Mail™

Registered Mail Restricted Delivery

Certified Mail Restricted Delivery

Signature Confirmation

Collect on Delivery

Signature Confirmation Restricted Delivery

Collect on Delivery Restricted Delivery

Insured Mail

Insured Mail Restricted Delivery (over \$500)