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JUSTICE COURT  
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DEPUTY

1 **COMP**  
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12 JUSTICE COURT, LAS VEGAS TOWNSHIP  
13 CLARK COUNTY, NEVADA

13 THE STATE OF NEVADA,

14 Plaintiff,

15 vs.

16 JOHN KEVIN McCABE; ID# 0122755  
17 CHARLES McCHESNEY; ID# 1493497

18 Defendant.

Case No.: 13F07698AB

Dept. No.: 6

19  
20 **CRIMINAL COMPLAINT**

21 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of  
22 Nevada, by and through Senior Deputy Attorney General JEFFREY H. SEGAL and Deputy  
23 Attorney General SARAH E. OVERLY, complains and charges the above named defendants  
24 with having committed the following offenses:

25 JOHN KEVIN McCABE (hereinafter "McCABE") has committed the crimes of two (2)  
26 counts of KIDNAPPING IN THE FIRST DEGREE, a category "A" felony in violation of NRS  
27 200.310(1) and NRS 200.320(2); one (1) count of ROBBERY WITH USE OF DEADLY  
28

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1 WEAPON, a category "B" felony in violation of NRS 200.380 and NRS 193.165; two (2) counts of  
2 ROBBERY, a category "B" felony in violation of NRS 200.380; five (5) counts of BURGLARY, a  
3 category "B" felony in violation of NRS 205.060(1)(2); one (1) count of EXTORTIONATE  
4 COLLECTION OF DEBT WITH USE OF DEADLY WEAPON, a category "B" felony in violation of  
5 NRS 205.322 and NRS 193.165; two (2) counts of EXTORTIONATE COLLECTION OF DEBT,  
6 a category "B" felony in violation of NRS 205.322; one (1) count of INVASION OF THE HOME, a  
7 category "B" felony in violation NRS 205.067(1)(2); one (1) count of ASSAULT WITH USE OF  
8 DEADLY WEAPON, a category "B" felony in violation of NRS 200.471(2)(b); three (3) counts of  
9 GRAND LARCENY, a category "B" felony in violation of NRS 205.220, NRS 205.222(3); and one  
10 (1) count of THEFT IN THE AMOUNT OF \$2,500.00 OR MORE, a category "B" felony in  
11 violation of NRS 205.0832 and NRS 205.0835.

12 CHARLES McCHESNEY (hereinafter "McCHESNEY") has committed the crimes of one  
13 (1) count of ROBBERY WITH USE OF DEADLY WEAPON, a category "B" felony in violation of  
14 NRS 200.380 and NRS 193.165; one (1) count of ASSAULT WITH USE OF DEADLY WEAPON,  
15 a category "B" felony in violation of NRS 200.471(2)(b); one (1) count of EXTORTIONATE  
16 COLLECTION OF DEBT WITH USE OF DEADLY WEAPON, a category "B" felony in violation of  
17 NRS 205.322 and NRS 193.165; one (1) count of INVASION OF THE HOME, a category "B"  
18 felony in violation NRS 205.067(1)(2); one (1) count of BURGLARY, a category "B" felony in  
19 violation of NRS 205.060(1)(2); and one (1) count of GRAND LARCENY, a category "B" felony in  
20 violation of NRS 205.220 and NRS 205.222(3);

21 The acts alleged herein were committed on or about June 18, 2010 to April 8, 2012, in the  
22 County of Clark, State of Nevada, as follows:

23 COUNT ONE

24 KIDNAPPING IN THE FIRST DEGREE

25 A Category 'A' Felony – NRS 200.310(1), NRS 200.320(2)

26 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
27 willfully and unlawfully seize, confine, inveigle, entice, decoy, abduct, conceal, kidnap or carry  
28 away a person by any means whatsoever with the intent to hold or detain, or did hold or detain,

1 the person for ransom, or reward, or for the purpose of committing sexual assault, extortion or  
2 robbery upon or from the person, or for the purpose of killing the person or inflicting substantial  
3 bodily harm upon the person, or to exact from relatives, friends, or any other person any money  
4 or valuable thing for the return or disposition of the kidnapped person, to wit:

5 On or about June 18, 2010, McCABE entered MARGARET PRESSLER'S ("PRESSLER")  
6 room at the Budget Suites located at 3655 West Tropicana Avenue, Las Vegas, Nevada, forcibly  
7 handcuffed and removed her from the room, and confined her in his vehicle for a period of  
8 approximately three hours or more. McCABE intended to and did obtain personal property from  
9 PRESSLER by, among other things, forcing her under duress to sign personal checks naming  
10 him as payee in the aggregate amount of \$10,500.00, providing to him her bank debit card and  
11 PIN number which he used to withdraw \$400.00 from her account, and taking other personal  
12 property from her residence. McCABE told PRESSLER he would take her out to the desert if  
13 she did not comply with his demands for money, which PRESSLER reasonably interpreted as a  
14 threat to cause her harm.

15 All which constitutes the crime of KIDNAPPING IN THE FIRST DEGREE, a category 'A'  
16 felony, in violation of NRS 220.310(1) and NRS 200.320(2).

17  
18 COUNT TWO

19 ROBBERY

20 A Category 'B' Felony – NRS 200.380

21 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
22 willfully and unlawfully take personal property from the person of another, or in the person's  
23 presence, against his or her will, by means of force or violence or fear of injury, immediate or  
24 future, to his or her person or property, or the person or property of a member of his or her  
25 family, or of anyone in his or her company at the time of the robbery, to wit:

26 On or about June 18, 2010, McCABE took money and other personal property from  
27 PRESSLER by means of force or violence or fear of injury by, among other things, forcibly  
28 handcuffing and forcibly removing her from her room at the Budget Suites located at 3655 West

1 Tropicana Avenue, Las Vegas, Nevada, confining her in his vehicle for approximately three  
2 hours or more, demanding money and other personal property, compelling her under duress to  
3 sign personal checks naming him as payee in the aggregate amount of \$10,500.00, compelling  
4 her under duress to provide to him her bank debit card and PIN number which he used to  
5 withdraw \$400.00, taking other personal property from her residence, and threatening to take her  
6 out to the desert if she did not comply with his demands for money.

7 All of which constitutes the crime of ROBBERY, a category 'B' felony, in violation of NRS  
8 200.380.

9 COUNT THREE  
10 EXTORTIONATE COLLECTION OF DEBT

11 A Category 'B' Felony – NRS 205.322

12 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
13 willfully and unlawfully cause a debtor to have a reasonable apprehension that a delay in  
14 repaying the debt could result in the use of violence or other criminal means to harm physically  
15 the debtor or any other person or damage any property belonging to or in the custody of the  
16 debtor, to wit:

17 On or about June 18, 2010, McCABE, using the pretext of an alleged debt owed,  
18 took money and other personal property from PRESSLER by means of force or violence or fear  
19 of injury by, among other things, forcibly handcuffing and forcibly removing her from her room at  
20 the Budget Suites located at 3655 West Tropicana Avenue, Las Vegas, Nevada, confining her in  
21 his vehicle for approximately three hours or more, demanding money and other personal  
22 property, compelling her under duress to sign personal checks naming him as payee in the  
23 aggregate amount of \$10,500.00, compelling her under duress to provide to him her bank debit  
24 card and PIN number which he used to withdraw \$400.00, taking other personal property from  
25 her residence, and threatening to take her out to the desert if she did not comply with his  
26 demands for money which PRESSLER reasonably interpreted as a threat to cause her physical  
27 harm.

28 All of which constitutes the crime of EXTORTIONATE COLLECTION OF DEBT, a

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1 category 'B' felony, in violation of NRS 205.322.

2 COUNT FOUR

3 BURGLARY

4 A Category 'B' Felony – NRS 205.060(1)(2)

5  
6 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
7 willfully and unlawfully, by day or night, entered a house, room, apartment, tenement, or other  
8 building, with the intent to commit grand or petit larceny, assault or battery on any person or any  
9 felony, or to obtain money or property by false pretenses, to wit:

10 On or about June 18, 2010, McCABE entered PRESSLER'S room at the Budget Suites  
11 located at 3655 West Tropicana Avenue, Las Vegas, with the intent to commit grand or petit  
12 larceny, assault or battery, and/or another felony, including, without limitation, kidnapping,  
13 robbery, or extortionate collection of debt, against PRESSLER as more fully described in Counts  
14 One, Two and Three of this Complaint, which are hereby incorporated by reference as though  
15 fully set forth herein.

16 All of which constitutes the crime of BURGLARY, a category 'B' felony, in violation of NRS  
17 205.060(1)(2).

18 COUNT FIVE

19 BURGLARY

20 A Category 'B' Felony – NRS 205.060(1)(2)

21 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
22 willfully and unlawfully, by day or night, entered a house, room, apartment, tenement, or other  
23 building, with the intent to commit grand or petit larceny, assault or battery on any person or any  
24 felony, or to obtain money or property by false pretenses, to wit:

25 On or about June 18, 2010, McCABE entered a branch of Chase Bank located at 6120  
26 West Tropicana Avenue, Las Vegas, Nevada, with the intent to withdraw \$5,000.00 from  
27 PRESSLER'S bank account by presenting to the bank a personal check he had obtained from  
28 PRESSLER during and as a result of the kidnapping, robbery and extortionate collection of debt

1 more fully described in counts One, Two and Three of this Complaint, which are hereby  
2 incorporated by reference as though fully set forth herein.

3 All of which constitutes the crime of BURGLARY, a category 'B' felony, in violation of NRS  
4 205.060(1)(2).

5 COUNT SIX

6 BURGLARY

7 A Category 'B' Felony – NRS 205.060(1)(2)

8 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
9 willfully and unlawfully, by day or night, entered a house, room, apartment, tenement, or other  
10 building, with the intent to commit grand or petit larceny, assault or battery on any person or any  
11 felony, or to obtain money or property by false pretenses, to wit:

12 On or about June 18, 2010, McCABE entered a branch of Chase Bank located at 3955  
13 South Buffalo Drive, Las Vegas, Nevada, with the intent to withdraw money from PRESSLER'S  
14 bank account by presenting her personal check(s) and by use of her bank debit card and PIN  
15 number that he obtained during and as a result of the kidnapping, robbery and extortionate  
16 collection of debt more fully described in counts One, Two and Three of this Complaint, which  
17 are hereby incorporated by reference as though fully set forth herein. As a result thereof,  
18 McCABE obtained a total of \$3,400.00 of money from PRESSLER's bank account.

19 All of which constitutes the crime of BURGLARY, a category 'B' felony, in violation of NRS  
20 205.060(1)(2).

21 COUNT SEVEN

22 BURGLARY

23 A Category 'B' Felony – NRS 205.060(1)(2)

24 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
25 willfully and unlawfully, by day or night, entered a house, room, apartment, tenement, or other  
26 building, with the intent to commit grand or petit larceny, assault or battery on any person or any  
27 felony, or to obtain money or property by false pretenses, to wit:

28 On or about June 18, 2010, McCABE entered PRESSLER'S brother's home located at

1 4444 West Sunset Road where she resided with the intent to take PRESSLER's money or other  
2 personal property without her consent. McCABE did take and permanently deprive PRESSLER  
3 of her poker game set and jewelry box.

4 All of which constitutes the crime of BURGLARY, a category 'B' felony, in violation of NRS  
5 205.060(1)(2).

6 COUNT EIGHT

7 GRAND LARCENY

8 A Category 'B' Felony – NRS 205.220, NRS 205.222(3)

9 That JOHN KEVIN McCABE ("McCABE"), in the County of Clark, State of Nevada, did  
10 intentionally steal, take and carry away the personal goods or property, with a value of \$2,500.00  
11 or more, owned by another person, to wit:

12 On or between June 2010 and August 2010, McCABE stole, took and carried away the  
13 property of PRESSLER, including, without limitation, her 1997 Honda Civic automobile, VIN#  
14 1HGEJ8VL037856, from her residence without her authorization or lawful authority.

15 All of which constitutes the crime of GRAND LARCENY, a category 'B' felony, in violation  
16 of NRS 205.220, NRS 205.222(3).

17 COUNT NINE

18 GRAND LARCENY

19 A Category 'B' Felony – NRS 205.220, NRS 205.222(3)

20 That JOHN KEVIN McCABE ("McCABE"), in the County of Clark, State of Nevada, did  
21 intentionally steal, take and carry away the personal goods or property, with a value of \$2,500.00  
22 or more, owned by another person, to wit:

23 On or about between June 18, 2010, McCABE stole, took and carried away the property  
24 of PRESSLER, including, without limitation, \$3,400.00 U.S. currency.

25 All of which constitutes the crime of GRAND LARCENY, a category 'B' felony, in violation  
26 of NRS 205.220, NRS 205.222(3).

27 ///

28 ///



1 home, handcuffed HUNT, brandished a deadly weapon, namely a firearm, at HUNT and her  
2 children in a threatening manner in order to subdue and gain their compliance, then rummaged  
3 through HUNT'S home taking and carrying away HUNT'S personal property, including a laptop  
4 computer, cell phone, video game console, and an automobile.

5 All of which constitutes the crime of ROBBERY WITH USE OF DEADLY WEAPON, a  
6 category 'B' felony, in violation of NRS 200.380 and NRS 193.165.

7 COUNT TWELVE

8 ASSAULT WITH USE OF DEADLY WEAPON

9 A Category "B" Felony – NRS 200.471(2)(b)

10 That JOHN KEVIN McCABE ("McCABE") and CHARLES McCHESNEY ("McCHESNEY"),  
11 acting directly or aiding or abetting in the commission of the crime or otherwise counseling,  
12 encouraging, hiring, commanding, or inducing, in the County of Clark, State of Nevada, did  
13 willfully, unlawfully and intentionally place another person in reasonable apprehension of  
14 immediate bodily harm with use of a deadly weapon, to wit:

15 On or about January 18, 2011, McCABE and McCHESNEY forcibly entered HUNT'S  
16 home and brandished a deadly weapon, namely a firearm, at UNIQUE HUNT, JAHQUIRE  
17 HUNT, a minor eleven years of age, BRANIYA GRIGGLEY, a minor seven years of age, and  
18 BREASIA GRIGGLEY, a minor two years of age, in a threatening manner in order to obtain their  
19 compliance with the Defendants' demands, thereby placing them in reasonable apprehension of  
20 immediate bodily harm.

21 All of which constitutes the crime of ASSAULT WITH USE OF DEADLY WEAPON, a  
22 category "B" felony in violation of NRS 200.471(2)(b).

23 COUNT THIRTEEN

24 EXTORTIONATE COLLECTION OF DEBT WITH USE OF DEADLY WEAPON

25 A Category 'B' Felony – NRS 205.322, NRS 193.165

26 That JOHN KEVIN McCABE ("McCABE") and CHARLES McCHESNEY ("McCHESNEY"),  
27 acting directly or aiding or abetting in the commission of the crime or otherwise counseling,  
28 encouraging, hiring, commanding, or inducing, in the County of Clark, State of Nevada, did

1 willfully and unlawfully cause a debtor to have a reasonable apprehension that a delay in  
2 repaying the debt could result in the use of violence or other criminal means to harm physically  
3 the debtor or any other person or damage any property belonging to or in the custody of the  
4 debtor, with use of deadly weapon, to wit:

5 On or about January 18, 2011, McCABE and McCHESNEY, using the pretext of an  
6 alleged debt owed, forcibly entered HUNT'S home, handcuffed HUNT, brandished a deadly  
7 weapon, namely a firearm, at HUNT and her children in a threatening manner in order to subdue  
8 and gain their compliance, then rummaged through HUNT'S home taking and carrying away  
9 HUNT'S personal property, including a laptop computer, cell phone, video game console, and  
10 automobile

11 All of which constitutes the crime of EXTORTIONATE COLLECTION OF DEBT WITH  
12 USE OF DEADLY WEAPON, a category 'B' felony, in violation of NRS 205.322 and NRS  
13 193.165.

14 COUNT FOURTEEN

15 INVASION OF THE HOME

16 A Category 'B' Felony – NRS 205.067(1)(2)

17 That JOHN KEVIN McCABE ("McCABE") and CHARLES McCHESNEY ("McCHESNEY"),  
18 acting directly or aiding or abetting in the commission of the crime or otherwise counseling,  
19 encouraging, hiring, commanding, or inducing, in the County of Clark, State of Nevada, did  
20 willfully and unlawfully, by day or night, forcibly enter an inhabited dwelling without permission of  
21 the owner, resident or lawful occupant, to wit:

22 On or about January 18, 2011, McCABE and McCHESNEY forcibly entered a home  
23 inhabited by UNIQUEA HUNT ("HUNT") and her three children without permission, causing  
24 damage to HUNT'S front door frame.

25 All of which constitutes the crime of INVASION OF THE HOME, a category 'B' felony, in  
26 violation of NRS 205.067(1)(2).

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1 video game console, and HUNT's 2006 Monte Carlo with an aggregate value of \$2,500.00 or  
2 more, from her residence without her authorization.

3 All of which constitutes the crime of GRAND LARCENY, a category 'B' felony, in violation  
4 of NRS 205.220, NRS 205.222(3).

5 COUNT SEVENTEEN

6 KIDNAPPING IN THE FIRST DEGREE

7 A Category 'A' Felony – NRS 200.310(1), NRS 200.320(2)

8 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
9 willfully and unlawfully seize, confine, inveigle, entice, decoy, abduct, conceal, kidnap or carry  
10 away a person by any means whatsoever with the intent to hold or detain, or did hold or detain,  
11 the person for ransom, or reward, or for the purpose of committing sexual assault, extortion or  
12 robbery upon or from the person, or for the purpose of killing the person or inflicting substantial  
13 bodily harm upon the person, or to exact from relatives, friends, or any other person any money  
14 or valuable thing for the return or disposition of the kidnapped person, to wit:

15 On or about April 8, 2012, McCABE seized Kirsten Shaw ("SHAW") from her ex-  
16 boyfriend's residence and held her captive in his office for a period of approximately 24 hours or  
17 more with the intent and purpose of obtaining personal property, including money and a  
18 controlled substance (crystal methamphetamine) for his personal use, from her and others in  
19 exchange for her release and return. As a result thereof, McCABE obtained \$500.00 from  
20 SHAW'S friend, Kevin McClusky, a cell phone from her brother, Travis Shaw, and from her a  
21 "tender" of crystal methamphetamine, a controlled substance.

22 All which constitutes the crime of KIDNAPPING IN THE FIRST DEGREE, a category 'A'  
23 felony, in violation of NRS 220.310(1) and NRS 200.320(2).

24 COUNT EIGHTEEN

25 ROBBERY

26 A Category 'B' Felony – NRS 200.380

27 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
28 willfully and unlawfully take personal property from the person of another, or in the person's

1 presence, against his or her will, by means of force or violence or fear of injury, immediate or  
2 future, to his or her person or property, or the person or property of a member of his or her  
3 family, or of anyone in his or her company at the time of the robbery, to wit:

4 On or about April 8, 2012, McCABE used force to seize Kirsten Shaw ("SHAW") from her  
5 ex-boyfriend's residence and hold her against her will in his office for a period of approximately  
6 24 hours or more with the intent and purpose of obtaining personal property, including money  
7 and a controlled substance (crystal methamphetamine) for his personal use, from her and others  
8 in exchange for her release and return. As a result thereof, McCABE obtained \$500.00 from  
9 SHAW'S friend, Kevin McClusky, a cell phone from her brother, Travis Shaw, and a "tender" of  
10 crystal methamphetamine, a controlled substance, from SHAW.

11 All of which constitutes the crime of ROBBERY, a category 'B' felony, in violation of NRS  
12 200.380.

13 COUNT NINETEEN

14 EXTORTIONATE COLLECTION OF DEBT

15 A Category 'B' Felony – NRS 205.322

16 That JOHN KEVIN McCABE ("McCABE") in the County of Clark, State of Nevada, did  
17 willfully and unlawfully cause a debtor to have a reasonable apprehension that a delay in  
18 repaying the debt could result in the use of violence or other criminal means to harm physically  
19 the debtor or any other person or damage any property belonging to or in the custody of the  
20 debtor, to wit:

21 On or about April 8, 2012, McCABE willfully and unlawfully caused SHAW to have a  
22 reasonable apprehension that a delay in repaying a debt could result in the use of violence or  
23 other criminal means to harm her physically by handcuffing and detaining her in his office for  
24 approximately 24 hours or more and conditioning her release upon the payment of money and  
25 other property, including a "tender" of crystal methamphetamine, a controlled substance.

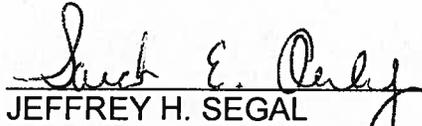
26 All of which constitutes EXTORTIONATE COLLECTION OF DEBT, a category 'B' felony,  
27 in violation of NRS 205.322.

1 All of which is contrary to the form, force, and effect of statutes in such cases made and  
2 provided against the peace and dignity of the State of Nevada. Furthermore, Complainant  
3 makes this declaration upon information and belief and subject to the penalty of perjury.  
4

5 Dated this 13 day of May, 2013.

6 CATHERINE CORTEZ MASTO  
7 Attorney General

8 By:

  
9 JEFFREY H. SEGAL  
10 Senior Deputy Attorney General  
11 SARAH E. OVERLY  
12 Deputy Attorney General  
13 Fraud Unit  
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