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JUSTICE COURT
NORTH LAS VEGAS, NV

BY KZ CLERK

8 IN THE JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP
9 CLARK COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 v.

13 DERRICK WILLIAMS, ID#1479391
14 ANTHONY WOODS, ID#1995643

15 Defendants.

Case No.: 11FN1642AB

16 Dept. No.: 8 1

16 CRIMINAL COMPLAINT

17 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
18 Nevada, by and through Deputy Attorney General ADAM L. WOODRUM, complains and
19 charges the above named defendant, DERRICK WILLIAMS and ANTHONY WOODS, with
20 having committed the crimes of POSSESSION OF CREDIT OR DEBIT CARD WITHOUT
21 CARDHOLDER'S CONSENT (Category "D" Felony – NRS 205.690) (3 counts); THEFT
22 (Category "B" Felony – NRS 205.0832); POSSESSION OR SALE OF DOCUMENT OR
23 PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY
24 (Category "E" Felony – NRS 205.465) (9 Counts); all within the County of Clark, State of
25 Nevada, as follows:

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1 COUNT ONE

2 POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT

3 (Category "D" Felony – NRS 205.690)

4 That the Defendant, DERRICK WILLIAMS, possessed a credit card or debit card without
5 the consent of the cardholder and with the intent to circulate, use, sell or transfer the credit card
6 or debit card with the intent to defraud, to wit: On or about August 11, 2011, the Defendant
7 possessed a Green Dot MasterCard #5192851001384356, issued in the name of Betsy Ann
8 Johnson, without her consent, with intent to circulate, use, sell or transfer the card with the intent
9 to defraud.

10 COUNT TWO

11 THEFT

12 (Category "B" Felony – NRS 205.0832)

13 That the Defendant, DERRICK WILLIAMS, did control any property of another person
14 with the intent to deprive that person of the property, or obtained real, personal or intangible
15 property or the services of another person by a material misrepresentation with intent to deprive
16 that person of the property or services, to wit: that on or around August 2, 2011, Derrick Williams
17 used Discover Card #6011208984098890 in the name of Eric Moffett, without authorization, to
18 obtain money from Rapid Cash, by misrepresenting that he was Eric Moffett, ultimately resulting
19 in a financial loss to Discover in the amount of \$7,467.84.

20 COUNT THREE

21 POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION

22 TO ESTABLISH FALSE STATUS OR IDENTITY

23 (Category "E" Felony – NRS 205.465)

24 That the Defendant, DERRICK WILLIAMS, possessed, sold or transferred any document
25 or personal identifying information for the purpose of establishing a false status, occupation,
26 membership, license or identity for himself or herself or any other person, to wit: That on or
27 about August 11, 2011, Defendant possessed a Florida Driver's License in the name of Ronald
28 Hadad, but containing a photograph of Derrick Williams.

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1 Ronald Hadad, with a license number belonging to Michelle Nash, and containing the
2 photograph of an unknown person.

3 **COUNT SEVEN**

4 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION**
5 **TO ESTABLISH FALSE STATUS OR IDENTITY**

6 (Category "E" Felony – NRS 205.465)

7 That the Defendant, DERRICK WILLIAMS, possessed, sold or transferred any document
8 or personal identifying information for the purpose of establishing a false status, occupation,
9 membership, license or identity for himself or herself or any other person, to wit: That on or
10 about August 11, 2011, Defendant possessed a Nevada Driver's License in the name of Sinh
11 Tang-Ho.

12 **COUNT EIGHT**

13 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION**
14 **TO ESTABLISH FALSE STATUS OR IDENTITY**

15 (Category "E" Felony – NRS 205.465)

16 That the Defendant, DERRICK WILLIAMS, possessed, sold or transferred any document
17 or personal identifying information for the purpose of establishing a false status, occupation,
18 membership, license or identity for himself or herself or any other person, to wit: That on or
19 about August 11, 2011, Defendant possessed an Arizona Driver's License in the name of Sinh
20 Tang-Ho, but containing a photograph of Derrick Williams.

21 **COUNT NINE**

22 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION**
23 **TO ESTABLISH FALSE STATUS OR IDENTITY**

24 (Category "E" Felony – NRS 205.465)

25 That the Defendant, DERRICK WILLIAMS, possessed, sold or transferred any document
26 or personal identifying information for the purpose of establishing a false status, occupation,
27 membership, license or identity for himself or herself or any other person, to wit: That on or

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1 about August 11, 2011, Defendant possessed a written note containing the name, date of birth,
2 and social security number of Brian James Rose.

3 **COUNT TEN**

4 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION**
5 **TO ESTABLISH FALSE STATUS OR IDENTITY**

6 (Category "E" Felony – NRS 205.465)

7 That the Defendant, ANTHONY WOODS, possessed, sold or transferred any document
8 or personal identifying information for the purpose of establishing a false status, occupation,
9 membership, license or identity for himself or herself or any other person, to wit: That on or
10 about August 11, 2011, Defendant possessed an Experian credit report in the name of Victor
11 Ramirez Ruiz.

12 **COUNT ELEVEN**

13 **POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT**

14 (Category "D" Felony – NRS 205.690)

15 That the Defendant, ANTHONY WOODS, possessed a credit card or debit card without
16 the consent of the cardholder and with the intent to circulate, use, sell or transfer the credit card
17 or debit card with the intent to defraud, to wit: On or about August 11, 2011, the Defendant
18 possessed American Express Credit Card #377237539991011, as well as the expiration date
19 and CVV code of said card, belonging to Galina Shir, without her consent, with intent to
20 circulate, use, sell or transfer the card with the intent to defraud.

21 **COUNT TWELVE**

22 **POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT**

23 (Category "D" Felony – NRS 205.690)

24 That the Defendant, ANTHONY WOODS, possessed a credit card or debit card without
25 the consent of the cardholder and with the intent to circulate, use, sell or transfer the credit card
26 or debit card with the intent to defraud, to wit: On or about August 11, 2011, the Defendant
27 possessed American Express Credit Card #376740930851016, as well as the expiration date
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1 and CVV code of said card, belonging to Raj Mehta, without his consent, with intent to circulate,
2 use, sell or transfer the card with the intent to defraud.

3 **COUNT THIRTEEN**

4 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION**
5 **TO ESTABLISH FALSE STATUS OR IDENTITY**

6 (Category "E" Felony – NRS 205.465)

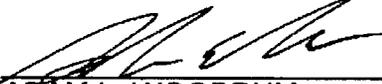
7 That the Defendant, DERRICK WILLIAMS, possessed, sold or transferred any document
8 or personal identifying information for the purpose of establishing a false status, occupation,
9 membership, license or identity for himself or herself or any other person, to wit: That on or
10 about August 11, 2011, Defendant possessed the name, social security number, and date of
11 birth of David Michael James, which he used to lease an apartment.

12 Complainant knows said crime occurred and that the Defendant committed the same
13 based upon the following: because the complainant is a Deputy Attorney General, and is in
14 possession of a Declaration of Arrest from David W. Smith, known to be a detective for the
15 North Las Vegas Police Department, a copy of which is attached hereto as Exhibit "1" and
16 hereby incorporated by reference herein, for the limited purpose of securing a warrant of arrest
17 for the Defendant. Complainant makes this declaration subject to the penalty of perjury.

18 All of which is contrary to the form, force and effect of statutes in such cases made and
19 provided against the peace and dignity of the State of Nevada.

20 DATED this 6th day of December, 2012.

21 Submitted by:
22 CATHERINE CORTEZ MASTO
23 Attorney General

24 By: 
25 ADAM L. WOODRUM
26 Deputy Attorney General
27 Special Prosecutions Division
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