

1 **IND**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 DANIELLE PIEPER
6 Chief Deputy District Attorney
7 Nevada Bar #08610
8 MICHAEL DICKERSON
9 Chief Deputy District Attorney
10 Nevada Bar #13476
11 200 Lewis Avenue
12 Las Vegas, Nevada 89155-2212
13 (702) 671-2500
14 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

15 THE STATE OF NEVADA,

16 Plaintiff,

17 -vs-

18 DONALD ZACKERY #7097730,
19 LEE OWENS #7097731,
20 QIWON WHITTAKER,
21 aka Qiwon Wjottoler #7097732,
22 JOHN FERRELL,
23 aka John Quincy Ferrell, Jr. #7093315,
24 EARNEST RUFF, #5389550

25 Defendant(s).

CASE NO: C-20-351624-1, -2, -3, -
7, -11
DEPT NO: IX

SUPERSEDING
INDICTMENT

26 STATE OF NEVADA }
27 COUNTY OF CLARK } ss.

28 The Defendant(s) above named, DONALD ZACKERY, LEE OWENS, QIWON WHITTAKER, aka Qiwon Wjottoler, and JOHN FERRELL, aka John Quincy Ferrell, Jr., EARNEST RUFF, accused by the Clark County Grand Jury of the crime(s) of CONSPIRACY TO COMMIT MURDER (Category B Felony - NRS 200.010, 200.030, 199.480 - NOC 50038); ATTEMPT MURDER WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.010, 200.030, 193.330, 193.165 - NOC 50031); and BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM (Category B Felony - NRS 200.481 - NOC 50226), committed at and within the County of Clark, State of Nevada, on or between September 26, 2020 and September 28, 2020, as follows:

1 COUNT 1 - CONSPIRACY TO COMMIT MURDER

2 Defendants did on or about September 26, 2020, willfully, unlawfully, and feloniously
3 conspire with each other to commit murder, by the Defendants committing the acts as set forth
4 in Counts 2 through 9, said acts being incorporated by this reference as though fully set forth
5 herein.

6 COUNT 2 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

7 Defendants did on or about September 26, 2020, willfully, unlawfully, feloniously and
8 with malice aforethought attempt to kill JORDAN MITCHELL, a human being, with use of a
9 deadly weapon, to wit: a firearm, by shooting at and/or into the body of the said JORDAN
10 MITCHELL, the Defendant(s) 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 by
16 Defendants, along with ELIJAH BROWN, CHARLES PACKARD, DANTE TRAVONT
17 HARMON, ISAIAH MANNING and/or other unnamed coconspirators engaging in a
18 coordinated effort to locate and/or follow JORDAN MITCHELL and/or ALYSSA RUDDLE,
19 on foot and/or by vehicle, and thereafter shooting at and/or towards JORDAN MITCHELL,
20 ALYSSA RUDDLE, RONALD PERRY, ARCHIE ARMSTRONG and/or DARYL JONES,
21 Defendants acting in concert throughout.

22 COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

23 Defendants did on or about September 26, 2020, willfully, unlawfully, feloniously and
24 with malice aforethought attempt to kill RONALD PERRY, a human being, with use of a
25 deadly weapon, to wit: a firearm, by shooting at the said RONALD PERRY, the Defendant(s)
26 being criminally liable under one or more of the following principles of criminal liability, to
27 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission
28 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,

1 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)
2 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,
3 Defendants aiding or abetting and/or conspiring by Defendants, along with ELIJAH BROWN,
4 CHARLES PACKARD, DANTE TRAVONT HARMON, ISAIAH MANNING and/or other
5 unnamed coconspirators engaging in a coordinated effort to locate and/or follow JORDAN
6 MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle, and thereafter shooting at
7 and/or towards JORDAN MITCHELL, ALYSSA RUDDLE, RONALD PERRY, ARCHIE
8 ARMSTRONG and/or DARYL JONES, Defendants acting in concert throughout.

9 COUNT 4 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

10 Defendants did on or about September 26, 2020, willfully, unlawfully, feloniously and
11 with malice aforethought attempt to kill ARCHIE ARMSTRONG, a human being, with use of
12 a deadly weapon, to wit: a firearm, by shooting at the said ARCHIE ARMSTRONG, the
13 Defendant(s) being criminally liable under one or more of the following principles of criminal
14 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
15 commission of this crime, with the intent that this crime be committed, by counseling,
16 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit
17 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this
18 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants, along
19 with ELIJAH BROWN, CHARLES PACKARD, DANTE TRAVONT HARMON, ISAIAH
20 MANNING and/or other unnamed coconspirators engaging in a coordinated effort to locate
21 and/or follow JORDAN MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle,
22 and thereafter shooting at and/or towards JORDAN MITCHELL, ALYSSA RUDDLE,
23 RONALD PERRY, ARCHIE ARMSTRONG and/or DARYL JONES, Defendants acting in
24 concert throughout.

25 COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

26 Defendants did on or about September 26, 2020, willfully, unlawfully, feloniously and
27 with malice aforethought attempt to kill DARYL JONES, a human being, with use of a deadly
28 weapon, to wit: a firearm, by shooting at the said DARYL JONES, the Defendant(s) being

1 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
2 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
3 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,
4 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)
5 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,
6 Defendants aiding or abetting and/or conspiring by Defendants, along with ELIJAH BROWN,
7 CHARLES PACKARD, DANTE TRAVONT HARMON, ISAIAH MANNING and/or other
8 unnamed coconspirators engaging in a coordinated effort to locate and/or follow JORDAN
9 MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle, and thereafter shooting at
10 and/or towards JORDAN MITCHELL, ALYSSA RUDDLE, RONALD PERRY, ARCHIE
11 ARMSTRONG and/or DARYL JONES, Defendants acting in concert throughout.

12 COUNT 6 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

13 Defendants did on or about September 26, 2020, willfully, unlawfully, feloniously and
14 with malice aforethought attempt to kill ALYSSA RUDDLE, a human being, with use of a
15 deadly weapon, to wit: a firearm, by shooting at the said ALYSSA RUDDLE, the
16 Defendant(s) being criminally liable under one or more of the following principles of criminal
17 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
18 commission of this crime, with the intent that this crime be committed, by counseling,
19 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit
20 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this
21 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants, along
22 with ELIJAH BROWN, CHARLES PACKARD, DANTE TRAVONT HARMON, ISAIAH
23 MANNING and/or other unnamed coconspirators engaging in a coordinated effort to locate
24 and/or follow JORDAN MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle,
25 and thereafter shooting at and/or towards JORDAN MITCHELL, ALYSSA RUDDLE,
26 RONALD PERRY, ARCHIE ARMSTRONG and/or DARYL JONES, Defendants acting in
27 concert throughout.

1 COUNT 7 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN
2 SUBSTANTIAL BODILY HARM

3 Defendants did on or about September 26, 2020, willfully, unlawfully, and feloniously
4 use force or violence upon the person of another, to wit: RONALD PERRY, with use of a
5 deadly weapon, to wit: a firearm, by shooting at and/or into the body of the said RONALD
6 PERRY, resulting in substantial bodily harm to RONALD PERRY, the Defendant(s) being
7 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
8 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
9 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,
12 Defendants aiding or abetting and/or conspiring by Defendants, along with ELIJAH BROWN,
13 CHARLES PACKARD, DANTE TRAVONT HARMON, ISALAH MANNING and/or other
14 unnamed coconspirators engaging in a coordinated effort to locate and/or follow JORDAN
15 MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle, and thereafter shooting at
16 and/or towards JORDAN MITCHELL, ALYSSA RUDDLE, RONALD PERRY, ARCHIE
17 ARMSTRONG and/or DARYL JONES, Defendants acting in concert throughout.

18 COUNT 8 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN
19 SUBSTANTIAL BODILY HARM

20 Defendants did on or about September 26, 2020, willfully, unlawfully, and feloniously
21 use force or violence upon the person of another, to wit: ARCHIE ARMSTRONG, with use
22 of a deadly weapon, to wit: a firearm, by shooting at and/or into the body of the said ARCHIE
23 ARMSTRONG, resulting in substantial bodily harm to ARCHIE ARMSTRONG, the
24 Defendant(s) being criminally liable under one or more of the following principles of criminal
25 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
26 commission of this crime, with the intent that this crime be committed, by counseling,
27 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit
28 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this

1 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants, along
2 with ELIJAH BROWN, CHARLES PACKARD, DANTE TRAVONT HARMON, ISIAIAH
3 MANNING and/or other unnamed coconspirators engaging in a coordinated effort to locate
4 and/or follow JORDAN MITCHELL and/or ALYSSA RUDDLE, on foot and/or by vehicle,
5 and thereafter shooting at and/or towards JORDAN MITCHELL, ALYSSA RUDDLE,
6 RONALD PERRY, ARCHIE ARMSTRONG and/or DARYL JONES, Defendants acting in
7 concert throughout.

8 COUNT 9 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN
9 SUBSTANTIAL BODILY HARM

10 Defendants did on or about September 26, 2020, willfully, unlawfully, and feloniously
11 use force or violence upon the person of another, to wit: DARYL JONES, with use of a deadly
12 weapon, to wit: a firearm, by shooting at and/or into the body of the said DARYL JONES,
13 resulting in substantial bodily harm to DARYL JONES, the Defendant(s) being criminally
14 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
15 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
16 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,
17 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a
18 conspiracy to commit this crime, with the intent that this crime be committed, Defendants
19 aiding or abetting and/or conspiring by Defendants, along with ELIJAH BROWN, CHARLES
20 PACKARD, DANTE TRAVONT HARMON, ISIAIAH MANNING and/or other unnamed
21 coconspirators engaging in a coordinated effort to locate and/or follow JORDAN MITCHELL

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1 and/or ALYSSA RUDDLE, on foot and/or by vehicle, and thereafter shooting at and/or
2 towards JORDAN MITCHELL, ALYSSA RUDDLE, RONALD PERRY, ARCHIE
3 ARMSTRONG and/or DARYL JONES, Defendants acting in concert throughout.

4 DATED this _____ day of November, 2020.

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

7
8 BY

9 _____
DANIELLE PIEPER
Chief Deputy District Attorney
Nevada Bar #08610

10
11 STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

12
13 BY

14 _____
MICHAEL DICKERSON
Chief Deputy District Attorney
Nevada Bar #13476

15
16
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18
19
20 ENDORSEMENT: A True Bill

21
22 _____
23 Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 ARMSTRONG, ARCHIE – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

3 BODILY, LOGAN – LVMPD

4 GERCA, GARED – LVMPD

5 GORSKI, GARY – LVMPD

6 JUNAS, DARYL – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

7 MCGILL, SOLON – LVMPD

8 PEREZ, NICHOLAS – LVMPD

9 PERRY, RONALD – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

10
11 Additional Witnesses known to the District Attorney at time of filing the Indictment:

12 CUSTODIAN OF RECORDS - CCDC

13 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

14 CUSTODIAN OF RECORDS - LVMPD RECORDS

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27 20AGJ050A-K/20CR026181/cl-GJ
28 LVMPD EV# 200900112908
(TK12)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Department: PC

Amended Court Minutes



L012813066

20-PC-026181-006 State of Nevada vs. ZACKERY, DONALD

**9/30/2020 1:30:00 PM Initial Appearance Justice
Court (PC Review)**

Result: Matter Heard

PARTIES State Of Nevada Benedict, Susan
PRESENT: Defendant ZACKERY, DONALD

Judge: Bonaventure, Joseph M.

Court Reporter: Nelson, Bill

Court Clerk: Espinoza, Jose

PROCEEDINGS

Hearings: 10/5/2020 7:30:00 AM: Status Check on Filing of Criminal Complaint

Added

**Justice Court, Las Vegas Township
Clark County, Nevada**

Events:

Probable Cause Found

72-Hour Hearing Completed

Counsel Provisionally Appointed

J. Bayudan provisionally appointed for limited purposes of first appearance hearing.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Individualized Custody Status Hearing Held

The Court conducted an individualized determination regarding the defendant's custody status. Both the State and the Defendant's provisionally appointed counsel had the opportunity to present evidence and argument regarding the Defendant's custody status. The Court has also considered factors set forth in NRS 178.4853 and NRS 178.498 and has considered the Defendant's financial resources when a financial affidavit was available and/or when the defendant was present in court.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047 - \$10,000.00/\$10,000.00 Total Bail and Intensive Supervision

Bail Condition - Intensive Supervision

In addition to posting bail...

Defendant is to report to Pretrial Services the day after being released from jail and 1 time per week thereafter.

Source Hearing ordered to be held prior to release

Bail Condition - Stay Out of Trouble

Bail Condition

Not to possess any weapons

Bail Condition

No contact with co-defendants

Bail Condition

Ordered out of Resort corridor

Comment

Defendant resides out of State

Continued for Status Check on filing of Criminal Complaint

Order Out of Corridor

Filed and Served on Defendant in Open Court

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1100941

County Jail City Jail Adult Juvenile Bureau: GVB

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)	(MIDDLE)	SSN#
[REDACTED]		LLV200900112908		ZACKERY			DONALD		[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB		
B	M	2/25/1999	5'10"	180	BLK	BRO	FRESNO		
ARRESTEE'S ADDRESS						CITY		STATE	ZIP CODE
[REDACTED]						SACRAMENTO		CA	95823
OCCURRED			ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)				
DATE: 9/26/2020		TIME: 03:29	DATE: 9/29/2020		TIME: 20:14		I 15/LAKEMEAD NORTH LAS VEGAS NEVADA 89030		
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)									
4000 LINQ LAS VEGAS NEVADA 89109									
CHARGES / OFFENSES									
PC - LVJCR - 51445 - F - DISCHG GUN W/I STRUCT/VEH W/I PROHIBIT AREA									
PC - LVJCR - 51442 - F - DISCHG GUN AT/INTO OCCUP STRUCT/VEH/CRAFT									
PC - LVJCR - 50031 - F - ATT MURDER, E/DW									
PC - LVJCR - 51448 - G - DISCHG GUN/OTHER WEAPON WHERE PERS MIGHT BE ENDANG									
CONNECTING REPORTS (TYPE OR EVENT NUMBER)									
FELONY PACKET, OFFICERS REPORT, PROPERTY REPORT									

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 7 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 4000 LINQ LAS VEGAS NEVADA 89109 and that the offense(s) occurred at approximately 03:29 hours on the 26th day of September, 2020.

Details for Probable Cause:

Victims:

Jordan Mitchel [REDACTED] (Attempted Murder)
 Ronald Perry [REDACTED] (Attempted Murder, Battery with a Deadly Weapon)
 Archie Armstrong [REDACTED] (Attempted Murder, Battery with a Deadly Weapon)
 Daryl Jones DOB [REDACTED] (Attempted Murder, Battery with a Deadly Weapon)
 Alyssa Ruddle DOB [REDACTED] (Attempted Murder)
 Eric Lefever DOB [REDACTED] (Attempted Murder)
 Keianna Taylor DOB 9/28/1998 (Attempted Murder)
 Alondre Dickerson DOB 6/22/1994 (Attempted Murder)
 State of NV (Discharge Firearm from Occupied Vehicle; 18 counts, Discharge Firearm Into Occupied Structure; 3 counts, Discharge Firearm where Person may be Endangered; 18 counts)

Witnesses:

Michelle Calm
 DOB [REDACTED]
 RTC
 Paulino Kamohg
 DOB [REDACTED]
 Flamingo Security

Detectives:

S. McGill P# 14716

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 7097730 EVENT #: LLV200900112908

Page 2 of 10

A. Hawkins P# 13505

E. Stafford P# 13642

J. Marin P# 15026

Evidence:

Glock 19 9mm Serial# BNNK325

3 DNA Buccal Kits

Synopsis:

At approximately 0329 hours on 9/26/20 LVMPD dispatch received numerous calls regarding a shooting at the Stage Door Casino, 4000 Linq Ln, Las Vegas, NV under event LLV200900112908. Through the course of the investigation, it was learned that the shooting occurred as a result of a fight that had taken place a short time earlier. After the fight one of the involved groups followed the other on foot and vehicles in a coordinated manner, with several people and vehicles taking part in the surveillance and active tracking of the victim group.

Coordination and contact occurred between members of the suspect group as they tracked the victim group. Clear evidence of this effort was recorded on numerous surveillance cameras over an extended period of approximately 15 minutes. Additional apparent verbal contact was made between suspects and victims during this time.

After approximately 15 minutes, members of the suspect group were in positions to observe the victim group, and were turned to look at them, while on cellular phones. At the same time, other members of the suspect group in vehicles rearranged the vehicles, so they were in a specific order. Once this was done, with observation still in place, several of the suspect vehicles started to pull out of the Stage Door parking lot and adjacent Linq Ln onto westbound Flamingo.

The first suspect vehicles approached part of the victim group, as the remaining vehicles followed. An additional apparent interaction took place between the lead suspect vehicle and the victims. At approximately the same time, a person can be seen with the entire upper body leaning out of the window of one of the rear vehicles toward the victim group. As this occurs, people in the parking lot and on the sidewalk started running and ducking behind cover. The other vehicle in the rear follows, with a passenger side window coming down with an apparent firearm coming out. What appears to be a muzzle flash is then seen coming from the apparent firearm. Additional people started ducking and running away from the suspect vehicles.

The suspect vehicles continued westbound on Flamingo for several miles. Four suspects who were observing from the top of the Cromwell parking garage ran down the stairwell, passed responding patrol officers without any attempt to summon aid for the wounded persons. They continued to the Flamingo parking garage before apparently leaving in the same vehicle they had been in at the time of the fight and as they tracked the victim group.

Patrol officers responded to the scene and located three wounded victims and evidence of firearms discharge including (18) 9mm cartridge casings. Detectives responded and conducted a follow up investigation that lead to the identification of John Ferrell (DOB 1/25/94) and Elijah Brown (DOB 6/29/93) as conspirators in the shooting and attempted murder of numerous individuals.

Initial Call and Response:

At approximately 0329 hours on 9/26/20 LVMPD dispatch received numerous calls regarding a shooting at the Stage Door Casino, 4000 Linq Ln, Las Vegas, NV. Callers reported that a shooting took place at the casino and that people had been shot. LVMPD patrol officers responded to the scene and located three individuals suffering from gunshot wounds as well as evidence of firearms discharge. The wounded individuals were identified as:

- 1) Ronald Perry [REDACTED]
- 2) Archie Armstrong [REDACTED]
- 3) Daryl Jones [REDACTED]

It was determined during the initial investigation that two of the victims had been outside when they were shot and the third was sitting inside of the bar when a bullet passed through the window and struck him in the leg.

Officers received information that shortly before the time of the fight, several people were involved in a fight in the parking lot of the casino and attached liquor store. Initial details indicated that people involved in the fight may have been involved in the shooting. Several vehicles were used by the suspects during the crime. Based on video evidence, it is probable that individuals fired several numerous 9mm rounds from moving vehicles, striking the wounded victims, nearly striking several other individuals, and striking the occupied casino.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 7097730 EVENT #: LLV200900112908

Page 3 of 10

Officers located members of the victim group including Alyssa Ruddle [REDACTED]. Victims and witnesses provided statements. Detectives and Crime Scene Analysts responded to the scene to continue the investigation.

Initial Follow Up Investigation:

LVMPD Crime Scene Analysts responded to process the scene. They recovered several items of evidentiary value including (18) 9mm cartridge casings and bullet fragments. At least (3) defects consistent with bullet impacts were located into the Stage Door Casino, which was occupied by several people at the time that the shots impacted it. Additional defects were located on the sidewalk, into a trash can, into a power box, into a dumpster, and into a bus stop. The evidence including cartridge casings extended along Flamingo from the Stage Door parking lot, past the building and alley, and west past the bus stop. Evidence at the scene showed that all rounds were fired from an occupied vehicle on a roadway.

Detectives responded and conducted victim and witness interviews. All information from interviews is summarized and is not verbatim.

Interview with Alyssa Ruddle:

Alyssa Ruddle was with Jordan Mitchell [REDACTED] and another male prior to the fight and shooting. They were planning on meeting another group of people at the Cromwell, but stopped at the Stage Door Liquor Store to buy some things first. Ruddle and Mitchell were riding mobility scooters at the time. When they tried to leave the store, their path was blocked by a group of about four black male adults. Words were exchanged between the two groups, which escalated to an argument. Mitchell and the black male adults he was arguing with agreed to fight in the parking lot. Mitchell engaged in a fist fight with a group of black male adults that increased to approximately ten. The fight was broken up by security, but several of the black male adults shouted about getting guns and ran to vehicles.

Ruddle, Mitchell, and the other male they were with continued toward the Cromwell to meet up with the rest of their group. Ruddle noticed some of the group who had been in the fight with Mitchell had gotten in a white sedan and a black sedan, both of which started driving up and down Flamingo and circling the area as she moved around. They met up with the rest of their group and started to move toward Flamingo and the Stage Door. As they got to the area of the alley behind the Stage Door, the white car pulled alongside them and honked its horn, which she believed was a signal to the rest of the suspect group. She then heard several gunshots ring out and saw a member of their group and another male hit by gunfire. She was not certain where the gunshots came from, but said they were close by.

Interview with Eric Lefever:

Lefever had just arrived in the area and met up with the group containing Ruddle and Mitchell. The group met in the area of the Cromwell parking garage and started walking east through the lot and then toward Flamingo. They got to an area behind a bus stop near the rear of the Stage Door when he heard numerous gunshots and realized he was being shot at by someone on the street. He did not see the actual shooter. He dove for cover behind the bus stop and saw that someone had been shot.

Interview with Keianna Taylor:

Taylor was walking with Alondre Dickerson in the area of the rear of the Stage Door, coming from the Cromwell valet area. As they got to the area of the parking lot behind some bushes near the same bus stop as Lefever, she heard several gunshots ring out and took cover. She saw that someone near her had been shot, but did not see the shooter.

Interview with Alondre Dickerson:

Dickerson was walking with Taylor. As they approached the rear of the Stage Door, near a bus stop and some power boxes, he heard numerous gunshots. He took cover and saw that someone near him had been shot. He did not see who was shooting.

Stage Door Video:

Detectives obtained high quality surveillance video from the Stage Door. The video was consistent with Ruddle's statement. It showed that several black male adults with distinctive facial features, hair, and clothing were involved in the fight. During and after the fight, several of them got in and out of vehicles including a white Chrysler 200 with CA license plates, a gray or silver BMW SUV with CA license plates, a black, probable Volkswagen 4 door, a white Toyota Camry or similar vehicle, a mid-1990's maroon Pontiac Trans Am or similar vehicle and a black Mitsubishi Outlander or similar vehicle. The surveillance video showed these vehicles repeatedly circling the area and entering the lower area below the Cromwell parking structure near the victim group. This was consistent with Ruddle's statement that they were being followed and tracked by the suspects. This continued for approximately 15 minutes until approximately 03:29.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 7097730 EVENT #: LLV200900112908
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Video additionally showed members of the suspect group on foot, moving around the area of the Casino, looking around the building and directly into the southern doors and windows. This was consistent with efforts to locate someone, specifically the victim group.

At approximately 03:29 hours on 9/26/20, the white Chrysler and other white car pulled out of the Stage Door parking lot onto westbound Flamingo. The black Outlander style vehicle pulled out directly behind them from Linq Ln with a person hanging out of the rear passenger side window, oriented toward the victim group and others on the sidewalk. As this occurred, people started to duck and run, and it appeared that someone was likely firing a firearm from the vehicle. The black, likely Volkswagen followed directly behind, out of the Stage Door lot. As it pulled out, a passenger window rolled down and an apparent firearm can be seen coming from the window with an apparent muzzle flash indicating a firearm being fired toward the victims, from an occupied vehicle. Additional people on the sidewalk and in the parking lot reacted by running and hiding behind cover.

The video clearly showed that people were shooting from occupied vehicles on the street. The firearms were pointed at large crowds of people who were outside as well as the Stage Door Casino, which was occupied by several people.

Flamingo Security Video:

Additional security video was obtained from Flamingo Hotel Casino security, which included the Cromwell, Flamingo, and Linq areas. The video provided additional details of the suspects' movements throughout the area. It showed additional details that indicated complex coordination between the suspects including suspects following victims on foot and in vehicles through multiple areas and for approximately 15 minutes. The suspects were regularly seen on phones as the coordinated movement continued. Suspect vehicles met up multiple times and at more than one point, suspects moved from one vehicle to another, further confirming their coordination and relationship with each other.

Some of the suspect group members moved on foot throughout the area. As they moved around the rear of the Stage Door, they moved into an area where the victim group would have become visible. They then maintained a position of apparent observation of the victim group until vehicles associated with the suspect group looped around again and into positions to observe the targeted victims.

Vehicles occupied by the suspects continued to turn and make passes around the area. At the intersection immediately to the north of the Stage Door on Linq, the BMW and the Chrysler 200 met and stopped. Occupants moved from vehicle to vehicle, with people later identified as Dante Harmon and Qiwon Whittiker rapidly moving from the BMW to the Chrysler before both vehicles continue their mobile surveillance. Both Harmon and Whittiker are readily identifiable in the video. This occurred within minutes of the shooting.

A group of four suspects who were readily identifiable as having been involved in the fight and tracking/surveillance on foot and in vehicles moved up the stairs of the Cromwell parking structure to the top floor. They can be seen on phones as they move together. Once they reached the top, they split and moved to four positions along the south edge of the structure, where they had direct overwatch of the victim group. The suspects at the top of the parking structure leaned out and looked down directly toward the victim group. One or more of these individuals were seen on cellular phones throughout this time. They were in this position as the other video showed the suspect vehicles pulling onto westbound Flamingo and starting shooting.

Immediately after the shooting, the suspects ran down the stairwell and past uniformed LVMPD patrol officers. They made no effort to advise the officers of the injured victims and continued to the Flamingo parking garage. They ran up to the fifth floor of the parking garage and briefly out of view. Within minutes, a BMW SUV that appeared to be the same suspect BMW seen earlier drove down, out of the parking garage, and north northbound Linq.

Suspect Identification:

Detectives obtained still photos of several suspects from surveillance video. Some of these photos were provided to officers working in the Convention Center Area Command. CCAC FLEX officers notified detectives that they recognized one of the individuals from a persons stop conducted on the night of 9/24/20 in front of the Linq. They identified this individual as John Ferrell (DOB 1/25/94) and provided body worn camera footage of the stop. Independent to this stop, an investigative lead was developed in which facial recognition technology listed John Ferrell as a likely match to the same suspect photos. Detectives watched body worn camera footage and obtained additional images of Ferrell and were able to confirm that Ferrell is the suspect identified in surveillance video.

Ferrell was one of the suspects involved in the initial fight, tracking of the victims on foot and in vehicles, and was seen in the overwatch position at the top of the Cromwell, while on his phone. Based on his actions, it is probable that Ferrell did engage in an planned and prolonged conspiracy with several other individuals to murder the above victims with the use of a deadly weapon, specifically a firearm.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
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An associate of Ferrell was identified through multiple means including open source social media, surveillance video, and booking photos. The identity was further confirmed by a debit card transaction that was recorded on surveillance video at a liquor store. This individual was identified as Elijah Brown [REDACTED]. Brown was positively identified by detectives as another individual who was involved in the initial fight and who was with Ferrell, observing the victims from the rooftop. Based on his actions, it is probable that Brown did engage in an planned and prolonged conspiracy with several other individuals to murder the above victims with the use of a deadly weapon, specifically a firearm.

Additional analysis of open source social media related to the identified suspects led to photographs and social media accounts for another individual who was readily identifiable as having been involved in the fight. This individual was later positively identified via CA criminal history records and photographs as Dante Harmon ([REDACTED]). At the start of the fight, Harmon exited the rear passenger seat of the white Chrysler 200. As the fight concluded, he entered the BMW X3 and remained in it through the tracking and observation of the victims leading up to the shooting. Based on his actions, it is probable that Harmon did engage in a planned and prolonged conspiracy with several other individuals to murder the above victims with the use of a deadly weapon, specifically a firearm. His whereabouts during the actual shooting are currently unknown.

Locating 2909 White Peaks:

On 9/24/2020 under LVMPD Event# 200900112778, patrol officers and detectives responded to separate shooting event located at 372 E. Tropicana. During this event the victim, Joie Sanchez DOB [REDACTED] was shot one time to her lower leg. During the interview, coupled with video surveillance it was discovered that Sanchez was with the suspects on a party bus and in businesses before she was shot. Video surveillance also revealed that numerous subjects who were present at this shooting event were also present during the shooting at the Stage Door Casino. These suspects included Ferrell, Brown, and Harmon. It was noted that the shooting of Sanchez occurred less than an hour prior to the fight that proceeded the shooting at the Stage Door and that the suspects were wearing the same clothing and with the same group. Sanchez explained that this was part of a large group in town from the Fresno, CA area for one of the party goers birthday. These individuals were acquainted and known to each other. Sanchez later advised detectives that she believed the people involved were staying at a vacation rental home which is located at 2909 White Peaks Ave, North Las Vegas, NV 89081.

On 9/28/2020, detectives conducted surveillance at 2909 White Peaks Ave. Detectives S. McGill P#14716 and E. Stafford P#13642 observed a gray BMW utility vehicle, bearing California plate 5UEV025, parked directly in front of 2909 White Peaks. It should be noted that this vehicle did not have a front license plate which is consistent with the gray BMW observed in the surveillance video from the Stage Door Casino shooting. The make, model, body style, and other characteristics were consistent with the suspect BMW X3 seen in surveillance video and previously occupied by Ferrell, Brown, and Harmon. Directly across the street is a white Chrysler 200 bearing California plate 8ROY983. The license plate of the Chrysler follows the same sequence as the suspect Chrysler including all known letters and numbers. A search of a private license plate reader data revealed that no other Chryslers with the same partial CA license plate have been scanned anywhere in the country within the last 90 days. A translucent license plate cover is over the rear plate, which makes it more difficult to read in video. The BMW and the Chrysler match the vehicles that were being used together during the shooting. They are both parked at the same location which was given by a victim, who was with them before the shooting. Based on these circumstances it is reasonable to believe the BMW and the Chrysler were used during the shooting and that the suspects are now inside the residence.

Due to the above fact and circumstances, a search warrant was drafted for the residence of 2909 White Peaks Ave, the 2015 Chrysler bearing California plate 8ROY983, and the 2006 BMW bearing California plate 5UEV025. The scope of the above described premises was any and all firearms, cellular telephones, and the clothing believed to be worn during the crime. The warrant was approved by Deputy District Attorney Michael Dickerson and was authorized by the Honorable Amy Chelini.

On 9/28/2020 the warrant was executed as numerous subjects were leaving in the BMW and the Chrysler 200. The Chrysler was stopped by Detective E. Stafford P#13642 along with patrol officers at Lakemead and I-15. The BMW was stopped by Detective J. Marin P#15026 along with patrol officers at Lone Mountain and Losee.

Chrysler Search:

Upon stopping the Chrysler, the following subjects were identified in the vehicle:

Donald Zackery DOB [REDACTED] Driver

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

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Malik Fields DOB [REDACTED] Front Passenger
Ernest Dean DOB [REDACTED] Rear Driver Side
Qiwon Whittiker DOB [REDACTED] Rear Passenger Side

During the search of the Chrysler, pursuant to the warrant, Detective Stafford located a black 9mm Glock 19 handgun, serial# BNNK325. The handgun and the extended magazine in the firearm were impounded in a forensically sound manner to preserve DNA evidence. There was also a multi-colored Mickey Mouse Sweater in the vehicle that is easily recognizable to have been worn by Whittiker, who was present and on video surveillance at the shooting event at the Stage Door shooting. Whittiker did actively engage in coordinated, material efforts to locate, track, and kill several persons with the use of firearms discharged from occupied vehicles.

Ernest Dean spoke to detectives at the scene of the stop while subject to Miranda. He stated that he understood his rights. Dean told detectives that he had not been there for the fight and shooting, but that he heard something had happened. He told officers that when they were stopped, they were getting out of Las Vegas and he did not plan on coming back. This tended to reinforce the seriousness of the incident he had heard about and that they intended to flee the city, without plans to return.

Donald Zachary claimed ownership of the Chrysler 200. He was visible on video surveillance as having been part of the suspect group as it was engaged in the fight, followed immediately by the tracking, surveillance, and shooting. His vehicle can clearly be seen engaging in protracted surveillance and tracking of the victims and is the vehicle which again reinitiated contact with the victims minutes before the shooting. It is also the lead vehicle as the suspects moved into position to commit the attempted murder and was the vehicle used to mark the victim's location immediately before gunshots were fired at the victims. Zachary did actively engage in coordinated, material efforts to locate, track, and kill several persons with the use of firearms discharged from occupied vehicles.

Based on the above circumstances, Detective Hawkins drafted a search warrant for DNA samples from Zackery, Fields, Dean and Whittiker due to the fact that they were all within close proximity of a firearm that was likely used in this shooting event and all were riding in one of the suspect vehicles. The warrant was approved by Deputy District Attorney Michael Dickerson and was authorized by the Honorable Amy Chelini. The warrant was executed on 9/28/2020 and all of the DNA samples were impounded as evidence.

BMW Search:

Upon stopping the BMW at Lone Mountain and Losee, the driver was identified as Lee Owens DOB [REDACTED] Via California ID. Owens was searched pursuant to the search warrant, which resulted in two clear baggies in each of his front pockets. Inside these baggies contained a white, powdery like substance consistent with cocaine. The bags were located by Detective J. Marin.

I, Detective S. McGill P# 14716 recognized Owens as the driver of the gray BMW during the fight and shooting incident at the Stage Door. I recognized Owens distinct facial features that could be observed from the video surveillance from the incident. His BMW was a vehicle used in the initial location and tracking of the victims. It was also used as the getaway vehicle in which the rooftop lookouts fled from the shooting scene. Owens did actively engage in coordinated, material efforts to locate, track, and kill several persons with the use of firearms discharged from occupied vehicles.

Photo Stills:

Numerous photo stills of events were taken. The photos are attached in an Officers Report

Fight starting outside of Stage Door. John Ferrell and unidentified coconspirators are visible.

Fight being broken up. Ferrell is in shirt with bear in center, Whittiker is in multi-colored sweater. Dante Harmon is shirtless. Other unidentified coconspirators are in view.

BMW, Chrysler 200, and Trans Am meeting up. Numerous named and unnamed suspects in view. Owens is in driver's seat of BMW, seen getting out moments later.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

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One of targeted victims, Jordan Mitchell in area under parking garage as he was being tracked by suspects.
Group of targeted victims at area of shooting.

Chrysler 200 tracking victims between Stage Door and Cromwell, 1st Lap. Victim group just west of vehicle.

Chrysler 200 making third lap. Under Cromwell parking structure, behind power boxes and bus stop. Victims now further west in area 200 is coming from.

Chrysler 200 making 4th lap, into alley. Victims are behind 200, coming from valet area. Just after 200 occupants contacted victims.

Chrysler under other part of parking garage near loading area. Coming from valet area where victim group met friends.

Chrysler meeting lookouts after they observed victims on foot, prior to lookouts moving to rooftop overwatch.

Chrysler meeting with BMW north of Stage Door. Occupants moving between cars. Whittiker can be seen moving past the back of the BMW with multi-colored shirt.

Chrysler backing down entire length of parking structure toward victims.

Chrysler turning onto Linq from alley after passing victims again.

Volkswagen turning onto Linq, shortly behind Chrysler.

Volkswagen under Cromwell parking garage approaching victims.

Volkswagen making lap into parking garage toward victims.

BMW pulling into parking garage under Cromwell, moving toward victims.

Trans Am making lap onto Linq after leaving apparent contact with victims under Cromwell parking structure.

John Ferrell and unidentified coconspirator scouting on foot, looking after fight. This is shortly before they moved to parking garage, followed victims, made contact with Chrysler, and went to rooftop overwatch.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

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LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

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John Ferrell on rooftop overwatch, on phone. He is looking down at exact location of victims, this immediately before shooting.

John Ferrell running down from rooftop overwatch before running to BMW to flee.

Previous Shooting Event:

During a follow up investigation, detectives learned that the same suspect group had been present for and involved in a series of disturbances that culminated in a separate shooting. This occurred less than an hour before the shooting at the Stage Door. This event occurred under LLV200900112778 at 372 E Tropicana, Las Vegas, NV.

During this event, the same group including all parties arrested under this event were involved in a birthday party celebration for a deceased individual. They had been on a party bus, but were being kicked off after causing numerous disturbances and acting violently on the bus and along the way. The owner of the bus company and nearby security reported seeing people in the group with firearms.

An argument started between two members of the group, one of which was identified as Morris Fields DOB 9/22/94. Fields is a know associate of the named suspects. During the incident, he armed himself with a firearm and discharged a firearm multiple times, striking a female. The other members of the suspect group continued their activities and appeared unconcerned by the shooting. They did not summon aid or assist the victim. Others assisted in the flight of Fields from the scene. All individuals involved in the Stage Door shooting left the scene as police arrived and were uncooperative in that investigation. They then moved to the Stage Door a short time later. The fight and shooting at Stage Door happened quickly after that.

Additional Information:

The named suspects and their known associates are from Fresno, CA or the surrounding area. They were attempting to leave Las Vegas when they were located and arrested. All have lengthy and violent criminal histories with several showing histories of resisting, obstructing, and failing to go to court, which shows a high propensity for flight to avoid prosecution. This is demonstrated below.

FIELDS, MORRIS LEE D [REDACTED]

Arrests:

[REDACTED]

WHITTAKER, QIWON DOB 06/24/97 ID# 7097732

Arrests:

[REDACTED]

Currently has a Warrant on a Gun charge per Fresno PD.

Convictions:

CARRY LOAD F/ARM:PUB:SPEC CIRC (25850(A) PC) 5-16-16

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

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Severity Felony Disposition (CONVICTED-PROB/JAIL)
PROBATION EXTENDED
EARLY DISMISSAL FROM PROBATION
PROB VIOL/REV AND/OR REINSTATE

Zackery, Donald DOB 02/25/99 ID# 7097730

Arrests:



Multiple Burglary charges

Owens, Lee DOB 03/05/92 ID#7097731

Arrests:



Convictions:

PANDER:PROCR F/PROSTITUTION (266I(A)(1) PC
Disposition (CONVICTED COMMITTED TO PRISON) 2-19-16

Conclusion:

Video surveillance shows numerous suspects involved in the protracted and clear coordination and execution of the shooting. There are approximately fifteen to twenty suspects involved in this incident. The suspects used complex coordination, communication, and tactics in the execution of the crime. Based on my experience and training in the US Marine Corps in training and in combat, I recognized the actions of the suspects as a complex, military style ambush attack on specifically selected and targeted victims. The efforts over such an extended period showed clear pre-planning and sophisticated coordination in an effort to unlawfully take the lives of people through the use of firearms. All conspirators actively engaged in the conspiracy through multiple means including physical surveillance, tracking of the victims, communications and coordination, and marking of the victim location. This coordinated attack and the extreme level of violence endangered not only the targeted victims, but approximately 75 to 100 other people who were on the street, in the parking lot, in the liquor store, and in the casino. These innocent bystanders were in the direct line of fire in a concentrated area where the rounds impacted. But for the substantial efforts of each of the coconspirators, the crimes of attempted murder, conspiracy to commit murder, battery with a deadly weapon, discharging firearm from occupied vehicle, and discharging firearm where person may be endangered.

Three people were shot and several others narrowly escaped being shot with the 15 or more additional shots that were fired along a crowded block. Impacts that struck the building, bus stop, trash can, power boxes, bus stop, and dumpster all passed in very close proximity to additional people.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

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Donald Zackery was driving the Chrysler 200 and stated during the traffic stop that the car belonged to him. Video surveillance shows that he was present for the criminal acts that included the fight, conspiracy, and likely for the actual shooting. Zackery also had a firearm hidden in the center console of the vehicle that was likely used during the shooting. It should be noted that Zackery is a prohibited person from possessing firearms due to being convicted of a Burglary in California in 2020. Zackery was also stopped with Whittiker, was also present during the fight and the shooting.

His vehicle was seen making numerous laps, turns, stopping, backing up, and other maneuvers in order to locate, track, reengage, and mark the locations of targeted victims in order to murder them. Based on these circumstances it is probable that Zackery did conspire to commit Murder against Jordan Mitchell, Ronald Perry, Archie Armstrong, Daryl Jones, Alyssa Ruddle, Eric Lefever, Keianna Taylor, Alondre Dickerson. Zackery did unlawfully possess a firearm while being a prohibited person from possessing firearms. He was therefore charged with Prohibited Person Possession of a Firearm. He acted in concert with several other named and unnamed individuals in an attempt to commit Murder against 8 named persons, Battery with a Deadly Weapon against 3 persons, and to commit Discharge Firearm from Occupied Vehicle; 18 counts, Discharge Firearm Into Occupied Structure; 3 counts, Discharge Firearm where Person may be Endangered; 18 counts

Whittiker was recognized by detectives as being present during the fight and the shooting via video surveillance. Whittiker was stopped in one of the suspect vehicles (Chrysler 200) that contained the same distinctive clothing worn during the shooting and fight. He was seen meeting with other coconspirators and occupied at least two of the suspect vehicles during the commission of the crime. Due to the above facts and circumstances it is reasonable the Whittiker did conspire to commit Murder against Jordan Mitchell, Ronald Perry, Archie Armstrong, Daryl Jones, Alyssa Ruddle, Eric Lefever, Keianna Taylor, Alondre Dickerson. He made affirmative acts in the furtherance of the attempt to murder these individuals. He acted in concert with several other named and unnamed individuals in an attempt to commit Murder against 8 named persons, Battery with a Deadly Weapon against 3 persons, and to commit Discharge Firearm from Occupied Vehicle; 18 counts, Discharge Firearm Into Occupied Structure; 3 counts, Discharge Firearm where Person may be Endangered; 18 counts

Lee Owens was observed, via video surveillance, being present during the shooting and driving one of the suspect vehicles (gray BMW). Owens was stopped in the same vehicle leaving the residence where other co-conspirators were located. His vehicle was used in the active tracking of the victims in the furtherance of the attempt to murder them. His vehicle was used by the suspects in the rooftop overwatch positions to flee the scene of the crime as police arrived. Due to these circumstances it is probable that Owens did conspire to commit Murder against Jordan Mitchell, Ronald Perry, Archie Armstrong, Daryl Jones, Alyssa Ruddle, Eric Lefever, Keianna Taylor, Alondre Dickerson. He made affirmative acts in the furtherance of the attempt to murder these individuals. He acted in concert with several other named and unnamed individuals in an attempt to commit Murder against 8 named persons, Battery with a Deadly Weapon against 3 persons, and to commit Discharge Firearm from Occupied Vehicle; 18 counts, Discharge Firearm Into Occupied Structure; 3 counts, Discharge Firearm where Person may be Endangered; 18 counts

Zackery, Whittiker and Owens were transported to the Clark County Detention Center and booked accordingly.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: S MCGILL

P#: 14716

LVMPD 602 (Rev 02/18) Word 2013



JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

THE STATE OF NEVADA, APR 19 P 3:13

Case No: 21CR018826
Dept. 8

Plaintiff, JUSTICE COURT
LAS VEGAS, NEVADA
DBS

-vs-

BY _____
DEPUTY

REINO PINA-CASTILLEJO, aka,
Reino Pinacastillero #2753169,

DA CASE NO: 202118991C

Defendant.

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138) and MURDER WITH USE OF A DEADLY WEAPON (Category A Felony - NRS 200.010, 200.030, 193.165 - NOC 50001), in the manner following, to wit: That the said Defendant, on or about the 11th day of April, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - CONSPIRACY TO COMMIT ROBBERY

did willfully, unlawfully, and feloniously conspire with an uncharged conspirator to commit a robbery, by the defendant and/or uncharged conspirator committing the acts as set forth in Count 2, said acts being incorporated by this reference as though fully set forth herein.

COUNT 2 - ROBBERY WITH USE OF A DEADLY WEAPON

did willfully, unlawfully, and feloniously take personal property, to wit: a chain, cellular telephone, and/or wallet from the person of CORNELL BLACK, or in his presence, without the consent and against the will of CORNELL BLACK, by means of force or violence or fear of injury, immediate or future, to his person, the person of a member of his family, or of anyone in his company at the time of the robbery, defendant using force or fear to obtain or retain possession of the property, to prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with use of a deadly weapon, to wit: one or more baseball

1 bats; the Defendant(s) being criminally liable under one or more of the following principles
2 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
3 abetting in the commission of this crime, with the intent that this crime be committed, by
4 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other
5 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent
6 that this crime be committed, Defendant and his conspirator aiding or abetting and/or
7 conspiring in the following manner, to wit: by entering into a course of conduct whereby
8 Defendant and/or his conspirator strike CORNELL BLACK with one or more baseball bats
9 and one and/or the other did take his chain, cellular telephone, and/or wallet, Defendant and
10 his conspirator acting in concert throughout.

11 COUNT 3 - MURDER WITH USE OF A DEADLY WEAPON

12 did willfully, unlawfully, feloniously and with malice aforethought, kill CORNELL
13 BLACK, a human being, with use of a deadly weapon, to wit: one or more baseball bats, by
14 striking CORNELL BLACK with one or more baseball bats, the said killing having been (1)
15 willful, deliberate and premeditated, and/or (2) committed during the perpetration or attempted
16 perpetration of a robbery and/or an attempted robbery the Defendant being criminally liable
17 under one or more of the following principles of criminal liability, to wit: (1) by directly
18 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
19 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,
20 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a
21 conspiracy to commit this crime, with the intent that this crime be committed, Defendant and
22 his conspirator aiding or abetting and/or conspiring by Defendant and his conspirator acting
23 in concert throughout.

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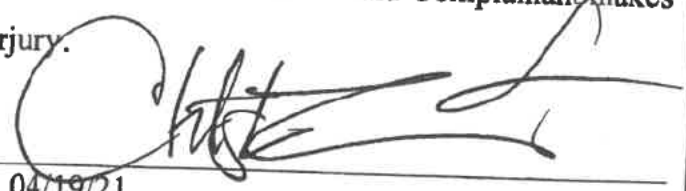
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1 All of which is contrary to the form, force and effect of Statutes in such cases made and
2 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
3 this declaration subject to the penalty of perjury.

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28 LVMPD EV# 210400049329
(TK08)

FILED

2021 APR 19 P 3:13

JUSTICE COURT
LAS VEGAS NEVADA

BY DBS
DEPUTY

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 7/13/1993)

21-CR-018826
DWS
Declaration of Warrant Summons (Affidavit)
13489386



Event Number: 210400049329

STATE OF NEVADA) Pina-Castillejo, Reino
) ss: ID#: 2753169
COUNTY OF CLARK) [REDACTED]

Ryan Jaeger, being first duly sworn, deposes and says:

That he is a Detective with the Las Vegas Metropolitan Police Department, being so employed for a period of 22 years, assigned to investigate the crime(s) of Murder with Deadly Weapon committed on or about April 11th, 2021, which investigation has developed Pina-Castillejo, Reino as the perpetrator thereof.

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME, TO WIT:

On April 11th, 2021 at 2034 hours the Las Vegas Metropolitan Police Department (LVMPD) 911 call center received multiple phone calls requesting police and an ambulance to the intersection of Twain Avenue and University Center Drive to treat a person who was beaten with a baseball bat. The callers described the victim was still lying unconscious in the street.

Uniformed LVMPD Officers arrived the area and located an injured person later identified as Cornell Black lying in the westbound lanes of Twain Avenue just west of University Center Drive. Black was suffering from multiple injuries to his head. Due to the severity of the head injuries Black was transported to Sunrise Hospital Trauma Center. Uniformed Officers identified Witnesses #1 and 2 who stated they were able to direct police to the attacker's apartment. Officers were directed to 3726 Hazelwood Street Apartment # 19. Officers knocked on the door and learned the apartment was occupied by Reino Pina-Castillero DOB [REDACTED] and Jorge Piloto DOB [REDACTED]. A protective sweep of the apartment was conducted and a white and lime green metal baseball bat was observed by Officer D. McCabe #17285 inside the apartment. Uniformed Officers attempted to conduct a field show-up identification with the Witnesses #1 and #2 in an attempt to identify Pina-Castillero and Piloto as the

CONTINUATIONEvent #: 210400049329

attackers. Due to lighting conditions, distance, and environmental factors an identification could not be made, so no arrest resulted.

Officer McCabe completed an incident crime report detailing the call for service. The incident crime report was assigned to South Central Area Command Patrol Detectives for follow-up investigation.

On April 12th at 1627 hours South Central Area Command Patrol Detectives R. Hall #10070 and K. Bryant #7773 conducted a digitally recorded interview with Cornell Black at Sunrise Hospital. During the interview Black relayed:

Black was at the bus stop waiting for the #203 bus and started talking to a female who he only knew as Nicole about the apartment complex he lived in. A Hispanic male started to interject into the conversation by insulting Black. The Hispanic male then yanked a gold chain from around Black's neck so Black started fighting with the Hispanic male. During the altercation two more Hispanic males armed with baseball bats joined the affray. Black attempted to flee the area but slipped and fell to the ground. While on the ground both Hispanic males beat him over the head with baseball bats. During the attack Black was able to stand up, but again slipped and fell. Once on the ground the two men beat him with the bats until he was knocked out. During the attack, the two men took Black's wallet and gold chains before they fled the area.

Black was able to describe the first man he was arguing with as 5' 8" 170 lbs approximately 22-23 years old, Hispanic, brown hair, dark skin, small mustache, wearing a burgundy in color long sleeve shirt and blue jean pants. The first attacker armed with a bat was a Hispanic male adult with brownish/black mullet hair style, his hair hung out the back of his hat, wearing a white in color, short sleeve shirt, with three buttons at the top by the neck, blue jeans, armed with a wooden baseball bat. The second attacker was a Hispanic male adult with ear length brown/ black, hair 6' tall, wearing a dark color shirt, and blue jeans, also armed with a black metal bat with a red tip. Black knew the two men who attacked him stayed in the apartments located off Twain Avenue, just west of University Center Road.

CONTINUATION

Event #: 210400049329

It should be noted during the interview because of Black's head injury he had troubles finding words to express himself, was confused and slurred his words.

On April 13th at approximately 1730, hours Black signed himself out of the hospital against medical advice. At approximately 2100 hours Black returned to Sunrise Hospital complaining of worsening symptoms of his head injury and was admitted back into the hospital Intensive Care Unit. On April 14th, at approximately 0550 hours, Black suffered a seizure because of his head injury and lost consciousness. According to hospital staff, Black was not expected to survive.

On April 14th, Detective Hall was notified of the drastic change in Black's medical condition. At 1630 hours, Detective Hall met with the LVMPD Homicide section and briefed the details of the case. The LVMPD Homicide section assumed investigative responsibility of the case.

A records check was conducted on Reino Pina-Castillero DOB [REDACTED]2 which revealed Pina-Castillero was on house arrest ordered to wear an ankle bracelet. Detective M. Gutierrez #9886 with the LVMPD Alternative to Incarceration detail was contacted. Detective Gutierrez was able to confirm Pina-Castillero was on house arrest ordered to wear a GPS ankle bracelet that monitored and recorded his movements. Pina-Castillero's movements were researched, and it showed Pina-Castillero was at the bus bench where Black was attacked at 2032 hours, just two (2) minutes before the 911 call reporting the incident. From the incident Pina-Castillero returned to his apartment.

On April 15th, Homicide Detectives Ravelo and Jaeger conducted a digitally recorded interview with Witnesses #1 and #2 at LVMPD Headquarters. During the interview Witness #1 and #2 relayed:

They were on the balcony of their apartment when their attention was drawn to the bus stop at the south end of the alley way adjacent to their apartment. Witness #1 and #2 heard yelling about getting a cell phone and jewelry. Witness #1 and #2 saw two Hispanic males, one taller than the other walk, from the bus stop back to their apartment. The shorter of the two men was carrying a baseball bat, wearing a white tank top and blue jeans. The second suspect was

CONTINUATION

Event #: 210400049329

described as a Hispanic male, taller than the other, wearing a black shirt, and unknown pants. The bat was described as possibly being black but had a reflective shine and possibly metal material. Witness #1 and #2 confirmed the uniformed police officer were in the correct apartment where she observed both suspects walk into the night of the incident. Witness #1 and #2 believed the two Hispanic males involved are the same two people that live in the apartment.

On April 16th Homicide Detectives E. Ravelo and R. Jaeger conducted a digitally recorded interview with Reino Pina-Castillejo, DOB [REDACTED] inside an unmarked LVMPD vehicle parked directly in front of his apartment. Pina-Castillero was not in custody or under arrest at the time of the interview. During the interview Pina-Castillejo relayed:

Pina-Castillejo confirmed he lived at [REDACTED] Apartment #19 with Jorge Piloto. On April 11th, Pina-Castillejo was outside his apartment when a commotion drew his attention to the bus stop at the end of the alley right behind his apartment. Pina-Castillejo armed himself with a baseball bat for protection and walked to the area to investigate the commotion. Pina-Castillejo saw police arriving the area so he walked back to his apartment. Pina-Castillejo admitted the police were in his apartment shortly after the incident and located a baseball bat that was still in his apartment. Pina-Castillejo denied hitting anyone with a baseball bat the night of the incident.

On April 16th Homicide Detectives E. Ravelo and Jaeger conducted a digitally recorded interview with Jorge Piloto DOB [REDACTED] inside an unmarked LVMPD vehicle parked directly in front of his apartment. During the interview Piloto relayed:

Piloto heard a commotion outside of his apartment so he walked over to investigate. When he got to the crime scene police were on scene putting up yellow crime scene tape. Piloto returned to his apartment and a few minutes later uniformed police searched his apartment. Piloto denied hitting anyone with a baseball bat during the incident.

CONTINUATION

Event #: 210400049329

On April 16th at 1229 hours, a search warrant was authored by Detective R. Jaeger authorizing police to search [REDACTED] Apartment #19, Las Vegas, Nevada 89119. The search warrant was approved by District Court Judge Tierra Jones. During the search of the apartment two (2) baseball bats were collected. One bat was a metal white in color Easton with green and reflective silver lettering. The second bat was a black metal bat with red and silver lettering. The bats matched the description provided by eyewitness and victim during the incident.

On April 16th at 1730 hours Cornell Black was pronounced deceased at Sunrise hospital by Registered Nurse Gilbert Martinez. On April 17th, a complete autopsy was conducted on the body of Cornell Black by Medical Examiner Satish Chundru at the Clark County Coroner's and Medical Examiner's Office. At the conclusion of the autopsy, Dr. Chundru ruled the cause of death blunt force trauma to the head, Homicide.

On April 19th, Detectives Ravelo and Embry conducted a digitally recorded interview with Witness #3. During the interview Witness #3 relayed:

On the date of the incident Witness #3 was at home sitting on her balcony which faced west overlooking the parking lot between her complex and 3726 Hazelwood. Witness #3's balcony is just a few feet away from the bus stop where the incident began.

Witness #3 described seeing two black females and three males which later turned out to be the two suspects and the victim. Witness #3 heard and saw the argument between the victim and the suspects. Witness #3 heard one of the males say, "Give me my chain". Another male was heard arguing back about a cellphone saying, "You took my cellphone!"

Witness #3 described one of the suspects as being a Hispanic male adult in his mid-30's, approximately 5'-6" in height and having short dark hair. The second suspect was described as a short Hispanic male whom Miles immediately recognized as a neighbor who lives directly across the alley at 3726 Hazelwood # 19. Miles added that the first suspect is believed to be the son of the second and is much younger.

CONTINUATION

Event #: 210400049329

During the course of the argument, Witness #3 observed both suspects run back to Apartment 19 and they retrieved two (2) bats. Witness #3 observed both suspects run back to the scene and strike the victim with a bat and chase him down the street. Both suspects then ran back to the Apartment #19 after the argument.

Based on the proximity of Pina-Castillejo's apartment to the crime scene, witnesses seeing Pina-Castillejo walk from the crime scene into his apartment armed with a bat, patrol officers observing a bat inside the apartment minutes after the attack, Pina-Castillejo's ankle bracelet recording him at the crime scene at the time of the incident, and two baseball bats recovered from his apartment during the service of a search warrant. It is believed Pina-Castillejo struck Cornell Black with a baseball bat causing his death.

Wherefore, Declarant prays that a Warrant of Arrest be issued for suspect Pina-Castillejo, Reino on the charge(s) of Battery with Deadly Weapon.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed on this 19th day of April, 2021.

DECLARANT:

R. Jaeger #5587

WITNESS:

[Signature]

DATE:

04-19-21

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

2019 OCT 17

P 2: 37

CASE NO: 19F21037X

DEPT NO: 9

JUSTICE COURT
LAS VEGAS NEVADA
JN

DEPUTY

1
2
3 THE STATE OF NEVADA,

4 Plaintiff,

5 -vs-

6 REINO PINA-CASTILLERO, aka,
7 Reino Pinacastillero #2753169,

8 Defendant.

9 CRIMINAL COMPLAINT

10 The Defendant above named having committed the crimes of SEXUAL ASSAULT
11 WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS
12 200.364, 200.366 - NOC 50105) and LEWDNESS WITH A CHILD UNDER THE AGE OF
13 14 (Category A Felony - NRS 201.230 - NOC 50975), in the manner following, to wit: That
14 the said Defendant, on or about the 13th day of February, 2013, at and within the County of
15 Clark, State of Nevada,

16 COUNT 1 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

17 did then and there willfully, unlawfully, and feloniously sexually assault and subject
18 A.M., a child under fourteen years of age, to sexual penetration, to wit: digital penetration; by
19 Defendant inserting his finger(s) into the genital opening of the said A.M., against his or her
20 will, or under conditions in which Defendant knew, or should have known, that A.M. was
21 mentally or physically incapable of resisting or understanding the nature of Defendant's
22 conduct.

23 COUNT 2 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

24 did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon
25 or with the body, or any part or member thereof, of a child, to wit: A.M, a child under the age
26 of fourteen years, by Defendant touching and/or rubbing the vaginal area of the said A.M.,
27 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
28 defendant, or A.M.

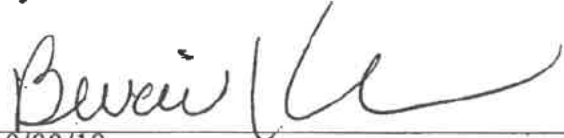
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19F21037X
CRM
Criminal Complaint
11617834



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All of which is contrary to the form, force and effect of Statutes in such cases made and provided and against the peace and dignity of the State of Nevada. Said Complainant makes this declaration subject to the penalty of perjury.


10/09/19

19F21037X/ew
LVMPD EV# 190800147201
(TK9)

Justice Court, Las Vegas Township
Clark County, Nevada

Department: 09

Court Minutes



L011653901

19F21037X State of Nevada vs. PINA-CASTILLERO, REINO

10/28/2019 8:00:00 AM Motion (No bail posted)

Lead Atty: Public Defender

Result: Motion Granted

PARTIES PRESENT:
State Of Nevada Attorney Defendant
Sweetin, Jim
Brouwers, Shana
PINA-CASTILLERO, REINO

Judge: Bonaventure, Joseph M.

Court Reporter: Cangemi, Robert

Court Clerk: Falcon, Kristian

PROCEEDINGS

Attorneys:	Brouwers, Shana	Pinacastillero, Reino	
	Public Defender	Pinacastillero, Reino	Added
Hearings:	11/20/2019 9:00:00 AM: Preliminary Hearing		Added
Events:	Interpreter Present in Court		Added

Spanish

Public Defender Appointed

Defendant Identified as Indigent

Defendant and the Court discussed the appointment of counsel and defendant requested appointment of counsel.

Counsel appeared as Friend of the Court

Frank Coumo, Esq

Motion for O/R Walkthrough on Arrest Warrant

objected by the State. Motion granted.

Opposition

filed in open court by State.

Defendant to be booked on Arrest Warrant and released on OR

Release Order - Electronic Monitoring - High Level

Bail Condition - Stay Away From Victim

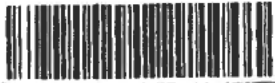
and any minor under 18.

Stay away from victim's address.

Bail Condition - Surrender Passport

or Resident alien card. Given to Counsel in Open Court

19F21037X
DWS
Declaration of Warrant Summons (Affidavit)
11017036



LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 7/13/1993)

Event Number: **D 190800147201**

STATE OF NEVADA) Pina-Castillero, Reino
) ss: ID#: [REDACTED]
COUNTY OF CLARK) DOB: [REDACTED]

2019 OCT 17 P 2: 31
JUSTICE COURT
LAS VEGAS NEVADA
BY JW
DEPUTY

S. Balonek, being first duly sworn, deposes and says:

That he is a Detective with the Las Vegas Metropolitan Police Department, being so employed for a period of 20 years, assigned to investigate the crime(s) of Sexual Assault against a Child under 14 years and Lewdness with a Child under 14 years, Kidnapping of a Child 1st Degree and Child Abuse committed on or about 02/13/13, which investigation has developed Pina-Castillero, Reino as the perpetrator thereof.

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME, TO WIT:

On 08/30/19, Barbara Vicente filed a report with the Las Vegas Metropolitan Police Department (LVMPD) for her daughter, [REDACTED] DOB [REDACTED] Barbara reported her daughter being sexual abused by a person she only knew as "Pina." Barbara said her daughter told her the day before Barbara's wedding "Pina" had touched her vagina over the clothes. "Pina" then instructed Aluxxus to the back room and placed his hand in her pants under her clothing. The report was taken under LVMPD event 190800147201.

On 09/04/19, I received the report and placed a phone call to Barbara. During my conversation with Barbara arrangements were made to have [REDACTED] forensically interviewed at the Southern Nevada Children's Advocacy Center located at 701 N. Pecos Rd, Las Vegas, Nevada 89101 on 09/12/19.

On 09/12/19, [REDACTED] and her mother, Barbara Vincente arrived at the SNCAC for Aluxxus's scheduled Forensic Interview. During the interview Aluxxus described how "Pina" touched her vagina over and under her clothing. Aluxxus said she remembered the day because it was the day before her mother and father were married. Aluxxus said she never told anyone until recently. Aluxxus said her grandmother was home and in the kitchen cooking when "Pina" came into the house and inappropriately touched her.

On 09/12/19, Barbara Vincente and Maria Vincente were also interviewed. Barbara explained that [REDACTED] came to her about the incident between her and "Pina." Barbara also confirmed the dates of the alleged allegation and the address where the incident took place. I also spoke with Maria who confirmed being at the residence during the alleged time.

CONTINUATION

Event #: 190800147201

Barbara provided an address for "Pina." I attempted to locate the address Barbara provided and was having no luck. The address Barbara initially provided was 3726 East Twain, Apt 19. I was able to find 3726 in the area Barbara described in her interview, however that address was 3726 Hazelwood not 3726 Twain. Barbara also showed me a wedding picture from her wedding with an adult male. Barbara said that was "Pina." On 09/20/19, Barbara explained that she found "Pina's" Facebook and said his name was Reino Pina-Castillero.

I conducted a check with the name of Reino Pina-Castillero and found a photograph of him which matched the photograph Barbara showed me on 09/12/19. "Pina" was identified as Reino Pina-Castillero, DOB: [REDACTED]

On 09/26/19, I went to 3726 Hazelwood, Apt 19 and knocked on the door. No one answered the door and I left a business card on the door. I received a call at approximately 1400 HRS on 09/26/19. An unknown male said he was calling on behalf of his father, Reino Pina. After speaking with Reino's son, arrangements were made with Reino to come to my office located at 701 N. Pecos Rd, Las Vegas, Nevada 89101 for an interview. The interview was scheduled for 0900 HRS on 10/03/19.

On 10/03/19, Reino did not show up for his scheduled interview. Detectives waited and attempted to call Reino. Detectives had no luck contacting Reino.

Interviews:**Forensic Interview of [REDACTED]**

The following is a summary of the interview and not verbatim

Matt introduced himself and asked [REDACTED] her name and age, which she provided. Matt provided a brief explanation of his job and told [REDACTED] that she is not in trouble. Matt explained the audio and video recordings of the room which [REDACTED] appeared to understand.

Matt also discussed the rules of the room and asked [REDACTED] if she would only talk about things that are true and real. Aluxus agreed to tell the truth and talk about only real things.

Matt asked [REDACTED] why she was here talking with him and [REDACTED] said she had a got in trouble because she was doing bad things with her family friend. [REDACTED] said she was doing bad things on her phone and she got caught. [REDACTED] said her father asked her why she was doing that, and [REDACTED] told her father a family friend had touched her inappropriately the day before his wedding.

[REDACTED] said the apartment she and her family were staying at was on Palos Verde. [REDACTED] described an open field across the street and an alley way. [REDACTED] described the family friend as a male, short hair who she only knew as "Pina." [REDACTED] said after the incident she felt as if "Pina" avoided her family.

[REDACTED] said she came out of her parents' bedroom and "Pina" told her to sit on the couch. [REDACTED] described the couch as possibly dark green. [REDACTED] said she sat on the couch next to "Pina." [REDACTED] said she was wearing skinny jeans and a shirt. [REDACTED] said "Pina" unbuckled her pants and stuck his hand down her pants under her

CONTINUATION

Event #: 190800147201

underwear. [REDACTED] described "Pina's" hand moving back and forth on her vagina and it made her feel uncomfortable. (Sexual Assault against a Child under 14 years-count 1) [REDACTED] said he touched the outside part of her vagina. [REDACTED] said she felt scared and uncomfortable.

[REDACTED] said "Pina" told her to go into the room. Once in the room "Pina" told her to pull her pants down and she did. [REDACTED] said "Pina" just stared at her and she was scared. (Lewdness with a Child under 14 years-Count 2) [REDACTED] said her grandmother called for "Pina" and she pulled her pants and underwear up and he left. [REDACTED] said she told her sister, Samantha. (Kidnapping-Count 3 and Child Abuse-Count 4)

[REDACTED] said she has not seen "Pina" since her parents wedding. [REDACTED] said if she saw "Pina" again she would recognize him.

Interview of Barbara Vincente DOB [REDACTED]**The following is a summary of the interview and not verbatim**

On 09/12/19, I spoke with Barbara. During the interview Barbara informed me that she was not aware of the allegations until 08/30/19. Barbara said as soon as she heard about the allegations, she contacted law enforcement. I asked Barbara if she knew "Pina's" real name and she said she was not aware, everyone just called him "Pina." Barbara said she had run into a friend and asked if the friend knew "Pina" real name or address. Barbara said the friend showed her where she thought "Pina" might be living. Barbara provided an address of 3726 East Twain, apt 19. Barbara also said she would try and find out "Pina's" true name.

Barbara said they lived at 504 Albert Ave, Apt 1, Las Vegas, Nevada 89119 prior to her marriage of [REDACTED] father. Barbara said after getting married her and her husband decided to move. Barbara said they packed their belongings and moved during the middle of the night. Barbara said the area they were living in was not an area she wanted her children to be raised in. Barbara said after the wedding and moving she has not talked with anyone in the area of 504 Albert.

On 09/20/19, Barbara called and said she had learned "Pina's" true name and provided Reino Pina-Castillero. Barbara provided a wedding photo with "Pina" in the photo. I conducted a record check on the name Barbara provided and located a suspect that matched the description and name given to me by Barbara. I asked Barbara about the address again and she said she might have gotten the street wrong.

Interview of Maria Vincente DOB [REDACTED]**The following is a summary of the interview and not verbatim**

On 09/12/19, I conducted an interview with Maria Vincente. During the interview Maria said she lived with her daughter and son at 504 Albert Ave, Apt 1. Maria advised me that she wasn't sure about the day that [REDACTED] was talking about but said it was not uncommon for "Pina" to be in their apartment.

CONTINUATION

Event #: 190800147201

Maria said she is [redacted] grandmother and she does not remember [redacted] saying anything happened the day before wedding. Maria said she does not remember calling for "Pina" that day either. Maria was very apologetic and explained she would never have allowed "Pina" to do anything to her granddaughter.

Conclusion:

Reino Pina-Castillero did willfully and lewdly commit a Sexual act upon the person or with the body part of member thereof, A [redacted] (a Child under the age of 14) with the intent to arouse, appeal or gratify the lust, passions, or sexual desire of that person or child by placing his hand on her vagina and moving his hand in a back and forth motion. Reino Pina-Castillero did also lewdly commit a Sexual act upon the person or with the body part of member thereof, A [redacted] (a Child under the age of 14) with the intent to arouse, appeal or gratify the lust, passions, or sexual desire of that person or child by removing the child from another room and having the child remove her clothes and stare at her while she was naked.

Wherefore, Declarant prays that a Warrant of Arrest be issued for suspect Pina-Castillero, Reino on the charge(s) of Sexual Assault against a Child under 14 years and Lewdness with a Child under 14 years.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed on this 26th day of September, 2019.

DECLARANT:

[Signature] P#0230

Stephen Balonek

WITNESS:

[Signature] 15586

DATE:

10/03/19

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

RAMON LEYVA-MARTINEZ #7099561,

Defendant.

CASE NO: 20CR035316

DEPT NO: 14

DA CASE NO:

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975) and SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105), in the manner following, to wit: That the said Defendant, on or between May 1, 2015 and May 31, 2015, at and within the County of Clark, State of Nevada,

COUNT 1 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.L., a child under the age of fourteen years, by sucking on the said J.L.'S breast, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.L.

COUNT 2 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.L., a child under the age of fourteen years, by sucking on the said J.L.'S breast, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.L.

COUNT 3 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.L., a child under the

1 age of fourteen years, by sucking on the said J.L.'S breat, with the intent of arousing, appealing
2 to, or gratifying the lust, passions, or sexual desires of defendant, or J.L.

3 COUNT 4 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

4 did then and there willfully, unlawfully, and feloniously commit a sexual penetration
5 upon J.L., a child under the age of 14 years, to wit: digital penetration, by inserting his
6 finger(s) into the genital opening of the said J.L.

7 All of which is contrary to the form, force and effect of Statutes in such cases made and
8 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
9 this declaration subject to the penalty of perjury.

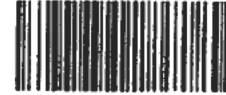
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(TK14)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes

Department: PC



L013000935

20-PC-035316 State of Nevada vs. LEYVA-MARTINEZ, RAMON

**11/24/2020 1:30:00 PM Initial Appearance
Justice Court (PC Review)**

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Defendant Scow, Richard LEYVA-MARTINEZ, RAMON

Judge: Bonaventure, Joseph M.

Court Reporter: Nelson, Bill

Court Clerk: Garcia, Maria D.

PROCEEDINGS

Hearings: 11/30/2020 8:30:00 AM: Status Check on Filing of Criminal Complaint Added

Events: **72-Hour Hearing Completed**

Probable Cause Found

Counsel Provisionally Appointed

F. Ghadiri, Esq provisionally appointed for limited purposes of first appearance hearing.

Individualized Custody Status Hearing Held

The Court conducted an individualized determination regarding the defendant's custody status. Both the State and the Defendant's provisionally appointed counsel had the opportunity to present evidence and argument regarding the Defendant's custody status. The Court has also considered factors set forth in NRS 178.4853 and NRS 178.498 and has considered the Defendant's financial resources when a financial affidavit was available and/or when the defendant was present in court.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004 - \$1,000.00/\$1,000.00 Total Bail

No Contact with Victim

Bail Condition - Stay Away From Victim

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1109758

County Jail City Jail Adult Juvenile Bureau: HSCB

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)		(MIDDLE)		SSN#
[REDACTED]		LLV201100098228		LEYVA-MARTINEZ			RAMON				[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB				
W	M	6/2/1973	5'09"	180	BLK	BRO					
ARRESTEE'S ADDRESS						CITY	STATE	ZIP CODE			
[REDACTED]						LAS VEGAS	NV	89149			
OCCURRED			ARREST			LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)					
DATE: 5/1/2015		TIME: 22:00	DATE: 11/23/2020		TIME: 14:45	[REDACTED]					
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)											
[REDACTED]											
CHARGES / OFFENSES											
PC - LVJCR - 50105 - F - SEX ASSAULT AGAINST CHILD LESS THAN 14											
PC - LVJCR - 50975 - F - LEWDNESS W/CHILD LESS THAN 14, (1ST)											
CONNECTING REPORTS (TYPE OR EVENT NUMBER)											

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 21 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 7148 FOREST FROST STREET LAS VEGAS NEVADA 89149 and that the offense(s) occurred at approximately 22:00 hours on the 1st day of May, 2015.

Details for Probable Cause:

On November 23, 2020, sexual assault was contacted anonymously and advised of a possible sexual abuse victim living with the suspect, her biological father, at 7148 Forest Frost Street, Las Vegas, Nevada. A work-up was completed on the address and residents and the possible victim and suspect were identified.

On November 23, 2020 at 1224 hours, a call for service was created for a welfare check at 7148 Forest Frost Street. Patrol Officers S. Peters P# 16155 and J. Coover P# 16313 arrived and contacted the occupants in the residence. The purported victim, [REDACTED] was home in the residence with her brother, Jonas Leyva [REDACTED], mother, Maritza Flores ([REDACTED]), and father, the alleged suspect, Ramon Leyva-Martinez ([REDACTED]).

Officers separated the family and spoke with [REDACTED] away from the family. [REDACTED] disclosed she was sexually abused by her father when she was twelve years old. Officers spoke with Maritza who learned about the incident in August of this year, but it was decided they would not report it to police. Maritza confronted Ramon in August and he apologized, but Ramon did not state exactly what he did. Officers took Ramon into custody and the family was transported to Las Vegas Metropolitan Police Department's Headquarters for questioning.

Detective L. Gilbert P# 6513 with Sex Crimes interviewed [REDACTED] and recorded the interview on a digital recorder. The following is a synopsis of the interview and not verbatim. For the complete interview, please refer to [REDACTED] transcription. [REDACTED] stated when she was in the seventh grade, around Spring (2015), there was a weeklong period where her father, Ramon, had touched her inappropriately. [REDACTED] had her own room and the incidents occurred there. When [REDACTED] was in bed, Ramon entered her room. [REDACTED] wore a pink or lavender nightgown. On the first night, Ramon came into her room and rubbed on her legs. The three nights, Ramon entered her room and either pulled her nightgown down by undoing the buttons or pulled it up to expose her breasts. Ramon then sucked on her breasts with his mouth. On the fifth night, Ramon entered her room, put his hand under [REDACTED]'s nightgown and digitally penetrated

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: L GILBERT

P#: 6513

LVMPD 802 (Rev 02/18) Ward 2013

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: EVENT #: LLV201100098228
Page 2 of 2

her vagina with his finger. His fingers were moving around in a circular motion and it went on for "quite a while". When this was happened, [REDACTED] was confused. She froze, went blank, and numb [REDACTED] started "squirming around" and Ramon stopped, said, "Just forgive me" and left the room. The next time [REDACTED] used the bathroom, she felt a sharp pain in her vagina. That was the last time Ramon touched her. [REDACTED]'s "world was turned upside down" after that week.

Nothing was ever discussed between [REDACTED] and Ramon since that incident. [REDACTED] gave Ramon a letter written in Spanish around New Year 2020, letting him know she did not forget what happened and how awful she felt. The years before, [REDACTED] suffered from depression and was in counselling, but she did not disclose to the counsellor what Ramon had done to her. Ramon tried to convince her it wasn't depression and she was alright. [REDACTED] first disclosed to her cousin about the abuse, then her brother, Jonas. [REDACTED] did not tell her mother about the incidents until August of 2020 because she was tired of hiding what happened. Maritza confronted Ramon about the incidents, and they had a heated argument, but nothing became of it.

Detective B. Hoffman P#10069 interviewed Jonas Leyva. The following is a synopsis of the interview and not verbatim. For the complete interview, please refer to Jonas Leyva's transcription. Jonas stated he was there because his father, Ramon did something to his little sister [REDACTED]. [REDACTED] was described as innocent and simple and he believes it happened because [REDACTED] said it did. Johanna told him Ramon touched her in places she did not want to be touched. It happened once when she was thirteen years old. Jonas does not think [REDACTED] would lie about this incident. Jonas noticed around that time [REDACTED] changed from being outgoing and social, to a "loner" and introvert. [REDACTED] seemed as though she did not trust people. It wasn't until about a year ago that [REDACTED] started to talk more and open up to Jonas and their mother.

Jonas was told about the incident a few months ago, but he figured out what happened a couple of months before that. [REDACTED] told him someone did something to her but did not say who. Jonas questioned her about it but decided to wait until Johanna was ready to talk about it. [REDACTED] decided to tell Maritza and they dealt with the situation as a family.

Detective Gilbert with the assistance of Detective B. Hodson P# 9034 as a Spanish Interpreter, spoke to Maritza Flores. The following is a transcription of the interview and not verbatim. For the complete interview, please refer to Maritza Flores' transcription. Maritza stated she was at home and the police came and asked to talk to [REDACTED]. They were there regarding what [REDACTED] told her back in August. [REDACTED] told Maritza, Ramon had touched [REDACTED] when [REDACTED] was twelve years old. police asked [REDACTED] about what [REDACTED] first told about [REDACTED] being touched by her father Ramon back in August of 2020. It occurred back when she as twelve years old. [REDACTED] did not tell her the extent of the touching but said Ramon was accused of touching her vagina. A few years ago, Maritza, noticed [REDACTED] had changed and seemed to be upset and depressed all the time. Maritza asked what was going on, but [REDACTED] never said what it was.

Detectives attempted to talk to Ramon about the incident, but Ramon refused to talk.

Due to the fact that [REDACTED] Leyva at the age of twelve, was touched inappropriately by her father, Ramon Leyva-Martinez, when they lived at 7148 Forest Frost Street, Las Vegas, Nevada, that the incidents occurred around or about May 2015, that [REDACTED] stated on three separate evenings, Ramon sucked on her breasts, and on last evening Ramon digitally penetrated her vagina with his finger, causing her pain the next time she urinated, Ramon Leyva-Martinez was arrested for Lewdness with a Child Under 14 (3 Counts), and Sexual Assault Child Under 14.

Ramon was advised of his charges and transported to CCDC where he was processed accordingly.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: L GILBERT

P#: 6513

LVMPD 602 (Rev 02/18) Word 2013

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

THE STATE OF NEVADA,

2020 JUN 15 A 11:14

Plaintiff,

JUSTICE COURT
LAS VEGAS NEVADA

CASE NO: 20CR007791

-vs-

BY JNV DEFPT

DEPT NO: 7

GREGORY JAMES CAMERON JR.
#8507207,

DA CASE NO:

Defendant.

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of SEXUAL ASSAULT (Category A Felony - NRS 200.364, 200.366 - NOC 50095) and FIRST DEGREE KIDNAPPING (Category A Felony - NRS 200.310, 200.320 - NOC 50051), in the manner following, to wit: That the said Defendant, on or about the 10th day of June, 2020, at and within the County of Clark, State of Nevada,

COUNT 1 - SEXUAL ASSAULT

did then and there willfully, unlawfully, and feloniously sexually assault and subject M.L., a female person, to sexual penetration, to wit: digital penetration; by inserting his finger(s) into the genital opening of the said M.L., against her will, or under conditions in which Defendant knew, or should have known, that M.L. was mentally or physically incapable of resisting or understanding the nature of Defendant's conduct.

COUNT 2 - SEXUAL ASSAULT

did then and there willfully, unlawfully, and feloniously sexually assault and subject M.L., a female person, to sexual penetration, to wit: cunnilingus: by placing his mouth and/or tongue on any part of the female genitalia, against her will, or under conditions in which Defendant knew, or should have known, that M.L. was mentally or physically incapable of resisting or understanding the nature of Defendant's conduct.

COUNT 3 - SEXUAL ASSAULT

did then and there willfully, unlawfully, and feloniously sexually assault and subject

-CR-007791
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riminal Complaint
15815



1 M.L., a female person, to sexual penetration, to wit: sexual intercourse: by placing his penis
2 into the genital area of the said M.L., against her will, or under conditions in which Defendant
3 knew, or should have known, that M.L. was mentally or physically incapable of resisting or
4 understanding the nature of Defendant's conduct.

5 COUNT 4 - FIRST DEGREE KIDNAPPING

6 did willfully, unlawfully, and feloniously, seize, confine, inveigle, entice, decoy,
7 abduct, conceal, kidnap, or carry away M.L, a human being, with the intent to hold or detain
8 M.L against her will, and without her consent, for the purpose of committing sexual assault
9 upon M.L.

10 All of which is contrary to the form, force and effect of Statutes in such cases made and
11 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
12 this declaration subject to the penalty of perjury.

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28 LVMPD EV# 200600036653
(TK7)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Department: PC

Court Minutes



L012413172

20-PC-007791 State of Nevada vs. CAMERON, GREGORY JAMES, Jr

**6/12/2020 1:30:00 PM Initial Appearance Justice
Court (PC Review)**

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Thunell, Peter
Defendant CAMERON, GREGORY JAMES, Jr

Judge: Bonaventure, Joseph M.

Court Reporter: Nelson, Bill

Court Clerk: Kuszak, Rhonda

PROCEEDINGS

Hearings: 6/19/2020 7:30:00 AM: Status Check on Filing of Criminal Complaint Added

Events: **Probable Cause Found**

72-Hour Hearing Completed

Counsel Provisionally Appointed

M. Pensabene Esq Public Defender provisionally appointed for limited purposes of first appearance hearing.

Individualized Custody Status Hearing Held

The Court conducted an individualized determination regarding the defendant's custody status. Both the State and the Defendant's provisionally appointed counsel had the opportunity to present evidence and argument regarding the Defendant's custody status. The Court has also considered factors set forth in NRS 178.4853 and NRS 178.498 and has considered the Defendant's financial resources when a financial affidavit was available and/or when the defendant was present in court.

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004 - \$10,000.00/\$10,000.00 Total Bail

**Release Order - Bail AND Electronic Monitoring -
High Level**

No Contact with Victim

Bail Condition - Stay Away From Victim

and victims address

Comment

Defendant's family present in Court

**Continued for Status Check on filing of Criminal
Complaint**

Comment

Date set at Defense request

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8507207 EVENT #: LLV200600036653
Page 2 of 6

DOB: [REDACTED]
ADDRESS: [REDACTED]
SUSPECT(S):
#1: GREGORY CAMERON, ID#: 8507207
DOB: [REDACTED]
ADDRESS: [REDACTED]

SUSPECT(S) VEHICLE: 2017 DODGE RAM VAN
 Nevada Registration: [REDACTED]

CHARGE(S):
Sexual Assault (NRS: 200.366 (3 counts)),
1st Degree Kidnapping (NRS: 200.310 (1 count))

SYNOPSIS:

On June 10th, 2020 at approximately 1650 hours, [REDACTED] became the victim of a sexual assault and kidnapping. The crimes took place at [REDACTED]. The suspect was reported to be a Cox Communication Technician who was at [REDACTED] home on a scheduled service call. An incident crime report was taken under LVMPD event number LLV200600036653.

That suspect who committed the crimes of 3 counts of sexual assault and 1 count of kidnapping was identified as Gregory Cameron, ID# 8507207.

Cameron was observed on video surveillance arriving at [REDACTED] apartment complex at approximately 1611 hours on June 10th, in his company dodge van. Cameron committed the crime of sexual assault by digitally penetrating [REDACTED] with two fingers after he had picked her up and slung her over his shoulder. Cameron carried [REDACTED] into her bedroom with the intent to sexually assault her. Cameron committed another sexual assault against [REDACTED] when he performed cunnilingus on [REDACTED]. The final sexual assault committed by Cameron happened when he penetrated [REDACTED] vagina with his penis. Cameron was observed leaving the area in his vehicle at approximately 1725 hours on the same video surveillance system.

PRELIMINARY INVESTIGATION:

[REDACTED] was transported to University Medical Center (UMC) by Community Ambulance #108. While at UMC, [REDACTED] completed a Sexual Assault Kit (SAK). The SAK was collect by UMC Sex Assault Nurse Examiner (SANE) Jeri Dermanellian. Officer Kaposta was dispatched to the incident and contacted [REDACTED] at her residence after arriving home. After completing the preliminary investigation, Officer Kaposta notified LVMPD Sex Crimes Detectives.

The following narrative was completed by Officer Kaposta reference the incident.

"On 06/10/20 at approximately 1757 hours, [REDACTED] called 9-1-1 to report a sexual assault that occurred at approximately 1650 hours. [REDACTED] stated that the sexual assault occurred inside of her residence located at [REDACTED]. The details continued to state that [REDACTED] was transported to UMC hospital by Community ambulance 108 and that [REDACTED] had a Sane exam completed at the hospital. I, Officer S. Kaposta P#15082, was assigned to the above stated call at approximately 2355 hours and made contact with [REDACTED] at her residence.

[REDACTED] stated that she had a scheduled appointment with COX Communications due to her internet not working. [REDACTED] said that a technician showed up from COX Communications and introduced himself as "Cam". [REDACTED] stated that she noticed that Cam's nametag had the name "Gregory" inscribed on it. [REDACTED] said that Cam worked on her internet for approximately forty-five minutes and that he continuously attempted to flirt with her during that timeframe. [REDACTED] said that Cam attempted to touch her hand throughout the process and at one point touched her feet while she was sitting in her office chair. [REDACTED] stated that her office chair was located in the living room next to her WIFI modem. [REDACTED] stated that after Cam touched her feet, he then picked her up off of her chair and carried her to her bedroom. [REDACTED] stated that Cam forcibly threw her onto her bed and then got on top of her. [REDACTED] said that Cam then pulled her pants off and forcibly

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: B HOFFMAN

P#: 10069

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8507207 EVENT #: LLV200600036653
Page 3 of 6

placed his penis inside of her vagina. [] said that the altercation lasted approximately ten to fifteen minutes before Cam got off of her.

[] stated that after Cam raped her, Cam told her to not tell on him due to him having children. [] said that Cam repeated to not call the police on him multiple times and that she told him that she would not due to fearing what else he would do to her. [] stated that Cam then called her cell phone number before leaving and stated that he now has her cell phone number so that he would know if she called on him. [] described Cam as a 6'00" thin build black male adult in his early thirties. [] described Cam as wearing a blue COX polo and tan khakis.

CSA S. Felabom P#14765 responded to [] residence and processed the scene. Sexual Assault Detectives A. Jerbic P#14830 and B. Hoffman P#10069 also responded to the scene and took over the investigation."

FOLLOW-UP INVESTIGATION:

On June 10th I, Detective Hoffman, assigned to the Sexual Assault Section was notified by Officer Kaposta of LVMPD event number LLV200800036653. Officer Kaposta advised me that the victim [] had become a victim of a sexual assault which occurred at 1650 hours and the suspect was said to be a Cox Communications Technician. Officer Kaposta stated that [] has already completed an SAK and wanted to speak to detectives.

Under LVMPD event number LLV200800040291 an investigation/follow up event was created to document details later in the day on June 11th. Another LVMPD event number LLV200800041295 was generated by Northeast Area Command Patrol Officers documenting their response to []

Victim Interview:

That at approximately 0030 hours (June 11th, 2020), Detective Jerbic and I arrived at [] residence. I completed a digitally recorded interview with [] detailing the incident. The interview took place at approximately 0038 hours. The following is a summary of that interview and is not verbatim. For further details, please refer to the accompanying transcription.

[] stated that she contacted Cox Communication and scheduled an appointment for a technician to respond to her residence, to take place on June 10th between 4pm and 5pm. [] stated that the technician did not call ahead like other techs have in the past. The technician was described as a light skinned, mixed-race male, looking to be African American and Caucasian in his early 30's, he was dressed in a blue "Cox" collared short-sleeve shirt, having the name "Gregory" embroidered into the shirt, with Khaki pants, and had tattoos on both arms. During the service call, [] stated the suspect was very flirtatious with her and asked her several times "what's your limit". [] was confused by this question and laughed it off without answering. While sitting at her office chair located in her Livingroom, and after the suspect completed the service call, the suspect approached [] got down on one knee and took her by the hand. [] stated this caught her off guard and caused her to become worrisome. The suspect, without hesitation began kissing and licking her ankle and leg. [] stated she kicked him in a "shooing manner", while using her hands to push his shoulders. [] told the suspect that it was time for him to leave and stated, "now I'm uncomfortable". The suspect then without warning, picked [] up and put her over his shoulder. (Kidnapping, 1 count) [] was telling the suspect to put her down, no, and stop, while he carried her into her bedroom. [] also stated that the suspect digitally penetrated her vagina (Sexual Assault, 1 count) with at least two fingers while he was carrying her, causing her discomfort. Once inside the room the suspect dropped her onto her bed as he went into a kneeling position. [] stated she attempted to keep her legs closed, but the suspect was stronger and forced her legs apart. The suspect then performed cunnilingus (Sexual Assault, 1 count) on [] for approximately one to two minutes. [] claimed that at this time she became silent and shut down. [] claimed the suspect dropped his pants, exposed his genitals and inserted his penis into her vagina. (Sexual Assault, 1 count) [] claimed the suspect did not wear a condom and believed the suspect ejaculated inside her. Once finished, the suspect stood up and retrieved a pink hand towel from her bathroom, cleaning himself with it. The suspect walked back towards [] and attempted to wipe her with the same towel when [] said the suspect noticed she had a fearful look on her face. The suspect stated, "I hope you don't tell anyone about this, I have two kids". [] told the suspect "no, we are good" and claimed this was her attempt to get him out of her home. The suspect then pulled out his phone, called her phone and stated, "now I have your number". The

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: B HOFFMAN

P#: 10069

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8507207 EVENT #: LLV200600036653
Page 4 of 5

suspect told [REDACTED] to take his number. [REDACTED] grabbed a piece of paper nearby and wrote down [REDACTED] and said his name is "Cam" before leaving.

Witness/Contact Interview(s):

The morning of the response, Detective Jerbic conducted a digitally recorded interview with [REDACTED]'s boyfriend, [REDACTED] DOB: [REDACTED]. [REDACTED] stated [REDACTED] was texting him throughout the service call. [REDACTED] provided Detective Jerbic with screenshots of the conversation. Within the conversation, [REDACTED] texts [REDACTED] that the suspect was flirting with her, but she wasn't having it.

On June 11th after obtaining video surveillance from the main office surveillance system, I contacted Sasha [REDACTED] and her roommate, Morgan [REDACTED]. I conducted a digitally recorded interview with both inside of their apartment. The following is a summary of that interview and is not verbatim. For further please refer to the transcription.

At approximately 1600 hours Sasha and Morgan returned home from the hospital. Sasha stated she drove and parked out front of their apartment to drop Morgan off due to a leg injury. After exiting the vehicle, they came into contact with Gregory Cameron. Cameron offered Morgan his assistance to help get to her apartment located on the second floor, directly across from the victim's apartment. Cameron was said to be wearing a blue button up, short sleeve shirt with the "Cox" insignia and khaki pants. He was described as a light skinned black male in his late 20's or early 30's. Cameron assisted Morgan by picking her up in a cradling position. Cameron carried Morgan up the two flights of stair placing her just outside of her doorway. After putting Morgan down, Morgan stated that Cameron adjusted the shorts she was wearing and was uncomfortable by his actions. Morgan stated that he shorts "road up" a bit while Cameron carried her up the stairs. Morgan stated Cameron asked her for her number and she provided it to him. Morgan entered her apartment followed by Sasha. Before closing their door, they observed Cameron knock on unit [REDACTED] and [REDACTED] opening the door. This ended the

Crime Scene and Evidence Collected:

On June 11th at approximately 0130, CSA Felabum was dispatched and responded to [REDACTED] to process the crime scene. CSA Felabum took over all photographs of the crime scene, Collected bedding and a towel from [REDACTED] bedroom and bathroom after [REDACTED] signed a consent to search form.

Identification of: GREGORY CAMERON

Details within the initial call stated that the victim had scheduled a technician from Cox Communication to service her internet. On June 11th at approximately 0800 hours Detective Friess drafted and faxed an administrative subpoena to Cox Communication to obtain all documents related to [REDACTED] from June 10th, 2020. Documents obtained from said administrative subpoena showed the technician who serviced [REDACTED], on June 10th was identified as Gregory Cameron, DOB: [REDACTED]. Cameron is a subcontractor for Cox Communication and is employed by "End2End Technologies". Documents showed Cameron arrived at the residence around 1600 hours and ended the service call just after 1700 hours. It is policy for all technicians to report to Cox of the services provided and the interaction with the customer. The report from this service call was never generated by Cameron.

That detectives located a Nevada DMV record, a SCOPE record and an Interstate Identification Index (II) record for Gregory Cameron. The Nevada DMV record obtained had his NV DL photograph and said photo was taken in January 2020 and matched the physical description provided by the victim and witnesses who had been interviewed. NV DMV had the address of [REDACTED] documented. That the SCOPE record also had the same address affixed to its record. Lastly, the III record revealed Cameron had a criminal history out of California for crimes against children, annoy/molest children, sexual battery, indecent exposure.

At approximately 1700 hours Detective Jerbic arrived and conducted surveillance at the listed address for Cameron. At approximately 17:25 hours, Detective Jerbic observed Cameron exiting his residence. With the assistance from Northeast Patrol Officers, Cameron was taken into custody, his identity was confirmed by a Nevada DMV issued driver's license, and transported to LVMPD Headquarters in the attempt to complete an interview with him.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: B HOFFMAN

P#: 10069

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8507207 EVENT #: LLV200600036653
Page 5 of 5

Suspect Interview(s):

That Gregory Cameron's digitally recorded statement took place at approximately 1800 hours, with Detective Jerbic overseeing the interview. Cameron was advised that I, was a Sexual Assault Detective with LVMPD and that I was investigating a sexual assault that had been committed.

That prior to me questioning Cameron on the crime being investigated, Cameron was duly advised of his Miranda Rights from the issued LVMPD Miranda Rights Card (LVMPD148). Cameron did acknowledge his rights by verbally stating "yes" after the Miranda Rights were read and ask if he understood their rights. The following is a summary of that interview and is not verbatim. For further please refer to the transcription.

Cameron was advised that he is a suspect in a sexual assault investigation. During questioning Cameron was asked to detail June 10th, 2020 from morning until he went to bed. Cameron claimed that he started work at 0700 hours, got off work around 17:00 hours and was home by 18:00 hours for his court appointed Domestic Violence course. Cameron was asked to list everyone in the past week who he has had sexual relations with. Cameron stated he has not been intimate with anyone, his wife is currently pregnant and is "high risk" making it impossible to have sexual relations with her. Cameron stated that he is a good-looking man, he has a wife with 5 kids, and I don't need to rape anyone. Your Affiant continued to ask him about his day on June 10th, however, could not provide any details without first referring to his phone that have his work call logs within them. Cameron was adamant that he has not had any type of sexual relations with anyone in the past week.

Search Warrant:

On June 11th, 2020 the Honorable Judge Bonaventure granted a telephonic search warrant for the following described premise(s): The person of: Gregory Cameron, ID# 8507207. On June 11th at approximately 2158 hours said search warrant was executed. CSA Felabum responded and collected a buccal swab, penile swabs, scrotum swabs, and hand/finger scrapings from Cameron at LVMPD Headquarters where the search warrant was executed. As well as taking digital photographs documenting the suspect and process. Detective Jerbic seized Cameron's cellular phones as well as documents from Cameron's wallet establishing his employment. These items included a \$53 check issued to Cameron from End2End Technologies, and company debit/credit card issued in Cameron's name with End2End Technologies.

CONCLUSION:

Due to the fact that [REDACTED] filed a report under LVMPD event number LLV200600036653 with criteria identifying the crimes of sexual assault and kidnapping, that the suspect was said to be wearing a blue button up, short sleeve shirt with the "Cox" insignia and khaki pants. He was described as a light skinned black male in his late 20's or early 30's and that Gregory Cameron matches the general physical description of the suspect, that Cameron is in fact employed as a subcontractor for Cox Communication by his own admission, and that through the investigation, Cameron was identified as the person who committed the crimes against [REDACTED]. I believe there is probable cause for Gregory Cameron, ID# 8507207 for the charges of sexual assault (NRS: 200.386 (3 counts)), and 1st degree kidnapping (NRS: 200.310 (1 count)). Cameron was placed under arrest for the crimes and transported to CCDC where he was booked accordingly.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: B HOFFMAN

#: 10069

LVMPD 602 (Rev 02/18) Word 2013



JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

THE STATE OF NEVADA **2021 MAR 22 A 8:35**

Plaintiff JUSTICE COURT
LAS VEGAS NEVADA

-vs-

BY DEPUTY **DLP**

LAPARESE JONES #8416216,

Defendant.

CASE NO: 21CR013085

DEPT NO: 11

DA CASE NO:

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of SEXUAL ASSAULT (Category A Felony - NRS 200.364, 200.366 - NOC 50095), BATTERY BY STRANGULATION WITH INTENT TO COMMIT SEXUAL ASSAULT (Category A Felony - NRS 200.400.4 - NOC 54734), BATTERY WITH INTENT TO COMMIT SEXUAL ASSAULT (Category A Felony - NRS 200.400.4 - NOC 50157) and DESTROYING EVIDENCE (Gross Misdemeanor - NRS 199.220 - NOC 52980), in the manner following, to wit: That the said Defendant, on or about the 8th day of March, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - SEXUAL ASSAULT

did then and there willfully, unlawfully, and feloniously sexually assault and subject K.M., a female person, to sexual penetration, to wit: digital penetration, by inserting his finger(s) into the genital opening of the said K.M., against her will, or under conditions in which Defendant knew, or should have known, that K.M. was mentally or physically incapable of resisting or understanding the nature of Defendant's conduct.

COUNT 2 - BATTERY BY STRANGULATION WITH INTENT TO COMMIT SEXUAL ASSAULT

did then and there willfully, unlawfully and feloniously use force or violence upon the person of another, to wit: K.M., with the intent to commit sexual assault, by strangulation.

///

1 COUNT 3 - BATTERY WITH INTENT TO COMMIT SEXUAL ASSAULT

2 did then and there willfully, unlawfully, and feloniously use force or violence upon the
3 person of another, to wit: K.M., with intent to commit sexual assault by grabbing the said K.M.
4 and/or tackling K.M. to the ground.

5 COUNT 4 - DESTROYING EVIDENCE

6 did willfully and unlawfully, with intent to conceal the commission of a felony, to wit:
7 Sexual Assault, or to protect or conceal the identity of any person committing the same, or
8 with the intent to delay or hinder the administration of the law, or to prevent the production
9 thereof at any time in any Court, or before any Officer, Tribunal, Judge, or Magistrate, destroy,
10 alter, erase, obliterate, or conceal evidence by burning the clothing that the Defendant was
11 wearing during the sexual assault.

12 All of which is contrary to the form, force and effect of Statutes in such cases made and
13 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
14 this declaration subject to the penalty of perjury.

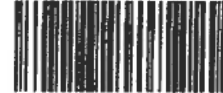
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28 LVMPD EV# 210300034893
(TK11)

Justice Court, Las Vegas Township
Clark County, Nevada

Department: PC

Court Minutes



L013374044

21-PC-013085 State of Nevada vs. JONES, LAPARESE

3/18/2021 9:00:00 AM Initial Appearance Justice
Court (PC Review)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Defendant Martinez, Samuel JONES, LAPARESE

Judge: Bonaventure, Joseph M.

Court Reporter: Nelson, Bill

Court Clerk: Espinoza, Jose

PROCEEDINGS

Hearings: 3/23/2021 7:30:00 AM: Status Check on Filing of Criminal Complaint Added

Events: Probable Cause Found

72-Hour Hearing Completed

Counsel Provisionally Appointed

Counsel provisionally appointed for limited purposes of first appearance hearing. Public Defender Marissa Pensabene, Esq.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Individualized Custody Status Hearing Held

The Court conducted an individualized determination regarding the defendant's custody status. Both the State and the Defendant's provisionally appointed counsel had the opportunity to present evidence and argument regarding the Defendant's custody status. The Court has also considered factors set forth in NRS 178.4853 and NRS 178.498 and has considered the Defendant's financial resources when a financial affidavit was available and/or when the defendant was present in court.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004; 005 - \$25,000.00/\$25,000.00 Total Bail

Release Order - Bail AND Electronic Monitoring - High Level

Order Regarding Media Request for Electronic Coverage Filed

Media Request for Electronic Coverage Granted

Continued for Status Check on filing of Criminal Complaint

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT

TCR1128344

County Jail City Jail Adult Juvenile Bureau: HSCB

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)	(MIDDLE)	SSN#
		LLV210300034893		JONES			LAPARESE		
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB		
B	M		6'01"	148	BLK	BRO			
ARRESTEE'S ADDRESS					STREET		CITY	STATE	ZIP CODE
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)					
DATE: 3/8/2021	TIME: 06:57	DATE: 3/16/2021	TIME: 00:00						
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)									
CHARGES / OFFENSES									
PC - LVJCR - 50095 - F - SEX ASSAULT									
PC - LVJCR - 54734 - F - BATTERY BY STRANGULATION TO COMMIT SEXUAL ASSAULT									
PC - LVJCR - 58009 - F - BATTERY WITH INTENT TO COMMIT SEXUAL ASSAULT E/CG									
PC - LVJCR - 55513 - F - ATT KIDNAPPING, 1ST DEGREE, E/SEX									
PC - LVJCR - 52980 - G - DESTROY/CONCEAL EVIDENCE									
CONNECTING REPORTS (TYPE OR EVENT NUMBER)									
WIT LIST, RFP									

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 20 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of _____ and that the offense(s) occurred at approximately 06:57 hours on the 8th day of March, 2021.

Details for Probable Cause:

On 03/08/2021, at approximately 0700 hours, _____ was walking her small dog near the pool area of the apartment complex located at _____. _____ walked by an unknown black male adult and they exchanged "Hellos" with each other. _____ said the male was acting strangely so she took a quick glance behind her and saw the male staring at her. _____ sped up and began to walk away from the male. The male began to follow and she began to walk towards the pool area of the complex. _____ took another look behind her and noticed the male was no longer following her, so she decided to walk back towards her apartment.

_____ was near building # _____, when she looked over her shoulder again and saw the same male running towards her. _____ was unable to run away when the male grabbed her and they both fell to the ground. _____ was on her back and the male was on top of her, straddling her lower torso. _____ immediately began to yell for help and the male put his right hand around her neck and started to apply pressure to keep her from yelling. While the male was choking her, _____ punched him several times in the face area with a closed fist, but it did not have any effect on the male. _____ then felt the male pull down her pants and underwear. The male forcibly shoved several fingers inside of her vagina. _____ ripped his black face mask off and his black rimmed glasses.

_____ used those glasses to hit the male in the face and head area several times. _____ was not sure, but she thought the glasses broke because she heard them crack in her hand. While she was striking the suspect, she also called him a "bitch!" _____ said this surprised him and caused him to stop sexually assaulting her with his fingers. The male got up and ran away in an unknown direction of travel. _____ ran to her nearby apartment and told her cousin what happened to her. After a small delay they went over to the apartment managers office and notified them.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: EDWARD PAZOS

PI: 6817

21 - CR - 813086

ROPJ

Redacted paperwork approved by Judge

13400018

LVMPD 682 (Rev 02/16) Word 2013



LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8416216 EVENT #: LLV210300034893
Page 2 of 4

Officers from the Northwest Area Command arrived on scene and conducted a preliminary investigation. Officers completed a crime report and requested the assistance of sexual assault detectives who took over the investigation. While putting up crime scene tape, patrol officers found a black cloth mask on the ground in the area where the attack occurred. [redacted] told Officers on scene the suspect was a black male adult, approximately 19 - 20 years old, thin build, 5'10" in height, wearing a dark gray hoodie, gray colored sweats with black knee pads, and black rimmed glasses. She further described the male as having full lips and a large, broad nose.

[redacted] was taken to UMC Hospital where she completed a sexual assault exam. Preliminary results of the exam conducted by Nurse Jeri indicate [redacted] had abrasions to the left side of her labia and petechial hemorrhaging to her neck. For more information, please see Nurse Dermanelian's SAK report.

Crime Scene Analyst (CSA) H. Ubbens P#14792 processed the crime scene and recovered the black mask along with a newer black glove found in the bushes near the scene. For more information, please see CSA Ubbens report.

[redacted] conducted a taped statement with Detectives and then she sat down with Detective T. Fasulo Jr. P#13459 and completed a Forensic sketch of the suspect. Detectives canvassed the area for video, spoke to numerous residents, spoke to other persons of interest, and used advanced investigative techniques to identify a possible suspect by the name of Laparese Jones LVMPD ID [redacted]

On 03/14/2021 at approximately 2104 hours, [redacted] called the police reference a dispute at [redacted]. Officers arrived on scene and were advised [redacted] is an independent living group home for juveniles who are getting off probation. One of the residents of [redacted] Laparese Jones LVMPD ID# [redacted] threatened to shoot up the group home. Laparese Jones was upset because he was locked out of the home for coming home past curfew. Per the house rules, if you miss curfew, subjects are not allowed to come in back to the residence until the next morning at 8 am. Laparese Jones and the other male Joseph [redacted] DOB [redacted] were told to leave and not come back until 08:00 am.

The next day, 03/15/2021 at approximately 1545 hours, Sgt. James O'leary P#14108 with the Northwest Area Command (NWAC) sent over an email containing body worn camera (BWC) footage of the above event. Sgt O'leary stated, Laparese Jones, resembled the black male who sexually assaulted [redacted] Sgt O'leary had seen several still shots of the suspect obtained from the video surveillance and believed Laparese Jones matched. Your affiant reviewed the BWC video sent by Sgt. O'leary and, also believed the individual on the BWC matched the person on video surveillance. Per SCOPE Laparese Jones is 6'1", 148 pounds, 18 years of age, and on the BWC he is wearing a dark hoodie, black and white sneakers. Laparese Jones had a medium afro style haircut and black framed glasses similar to the images caught on BWC.

Detectives conducted a records check on Laparese Jones ID [redacted] and learned the following: On 05/03/2017 under CCSDPD report # [redacted] Officer S. Patty P#520 with school police was working at Centennial High School when she was advised that a juvenile female who attended the school was sitting in math class when a fellow student (Laparese Jones) stuck his hand down the back of her ROTC uniform and almost touched the crack of her butt. Officer Patty contacted Laparese Jones and read him juvenile miranda. Laparese Jones told Officer Patty his hand brushed against the butt area of the juvenile female and that action excited him. Laparese Jones also said he had a problem with touching females inappropriately and he was going to get help. According to the report by Officer Patty, this was the third time Laparese Jones had sexually touched a female student in the past 30 days, Laparese Jones was arrested for Open and Gross Lewdness 2nd Offense.

Detective Pazos spoke to the House Manager, Arlene [redacted] who runs the Firebird Independent Living. She verified Laparese Jones lives at [redacted] and has been living there for approximately 1 year. Arlene advised me the residents of the Firebird where Laparese Jones lives are on a very strict curfew and the facility keeps a log of when the residents come and go. Arlene stated that on Sunday, March 7th at approximately 2301 hours, Laparese Jones left the facility and did not come back home until Monday at 0857 hours. The suspect was last seen (0659 hours)

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: EDWARD PAZOS

PI: 6817

LVMPD 602 (Rev 02/15) Word 2013

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8416216 EVENT #: LLV210300034893
Page 3 of 4

near the area of _____ and per Google maps, it is approximately 2 miles away from _____

BUCCAL SEARCH WARRANT:

On 03/15/2021, Detectives with the Criminal Intelligence Unit (CIU) were conducting surveillance at _____. They were instructed to watch for Laparese Jones and to stop him if he were to leave the above address. CIU Detectives observed Laparese Jones leave the _____ and walk towards the area of Smoke Ranch and Decatur. Officer J. Vance P#9004 observed Laparese Jones Jaywalking at the intersection of Smoke Ranch west of Decatur. Laparese Jones was stopped and class 2'd for the traffic infraction. Laparese Jones was taken to LVMPD Headquarters where a search warrant was served for his DNA. CSA B. Grover P#4934 collected buccal swab, fingernail swabs, and took photographs of Laparese Jones. CSA Grover also impounded his glasses, black sneakers, and his grey Coolpad Legacy smart phone was seized by detectives. The search warrant was authorized by the Honorable Judge Alf.

DNA:

The DNA collected from Laparese Jones was taken to the LVMPD Forensic Laboratory (Lab Case# _____) and his DNA was compared to the DNA that was collected in the black mask CSA H. Ubbens previously collected on 03/08/2021. According to the Forensic Lab Report: *Lab Item 1.2 Swabbing from side B of the black mask, it states the probability the mixture of DNA profile is 854 septillion times more likely if it originated from Laparese Jones and one unknown random contributor than if it originated from two unknown random contributors.*

For more information reference the DNA please see the Forensic Laboratory Report.

DETECTIVE FOLLOW UP:

On 03/16/2021 Detectives with the Digital Forensic Laboratory (DFL) were tasked with gathering video surveillance from _____. When they knocked on the door, Laparese Jones ran out of the back door into the backyard. This information was provided to detectives by Arlene _____ the house manager at the Firebird Independent Living. Ms. _____ also provided detectives with a copy of a cell phone video showing Laparese Jones in the backyard burning what appears to be some clothing. A copy of the video was retained by Detectives and will be impounded as evidence.

Based on the above information, Detectives with the Criminal Intelligence Unit (CIU) were tasked with taking Laparese Jones into custody. The following is a synopsis provided by Detective R. Moreno P#4922.

CIU Detective R. Moreno:

On 03/16/2021 under LVMPD event LLV210300075056 CIU Detective R. Moreno P# 4922 operating as unmarked LVMPD unit IX20 was conducting surveillance in the area of Miner's Hope and Lost Dutchman Dr., _____ in reference to an investigation follow-up to assist Sexual Assault Detectives. Detectives were attempting to locate a Jones, Laparese, who was last seen wearing a red shirt and black pants. At approximately 19:55 hours, an individual matching the description was located in the area. Detective J. Kennedy P#15468 operating as unmarked LVMPD unit IX25 located the male walking in the neighborhood and confirmed him to be Jones. Detectives requested patrol's assistance in conducting a person stop on Jones.

On 3/16/2021 At 19:57 hours under _____ Officer J. Serge P# 17275 along with Officer J. Casper P#17691 while operating as marked patrol unit 8X12 arrived on Miner's Hope Dr. Las Vegas, Nevada 89108 and initiated a traffic stop utilizing their overhead lights and siren. The male immediately fled westbound on foot and then turned north bound on Claim Jumper Dr. Officer's issued multiple verbal commands and the male eventually gave up, proning himself out on the ground. The male verbally identified himself as Jones, Laparese. _____ Jones was taken into custody without further incident and transported to LVMPD headquarters where a taped interview was conducted.

LAPARESE JONES:

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: EDWARD PAZOS

P#: 6817

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

SCOPE ID: 8416216 EVENT #: LLV210300034893
Page 4 of 4

On 03/16/2021, at approximately 2045 hours, Detectives E. Pazos P#6817 and C. Vensand P#14072 obtained an audio recorded statement from Laparese Jones. The following is a summary of the statement, for complete details refer to the transcript.

Detective E. Pazos read Laparese Jones his Miranda rights at approximately 2047 hours on 03/16/2021. Laparese stated he understood his rights and decided to speak with us. Laparese stated that on 03/08/2021 he was in a foul mood and wanted to beat someone up. Laparese said he was in an unknown apartment complex on Torrey Pines near a Sonic Drive Thru. While inside the apartment he stated he saw a small Asian female walking her dog, and described the dog as being small. Laparese watched her walk past him and began to follow her. Laparese followed her and ran behind her and intended to put her in a choke hold from behind. He said, she ducked, fell to the ground and began to scream. Laparese said he covered her face and choked her to keep her from screaming. As the victim () struggled to get away, Laparese said he may have stuck his fingers inside of her anus and vagina. Laparese went on to draw a picture of his finger showing how far his finger went inside of . Laparese also stated () took his mask and glasses off, but he only recovered his glasses before running away. He also admitted to panicking and burning the pants detectives had a video copy of. Laparese also wrote a letter to () and it reads as follows:

(Letter to victim from Laparese Jones/VERBATIM)

Dear

My name is Laparese Jones and I am the one that attacked you. I did not mean for you to feel sexually assaulted when I was beating you up. No body deserves to feel like they have been objectified for somebody elses needs. That is perverted. Im sorry that when you were struggling I ripped your clothes. I can't even imagine how scary that must have been. I know that I am in no position to ask forgiveness of you but I wanted to apologize.

(Signed)
Laparese Jones

Based on the above facts and circumstances, Laparese Jones was arrested for Sex Assault (putting his fingers inside of the victim), Battery by Strangulation to Commit Sex Assault (Jones choked the victim as she tried to scream for help) Battery with Intent to Commit Sex Assault (Jones pushed the victim to the ground and covered her face) Attempt Kidnapping 1st Degree (the victim tried to get away as she struggled with Jones, but he used his leverage to keep her from running away) Destroy/Conceal Evidence (Jones admitted to burning the sweats he was wearing because of the seriousness of the crime) .

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: EDWARD PAZOS

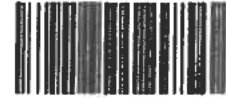
P#: 6817

LVMPD 602 (Rev 02/18) Word 2013

Justice Court, Las Vegas Township
Clark County, Nevada

Department: 11

Court Minutes



L013463039

21-CR-013085 State of Nevada vs. JONES, LAPARESE

Lead Atty: Public Defender

4/8/2021 9:00:00 AM Argument (In Custody)

Result: Matter Heard

PARTIES PRESENT:
State Of Nevada Kollins, Stacy
Attorney Hojvat, Nadia
Defendant JONES, LAPARESE

Judge: Goodman, Eric
Court Reporter: Smith, Patsy
Court Clerk: Garcia, Maria D.

PROCEEDINGS

Events: **Side Bar Conference Held**
Motion
by State to Increase Bail and Restrictions on Defendant - objection by Defense - Motion Granted
Bail Reset - Cash or Surety
Counts: 001; 002; 003; 004 - \$250,000.00/\$250,000.00 Total Bail
Release Order - Bail AND Electronic Monitoring - High Level
Future Court Date Stands
04/27/2021 at 9AM

1 **MOT**
2 **STEVEN B. WOLFSON**
3 **Clark County District Attorney**
4 **Nevada Bar #001565**
5 **STACEY KOLLINS**
6 **Chief Deputy District Attorney**
7 **Nevada Bar #005391**
8 **200 Lewis Avenue**
9 **Las Vegas, Nevada 89155-2212**
10 **(702) 671-2500**
11 **Attorney for Plaintiff**

LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT

ORIGINAL

MAR 23 2021

BY: JSP

7 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
8 **CLARK COUNTY, NEVADA**

9 THE STATE OF NEVADA,
10 Plaintiff,

11 -vs-

12 **LAPARESE JONES,**
13 **#8416216**
14 Defendant.

CASE NO: 21CR013085

DEPT NO: 11

15 **STATE'S MOTION TO INCREASE BAIL AND RESTRICTIONS ON DEFENDANT**
16 **JONES AS HE PRESENTS A DANGER TO THE COMMUNITY & A FLIGHT RISK**

17 DATE OF HEARING: 3/23/21
18 TIME OF HEARING: 7:30 AM

19 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, District Attorney,
20 through, STACEY KOLLINS, Chief Deputy District Attorney, and hereby submits and files
21 this State's STATE'S MOTION TO INCREASE BAIL AND RESTRICTIONS ON
22 DEFENDANT JONES AS HE PRESENTS A DANGER TO THE COMMUNITY AND A
23 FLIGHT RISK.

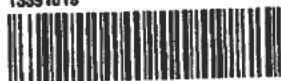
24 This Motion is made and based upon all the papers and pleadings on file herein, the
25 attached points and authorities in support hereof, and oral argument at the time of hearing, if
26 deemed necessary by this Honorable Court.

26 //

27 //

28 //

21 - CR - 013085
MOT
Motion
13391618



1 **POINTS AND AUTHORITIES**

2 **PROCEDURAL HISTORY & STATEMENT OF FACTS**

3 Laparese Jones, hereinafter Defendant, has been charged with having committed the
4 crimes of SEXUAL ASSAULT (Category A Felony - NRS 200.364, 200.366 - NOC 50095),
5 BATTERY BY STRANGULATION WITH INTENT TO COMMIT SEXUAL ASSAULT
6 (Category A Felony - NRS 200.400.4 - NOC 54734), BATTERY WITH INTENT TO
7 COMMIT SEXUAL ASSAULT (Category A Felony - NRS 200.400.4 - NOC 50157) and
8 DESTROYING EVIDENCE (Gross Misdemeanor - NRS 199.220 - NOC 52980). Defendant
9 brutally attacked, strangled and sexually assaulted 19-year-old K.M., as she walked her dog in
10 an apartment complex the morning of March 8, 2021. Despite Defendant's efforts to destroy
11 evidence and flee, savvy criminal behavior for someone his age, Defendant was apprehended
12 and placed under arrest. Last week, during Initial Arraignment Court, Defendant's bail was
13 set at \$25,000. The State views this amount as inadequate to secure his attendance as well
14 wholly insufficient to address genuine and serious community safety concerns.

15 On March 8, 2021, at approximately 0700 hours, K.M. was walking her small dog near
16 the pool area of an apartment complex located on North Torrey Pines. K.M. walked by an
17 unknown African American male adult and they exchanged "Hellos" with each other. K.M.
18 said the male was acting strangely so she took a quick glance behind her and saw the male
19 staring at her. K.M. sped up and began to walk away from the male. The male began to follow
20 K.M. and she began to walk towards the pool area of the complex. K.M. took another look
21 behind her and noticed the male was no longer following her, so she decided to walk back
22 towards her apartment.

23 K.M. was near building #14 when she looked over her shoulder again and saw the same
24 male running towards her. K.M. was unable to run away when the male grabbed her and they
25 both fell to the ground. K.M. was on her back and the male was on top of her, straddling her
26 lower torso. Defendant is over 6 feet tall and K.M. is short of 5 feet. K.M. immediately began
27 to yell for help and the male put his right hand around her neck and started to apply pressure
28 to keep her from yelling. While the male was choking her, K.M. punched him several times in

1 the face area with a closed fist without any effect on the male. K.M. then felt the male pull
2 down her pants and underwear. The male forcibly shoved several fingers inside of K.M.'s
3 vagina. K.M. ripped his black face mask off and his black rimmed glasses.

4 K.M. used those glasses to hit the male in the face and head area several times. While
5 she was striking the suspect, she also called him a "bitch!" K.M. said this surprised him and
6 caused him to stop sexually assaulting her with his fingers. The male got up and ran away in
7 an unknown direction of travel. K.M. ran to her nearby apartment and told her cousin about
8 the sexual assault that had transpired. Thereafter, they went over to the apartment managers
9 office and notified them.

10 Officers from the Northwest Area Command arrived on scene and conducted a
11 preliminary investigation. Officers completed a crime report and requested the assistance of
12 sexual assault detectives who took over the investigation. While putting up crime scene tape,
13 patrol officers found a black cloth mask on the ground in the area where the attack occurred.
14 K.M. told Officers on scene the suspect was a black male adult, approximately 19 - 20 years
15 old, thin build, 5'10" in height, wearing a dark gray hoodie, gray colored sweats with black
16 knee pads, and black rimmed glasses. She further described the male as having full lips and a
17 large, broad nose.

18 K.M. was taken to UMC Hospital where she completed a sexual assault exam.
19 Preliminary results of the exam conducted by Nurse Dermanelian indicate K.M. had abrasions
20 to the left side of her labia and petechial hemorrhaging to her neck.

21 Crime Scene Analyst (CSA) H. Ubbens processed the crime scene and recovered the
22 black mask along with a newer black glove found in the bushes near the scene. K.M.
23 conducted a taped statement with Detectives. K.M. then she sat down with Detective T. Fasulo
24 Jr. and completed a Forensic sketch of the suspect. Detectives canvassed the area for video,
25 spoke to numerous residents, spoke to other persons of interest, and used advanced
26 investigative techniques to identify a possible suspect by the name of Laparese Jones LVMPD
27 ID#8416216.

28 On 03/14/2021 at approximately 2104 hours, Keena Marshall called the police

1 reference a dispute at 2521 Apricot Lane. Officers arrived on scene and were advised 2521
2 Apricot Lane is an independent living group home for juveniles. One of the residents of 2521
3 Apricot Lane, Laparese Jones LVMPD ID#8416216 threatened to shoot up the group home.
4 Laparese Jones was upset because he was locked out of the home for coming home past
5 curfew. Per the house rules, if you miss curfew, subjects are not allowed to come in back to
6 the residence until the next morning at 8 am. Laparese Jones and the other male Joseph Murillo
7 DOB 02/21/2002 were told to leave and not come back until 08:00 am.

8 The next day, 03/15/2021 at approximately 1545 hours, Sgt. James O'Leary with the
9 Northwest Area Command (NWAC) sent over an email containing body worn camera (BWC)
10 footage of the above event. Sgt O'Leary stated, Laparese Jones, resembled the black male who
11 sexually assaulted K.M. Sgt O'Leary had seen several still shots of the suspect obtained from
12 the video surveillance and believed Laparese Jones matched. Per SCOPE Laparese Jones is
13 6'1", 148 pounds, 18 years of age, and on the BWC he is wearing a dark hoodie, black and
14 white sneakers. Laparese Jones had a medium afro style haircut and black framed glasses
15 similar to the images caught on BWC.

16 Detective Pazos spoke to the House Manager, Arlene Johnson, who runs the Firebird
17 Independent Living. She verified Laparese Jones lives at 2521 Apricot Lane, LVN 89108 and
18 has been living there for approximately 1 year. Arlene stated that on Sunday, March 7th at
19 approximately 2301 hours, Laparese Jones left the facility and did not come back home until
20 Monday at 0857 hours. Defendant was last seen (0659 hours) near the area of 6500 W. Lake
21 Mead Boulevard and per Google maps, it is approximately 2 miles away from 2521 Apricot
22 Lane LVN 89108.

23 On 03/15/2021, Laparese Jones was taken to LVMPD Headquarters where a search
24 warrant was served for his DNA. CSA B. Grover P#4934 collected the buccal swab, fingernail
25 swabs, and took photographs of Laparese Jones. CSA Grover also impounded his glasses,
26 black sneakers, and his grey Coolpad Legacy smart phone was seized by detectives. The search
27 warrant was authorized by the Honorable Judge Allf.

28 The DNA collected from Laparese Jones was taken to the LVMPD Forensic Laboratory

1 (Lab Case#21-05652.4) and his DNA was compared to the DNA that was collected in the
2 black mask CSA H. Ubbens previously collected on 03/08/2021. According to the Forensic
3 Lab Report: Lab Item 1.2 Swabbing from side B of the black mask, it states the probability
4 the mixture of DNA profile is 854 septillion times more likely if it originated from Laparese
5 Jones and one unknown random contributor than if it originated from two unknown random
6 contributors. The Sexual Assault Kit will be processed for DNA.

7 On March 16, 2021, Detectives with the Digital Forensic Laboratory (DFL) were tasked
8 with gathering video surveillance from 2521 Apricot Lane. When they knocked on the door,
9 Laparese Jones ran out of the back door into the backyard. This information was provided to
10 detectives by Arlene Johnson the house manager at the Firebird Independent Living. Ms.
11 Johnson also provided detectives with a copy of a cell phone video showing Laparese Jones
12 in the backyard burning what appears to be some clothing.

13 On March 16, 2021, at 19:57 hours under LLV210300075730 Officer J. Serge P#
14 17275 along with Officer J. Casper P#17691 while operating as marked patrol initiated a traffic
15 stop. The male immediately fled westbound on foot and then turned north bound on Claim
16 Jumper Drive. The male verbally identified himself as Jones, Laparese DOB: 04/01/2002.
17 Defendant was taken into custody without further incident and transported to LVMPD
18 headquarters where a taped interview was conducted.

19 On March 16, 2021, at approximately 2045 hours, Detectives E. Pazos P#6817 and C.
20 Vensand P#14072 obtained an audio recorded statement from Laparese Jones. Detective E.
21 Pazos read Defendant his *Miranda* rights at approximately 2047 hours on 03/16/2021.
22 Defendant stated he understood his rights and decided to speak. Defendant stated that on
23 March 8, 2021, he was in a foul mood and wanted to beat someone up. Defendant said he was
24 in an unknown apartment complex on Torrey Pines near a Sonic Drive Thru. While inside the
25 apartment complex, he stated he saw a small Asian female walking her small dog. Defendant
26 watched her walk past him and began to follow her. Defendant followed her, ran behind her
27 and intended to put her in a choke hold from behind. He said, she ducked, fell to the ground
28 and began to scream. Defendant said he covered her face and choked her to keep her from

1 screaming. As the victim (K.M.) struggled to get away, Defendant said he may have stuck his
2 fingers inside of her anus and vagina. Defendant went on to draw a picture of his finger
3 showing how far his finger went inside of K.M. Defendant stated K.M. took his mask and
4 glasses off, but he only recovered his glasses before running away. He also admitted to burning
5 the pants in the recovered video. Laparese also wrote a letter to K.M. and it reads as follows:

6 (Letter to victim from Laparese Jones/VERBATIM)

7 Dear (left blank)

8 My name is Laparese Jones and I am the one that attacked you. I did not mean for you
9 to feel sexually assaulted when I was beating you up. No body deserves to feel like they
10 have been objectified for somebody elses needs. That is perverted. I'm sorry that when
11 you were struggling I ripped your clothes. I can't even imagine how scary that must
12 have been. I know that I am in no position to ask forgiveness of you but I wanted to
13 apologize.

14 (Signed)

15 Laparese Jones

16 Video surveillance from local businesses as well as private residences were recovered
17 depicting Defendant before and after the vicious attack. Defendant confirmed several of the
18 still shots from these videos were in fact him. Jail calls recorded between Defendant and a
19 person believed to be Defendant's mother, contain multiple admissions surrounding the attack.
20 Additionally, audible witnesses were interviewed that heard K.M.'s screams for help. The
21 victim in this case has reportedly vacated her apartment residence and quit her employment.
22 She is truly traumatized and distraught.

23
24 **LEGAL ARGUMENT**

25 **I. DEFENDANT'S BAIL SHOULD BE MODIFIED**

26 **A. *Valdez-Jimenez* provides that Defendant's ability to afford bail is but one**
27 **factor amongst many to consider when setting bail.**

28 **A Defendant is entitled to an individualized determination on his pretrial custody status.**

1 Valdez-Jimenez v. Eighth Judicial District Court, 136 Nev. Ad Op.20 (April 9, 2020).

2 Recently, the Nevada Supreme Court held that the language in NRS 178.4851 that required “a
3 showing of good cause” before a detained person could be released without bail was
4 unconstitutional. Valdez-Jimenez v. Eighth Judicial District Court, 136 Nev. Adv. Op. 20
5 (April 9, 2020). Such language relieved the State of the burden to prove by clear and
6 convincing evidence that bail is necessary to serve the legitimate and compelling State
7 interests of ensuring (1) the presence of the defendant at future proceedings, or (2) the safety
8 of the community, victim(s), or the family of the victim. The Court must consider the factors
9 set forth in NRS 178.4853 and may impose bail only if the State meets the burden of clear and
10 convincing evidence.

11 If the district court determines that bail, rather than non-monetary conditions, is
12 necessary, the Court must consider the defendant’s financial resources as well as the other
13 factors set forth in NRS 178.498 in setting the amounts of bail. Although there is no
14 constitutional requirement that bail be set in an amount that the defendant can afford to pay,
15 the consideration of how much the defendant can afford is essential to determining the amount
16 of bail that will *reasonably ensure his or her appearance and the safety of the community*.
17 Valdez-Jimenez, 136 Nev. Adv. Op. 20 (2020).

18 Notably, while the Court must take into consideration “how much the defendant can
19 afford” to pay, the Court is not required to make a finding of whether the defendant can afford
20 the ultimate bail setting. If the Court decides to set a bail amount, the Court must state the
21 reasons for the bail amount on the record. The Court does not necessarily need to produce
22 written findings, oral findings will satisfy if the findings provide a sufficient basis for the
23 decision. Valdez-Jimenez.

24 Furthermore, the Valdez-Jimenez Court noted that it will look to “federal precedent for
25 guidance in determining what procedures satisfy due process”, citing to Hernandez v. Bennett-
26 Haron, 128 Nev. 580, 587, 287 P.3d 305, 310 (2012). The Court in Valdez-Jimenez relied
27 heavily on Salerno, where the United States Supreme Court upheld the Bail Reform Act. We
28 can look to other federal cases interpreting the Bail Reform Act for additional guidance.

1 Several federal cases have held that the State is not obligated to present witnesses at
2 detention hearings, and proffers will suffice in most hearings. United States v. Smith, 79 F.3d
3 1208, 1209-10; United States v. Gaviria, 828 F.2d 667, 669 (11th Cir. 1987); United States
4 v. Martir, 782 F.2d 1141, 1145 (2d Cir. 1986); United States v. Winsor, 785 F.2d 755, 756
5 (9th Cir. 1986); United States v. Acevedo-Ramos, 755 F.2d 203, 206-07 (1st Cir. 1985);
6 (United States v. Duncan, 897 F. Supp. 688, 690 (N.D.N.Y. 1988); United States v. Cardenas,
7 784 F.2d 937, 938 (9th Cir.1986); United States v. Delker, 757 F.2d 1390, 1395-96 (3d
8 Cir.1985); U.S. v. Whitman, 514 F. Supp. 2d 101 (D. Me. 2007), United States v. O'Neill, 144
9 F. Supp. 3d 428 (W.D. N.Y. 2015).

10 Due process principles do not require the state to present its case at a pretrial detention
11 hearing through live witnesses, and a defendant's due process right to confront witnesses is
12 satisfied by the opportunity for cross-examination of any witnesses the state *does* call and the
13 ability to raise questions about the accuracy of the proffer in the defendant's own offer of proof
14 or through defense witnesses. State v. Poulicakos, 131 N.H. 709, 559 A.2d 1341 (1989).

15 The rationale for permitting detention hearings to proceed by way of proffer is that such
16 hearings are "neither a discovery device for the defense nor a trial on the merits." Smith, 79
17 F.3d at 1210. "The process that is due is only that which is required by and proportionate to
18 the purpose of the proceeding." Id. "That purpose includes neither a reprise of all the evidence
19 presented before the grand jury, United States v. Suppa, 799 F.2d 115, 119 (3d Cir. 1986), nor
20 the right to confront non-testifying government witnesses, United States v. Accetturo, 783
21 F.2d 382, 388-89 (3d Cir. 1986)." Id. 79 F.3d at 1210 (also citing United States v. Hurtado,
22 779 F.2d 1467, 1479 (11th Cir. 1985) (purpose of pretrial detention hearing is not to
23 "rehash...probable cause" but to provide opportunity for detainee to show no risk of flight or
24 danger to community); United States v. Williams, 798 F. Supp. 34, 36 (D.D.C. 1992).
25 "Detention hearings are an informal proceeding, and the evidence presented is not governed
26 by the Federal Rules of Evidence." United States v. Acevedo-Ramos, 755 F.2d 203, 206-07
27 (1st Cir. 1985). "A right to require the government to produce its witnesses against [a
28 defendant] would complicate the hearing to a degree out of proportion to the liberty interest at

1 stake - viz. the interest in remaining free until trial, for what is by statute a period of limited
2 duration.” Smith, 79 F.3d at 1210. One court explained:

3 The judge or magistrate (retains) the responsibility for assessing the
4 reliability and accuracy of the government’s information, whether
5 presented by proffer or by direct proof. Of course, a detention hearing
6 is not to serve as a mini-trial, as discussed above, or as a discovery
7 tool for the defendant. Accordingly, a government proffer need not
8 always spell out in precise detail how the government will prove its
9 case at trial, nor specify exactly what sources it will use.”

10 U.S. v. Martir, 782 F.2d 1141, 1145 (2d Cir. 1986).

11 There is clear and convincing evidence that bail is necessary to protect the community
12 as well as to ensure Defendant’s presence at future Court dates. The need to protect the
13 community and to ensure his presence, when analyzed in light of the factors outlined in NRS
14 178.4853, suggest the current bail setting of \$25,000 is far below an amount that serves the
15 community protection factors. The courts are charged with exercising discretion in a manner
16 that protects the public from the danger of random, predatory behavior. The State has grave
17 and legitimate concerns that the amount currently set does not serve that interest. The
18 compulsion with which Defendant acted herein should cause this and any Court pause.

19 **B. The factors in NRS 178.4583 weigh in favor of increasing bail**

20 In NRS 178.4853, the Nevada Legislature has set out ten (10) factors the court, at a
21 minimum, shall consider, in deciding “whether there is good cause to release a person without
22 bail:” NRS 178.4583 is read in conjunction with NRS 178.498.

23 NRS 178.498 provides:

24 If the defendant is admitted to bail, the bail must be set at an amount
25 which in the judgment of the magistrate will reasonably ensure the
26 appearance of the defendant and the safety of other persons and of the
27 community, having regard to:

- 28 1. The nature and circumstances of the offense charged;
2. The financial ability of the defendant to give bail;
3. The character of the defendant; and
4. The factors listed in NRS 178.4853.

1 NRS 178.4853 provides as follows:

2 In deciding whether there is good cause to release a person without
3 bail, the court as a minimum shall consider the following factors
4 concerning the person:

- 5 1. The length of his residence in the community;
- 6 2. The status and history of his employment;
- 7 3. His relationship with his spouse and children, parents or other
8 members of his family and with his close friends;
- 9 4. His reputation, character and mental conditions;
- 10 5. His prior criminal record, including, without limitation,
11 any record of his appearing or failing to appear after
12 release on bail or without bail;
- 13 6. The identity of responsible members of the community
14 who would vouch for the reliability of the person;
- 15 7. The nature of the offense with which he is charged, the
16 apparent probability of conviction and the likely sentence,
17 insofar as these facts relate to the risk of his not appearing;
- 18 8. The nature and seriousness of the danger to the alleged victim,
19 any other person or the community that would be posed by the
20 person's release;
- 21 9. The likelihood of more criminal activity by him after he is
22 released; and
- 23 10. Any other factors concerning his ties to the community or
24 bearing on the risk that he may willfully fail to appear.

25 **II. ALL NON-MONETARY CONDITIONS AS WELL AS THE
26 CURRENT MONETARY CONDITIONS ARE INADEQUATE TO
27 SERVE THE COMPELLING STATE INTEREST OF SAFETY AS
28 THEY RELATE TO DEFENDANT**

Defendant is not a candidate for such a diminimus bail setting. Bail reform does not equate to bail abolishment. Such a miniscule bail amount should be made available to those individuals who commit property crimes and the like; not for those who brazenly sexually assault young people in broad daylight.

i. Length of residence in the community

Defendant lives in a halfway house and not in a residence with family support. A motion to unseal the history that places Defendant in that residence is being filed. In an abundance of

1 caution, the State will not discuss that history herein. The State is happy to provide that
2 information under seal as soon as it becomes available from the appropriate Court. In this
3 regard, The State believes the NPR is incorrect as that history is not reflected therein. Such a
4 residence can hardly be viewed as stable. Defendant is facing significant prison sentences in
5 the instant case and the evidence against him is extremely strong, as set forth above. That
6 provides an enormous incentive to flee the jurisdiction. Defendant has shown this Court his
7 willingness to flee as well as destroy evidence.

8 ***ii. Status of employment***

9 The State has no information regarding stable employment.

10 ***iii. Family relationships***

11 Defendant is believed to be speaking to his mother on the phone. The State has no
12 further information about family support. Notably, that parent did out keep him out of a
13 halfway house.

14 ***iv. Prior criminal history***

15 The State will bring any unsealed information to the Court's attention as soon as is viable.

16 ***v. Nature of offenses and apparent probability of conviction***

17 In review of the facts and evidence above, it is clear there is a high probability of
18 conviction in this case. Proof is evident herein and the likelihood of conviction is strong.
19 There is not a question of identity. There is physical corroboration in DNA, video surveillance,
20 Defendant's statements and injuries to K.M. Given the high likelihood of conviction and the
21 significant prison sentence he's facing, Defendant is a flight risk.

22 ***vi. Seriousness of danger to the community and likelihood of more criminal***
23 ***activity after release***

24 As addressed above, Defendant poses a substantial danger to the community given the
25 serious nature of the offenses with which he is charged.

26 ***vii. Availability of other avenues to ensure his presence in the future and to ensure***
27 ***the safety of the community.***

28 The State asserts that House Arrest would not be sufficient to protect the community or

1 ensure his good behavior while out of custody. Defendant was not abiding by his halfway
2 house curfew when this crime was committed. He fled from Officers upon contact. Defendant
3 even went so far as to destroy evidence herein. The risk that Defendant would commit another
4 crime of violence or flee is far too great such that the current bail adequately addresses those
5 issues.

6 **III. A HIGHER MONETARY BAIL IS NECESSARY TO SERVE THE**
7 **COMPELLING STATE INTEREST OF SAFETY AS THEY RELATE TO**
8 **DEFENDANT**

9 In this case, the State contends monetary bail is required to ensure Defendant's presence
10 at trial and the safety of the community. The nature and circumstances of the instant crimes
11 are despicable and have been described in detail above. The evidence against this Defendant
12 is sound and the probability of his conviction great. Defendant also faces a protracted term of
13 imprisonment upon being convicted of the crimes charged. This fact alone creates a greater
14 risk of flight.

15 Finally, the predatory manner in which Defendant battered, strangled and sexually
16 assaulted the victim in this case required the Court to set a responsible monetary bail. The bail
17 was set in this case is an insult to legitimacy of the victimization herein. The State's
18 compelling community safety interest is served by nothing short of an increase in monetary
19 bail that is commensurate with the danger it seeks to thwart. For the reasons stated above, the
20 State requests Defendant's current bail setting be increased to \$250,000, along with the added
21 conditions of High-Level Electronic Monitoring; surrender passport, and no contact with the
22 victim.

23 Based on the above information this Court should conclude by clear and convincing
24 evidence that Defendant is:

- 25 1. An extreme danger to the community as a sexual predator;
- 26 2. An overwhelming flight risk;
- 27 3. In a position where there is an extreme certitude of conviction.

28 By doing so this Court should conclude that no less restrictive means meet the
compelling State interests of presence and safety under Valdez-Jimenez v. Eighth Judicial

1 District Court, et. al., 136 Nev. Adv. Op. 6, 20 (April 9, 2020), and grant the State's Motion.

2
3 **CONCLUSION**

4 Based upon the above, the State requests this Court grant STATE'S MOTION TO
5 INCREASE BAIL AND RESTRICTIONS ON DEFENDANT JONES AS HE PRESENTS A
6 DANGER TO THE COMMUNITY AND A FLIGHT RISK.

7 DATED this 23rd day of March, 2021.

8 STEVEN B. WOLFSON
9 Clark County District Attorney
Nevada Bar #001565

10 BY 

11 STACEY KOLLINS
12 Chief Deputy District Attorney
Nevada Bar #005391

13
14
15 **CERTIFICATE OF SERVICE**

16 I hereby certify that service of the above and foregoing, was made this 23rd day of
17 March of 2021, by electronic mail to:

18 KRISTY S. HOLIDAY, Deputy Public Defender
19 E-mail Address: Kristy.Clark@clarkcountynv.gov

20
21 BY 

22 Employee of the District Attorney's Office
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28 21CR013085/SK/mlb/SVU

1 **OPPM**
2 DARIN F. IMLAY, PUBLIC DEFENDER
3 NEVADA BAR NO. 5674
4 NADIA HOJJAT, DEPUTY PUBLIC DEFENDER
5 NEVADA BAR NO. 12401
6 **PUBLIC DEFENDERS OFFICE**
7 309 South Third Street, Suite 226
8 Las Vegas, Nevada 89155
9 Telephone: (702) 455-4685
10 Facsimile: (702) 455-5112
11 Nadia.Hojjat@clarkcountynv.gov
12 *Attorneys for Defendant*

8 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,)
11) Plaintiff,) CASE NO. 21CR013085
12) v.) DEPT. NO. 11
13) LAPARESE JONES,)
14) Defendant,) DATE: April 7, 2021
15) TIME: 7:30 a.m.

16 **OPPOSITION TO STATE'S MOTION TO INCREASE BAIL AND**
17 **COUNTER-MOTION FOR OWN RECOGNIZANCE RELEASE**

18 COMES NOW, the Defendant, LAPARESE JONES, by and through NADIA HOJJAT,
19 Deputy Public Defender and hereby opposes the State's Motion to Increase Bail and instead asks
20 this Honorable Court for an own recognizance release with High Level Electronic Monitoring.

21 This Motion is made and based upon all the papers and pleadings on file herein,
22 the attached Declaration of Counsel, and oral argument at the time set for hearing this Motion.

23 DATED this 31st day of March, 2021.

24 DARIN F. IMLAY
25 CLARK COUNTY PUBLIC DEFENDER

26
27 By: /s/Nadia Hojjat
28 NADIA HOJJAT, #12401
Deputy Public Defender

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DECLARATION

NADIA HOJJAT makes the following declaration:

1. I am an attorney duly licensed to practice law in the State of Nevada; I am a Deputy Public Defender for the Clark County Public Defender's Office appointed to represent Defendant Laparese Jones in the present matter;

2. I am more than 18 years of age and am competent to testify as to the matters stated herein. I am familiar with the procedural history of the case and the substantive allegations made by The State of Nevada. I also have personal knowledge of the facts stated herein or I have been informed of these facts and believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).

EXECUTED this 31st day of March, 2021.

/s/Nadia Hojjat
NADIA HOJJAT

1 PROCEDURAL HISTORY

2
3 Mr. Jones was arrested on March 16, 2021. He had his initial arraignment in IA court on
4 March 18, 2021. At that time, the issue of bail was addressed by the parties. The Court found that
5 the State had met by clear and convincing evidence the burden of showing that there is no less
6 restrictive alternative to monetary bail to satisfy the interests of ensuring the defendant's
7 presence and community safety. The Court then set bail at \$25,000 with High Level Electronic
8 Monitoring as a condition of release.

9 Mr. Jones has remained in custody unable to pay the \$25,000 bail since that time. On
10 March 23, the State filed a Motion to Increase Bail asking for a \$250,000 bail. Argument for the
11 motion was set for April 7, 2021. Mr. Jones continues to sit in custody unable to afford a \$25,000
12 bail. This Opposition and Counter-Motion follows.

13 ABOUT MR. JONES

14
15
16 Mr. Jones is a 19 year old young man who is unemployed. He was born and raised here in
17 Las Vegas and has strong ties to the community. His mother resides here in Las Vegas, as do
18 several of his siblings. He has his mother's support and, if released from custody on high level
19 monitoring, would be able to reside with her and his siblings at her residence.

20 Mr. Jones came back as a "2" on the pretrial risk assessment, which is a "low." Even with
21 an override, he was only upgraded to a "moderate" risk by the assessor. He has no prior felony
22 convictions, no prior gross misdemeanor convictions, no prior misdemeanor convictions, and no
23 prior failures to appear to court.

24 His mother is financially unable to post a \$25,000 bail. She currently lives in Section 8
25 Authority Housing and receives \$790 per month in disability payments, as well as \$714 per
26 month in child support. Ms. Jones pays rent, utilities, food, and clothing for herself plus 3
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1 children on \$1500 per month. She cannot afford a \$25,000 bail figure, let alone a \$250,000 bail
2 figure.

3
4 **LAW AND ARGUMENT**

5 **1. Mr. Jones’s bail should not be increased, instead, he should be released from**
6 **custody pursuant to the factors laid out in Valdez-Jimenez v. Eighth Judicial**
7 **District Court**

8 The Nevada Supreme Court made significant changes to pre-trial detention in its recent
9 decision, Valdez-Jimenez v. Eighth Judicial District Court, 136 Nev. Adv. Op. 20 (2020). Prior
10 to Valdez-Jimenez, Nevada Revised Statute 178.4851(1) placed the burden on the defendant to
11 show by “good cause” why he should be released from custody. In Valdez-Jimenez, the Court
12 struck the “good cause” requirement as unconstitutional, explaining that the burden must be on
13 the State to show by clear and convincing evidence why a defendant should be detained.
14 Valdez-Jimenez, 136 Nev. Adv. Op. 20.

15 The Court made clear that the two primary considerations when addressing custody are
16 (1) ensuring the appearance of the accused at all stages of the proceeding; and (2) protecting the
17 safety of the victim and the community. Id. at 13. The purpose of pretrial detention is not
18 punishment for the crime alleged. Pretrial detention does not stem from the idea that an
19 individual who committed certain types of crimes should remain in custody. As the Nevada
20 Supreme Court previously held in In re Knast, “**punishment should follow conviction, not**
21 **precede it.**” 96 Nev. 597, 614 P.2d 2 (1980).

22 The State bears the “burden of proving **by clear and convincing evidence** that **no less**
23 **restrictive alternative** will satisfy its interests in ensuring the defendant’s presence and the
24 community’s safety.” Valdez-Jimenez, infra, at 19 (emphasis added) (internal citations omitted).

25 If, after consideration of all of the relevant factors, “the court finds that no combination
26 of nonmonetary conditions would be sufficient to reasonably ensure the defendant’s appearance
27 or the safety of the community,” only then may the court set a monetary bail. Id. at 16.

1 In the instant case, the IA Court did find that the State had made such a demonstration by
2 clear and convincing evidence. This is in spite of the fact that Mr. Jones scored only a “2” on the
3 assessment. Even with the manual override, Mr. Jones *still* was *not* considered a “high” risk.

4 With respect to concerns for the alleged victim’s safety, Mr. Jones has had absolutely no
5 contact with the alleged victim since the allegations were made and has made no efforts to have
6 any communications with her. This Court can fashion a wide range of conditions such as High
7 Level Monitoring, keeping Mr. Jones at his home, a stay away from the alleged victim, and a
8 requirement that Mr. Jones check in with the Court weekly via telephone. There is nothing to
9 suggest that nothing short of bail can ensure Mr. Jones return to court and stay out of trouble.

10 **2. Excessive bail and/or release conditions violate(s) the Federal and State**
11 **constitutions.**

12 The Eighth Amendment to the U.S. Constitution states, in part, that “excessive bail shall
13 not be required.” U.S.C.A. VIII. Similarly, the Nevada Constitution mandates that all
14 defendants “shall be bailable by sufficient sureties”¹ and that bail shall not be “excessive”. Nev.
15 Const. Art. 1 § 6-7. The constitutional right to bail is codified in Nevada statute, which requires
16 that “a person arrested for an offense other than murder of the first degree *must* be admitted to
17 bail.” NRS 178.484(1) (emphasis added).

18 The U.S. Supreme Court has defined excessive bail as “bail set at a figure higher than an
19 amount reasonably calculated to fulfill [this] purpose.” Stack v. Boyle, 342 U.S. 1, 5 (1951).
20 Release conditions also fall within the purview of the Eighth Amendment, and may not exceed a
21 purported threat posed by a particular defendant. U.S. v. Salerno, 481 U.S. 739, 754 (1987)
22 (requiring that “the Government’s proposed conditions of release or detention not be excessive in
23 light of the perceived evil.”) Thus, bail and/or release conditions cannot exceed that which is
24 minimally necessary to ensure the accused’s appearance in court and protect the community
25 against future dangerousness. U.S. v. Karper, 847 F. Supp. 2d at 362.

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28 ¹ The section makes an exception for cases involving a murder charge. Nev. Const. Art. 1 § 7.

1 The State seeks a \$250,000 bail when a \$25,000 bail is far outside of Mr. Jones' reach.
2 This would amount to an excessive bail. No reasoning has been given for why \$250,000 would
3 somehow better protect the community than \$25,000. Indeed, no reasoning has been given for
4 how *any* dollar amount "protects the community" more than having EMP keep Mr. Jones on
5 GPS and house arrest, away from the alleged victim and everyone else, and also having him do
6 weekly check ins with the court telephonically.

7
8 **3. Any bail imposed must be tailored to a detainee's financial means**

9 If the reviewing court determines that bail is appropriate, the court must set bail "in an
10 amount which... will reasonably ensure the appearance of the defendant and the safety of other
11 persons and of the community." NRS 178.498. In making this determination, the Court must
12 consider: "(1) the nature and circumstances of the offense charged; (2) the financial ability of
13 the defendant to give bail; (3) the character of the defendant; and (4) the factors listed in NRS
14 178.4853." NRS 178.498. Significantly, an accused's ability to give bail *must* be part of the bail
15 analysis. See Stack v. Boyle, 342 U.S. 1, 4-5 (1951) (stating "Bail set at a figure higher than an
16 amount reasonably calculated to fulfill [its] purpose is 'excessive' under the Eighth
17 Amendment").

18 The Nevada Supreme Court, in Cameron v. Eighth Judicial District Court, recently
19 reiterated that failure to consider a defendant's inability to pay seriously undermines NRS
20 178.498(2)'s requirement that the court assess a defendant's financial circumstances before
21 making a bail determination. Cameron v. Eighth Judicial Dist. Court in & for Cty. of Clark, 439
22 P.3d 957 (Nev. 2019).

23 The Court then again emphasized this principle in Valdez-Jimenez, writing that in
24 making the determination as to the amount of monetary bail, the Court "must take into
25 consideration the defendant's financial resources as well as other factors relevant to the purpose
26 of bail." Valdez, infra, at 16-17. "Consideration of how much the defendant can afford to pay is
27
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1 **essential** to determining the amount of bail that will reasonably ensure his or her appearance and
2 the safety of the community.” Id. at 17. (emphasis added).

3 “[B]ail must not be in prohibitory amount, more than the accused can reasonably be
4 expected under the circumstances to give, for if so it is substantially a denial of bail within the
5 constitutional provision.” Ex parte Malley, 50 Nev. 248, 253 (1927) (questioned on other
6 grounds by Ex Parte Wheeler, 406 P.2d 713, 81 Nev. 495 (1965)).

7 The Public Defender was appointed to represent Mr. Jones. Thus, the courts have already
8 determined that he is indigent. When determining an appropriate bail amount, “[R]egard must be
9 had to the circumstances and the ability of the prisoner...” Id.

10 The purpose of bail is to ensure the appearance of the individual, *not* to ensure he remains
11 in custody. Quite the contrary, the goal is to set a bail amount that the accused *can* meet.

12 Bail is excessive and, therefore, unlawful when not adjusted to a pretrial detainee’s
13 financial circumstances and not set at the minimum amount needed to ensure return to court.
14 Stack v. Boyle, 342 U.S. at 4-5 (bail exceeding that necessary to achieve its purpose violates
15 Eighth Amendment); see also, U.S. v. Salerno, 481 U.S. at 754 -55 (affirming Stack and holding
16 that “[w]hen the Government has admitted that its only interest is in preventing flight,
17 bail must be set by a court at a sum designed to ensure that goal, and no more”).

18 **RELIEF REQUESTED**

19 Mr. Jones requests this Honorable Court deny the State’s Motion to Increase Bail and
20 instead release him on his own recognizance with high level electronic monitoring and any other
21 conditions the Court deems necessary to protect the community.

22 DATED this 31st day of March, 2021.

23 DARIN F. IMLAY
24 CLARK COUNTY PUBLIC DEFENDER

25
26 By: /s/Nadia Hojjat
27 NADIA HOJJAT, #12401
28 Deputy Public Defender

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that service of the above and forgoing OPPOSITION TO STATE’S MOTION TO INCREASE BAIL AND COUNTER-MOTION FOR OWN RECOGNIZANCE RELEASE was served via electronic e-filing service to the Clark County District Attorney’s Office at motions@clarkcountynyda.com on this 1st day of April, 2021.

By: /s/ Sara Ruano
An employee of the
Clark County Public Defender’s Office

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SEP 07 2021

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

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THE STATE OF NEVADA,

Plaintiff,

-vs-

LAMAR STRINGER #5561758,

Defendant.

CASE NO. 21CR040752

DEPT. NO. 2

DA CASE NO: 202141835C

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50106); ATTEMPT SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category B Felony - NRS 200.364, 200.366, 193.330 - NOC 50124); FIRST DEGREE KIDNAPPING OF A MINOR (Category A Felony - NRS 200.310, 200.320 - NOC 50053); and SEX TRAFFICKING OF A CHILD UNDER 16 YEARS OF AGE (Category A Felony - NRS 201.300.2a1 - NOC 58003), in the manner following, to wit:

That the said Defendant, on or between June 18, 2021 and June 30, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

did, on or about June 30, 2021, then and there willfully, unlawfully, and feloniously sexually assault and subject R.L., a child under sixteen years of age, to sexual penetration, to wit: sexual intercourse, by inserting his penis into the genital opening of the said R.L., against his or her will, or under conditions in which Defendant knew, or should have known, that R.L. was mentally or physically incapable of resisting or understanding the nature of Defendant's conduct.

COUNT 2 - ATTEMPT SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

did, on or about June 30, 2021, then and there willfully, unlawfully, and feloniously

21-CR-040752
CRM
Criminal Complaint
13999584



1 attempt to sexually assault and subject R.L., a child under sixteen years of age, to sexual
2 penetration, to wit: by attempting to place his penis into the mouth of the said R.L., against his
3 or her will, or under conditions in which Defendant knew, or should have known, that R.L.
4 was mentally or physically incapable of resisting or understanding the nature of Defendant's
5 conduct.

6 COUNT 3 - FIRST DEGREE KIDNAPPING OF A MINOR

7 did, on or about June 30, 2021, willfully, unlawfully, and feloniously, lead, take, entice,
8 and/or carry away or detain R.L., a minor, with the intent to keep him or her for a protracted
9 period of time or permanently and/or imprison or confine the said R.L., from his or her parents,
10 guardians, or other person or persons having lawful custody of R.L., or with the intent to hold
11 R.L. to unlawful service, or to perpetrate upon the person of R.L. any unlawful act, to wit:
12 sexual assault.

13 COUNT 4 - SEX TRAFFICKING OF A CHILD UNDER 16 YEARS OF AGE

14 did, on or between June 18, 2021 and June 30, 2021, willfully, unlawfully, and
15 feloniously induce, cause, and/or recruit, R.L., a child under sixteen years of age, to engage in
16 prostitution.

17 All of which is contrary to the form, force and effect of Statutes in such cases made and
18 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
19 this declaration subject to the penalty of perjury.

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21 
22 _____
23 09/01/21
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25
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27 /mab
28 LVMPD EV# 210600136017
(TK02)

Justice Court, Las Vegas Township
Clark County, Nevada

Department: PC

Court Minutes



L013983410

21-PC-040752 State of Nevada vs. STRINGER, LAMAR

9/1/2021 9:00:00 AM Initial Appearance Justice
Court (PC Review)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Defendant Fattig, John STRINGER, LAMAR
Judge: Bonaventure, Joseph M.
Court Reporter: Nelson, Bill
Court Clerk: Espinoza, Jose

PROCEEDINGS

Hearings: 9/7/2021 7:45:00 AM: Status Check on Filing of Criminal Complaint

Added

Events: Probable Cause Found

72-Hour Hearing Completed

Counsel Provisionally Appointed

Counsel J. Bayudan, Esq. provisionally appointed for limited purposes of first appearance hearing.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004; 005; 006 - \$5,000.00/\$5,000.00 Total Bail

Release Order - Bail AND Electronic Monitoring - High Level

Bail Condition - Stay Out of Trouble

Bail Condition - No Contact with Victim

Comment

Defendant's family members present in the courtroom.

Continued for Status Check on filing of Criminal Complaint

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT

TCR1156867

County Jail City Jail Adult Juvenile Bureau: GVB

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)	(MIDDLE)	SSN#
[REDACTED]		LLV210600136017		STRINGER			LAMAR		[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB		
B	M	[REDACTED]	6'02"	190	BLK	BRO	LAS VEGAS, NEVADA		
ARRESTEE'S ADDRESS			STREET	BLDG/APT #	CITY		STATE	ZIP CODE	
[REDACTED]			[REDACTED]		NORTH LAS VEGAS		NEVADA	89032	
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)					
DATE: 6/30/2021	TIME: 05:00	DATE: 8/31/2021	TIME: 11:00	[REDACTED] NORTH LAS VEGAS NEVADA 89032					
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)									
206 N 3RD ST LAS VEGAS NEVADA 89101									
CHARGES / OFFENSES									
PC - LVJCR - 50106 - F - SEX ASSAULT AGAINST CHILD LESS THAN 16									
PC - LVJCR - 50124 - F - ATT SEX ASSAULT AGAINST CHILD LESS THAN 16									
PC - LVJCR - 50053 - F - KIDNAPPING OF MINOR, 1ST DEGREE									
PC - LVJCR - 58003 - F - SEX TRAFFICKING OF CHILD UNDER 16									
PC - LVJCR - 55226 - F - CHILD ABUSE OR NEGLECT, (1ST)									
CONNECTING REPORTS (TYPE OR EVENT NUMBER)									
SANE EXAM COMPLETED & INTERVIEW									

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 7 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 206 N 3RD ST LAS VEGAS NEVADA 89101 LAS VEGAS NEVADA 89101 and that the offense(s) occurred at approximately 05:00 hours on the 30th day of June, 2021.

Details for Probable Cause:

Patrol Response and Preliminary Investigation

On June 30th, 2021 at approximately 1632 hours Officers K. Urban P#18581 and C. Tirado P#9369 responded to University Medical Center, located at 1800 West Charleston Boulevard Las Vegas, Nevada 89106, reference a child molestation call under Las Vegas Metropolitan police Department (LVMPD) event LLV210600136027.

Once arrived, Officers contacted R.L. (a 15-year-old juvenile who for the remainder of this report will be referred to as R.L.) and her mother Rene Lyons. R.L. disclosed to Officers that she was the victim of a sexual assault that occurred at a party the night before and she suffered vaginal bleeding as a result. Prior to being sexually assaulted, R.L. said the suspect attempted to make her work as a prostitute. Officers on scene completed a crime report for sexual assault and R.L. received an exam by a sexual assault nurse examiner (SANE) which was processed accordingly. R.L.'s bloodstained underwear was also collected and impounded as evidence.

Your declarant was assigned this case due to the circumstances of the incident. Your declarant is a member of the LVMPD Vice Section and currently a Task Force Officer assigned to the Child Exploitation Task Force (CETF) which is responsible for investigating juvenile victims being exploited into commercial sex through prostitution (All terminology referenced for the remainder of this report will be explained from your declarant's experience as a Vice Detective in conducting numerous investigations).

Sexual Assault Test Kit

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: M MOORE P#: 15099

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 2 of 4

R.L. received a sexual assault examination by a SANE at UMC. This sexual assault kit was requested to be processed by the LVMPD Forensics Laboratory under Lab# 21-13787. This exam is still being processed at the time of this report.

Interview with R.L.

Your declarant and Detective C. Savino P#15100 met with R.L. and Rene at LVMPD Headquarters, located at 400 South Martin Luther King Boulevard Las Vegas, Nevada 89106. Detective Savino is also a member of the LVMPD Vice Section and currently assigned to CETF as a Task Force Officer. The following is not verbatim but a synopsis of the conversation with R.L. on 07-12-21. A recorded interview was conducted by your declarant and Detective Savino during this interview as well. A transcription of this interview will be available at a later date.

R.L. entered a polyamorous relationship with "Myah" and her boyfriend "Lamar" also known as "Ocho" in early June 2021 (Through investigative means "Lamar/Ocho" was identified as Lamar Stringer date of birth [REDACTED] by your declarant and will be referred to as Stringer for the remainder of this report. "Myah" was identified through investigative means as Jamyah Brown date of birth [REDACTED] and will be referred to as Brown for the remainder of the report). While in this relationship Stringer repeatedly pressured R.L. to have sex with him. R.L. refused because she did not want Stringer to take her virginity. R.L. said on one occasion she gave Stringer consensual oral sex in order not to have sex with him.

On June 29th, 2021 R.L. went to Brown's 18th birthday party at a hotel she knew as the "Grand Central" (possibly the Downtown Grand Hotel). Stringer was at the party and convinced R.L. to drink alcohol, though R.L. initially refused. R.L. drank to the point where she became sick and vomited in the bathroom. After vomiting R.L. sat on the toilet to urinate. While R.L. was urinating, Stringer entered the bathroom. Once inside the bathroom Stringer exposed his erect penis while standing in front of R.L. Stringer then attempted to force his penis inside R.L.'s mouth. R.L. tried to push Stringer away, then stood up to wash her hands (**Attempt Sexual Assault, Child Under 16 - 1 count**).

While washing her hands, R.L. said she felt Stringer forcefully insert his penis into her vagina from behind. R.L. dropped the soap into the sink and looked down to see blood on the bathroom floor. R.L. estimated the time frame for this was between 5 and 10 minutes. Afterward, R.L. was angry with Stringer for "popping her cherry" (the term "popping a cherry" is a term used to describe loss of virginity via penetration). The following day R.L. told her mother about what happened, and they drove to UMC where she completed a SANE exam (**Sexual Assault, Child Under 16 - 1 count**).

R.L. advised that while she did have permission to go to Brown's birthday party, she did not have permission from her mother, Lyons, to drink alcohol or engage in sex with Stringer. Stringer further enticed R.L. to drink alcohol to the point of intoxication where she was vomiting, at which point he held and detained R.L. inside the bathroom for the sole purpose of sexually assaulting her (**Kidnapping of a Minor 1st Degree - 1 count**).

Examination of R.L.'s Cellphone

While talking with your declarant and Detective Savino at LVMPD Headquarters R.L. showed numerous text messages on her cellphone with Stringer before and after the sexual assault. R.L. scrolled through these messages and allowed your declarant to photograph their conversation. R.L. said Stringer encouraged her on multiple occasions to work as a prostitute. R.L. never worked for Stringer or gave him any money. Excerpts from their text messages below corroborate R.L.'s statement. For the following conversation R.L. will represent [REDACTED] and Stringer will represent [REDACTED]

Friday June 18th, 2021 1358 hours

- Stringer: I know u be turning dates
- R.L.: Voice message response

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: M MOORE

P#: 15099

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 3 of 4

Stringer: Yeah I feel u this between u and me u ain't never just played nice and turned a date
R.L.: Voice message response (x2)
Stringer: So can we play nice and turn a date so we can get u a phone
R.L.: I have a phone (laughing emoji)
Stringer: I'm gone be in the next room all that
R.L.: We'll see (laughing emoji)
R.L.: Kause it's different now I don't like being so reckless kause I got a lot to loose
Stringer: That's why I'm here for to keep that shii in check
Stringer: U ain't gone lose shii
Stringer: Rn it's like wats to gain
R.L.: I'm telling you don't set them up for failure I will rob them and do them so dirtyyy
Stringer: Ain't no set up for failure
R.L.: Like I will kill them about my virginity that shit be scary that's why I drug them so I know I'm safe
Stringer: We gotta get some money fast
R.L.: Ight
Stringer: No
R.L.: Yesss
R.L.: They're getting drugger
Stringer: Just suck they dick and play nice
R.L.: Noo
R.L.: I'm not a hoe for the last time (100 emoji) you're the first Nigga dick I ever sucked
R.L.: I told y'all that I don't lie
(Later in the conversation)
Stringer: No matter how shii finna happen we gotta get it we got goals and a time limit we don't live forever
R.L.: I'm nice to you be nice to me
R.L.: Yea I know
Stringer: I'm very nice u can see one day
R.L.: Like I just got a job I already have \$1,000 dollars to buy my wholesale of wigs
R.L.: Like I have plans
R.L.: Why go a step backwards when I can do shit the legal way

Wednesday June 30th 1246 Hours

Stringer: Bitch wat
R.L.: Bro just leave me alone
Stringer: Ong don't ever try no weird shii wit my life
R.L.: Just leave me alone I have to go to the hospital
R.L.: I just can never get it back is what you don't understand

In the above messages Stringer attempted to recruit R.L. to work as a prostitute after R.L. said she did not want to and insisted she is not a prostitute. Stringer suggested R.L. "play nice and turn a date" (a date is commonly referred to as a meeting between a prostitute and a client where a sex act for money is involved). Stringer also suggested R.L. "suck they dick and play nice," when R.L. said she was scared to lose her virginity (Sex Trafficking a Child under 16 years old – 1 count).

Stringer caused R.L., a juvenile, unjustifiable mental suffering as a result of sexually assaulting her where she lost her virginity. Stringer also attempted to make R.L. work as a prostitute, causing further unjustifiable mental suffering (Child Abuse/Neglect – 2 Counts).

Identification of Stringer

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: M MOORE

P#: 15099

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 4 of 4

R.L. saved Stringer as the contact "Lamar (smiling emoji)" with the number [REDACTED] 8. R.L. also knew Stringer used the alias "Ocho". Your declarant located a shooting in January 2021 documented under LVMPD event LLV210100085708 where the person reporting was Lamar Stringer. Stringer used the phone number 702-929-0718 to call 911. Additionally, your declarant located a Facebook page with the name "ØckHø Bkaddk". Photographs on this page matched the description of Stringer.

On July 12th, 2021 Detective Savino conducted a photo line-up with R.L. under photo line-up number 53801. Six photographs with similar characteristics were shown to R.L. with one photo depicting Stringer in position number 3. R.L. picked photo number 3. Photo number 3 was in fact a picture of Stringer. While viewing the photo line-up R.L. wrote the statement, "#3 is who raped me".

Apprehension of Stringer

On August 31, 2021 at approximately 1030 hours LVMPD Criminal Apprehension Team (CAT) Detective B. LeBlanc P#7316 took Stringer into custody outside of 3106 Emeritus Circle North Las Vegas, NV 89032 as he was exiting a beige Buick sedan without license plates. Detective T. Radke P#5255, also a member of CAT, assisted and recovered Stringer's cellphone, a black iPhone with brown case, search incident to arrest on his person. Stringer was transported to Clark County Detention Center (CCDC) without incident.

Interview of Stringer

Your declarant and Detective Savino conducted a recorded interview with Stringer at CCDC. Stringer was read his Miranda rights, which was recorded and in the presence of Detective Savino. Stringer agreed to speak further after verbally acknowledged his rights in the affirmative. The following is not verbatim, but a synopsis of the recorded conversation. A transcription of this interview will be available at a later date.

Stringer gave his phone number as [REDACTED] and admitted to being in a relationship with R.L. whom he knew as "Ocean" in June 2021. Stringer acknowledged having consensual oral sex with R.L. Stringer also confirmed he was at a party with R.L. at the Downtown Grand, though he could not remember the room number. Stringer denied ever having sexual intercourse with R.L. during this party. When asked if his DNA would come back for any testing Stringer was unsure, but said it should not. Stringer said he believed R.L. was 17 years old.

When confronted with specific text messages from his conversation with R.L., Stringer denied that they related to him taking her virginity. Stringer said he knew R.L. was a virgin. When asked about messages with R.L. involving prostitution Stringer said he suggested that R.L. "sell pussy," as an alternative to stealing.

Probable Cause

Due to the facts and circumstances probable cause exists for Stringer's arrest for the following offenses: Sexual Assault of a Child Under 16, Attempt Sexual Assault of a Child Under 16, Kidnapping of a Minor 1st Degree, Sex Trafficking of a Child Under 16, and Child Abuse/Neglect (2 Counts).

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: M MOORE

P#: 15099

SEP 08 2021

BY: 

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

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THE STATE OF NEVADA,
Plaintiff,

-vs-

RICARDO MEDEROS #2844680,
Defendant.

CASE NO. 21CR040955

DEPT. NO. 2

DA CASE NO: 202142016C

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of OPEN OR GROSS LEWDNESS (Gross Misdemeanor - NRS 201.210 - NOC 50971); COERCION SEXUALLY MOTIVATED (Category B Felony - NRS 207.190, 175.547, 207.193 - NOC 55532); and RESIDENTIAL BURGLARY (Category B Felony - NRS 205.060.2C - NOC 61934), in the manner following, to wit: That the said Defendant, on or about the 29th day of August, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - OPEN OR GROSS LEWDNESS

did willfully and unlawfully commit an act of open or gross lewdness, by touching and/or rubbing and/or fondling the breast of K.B.

COUNT 2 - OPEN OR GROSS LEWDNESS

did willfully and unlawfully commit an act of open or gross lewdness, by ejaculating on the chest and/or face of K.B.

COUNT 3 - COERCION SEXUALLY MOTIVATED

did then and there, willfully, unlawfully and feloniously use physical force, or the immediate threat of such force, against K.B., with intent to compel her to do, or abstain from doing, an act which she had a right to do, or abstain from doing, by threatening to harm the said K.B. if K.B. told anyone about Defendant's conduct, one of the purposes for which the Defendant committed the offense was Defendant's sexual gratification.

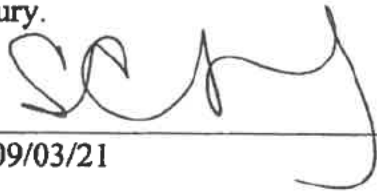
21-040956
CRM
Criminal Complaint
14005313



1 COUNT 4 - BURGLARY OF A BUSINESS

2 did willfully and feloniously unlawfully enter or unlawfully remain in a business
3 structure, owned or occupied by K.B., located at 3186 South Maryland Parkway, Las Vegas,
4 Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery,
5 and/or a felony.

6 All of which is contrary to the form, force and effect of Statutes in such cases made and
7 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
8 this declaration subject to the penalty of perjury.

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10 _____
11 09/03/21

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27 /mab
28 LVMPD EV# 210800131975
(TK02)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Department: PC

Court Minutes



L013992699

21-PC-040955 State of Nevada vs. MEDEROS, RICARDO

**9/2/2021 1:30:00 PM Initial Appearance Justice
Court (PC Review)**

Result: Matter Heard

PARTIES State Of Nevada Kochevar, Brian
PRESENT: Defendant MEDEROS, RICARDO

Judge: Bonaventure, Joseph M.

Court Reporter: Tavaglione, Dana

Court Clerk: Espinoza, Jose

PROCEEDINGS

Hearings: 9/8/2021 7:45:00 AM: Status Check on Filing of Criminal Complaint

Added

**Justice Court, Las Vegas Township
Clark County, Nevada**

Events: Media Request for Electronic Coverage Granted

Order Regarding Media Request for Electronic Coverage Filed

KLAS-TV

Comment

Kimberly A. Arguello- Deputy General Counsel for Nevada State Board of Nursing present in the courtroom.

Comment

Public Defender, M. Pensabene objects Deputy General Counsel for Nevada State Board of Nursing, Kimberly A. Arguello speak on the record on this case.

Probable Cause Found

72-Hour Hearing Completed

Counsel Provisionally Appointed

Counsel M. Pensabene, Esq. provisionally appointed for limited purposes of first appearance hearing.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004 - \$3,000.00/\$3,000.00 Total Bail

Release Order - Bail AND Electronic Monitoring - High Level

Bail Condition - Stay Out of Trouble

Bail Condition - No Contact with Victim

Bail Condition - Stay Away From

*Sunrise Hospital
3186 S. Maryland Pkwy
Las Vegas, NV 89121*

Bail Condition

Do not practice nursing

Continued for Status Check on filing of Criminal Complaint

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1157038

County Jail City Jail Adult Juvenile Bureau: SCAC

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)	(MIDDLE)	SSN#
[REDACTED]		LLV210800131975		MEDEROS			RICARDO		[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB		
W	M	[REDACTED]	5'09"	235	BLK	BRO	STOCKTON, CALIFORNIA		
ARRESTEE'S ADDRESS			STREET	BLDG/APT #	CITY	STATE	ZIP CODE		
[REDACTED]				422	HENDERSON	NEVADA	89014		
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)					
DATE: 8/29/2021	TIME: 23:00	DATE: 9/1/2021	TIME: 15:50	625 WHITNEY RANCH DR HENDERSON NEVADA 89014					
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)									
3186 MARYLAND PKWY S LAS VEGAS NEVADA 89169									
CHARGES / OFFENSES									
PC - LVJCR - 50971 - G - OPEN/GROSS LEWDNESS, (1ST) PC - LVJCR - 55532 - F - COERC W/FORCE OR THREAT OF FORCE, E/SEX									
CONNECTING REPORTS (TYPE OR EVENT NUMBER)									
FELONY ARREST PACKET									

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 16 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 3186 MARYLAND PKWY S LAS VEGAS NEVADA 89169 LAS VEGAS NEVADA 89169 and that the offense(s) occurred at approximately 23:00 hours on the 29th day of August, 2021.

Details for Probable Cause:

On August 29th, 2021, [REDACTED] became the victim of open and gross lewdness at Sunrise Hospital, located at 3186 South Maryland Parkway Clark County, Las Vegas, NV 89121.

SYNOPSIS

On August 29th and approximately 0315 hrs. Katherine was a patient at sunrise Hospital room #5544. She alleged that a subject did enter her hospital room while she was sleeping, ejaculated on her and told authorities that she saved a tissue and her face mask which contained semen. Katherine stated she waited to contact authorities out of fear due to threats made by the subject.

PRELIMINARY INVESTIGATION

Documented under LVMPD event number 210800131975, On August 31, 2021, Following Katherine notifying hospital authorities, Kierstin Niederschmidt, A hospital administrator, called police which were dispatched.

On August 31, 2021, I, Detective Zygmunt responded to Sunrise Hospital and contacted LVMPD patrol Officer R. Price P# 17087 and LVMPD CSI Lea P#17536. CSI and I, along with patrol Officer Price contacted Katherine at her room 5544.

LVMPD CSI Lea, conducted a preemptive field test of the tissue and face mask provided by [REDACTED] Per CSI the test was positive on both for semen. Photographs were taken of the tissue and facemask along with Photographs of Katherine and the hospital room. The Tissue and face mask were recovered by CSI Lea and later booked in at LVMPD Criminalistics.

INTERVIEW WITH VICTIM

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: P ZYGMONT

P#: 8558

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 2 of 5

On August 31, 2021, I conducted a taped interview with [REDACTED] at Sunrise Hospital room #5544, witnessed by Officer Price. A transcribe copy will be available later. Below is a Synopsis.

[REDACTED] detailed that she received medication, specifically Dilaudid and Benadryl, around 2:30 in the morning on August 29th, she became drowsy and started to fall asleep. A male subject, who she identifies as the Charge Nurse, Ricky or Ricardo came into her room around 0300-0315 hrs while she was sleeping. She stated that she awoke to a pressure on her chest and her gown open. She stated she observed Ricardo hands on her breasts, his penis was exposed, his penis was erect, he was masturbating, and ejaculated on her chest and face. She said that he turned around to obtain a medical wipe to clean off the ejaculation and when he did, she wiped off some of the semen from her chest with a tissue. She said he turned back around not seeing the tissue she had and wiped off her face and chest and pulled her mask back up over her mouth and nose.

[REDACTED] said that after he pulled up the mask, she had some residue in her mouth, so she spit it into the mask. She stated that Ricardo then threatened her to not tell anyone, specifically "He had people that could make sure that I didn't speak again", and "people on this floor will take care of it if you say anything", and "he would say that I was blackmailing him for pain meds". The victim told me during her interview that the medication she takes makes her drowsy and her times could be "a little fuzzy", however, she told me that on the same night this incident occurred there was some sort of commotion going on in the room next door and she overheard that a guest at the hospital was asked to leave after having been caught smoking in the bathroom, so she is certain these acts occurred the same night. (See follow up section, below for clarification [September 1, 2021])

During the interview with [REDACTED] she told me that this same subject, who she identifies as Ricky or Ricardo completed the same act previously on what she believed to be by August 24th. She described that the circumstances were similar, and the subject entered her room at night while she was sleeping and after her medication. She stated that he had his hands on her breasts, his penis was exposed, his penis was erect, he was masturbating, and ejaculated on her chest. She states that he used a medical wipe to clean off her chest after that act and then made to above mentioned threats. She stated that she was afraid to tell anyone because of the threats that he made, and she had no evidence to prove what she alleged. She states following the act he would enter her room, several times, to "remind her" not to say anything and "remind" her of his threats.

Per the victim and following this incident the victim found out when Ricardo was not scheduled to work and notified Hospital authorities. (*victim stated this occurred on the evening of August 28th into the morning of August 29th*)

FOLLOW UP August 31

On August 31, 2021, I, Detective Zygmunt contacted Sunrise Hospital Security Director at the hospital. Per Director Rodriguez, hospital records show the Charge Nurse assigned to the victim's floor on August 29th, 2021, the subject in question is Ricardo Mederos DOB [REDACTED] home address; [REDACTED]

Per Director Rodriguez, video surveillance shows Mederos entering the victim's room on the below date and time. A copy of the video surveillance will be available later.

Per Director Rodriguez, video surveillance shows Mederos entering the victim's room on the below date and time. A copy of the video surveillance will be available later.

Below is video surveillance of subject entering at 11:09:41 PM 8/28/2021

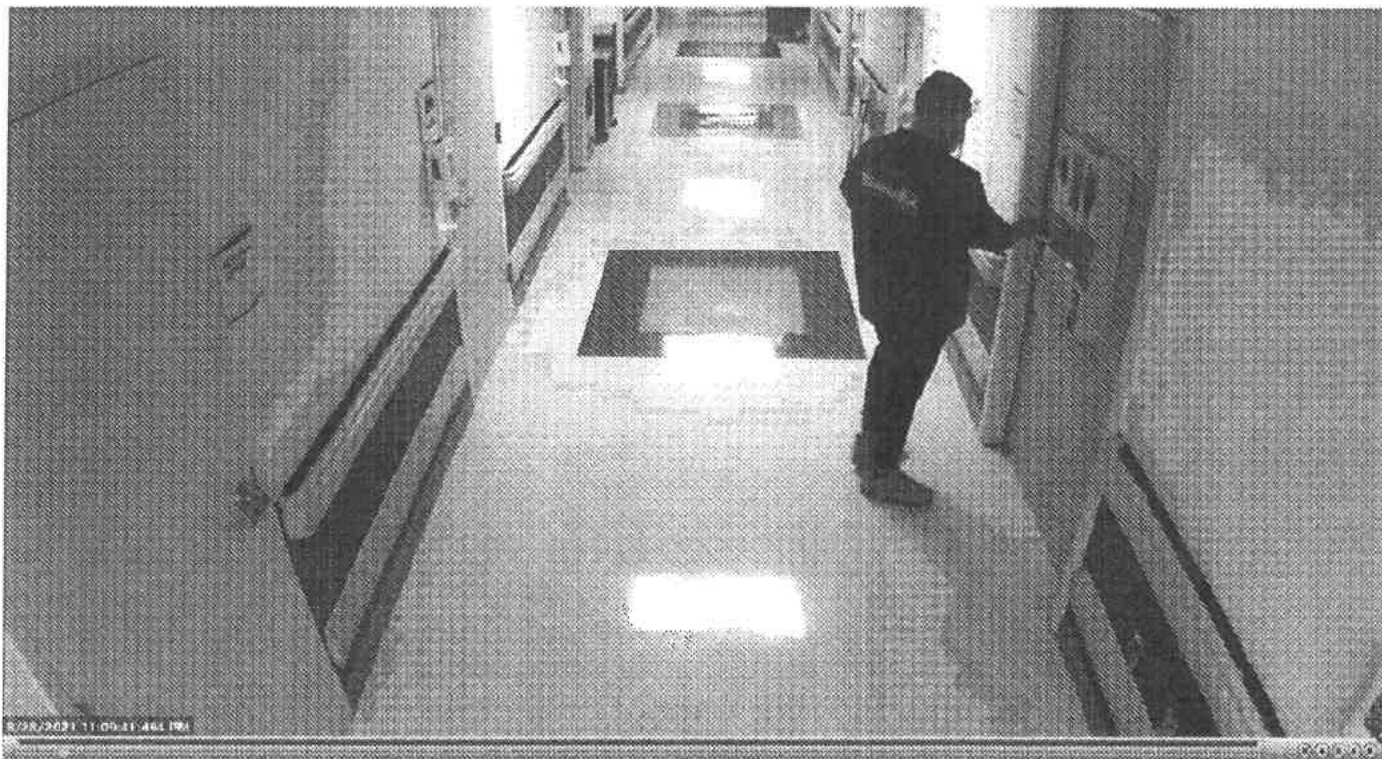
Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: P ZYGMONT

P#: 8558

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 3 of 5



Below is video surveillance of subject exiting at 11:11:40 PM 8/28/2021

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: P ZYGMONT

P#: 8558

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

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DETECTIVE FOLLOW UP SEPTEMBER 1, 2021

I contacted Director Rodriguez about the above-mentioned commotion on the same floor as the victim. Director Rodriguez confirmed there was an incident at room #5545 matching that description. Director Rodriguez provided me with the following details:

This occurred 08-28-2021:

2030: SECURITY ASSISTANCE/ AMA PATIENT REFUSING TO LEAVE: CHARLES WHEELER-6546. SECURITY RESPONDED TO ROOM# 5545 FOR PATIENT THAT WAS CAUGHT SMOKING IN THE BATHROOM. THE PATIENT DECIDED TO LEAVE A.M.A AFTER BEING CAUGHT. HOWEVER THE AMA PATIENT WAS REFUSING TO LEAVE AND BERATED THE MEDICAL STAFF. SECURITY ARRIVED AND ESCORTED THE INDIVIDUAL OFF PROPERTY.

I completed an Application and Affidavit for Buccal Search Warrant directing a search for and seizure of Epithelial cells from the mouth of Mederos, Ricardo to be collected via Buccal Swab; or A blood sample from the person of Mederos, Ricardo. Application and Affidavit was approved by Chief Deputy District attorney Elizabeth. The search warrant was approved by Honorable Judge Jacqueline M. Bluth, District Court Clark County.

September 1, 2021, LVMPD Detectives with the Major Violators section apprehended Ricardo Mederos at his home address; [REDACTED] Mederos was placed into custody at 1550 hours.

Detective Hammond and I arrived a short time later and served the above-mentioned search warrant, recovering Epithelial cells from the mouth of Mederos, Ricardo at 1658 hours. Mederos told Detectives that he wanted to talk about the situation but asked to speak to his Lawyer first, any and all questioning directed toward Mederos in reference to the situation ceased.

(DNA results pending) Evidence was impounded at South Central Area Command.

CONCLUSION

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: P ZYGMONT

PH: 8558

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

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Per NRS 207.190.2A

1. It is unlawful for a person, with intent to compel another person to do or abstain from doing,
2. An act which that person has a right to do or abstain from doing, to
3. use violence or inflict injury upon another person, family, or property.
4. Threaten to do so.
5. Deprive the person of any tool, implement or clothing or hinder them in the use thereof.
6. Attempt to intimidate the person by threats or force.

Ricardo Mederos did threaten the victim Katherine Burnett that if she told anyone about the incidents that occurred, in such a manner that the victim was in grave fear that if she told anyone about the acts, she believed that Mederos had the ability and opportunity to complete said threats.

Per NRS 201.210 Open and Gross Lewdness

An act in open and public place. More than just exposure. To include groping, rubbing, touching of one's person or the person of another. Touching is sexual in nature, to include masturbation.

Based on the above facts, Ricardo Mederos did enter the hospital room Hospital room #5544, on August 24th, 2021, while the victim was sleeping, ejaculated on her against her will (1 count Open and Gross Lewdness), August 28th, 2021, while the victim was sleeping, ejaculated on her against her will (2nd count Open and Gross Lewdness), and threatened the victim with personal harm if she reported the act to authorities (1 count Coercion W/force or threat of force, E/Sex), **RICARDO MEDEROS** was arrested and booked into Clark County Detention center accordingly.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: P ZYGMONT

P#: 8558

SEP 09 2021

BY: PDC

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

ALEJANDRO CARRION #6002609,

Defendant.

21CR041594

13

DA CASE NO: 202142822C

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of DRIVING UNDER THE INFLUENCE RESULTING IN DEATH (Category B Felony - NRS 484C.110, 484C.430, 484C.105 - NOC 53908), RECKLESS DRIVING (Category B Felony - NRS 484B.653 - NOC 53896), FAILURE TO MAINTAIN TRAVEL LANE (Misdemeanor - NRS 484B.223 - NOC 53788) and DRIVING WITHOUT A VALID LICENSE (Misdemeanor - NRS 483.550 - NOC 53720), in the manner following, to wit: That the said Defendant, on or about the 6th day of September, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - DRIVING UNDER THE INFLUENCE RESULTING IN DEATH

did then and there willfully and unlawfully drive and/or be in actual physical control of a vehicle on or off a highway at North Farm Road and Tenaya Way, Las Vegas, Clark County, Nevada, Defendant being responsible in one or more of the following ways and/or under one or more of the following theories, to wit: 1) while under the influence of intoxicating liquor to any degree, however slight, which rendered him incapable of safely driving and/or exercising actual physical control of a vehicle, 2) while he had a concentration of alcohol of .08 or more in his blood, and/or 3) when he was found by measurement within two (2) hours after driving and/or being in actual physical control of a vehicle to have a concentration of alcohol of .08 or more in his blood, Defendant, while driving and/or in actual physical control of a vehicle, failing to pay full time and attention to his driving, failing to exercise due care, and/or failing to drive in a careful and prudent manner, which acts, or neglect of duties,



1 proximately caused the vehicle Defendant was driving and/or in actual physical control of, to
2 strike and collide with a vehicle being driven or occupied by SUSAN VILLELLA, said
3 collision proximately causing death to SUSAN VILLELLA.

4 COUNT 2 - RECKLESS DRIVING

5 did then and there willfully, unlawfully, and feloniously drive a motor vehicle at North
6 Farm Road and Tenaya Way, Las Vegas, Clark County, Nevada, with willful or wanton
7 disregard for the safety of persons or property, by driving said vehicle without paying full time
8 and attention to his driving, and/or failing to exercise due care, and/or failing to drive in a
9 careful and prudent manner, and/or driving on the wrong side of the road and colliding head
10 on with SUSAN VILLELLA's vehicle, which acts, or neglect of duties, proximately causing
11 the death of or substantial bodily harm to SUSAN VILLELLA.

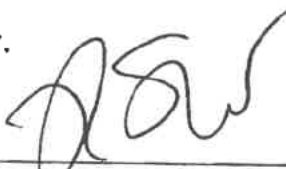
12 COUNT 3 - FAILURE TO MAINTAIN TRAVEL LANE

13 did then and there willfully and unlawfully fail to drive a motor vehicle as nearly as
14 practicable entirely within a single lane while operating a motor vehicle at North Farm Road
15 and Tenaya Way, Las Vegas, Clark County, Nevada, a highway with two or more clearly
16 marked lanes for traffic traveling in one direction.

17 COUNT 4 - DRIVING WITHOUT A VALID LICENSE

18 did then and there willfully and unlawfully operate a motor vehicle, on North Farm
19 Road and Tenaya Way, Las Vegas, Clark County, Nevada, without first being the holder of a
20 valid driver's license.

21 All of which is contrary to the form, force and effect of Statutes in such cases made and
22 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
23 this declaration subject to the penalty of perjury.

24 

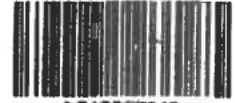
25 _____
09/08/21

26
27 /vw
28 LVMPD EV# 210900023524
(TK12)

Justice Court, Las Vegas Township
Clark County, Nevada

Department: PC

Court Minutes



L013997643

21-PC-041594 State of Nevada vs. CARRION, ALEJANDRO

Lead Atty: Bret O Whipple

9/7/2021 9:00:00 AM Initial Appearance Justice Court (PC Review)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Attorney Defendant Scow, Richard Whipple, Bret O CARRION, ALEJANDRO

Judge: Bonaventure, Joseph M.
Court Reporter: Nelson, Bill
Court Clerk: Garcia, Maria D.

PROCEEDINGS

Attorneys: Whipple, Bret O CARRION, ALEJANDRO Added

Hearings: 9/9/2021 7:30:00 AM: Status Check on Filing of Criminal Complaint Added

Events: Counsel Confirms as Attorney of Record

B. Whipple, Esq.

Case Re-tracked to the DUI Department

Case Administrative Reassignment to Department 13

Probable Cause Found

72-Hour Hearing Completed

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Individualized Custody Status Hearing Held

The Court conducted an individualized determination regarding the defendant's custody status. Both the State and the Defendant's provisionally appointed counsel had the opportunity to present evidence and argument regarding the Defendant's custody status. The Court has also considered factors set forth in NRS 178.4853 and NRS 178.498 and has considered the Defendant's financial resources when a financial affidavit was available and/or when the defendant was present in court.

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002; 003; 004; 005; 006; 007 - \$8,000.00/\$8,000.00 Total Bail

Bail Condition

Abstain from alcohol

Bail Condition - SCRAM

Bail Condition - Stay Out of Trouble

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1157858

County Jail City Jail Adult Juvenile Bureau: TRF

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)		(MIDDLE)		SSN#
[REDACTED]		LLV210900023524		CARRION			ALEJANDRO				[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB				
W	M	4 [REDACTED]	5'05"	130	BLK	BRO	LAS VEGAS, NEVADA				
ARRESTEE'S ADDRESS			STREET		BLDG/APT #	CITY		STATE		ZIP CODE	
[REDACTED]			[REDACTED]			NORTH LAS VEGAS		NEVADA		89030	
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)							
DATE: 9/6/2021	TIME: 07:31	DATE: 9/6/2021	TIME: 07:38	FARM RD / N TENAYA WAY LAS VEGAS NEVADA 89131							
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)											
FARM RD / N TENAYA WAY LAS VEGAS NEVADA 89131											
CHARGES / OFFENSES											
PC - LVJCR - 53908 - F - DUI, R/D											
PC - LVJCR - 53788 - M - FAIL MAINT LANE/IMPROPER LANE CHANGE											
PC - LVJCR - 53720 - M - DRIVE W/O DRV-LIC											
PC - LVJCR - 53896 - F - RECKLESS DRIVING, R/DOSBH											
PC - LVJCR - 54057 - M - FAIL WEAR SAFETY BELT/SHOULDER HARNESS											
PC - LVJCR - 62073 - F - POSS SCH I, II C/S LT 14 GRAMS, 1ST OR 2ND OFF											
CONNECTING REPORTS (TYPE OR EVENT NUMBER)											
NHP5, TCR, DOAR, SFST, IDR											

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 4 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of FARM RD / N TENAYA WAY LAS VEGAS NEVADA 89131 LAS VEGAS NEVADA 89131 and that the offense(s) occurred at approximately 07:31 hours on the 6th day of September, 2021.

Details for Probable Cause:

Narrative to follow

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: A JEGGE

P#: 16432

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
IMPAIRED DRIVING REPORT

Event Number: LLV210900023524
 I.D. Number: 6002609

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS:

That I am a Police Officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada being so employed for a period of 4 years. That I learned the following facts and circumstances which led me to believe that the below subject committed (or was committing) the offense of Felony Driving Under The Influence (DUI) Misdemeanor Driving Under The Influence (DUI) at the following location: Farm Rd / N Tenaya Was Las Vegas NV 89131.

Additional offense(s) that occurred: Reckless resulting in death, fail to maintain single lane of travel, no valid driver's, no seatbelt, no license, possession of controlled substance.

These offense(s) occurred at approximately 07:31 hours on the 6th day of September, 2021, in the

County of Clark City of Las Vegas City of North Las Vegas City of Henderson Boulder City Mesquite

DEFENDANT & VEHICLE

Last Name Carion	First Name Alejandro	Middle Name	Suffix (Jr., Sr., II, III, etc.)
Driver's License # [REDACTED]	State/Country NV	Status of License: <input type="checkbox"/> Valid <input type="checkbox"/> Suspended <input type="checkbox"/> Expired <input type="checkbox"/> Revoked (Date of Revocation) _____ to _____	<input checked="" type="checkbox"/> No License <input type="checkbox"/> ID Card Only
Vehicle Year 2002	Vehicle Make Chevrolet	Vehicle Model Tahoe	Body Style SUV
Vehicle Color Silver	License Plate # 304J91	License State NV	VIN # 1GNEC13Z72R138525

GIVE DETAILED INFORMATION AND CIRCUMSTANCES ON WHY THE VEHICLE WAS STOPPED AND/OR THE DRIVER WAS CONTACTED

<input type="checkbox"/> Traffic Stop	<input checked="" type="checkbox"/> Collision	Time of Call 07:31	<input type="checkbox"/> 9-1-1 Call	<input type="checkbox"/> Stopped/Parked Vehicle
<input type="checkbox"/> DUI Checkpoint	Enroute Time 07:32	Arrival Time 07:35		

VOLUNTARY CONSENT TO TESTING FOR EVIDENTIARY SAMPLE(S) / SEARCH WARRANT SECTION

SUSPECTED IMPAIRMENT

- I am requesting that you submit to an evidentiary test to detect the presence of alcohol and/or drugs. FYI
 (ALCOHOL IMPAIRMENT) - Will you submit to a breath and/or a blood test? Yes No (CHOICE)
 (DRUG IMPAIRMENT) - Will you submit to a blood test? Yes No

ONLY READ IF APPLICABLE

- I am requesting a blood test because you have caused death or substantial bodily harm to another person as a result of your driving while impaired by a prohibited or controlled substance or an alcoholic beverage.

Will you submit to a blood test? Yes No

(PER DISTRICT ATTORNEY'S OFFICE, FOR ALL DEATH AND SUBSTANTIAL INJURY CASES THEY REQUEST YOU OBTAIN A SEARCH WARRANT FOR BLOOD)

- Reason subject was not asked to submit to an evidentiary test? (Examples: Unconscious or Sedated)

Advised by Officer: A. Jegge P#: 16432 Date: 09/06/21 Time: 07:38

- Electronic/Telephonic Search Warrant Obtained 09/06/21 08:21 Approved by Judge: E. Graham
- Time Search Warrant Process Started: 07:57
- Exigent Circumstances (Describe in detail why a warrant was not obtained.)

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
IMPAIRED DRIVING REPORT

Event Number: LLV210900023524

I.D. Number: 6002609

VOLUNTARY CONSENT TO TESTING FOR EVIDENTIARY SAMPLE(S) / SEARCH WARRANT SECTION

ADVISED THE SUBJECT OF THE DMV NOTICE AFTER WARRANT IS SERVED (APPLICABLE ONLY WHEN THEY REFUSED)
(I am required to inform you that your license, permit or privilege to drive will be revoked and/or suspended due to refusing to submit to a voluntary sample of your blood and/or breath)

The evidentiary test was obtained: within 2 hours of physical control
 past 2 hours (Explain reason on alcohol related only.)

Prior DUI Convictions: (List date of arrest(s), jurisdiction of arrest, Case Number or Event Number and date of the conviction(s) for DUI)
"This is for all DUI convictions in the last 7 years and not arrests only." **IF CONVICTED OF FELONY DUI, all future arrests are Felony DUI**

Details:

02/09/19, Nevada Highway Patrol, NLV1906190012660, Conviction date 12/02/19.

EVIDENTIARY SAMPLE INFORMATION

Subject submitted to which evidentiary test:

Location of Test: CCDC LV City Jail Hospital Other Location _____

Breath Test Obtained @ _____ hours, _____, 20 Results of Breath Test: _____

Breath Test Administered by: _____

1st Blood Kit (with 2 tubes) Collected @ 9/6 hours, 08:31, 20 21 Pending

2nd Blood Kit (with 2 tubes) Collected @ 9/6 hours, 09:31, 20 21 Pending

Blood Test Drawn By: D. Rubalcaba Blood Test Witnessed by: A. Jegge

Urine Sample Obtained @ _____ hours, _____, 20 Pending

Urine Test Witnessed by: _____

Subject was unable to provide sample. (Explain)

Specimen(s) were stored and impounded at: CCDC Las Vegas City Jail LVMPD Traffic Bureau Evidence Vault

Forced sample obtained due to the following circumstances: (Explain: Restraints or Restraint Chair used at the jail)

Drug(s) are suspected and a screen was requested for the following controlled substance(s):

Stimulants, Hallucinogens

NARRATIVE - EXPLAIN THE 3 PHASES OF DUI DETECTION

VEHICLE IN MOTION - Articulate the reasonable suspicion or Probable Cause to pull over the driver. Explain what driving pattern was observed. This includes information from witnesses or other officers. Describe how the driver reacts to the police vehicle and the manner they stopped. Include how you determined the time of physical control and the location the vehicle was stopped or contacted. List contact information for witnesses or use a separate WITNESS LIST form. (COLLISIONS ARE NOT DOCUMENTED IN THIS SECTION).

On September 6th, 2021 at approximately 0730 hours, I, Officer A. Jegge P#16432 while operating as marked traffic unit T287 was dispatched to a vehicle collision on Farm Rd west of Tenaya Way. Details of the call stated a head on collision had occurred between two vehicles, a White Chevrolet Tahoe and a Blue Toyota Prius.

See NHP5 report by Officer Z. Lenner's P#16093.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
IMPAIRED DRIVING REPORT

Event Number: LLV210900023524
I.D. Number: 6002609

PERSONAL CONTACT- Articulate the reasonable suspicion or Probable Cause to have the driver exit the vehicle. This also includes any interactions at the door, including signs and symptoms of impairment, admissions of drug/medication/alcohol use, trouble with paperwork, and how they exit the vehicle. Document if the vehicle is running or not, location of the keys and the position the driver is seated. This can include your conversations at the hospital or outside the vehicle, prior to administering field sobriety tests. (COLLISION INFORMATION DOCUMENTED IN THIS SECTION). Explain what other details you obtained from your investigation.

Upon arrival, I made contact with the driver the of the White Chevrolet Tahoe bearing 304J91 NV plates identified by his Nevada ID as Carrion, Alejandro [REDACTED]

A witness verbally identified as Horlacher, Scott [REDACTED] observed Carrion climb out of the White Chevrolet Tahoe right after the collision occurred. Horlacher remained by Carrion's side as I arrived on scene.

Carrion had a strong odor of alcohol emitting from his person, and blood shot watery eyes.

Search incident to arrest, I recovered two small plastic baggies containing a brown leafy substance and a white powdery substance in Carrion's wallet. Carrion's wallet was in his front left pants pocket. The brown leafy substance appeared to be Psilocin and Cocaine.

PRE ARREST SCREENING - Articulate the results of the field sobriety tests and other information that assisted in the decision to arrest for DUI and/or additional charges. This would include prior arrests, citations for paraphernalia, evidence located at the stop or on the person, any admission made during the process of taking the person into custody, enroute to the jail, at the hospital, or during the booking process.

I attempted to perform Standardized Field Sobriety Tests on Carrion at approximately 07:36 hours.

Carrion did not want to answer any questions, refused to follow my instructions and shook his head when I asked him if he wanted to perform Standardized Field Sobriety Tests.

Carrion was placed in custody for DUI resulting in Death NRS 484C.430 at approximately 07:38 hours.

A search warrant was obtained and by the honorable Judge Elana Graham at approximately 0821 hours.

Two evidentiary blood samples were taken from Carrion at 0831 hours and 0931 hours at UMC.

Carrion was transported to CCDC where he was booked accordingly.

Wherefore this Declarant prays that the Honorable Magistrate find probable cause exists to hold the above named person for trial on such charge(s).

A. Jegge P#16432

Print Name and P#


Signature of Arresting Officer

Dated this 6th Day of September, 2021

Signature of Supervisor / P# / Date Approved

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
STANDARDIZED FIELD SOBRIETY TESTS RECORD

BODY CAMERA
 YES NO

IMPAIRMENT DETECTED
 YES NO

SUBJECT'S NAME Carrion, Alejandro		ID # 6002609	EVENT # LLV210900023524	
LOCATION OF SFSTS/INTERVIEW Farm Rd / N Tenaya Way Las Vegas NV 89131		OFFICER A. Jegge	DATE 09/06/21	TIME 07:38

PHYSICAL OBSERVATIONS: (Check Applicable Block(s))

Eyes: Bloodshot Watery Droopy Blank Stare Dilated/Constricted Pupils Eyelid Tremors

Odor: Odor Alcohol No Odor Marijuana/Spice Chemical/Paint Other (Describe Below)

Odor Strength: Strong Moderate Slight Odor Source: Breath Person/Clothing Vehicle

Speech: Slurred Mumbled Confused Slow Not Understandable Rapid

Gait: Unsteady Stiff Need Support Falling Over Unsure Leaning on Objects/Support

Attitude: Polite Cooperative Talkative Insulting Argumentative
 Excited Aggressive Combative Unresponsive

Clothing: Soiled Urinated Unkempt Unfastened Other (Describe Below)

Other Observations:

DO YOU HAVE ANY INJURIES? <input type="checkbox"/> YES <input type="checkbox"/> NO	DO YOU HAVE ANY ILLNESS? <input type="checkbox"/> YES <input type="checkbox"/> NO	DOCTOR/DENTIST NAME	LAST VISIT
DO YOU HAVE EPILEPSY? <input type="checkbox"/> YES <input type="checkbox"/> NO	DO YOU HAVE DIABETES? <input type="checkbox"/> YES <input type="checkbox"/> NO		
ARE YOU TAKING MEDICATION? <input type="checkbox"/> YES <input type="checkbox"/> NO	DESCRIBE		LAST DOSAGE (TIME)
ARE YOU USING ILLEGAL DRUGS? <input type="checkbox"/> YES <input type="checkbox"/> NO	DESCRIBE		LAST USED
ARE YOU USING MARIJUANA? <input type="checkbox"/> YES <input type="checkbox"/> NO	DESCRIBE		LAST USED
HAVE YOU CONSUMED ANY ALCOHOLIC BEVERAGES? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WHAT AND HOW MUCH? Numerous Jack & Cokes	LOCATION CONSUMED PT's Lake Mead Blvd and Tenaya Way	TIME STARTED STOPPED AT 07:00
WERE YOU IN A COLLISION? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WHAT TIME DID THE COLLISION OCCUR?	WHAT ROADWAY WERE YOU ON?	
WERE YOU DRIVING OR IN PHYSICAL CONTROL? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WHO OWNS THIS VEHICLE?	WHERE WERE YOU GOING?	WHERE DID YOU START?

STANDARDIZED FIELD SOBRIETY TESTS (HGN/ WAT/OLS)

TYPE OF SHOES/CLOTHING Gray tennis shoes, gray sweat pants, pink button up shirt	SURFACE CONDITIONS DURING SFSTS (Describe) Flat, level, debris free
WEATHER CONDITIONS DURING SFSTS (Describe) Calm, dry, warm	LIGHTING CONDITIONS DURING SFSTS (Describe) Daylight

GENERAL INSTRUCTIONS TO SUBJECT:
 "I AM GOING TO ADMINISTER A SET OF TESTS TO DETERMINE WHETHER OR NOT YOU ARE IMPAIRED. MY EVALUATION WILL BE BASED UPON HOW WELL YOU FOLLOW MY INSTRUCTIONS AND WHETHER OR NOT THE TESTS ARE PERFORMED EXACTLY AS I DEMONSTRATED THEM. DO YOU UNDERSTAND?" YES NO

INSTRUCTIONS TO SUBJECT	SCORING CRITERIA	SUBJECT'S PERFORMANCE		
		Left	Right	Total Clues
HORIZONTAL GAZE NYSTAGMUS Are you wearing contacts? <input type="checkbox"/> YES <input type="checkbox"/> NO HARD/SOFT If glasses are worn, remove them.	LACK OF SMOOTH PURSUIT	<input type="checkbox"/>	<input type="checkbox"/>	
*Put your feet together, hands at your side. Keep your head still and follow the movement of (the stimulus) with your eyes only. Continue following (the stimulus) with your eyes until told the test is over. Do you understand? <input type="checkbox"/> YES <input type="checkbox"/> NO	DISTINCT AND SUSTAINED NYSTAGMUS AT MAXIMUM DEVIATION	<input type="checkbox"/>	<input type="checkbox"/>	
	ONSET OF NYSTAGMUS PRIOR TO 45 DEGREES	<input type="checkbox"/>	<input type="checkbox"/>	
IMPAIRMENT DETECTED (4 OR MORE CLUES PRESENT)		<input type="checkbox"/> YES <input type="checkbox"/> NO		
VERTICAL GAZE NYSTAGMUS		<input type="checkbox"/> YES <input type="checkbox"/> NO		
Resting nystagmus?	<input type="checkbox"/> YES <input type="checkbox"/> NO			
Equal pupil size?	<input type="checkbox"/> YES <input type="checkbox"/> NO			
Equal tracking?	<input type="checkbox"/> YES <input type="checkbox"/> NO			

OTHER EYE OBSERVATIONS:

REFUSED TO COMPLETE SFSTS

WALK-AND-TURN
 Designated Line Imaginary Line
 Shoes Removed YES NO

"Place your LEFT foot on the line, then place your RIGHT foot on the line in front of your LEFT with the heel of your RIGHT foot against the toe of your LEFT foot and place your arms down at your side." (DEMONSTRATE POSITION - HAVE TEST SUBJECT GET INTO POSITION)

"Maintain this position until I have completed the instructions. Do not begin the test until told to do so."
 "DO YOU UNDERSTAND?" YES NO

"When I tell you to start, you will take nine heel-to-toe steps on the line while keeping your hands by your side. You will watch your feet and count each step out loud." (DEMONSTRATE 3 STEPS)

"When you reach your final step, you will keep your front foot on the line, then turn by taking a series of small steps with the other foot like this." (DEMONSTRATE)

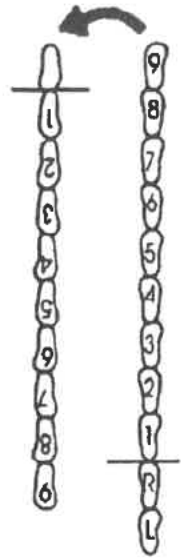
"You will then take nine more heel-to-toe steps back." (DEMONSTRATE 3 STEPS)

"Remember to look down at your feet, count each step out loud, and keep your arms down at your side. Once you start walking, don't stop until you have completed the test."
 "DO YOU UNDERSTAND?" YES NO

"Count your first step from this heel-to-toe position as one and begin."

- Can't keep balance during instructions
- Starts before instructions are finished
- Stops while walking
- Does not touch heel to toe
- Steps off line
- Using arms for balance
- Incorrect number of steps
 # of steps forward
 # of steps back
- Incorrect turn

POSITION OF THE STEPS



IMPAIRMENT DETECTED
 (2 OR MORE CLUES PRESENT)

YES NO

NUMBER OF CLUES

ONE LEG STAND
 "Please stand with your feet together and your arms at your sides, like this." (DEMONSTRATE)

"Maintain this position until told otherwise."
 "DO YOU UNDERSTAND?" YES NO

"When I tell you to start, raise one leg, either leg, with the foot approximately 6 inches off the ground, while keeping the raised foot flat or parallel to the ground. You must keep both legs straight with your arms at your side while you watch your raised foot." (DEMONSTRATE)

"While holding that position, count out loud in the following manner: One thousand one, one thousand two, one thousand three, until told to stop." (DEMONSTRATE)

"Remember to keep your arms at your side at all times and keep watching the raised foot."
 "DO YOU UNDERSTAND?" YES NO

"Raise one foot off the ground and begin the test."

ONE LEG STAND TEST (OLS)

- Sways while balancing
- Uses arms for balance
- Hopping
- Put foot down

IMPAIRMENT DETECTED
 (2 OR MORE CLUES PRESENT)

YES NO

NUMBER OF CLUES

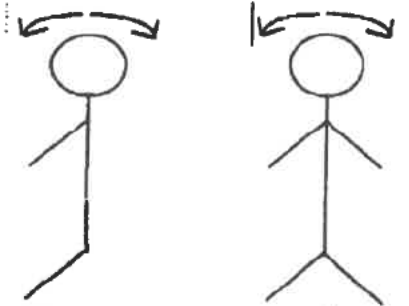
What foot is raised?
 RIGHT LEFT

Write any numbers when the person put their foot down

Record 30 seconds for the performance of the test and what number the person reaches in 30 seconds

PBT GIVEN? YES NO ALCOHOL IMPAIRMENT DETECTED? YES NO PBT SERIAL NUMBER? PBT ADMINISTERED BY:

ADDITIONAL TESTS PERFORMED BY A.R.I.D.E. AND D.R.E. ONLY



CONVERGENCE



LACK OF CONVERGENCE PRESENT

YES NO NOT PERFORMED

Finger to Nose
 (Draw lines to spots touched)



ADDITIONAL TESTS PROVIDED: Finger to Nose/Romberg Balance/Finger Count/DRE Evaluations or Opinion (EXPLAIN)

A. Jegge P#16432

Print Name and P#

Dated this 6th Day of September, 2021


Signature of Arresting Officer

Signature of Supervisor / P# / Date Approved

JUSTICE COURT LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

2021 SEP 13 A 11:47

THE STATE OF NEVADA
Plaintiff, JUSTICE COURT LAS VEGAS NEVADA
-vs- BY  DEPUTY
SONU SINGH #7109319,
Defendant.

CASE NO. 21CR041789
DEPT. NO. 2
DA CASE NO: 202143025C

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of TRAFFICKING IN CONTROLLED SUBSTANCE (Category A Felony - NRS 453.3385 - NOC 62099) and TRANSPORT OF A CONTROLLED SUBSTANCE (Category C Felony - NRS 453.321 - NOC 62067), in the manner following, to wit: That the said Defendant, on or about the 7th day of September, 2021, at and within the County of Clark, State of Nevada,

COUNT 1 - TRAFFICKING IN CONTROLLED SUBSTANCE

did willfully, unlawfully, feloniously, and knowingly or intentionally possess, either actually or constructively, 400 grams or more, to wit: approximately 1,140 grams of Cocaine, or any mixture of substance consisting of approximately 1,140 grams containing the controlled substance Cocaine.

COUNT 2 - TRANSPORT OF A CONTROLLED SUBSTANCE

did willfully, unlawfully, and feloniously transport within Clark County, a controlled substance, to wit: Cocaine.

All of which is contrary to the form, force and effect of Statutes in such cases made and provided and against the peace and dignity of the State of Nevada. Said Complainant makes this declaration subject to the penalty of perjury.


09/09/21

/mab
LVMPD EV# 210900030332
(TK02)

21 - CR - 041789

Criminal Complaint
14017534



Justice Court, Las Vegas Township
Clark County, Nevada

Department: PC

Court Minutes



21-PC-041789 State of Nevada vs. SINGH, SONU

9/8/2021 1:30:00 PM Initial Appearance Justice
Court (PC Review)

Result: Matter Heard

PARTIES PRESENT: State Of Nevada Defendant Clowers, Shanon SINGH, SONU
Judge: Bonaventure, Joseph M.
Court Reporter: Nelson, Bill
Court Clerk: Espinoza, Jose

PROCEEDINGS

Hearings: 9/15/2021 7:45:00 AM: Status Check on Filing of Criminal Complaint

Added

Events: Probable Cause Found

72-Hour Hearing Completed

Counsel Provisionally Appointed

Counsel J. Bayudan, Esq. provisionally appointed for limited purposes of first appearance hearing.

Bail Argument Heard

The Court has heard arguments from the prosecution and defense counsel regarding custody of the Defendant

Monetary Bail Set

The State has provided clear and convincing evidence that no less restrictive alternative to monetary bail will satisfy its interests in ensuring the defendant's presence and community safety.

Bail Reset - Cash or Surety

Counts: 001; 002 - \$2,000.00/\$2,000.00 Total Bail

Bail Condition - Stay Out of Trouble

Bail Condition - Intensive Supervision

Defendant is to report to Pretrial Services the day after being released from jail and 1 time per week thereafter..

Comment

Defendant resides out of state- California.

Continued for Status Check on filing of Criminal Complaint

Date set at Public Defender request.

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1158076

County Jail City Jail Adult Juvenile Bureau: MVNB

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)	(MIDDLE)	SSN#
[REDACTED]		LLV210900030332		SINGH			SONU		[REDACTED]
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB		
W	M	[REDACTED]	5'07"	150	BLK	BRO	UNKNOWN, INDIA		
ARRESTEE'S ADDRESS			STREET		BLDG/APT #	CITY		STATE	ZIP CODE
[REDACTED]			[REDACTED]			STOCKTON		CALIFORNIA	95207
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)					
DATE: 9/7/2021	TIME: 20:05	DATE: 9/7/2021	TIME: 20:05	115 N/B AT ST ROSE PKWY LAS VEGAS NEVADA 89183					
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)									
115 N/B AT ST ROSE PKWY LAS VEGAS NEVADA 89183									
CHARGES / OFFENSES									
PC - LVJCR - 62099 - F - TRAFFIC SCH I, II C/S, FLNTRZPM/GHB, 400+ GRAMS PC - LVJCR - 62067 - F - SELL/TRANS OR ATT SCH 1 OR II C/S, 1ST OFF									
CONNECTING REPORTS (TYPE OR EVENT NUMBER)									
FULL FELONY PACKET									

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 18 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 115 N/B AT ST ROSE PKWY LAS VEGAS NEVADA 89183 LAS VEGAS NEVADA 89183 and that the offense(s) occurred at approximately 20:05 hours on the 7th day of September, 2021.

Details for Probable Cause:

On 09-07-21, at approximately 1950 hours, I, Detective T. Robichaud P# 6605, while operating as N4, was in the area of I15 and Mile Marker 10 when I observed a blue semi-truck pulling a white trailer, bearing California registration plate 4TU9690, traveling northbound I15 at Mile Marker 15, at varying speeds from 60 -- 71 mph in a posted 70 mph zone. While following the truck I observed it to fail to maintain its lane by crossing over the white line separating the travel lanes several times while in the middle travel lane. Approximately five miles later, the semi-truck moved into the #3 travel lane and crossed the fog line separating the travel lane from the shoulder approximately 6 times in 10 mile stretch of I 15. Due to the fact that I believed the driver might be impaired or distracted, I initiated vehicle stop with my unmarked LVMPD vehicle and activated my red and blue lights for failure to maintain lane on the semi-trailer at northbound I15 just north of St. Rose Parkway.

After exiting my vehicle , I made contact with the driver and sole occupant at the passenger side of the truck. The driver identified himself as Sonu Singh DOB [REDACTED] via his California Driver's license. Singh stated that he had been driving for approximately 5 hours and was en route to Michigan to deliver a load of plastic barrels. Singh stated that he had a hard time keeping his truck in the travel lane because he "had never taken this route." As I was speaking with Singh he exhibited extremely nervous behavior (talking extremely fast, constantly licking his lips and he was visibly trembling.) After I spoke with Singh for several moments I returned to my vehicle to conduct a records check. It was at this time, Detective E. Calata P# 9486, arrived on scene to assist.

After completing the records check on Singh I exited my vehicle and re-approached the truck and asked Singh to exit so I could ask him clarifying questions about his travels. Singh complied and walked to the front of my vehicle. He stated that he had to be in Michigan on September 10 to drop off his load and that he was to pick up another load on September 11 and would return back to an unknown city in California with an unknown load. After the casual conversation, I returned Singh's driver's license as well as the paperwork regarding the semi-trailer. I advised Singh that I would only be giving him

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: T ROBICHAUD

P#: 6605

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION REPORT

HEADER
Page 2 of 2

a verbal warning for failing to maintain the travel lane and advised him that if he was going to travel at a speed lower than the posted speed limit he should be in the number three travel lane when feasible to avoid impeding traffic.

I then asked Singh for verbal consent to search the cab and trailer portion of the semi he was driving, to which he granted and stated "go ahead". Detectives also obtained written consent from Singh on a Las Vegas Metropolitan Police Department (LVMPD) Consent to Search form, which allows the search of any luggage, containers or items located in the interior and/or exterior of the vehicle, as well as any compartments which may need to be accessed by the use of tools, which Singh signed.

After Singh completed the consent to search form I conducted a thorough search of the truck while Det. Calata searched the trailer. While inside the truck I located a cardboard box covered with a blanket on the lower bed that contained several heat-sealed packages that I believed to be through my training and experience, Cocaine. I also located two additional cardboard boxes covered with a blanket in the storage compartment under the bed that contained identical packages as the other box. Detective Calata did not find any items of evidentiary value in the trailer of the truck. After locating the purported cocaine in the cab of the truck I placed Singh into custody for the purported narcotics.

I advised Singh of his Miranda rights at 2005 hrs, to which Singh stated that he "didn't really understand" therefore, the interview was terminated.

The purported cocaine was weighed utilizing a digital scale with a total weight of 58,000 gross grams (128 pounds). Detective J. Baumbach P# 14717 then subjected the purported cocaine to an ODV test, which resulted in a positive result for cocaine. Detective Baumbach was certified to conduct said test in August 2013 and the test was witnessed by Detective Calata.

Due to the above facts and circumstances, Singh was placed under arrest for Trafficking in a Controlled Substance - Cocaine > 400 grams and Transporting a Controlled Substance - Cocaine and was transported to CCDC where he was booked accordingly.

All items seized as evidence were impounded at the LVMPD Evidence vault under the above referenced event number.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: T ROBICHAUD

P#: 6605