

1 **IND**  
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6 **DISTRICT COURT**  
7  
8 **CLARK COUNTY, NEVADA**

8 THE STATE OF NEVADA,  
9  
10 Plaintiff,  
11  
12 v.

Case No.: C-23-379122-5  
Dept. No.: XVIII

11 MICHAEL JAMES MCDONALD,  
12 JAMES WALTER DEGRAFFENREID III,  
13 JESSE REED LAW,  
14 DURWARD JAMES HINDLE III,  
15 **SHAWN MICHAEL MEEHAN**, and  
16 EILEEN A. RICE,  
17  
18 Defendants.

16 **INDICTMENT**

17 The above-named Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER  
18 DEGRAFFENREID III, JESSE REED LAW, DURWARD JAMES HINDLE III, SHAWN MICHAEL  
19 MEEHAN, and EILEEN A. RICE, are accused by the Clark County Grand Jury of the crime(s) of:  
20 OFFERING FALSE INSTRUMENT FOR FILING OR RECORD, a Category "C" felony in violation of  
21 NRS 239.330, NOC [52399], and UTTERING FORGED INSTRUMENTS: FORGERY, a Category "D"  
22 felony in violation of NRS 205.110, NOC [50462], committed on or between December 8, 2020 through  
23 December 22, 2020, within the County of Clark, State of Nevada, as follows:

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**COUNT I**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
**Category "C" Felony - NRS 239.330**

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3 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER DEGRAFFENREID  
4 III, JESSE REED LAW, DURWARD JAMES HINDLE III, SHAWN MICHAEL MEEHAN, and  
5 EILEEN A. RICE, did knowingly procure or offer a false or forged instrument to be filed, registered or  
6 recorded in a public office, which instrument, if genuine, might be filed, registered or recorded in a public  
7 office under any law of this State or of the United States, to wit:

8 The Defendants knowingly offered a false or forged instrument titled, "CERTIFICATE OF THE  
9 VOTES OF THE 2020 ELECTORS FROM NEVADA" to be filed, registered or recorded in the office of  
10 the President of the United States Senate, and/or the Archivist of the United States, and/or the Nevada  
11 Secretary of State, and/or the Chief Judge of the District Court for the District of Nevada, the Defendants  
12 being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by  
13 directly committing this crime; and/or (2) pursuant to a conspiracy to commit this crime, with the intent  
14 that this crime be committed.

15 All of which constitutes the crime of Offering False Instrument for Filing or Record, a category  
16 "C" felony, in violation of NRS 239.330.

**COUNT II**  
**UTTERING FORGED INSTRUMENTS: FORGERY**  
**Category "D" Felony - NRS 205.110**

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20 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER DEGRAFFENREID  
21 III, JESSE REED LAW, DURWARD JAMES HINDLE III, SHAWN MICHAEL MEEHAN, and  
22 EILEEN A. RICE, knowing the same to be forged or altered, and with intent to defraud, uttered, offered,  
23 disposed of or put off as true, or had in his possession with intent so to utter, offer, dispose of or put off, a  
24 forged writing, instrument or other thing, the false making, forging or altering of which is punishable as  
25 forgery, to wit:

26 The Defendants uttered, offered, disposed of or put off as true a forged writing, instrument or other  
27 thing titled, "CERTIFICATE OF THE VOTES OF THE 2020 ELECTORS FROM NEVADA" to the  
28 President of the United States Senate, and/or the Archivist of the United States, and/or the Nevada

1 Secretary of State, and/or the Chief Judge of the District Court for the District of Nevada, with the intent to  
2 defraud, the Defendants being criminally liable under one or more of the following principles of criminal  
3 liability, to wit: (1) by directly committing this crime; and/or (2) pursuant to a conspiracy to commit this  
4 crime, with the intent that this crime be committed.

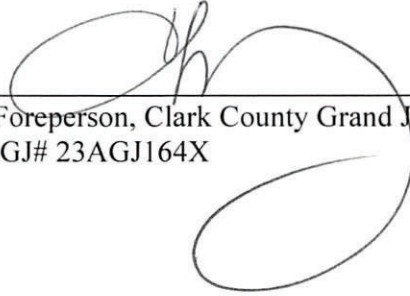
5 All of which constitutes the crime of Uttering Forged Instruments, a category "D" felony, in  
6 violation of NRS 205.110.

7 All of which is contrary to the form, force and effect of the statutes in such cases made and  
8 provided, and against the peace and dignity of the state of Nevada.

9 DATED this 5<sup>th</sup> day of December 2023.

10  
11 SUBMITTED BY  
12 By:   
13 AARON D. FORD  
14 Attorney General  
15 *Attorney for the State of Nevada*

16 ENDORSEMENT: A True Bill

17 By:   
18 Foreperson, Clark County Grand Jury  
19 GJ# 23AGJ164X

**WITNESS LIST**

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