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JUSTICE COURT
LAS VEGAS, NEVADA JSM
BY _____

8 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP

9 CLARK COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA,)
11 Plaintiff,)
12 vs.)
13 DERLAND BLAKE aka Derland Dewan)
Blake, ID #3036123,)
14 AMMAR HARRIS aka Ammar)
Asimfaruq Harris, ID #2753819,)
15 DERRICK MCKNIGHT aka Derrick)
Lamar McKnight, ID # 1591931,)
16 and AMY COLON,)
17 Defendants.)

CASE NO.: 14F12831ABCD

DEPT NO.: 1

CRIMINAL COMPLAINT

18
19 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
20 Nevada, by and through Deputy Attorney General KAREN A. WHELAN, complains and
21 charges the above named defendants, **DERLAND BLAKE, AMMAR HARRIS, DERRICK**
22 **MCKNIGHT**, and **AMY COLON**, with having committed the crimes of FURNISHING
23 PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER (Category "E"
24 Felony – NRS 212.165), ASKING OR RECEIVING A BRIBE BY A PUBLIC OFFICER
25 (Category "C" Felony – NRS 197.040), MISCONDUCT OF PUBLIC OFFICER (Category "E"
26 Felony – NRS 197.110), POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE
27 BY A STATE PRISONER (Category "D" Felony – NRS 212.165(3)), BRIBERY OF A PUBLIC

28 ///

1 OFFICER (Category "C" Felony – NRS 197.020), and CONSPIRACY TO COMMIT A CRIME
2 (Gross Misdemeanor – NRS 199.480); within the County of Clark, State of Nevada, as follows:

3 **COUNT ONE**

4 **FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER**

5 **(Category "E" Felony – NRS 212.165)**

6 That the defendant, **DERLAND BLAKE**, did, without lawful authorization, knowingly
7 furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution
8 or a facility of the Department of Corrections a portable telecommunications, to wit: On or
9 about May 9, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a
10 cellular telephone, 702-218-7186, by receiving funds and cellular telephones, smuggling the
11 cellular telephones into High Desert State Prison, and/or furnishing the cellular telephones to
12 the inmates Harris or McKnight.

13 **COUNT TWO**

14 **FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER**

15 **(Category "E" Felony – NRS 212.165)**

16 That the defendant, **DERLAND BLAKE**, did, without lawful authorization, knowingly
17 furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution
18 or a facility of the Department of Corrections a portable telecommunications, to wit: On or
19 about May 9, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a
20 cellular telephone, by receiving funds and cellular telephones, smuggling the cellular
21 telephones into High Desert State Prison, and/or furnishing the cellular telephones to the
22 inmates Harris or McKnight.

23 **COUNT THREE**

24 **FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER**

25 **(Category "E" Felony – NRS 212.165)**

26 That the defendant, **DERLAND BLAKE**, did, without lawful authorization, knowingly
27 furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution
28 or a facility of the Department of Corrections a portable telecommunications, to wit: On or

1 about May 9, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a
2 cellular telephone, 702-278-6191, by receiving funds and a cellular telephone, smuggling the
3 cellular telephones into High Desert State Prison, and/or furnishing the cellular telephone to
4 the inmate Elena.

5 **COUNT FOUR**

6 **ASKING OR RECEIVING A BRIBE BY A PUBLIC OFFICER**

7 **(Category "C" Felony – NRS 197.040)**

8 That the defendant, **DERLAND BLAKE**, did, while executing the functions of a public
9 officer as a person employed by or acting for the State, unlawfully and feloniously, ask or
10 receive, directly or indirectly, compensation, gratuity or reward, or any promise thereof, upon
11 an agreement or understanding that his vote, opinion, judgment, action, decision or other
12 official proceeding will be influenced thereby, or that he will do or omit any act or proceeding
13 or in any way neglect or violate any official duty, to wit: On or about May 9, 2014, the
14 defendant asked and/or received cash or compensation in order to use his position as a
15 corrections officer with Nevada Department of Corrections to smuggle cellular telephones,
16 food, and/or alcohol into High Desert State Prison, and/or provided the contraband and
17 cellular telephones to inmates at the institution.

18 **COUNT FIVE**

19 **ASKING OR RECEIVING A BRIBE BY A PUBLIC OFFICER**

20 **(Category "C" Felony – NRS 197.040)**

21 That the defendant, **DERLAND BLAKE**, did, while executing the functions of a public
22 officer as a person employed by or acting for the State, unlawfully and feloniously, ask or
23 receive, directly or indirectly, compensation, gratuity or reward, or any promise thereof, upon
24 an agreement or understanding that his vote, opinion, judgment, action, decision or other
25 official proceeding will be influenced thereby, or that he will do or omit any act or proceeding
26 or in any way neglect or violate any official duty, to wit: On or about May 9, 2014, the
27 defendant asked and/or received cash or compensation in order to use his position as a
28 corrections officer with Nevada Department of Corrections to smuggle a cellular telephone,

1 702-278-6191, into High Desert State Prison and/or provided the cellular telephone to an
2 inmate at the institution.

3 **COUNT SIX**

4 **ASKING OR RECEIVING A BRIBE BY A PUBLIC OFFICER**

5 **(Category "C" Felony – NRS 197.040)**

6 That the defendant, **DERLAND BLAKE**, did, while executing the functions of a public
7 officer as a person employed by or acting for the State, unlawfully and feloniously, ask or
8 receive, directly or indirectly, compensation, gratuity or reward, or any promise thereof, upon
9 an agreement or understanding that his vote, opinion, judgment, action, decision or other
10 official proceeding will be influenced thereby, or that he will do or omit any act or proceeding
11 or in any way neglect or violate any official duty, to wit: On or about May 9, 2014, the
12 defendant asked for and/or received cash or compensation in order to use his position as a
13 corrections officer with Nevada Department of Corrections to smuggle food,
14 methamphetamines, vodka, and/or a cellular telephone, 702-908-6432, into High Desert State
15 Prison, and/or provided said items to an inmate at the institution.

16 **COUNT SEVEN**

17 **MISCONDUCT BY A PUBLIC OFFICER**

18 **(Category "E" Felony – NRS 197.110)**

19 That the defendant, **DERLAND BLAKE**, did unlawfully and feloniously, as a public
20 officer, ask or receive, directly or indirectly, any compensation, gratuity or reward, or promise
21 thereof, for omitting or deferring the performance of any official duty, or, employ or use any
22 person, money, or property under the public officer's official control or discretion, or in the
23 public officer's official custody, for the private benefit or gain of the public officer or another, to
24 wit: On or about May 9, 2014, the defendant asked for and/or received compensation in
25 exchange for omitting to perform his official duties as a correctional officer at High Desert
26 State Prison and/or did use his uniform, identification, or other property under his official
27 control for his private benefit by gaining access to High Desert State Prison for the purpose of
28 introducing contraband into the same in exchange for money or other private benefits.

COUNT EIGHT

**POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE
PRISONER**

(Category "D" Felony – NRS 212.165(3))

That the defendant, **AMMAR HARRIS**, did, while lawfully confined in an institution of the Nevada Department of Corrections, without lawful authorization, possess or have in his custody or control a portable telecommunications device, to wit: On or about May 13, 2014, the defendant did possess or have in his custody or control a cellular telephone, 702-218-7186, hidden amongst his property in High Desert State Prison.

COUNT NINE

**POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE
PRISONER**

(Category "D" Felony – NRS 212.165(3))

That the defendant, **AMMAR HARRIS**, did, while lawfully confined in an institution of the Nevada Department of Corrections, without lawful authorization, possess or have in his custody or control a portable telecommunications device, to wit: On or about May 13, 2014, the defendant did possess or have in his custody or control a cellular telephone hidden amongst his property in High Desert State Prison.

COUNT TEN

BRIBERY OF OTHER PUBLIC OFFICERS

(Category "C" Felony – NRS 197.020)

That the defendant, **AMMAR HARRIS**, did, unlawfully and feloniously, give, offer, or promise, directly or indirectly, any compensation, gratuity or reward to a person executing any of the functions of a public officer with the intent to influence the person with respect to any act, decision, vote or other proceeding in the exercise of his powers or functions, to wit: On or about April 23, 2014, the defendant promised and/or gave a corrections officer cash or other compensation in order to influence the officer to smuggle cellular telephones, food, and/or alcohol into High Desert State Prison; (1) by Harris directly committing the offense, and/or (2)

1 by Harris and Colon, McKnight, and/or other coconspirators directly or indirectly aiding or
2 abetting one another in the commission of the offense by Harris encouraging, commanding,
3 and/or procuring Colon, McKnight, and/or other coconspirators to commit the offense and/or
4 financial support to Colon, McKnight, and/or other coconspirators with the intent that the crime
5 of bribery be committed, and/or (3) Harris and Colon, McKnight, and/or other coconspirators
6 conspiring with one another to commit the offense of Bribery of a Public Officer with the
7 specific intent to commit the offense.

8 **COUNT ELEVEN**

9 **POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE**
10 **PRISONER**

11 **(Category "D" Felony – NRS 212.165(3))**

12 That the defendant, **DERRICK MCKNIGHT**, did, while lawfully confined in an institution
13 of the Nevada Department of Corrections, without lawful authorization, possess or have in his
14 custody or control a portable telecommunications device, to wit: On or about May 13, 2014,
15 the defendant did possess or have in his custody or control a cellular telephone.

16 **COUNT TWELVE**

17 **BRIBERY OF OTHER PUBLIC OFFICERS**

18 **(Category "C" Felony – NRS 197.020)**

19 That the defendant, **DERRICK MCKNIGHT**, did, unlawfully and feloniously, give, offer,
20 or promise, directly or indirectly, any compensation, gratuity or reward to a person executing
21 any of the functions of a public officer with the intent to influence the person with respect to
22 any act, decision, vote or other proceeding in the exercise of his powers or functions, to wit:
23 On or about April 23, 2014, the defendant promised and/or gave a corrections officer cash or
24 other compensation in order to influence the officer to smuggle cellular telephones, food,
25 and/or alcohol into High Desert State Prison; (1) by McKnight directly committing the offense,
26 and/or (2) by McKnight and Colon, Harris, and/or other coconspirators directly or indirectly
27 aiding or abetting one another in the commission of the offense by McKnight encouraging,
28 commanding, and/or procuring Colon, and/or other coconspirators to commit the offense

1 and/or financial support to Colon, and/or other coconspirators with the intent that the crime of
2 bribery be committed, and/or (3) Harris and Colon, McKnight, and/or other coconspirators
3 conspiring with one another to commit the offense of Bribery of a Public Officer with the
4 specific intent to commit the offense.

5 **COUNT THIRTEEN**

6 **FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER**

7 **(Category "E" Felony – NRS 212.165)**

8 That the defendant, **AMY COLON**, did, without lawful authorization, knowingly furnish,
9 attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution or a
10 facility of the Department of Corrections a portable telecommunications, to wit: On or about
11 May 8, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a cellular
12 telephone (1) by Colon directly committing the offense, and/or (2) by Colon and/or other
13 coconspirators directly or indirectly aiding or abetting one another in the commission of the
14 offense by Colon encouraging, commanding, and/or procuring other coconspirators to commit
15 the offense and/or financial support to other coconspirators with the intent that the crime of
16 furnishing a telecommunication device to a state prisoner be committed, and/or (3) Colon
17 and/or other coconspirators conspiring with one another to commit the offense of Furnishing a
18 Portable Telecommunication Device to a State Prisoner with the specific intent to commit the
19 offense.

20 **COUNT FOURTEEN**

21 **BRIBERY OF OTHER PUBLIC OFFICERS**

22 **(Category "C" Felony – NRS 197.020)**

23 That the defendant, **AMY COLON**, did, unlawfully and feloniously, give, offer, or
24 promise, directly or indirectly, any compensation, gratuity or reward to a person executing any
25 of the functions of a public officer with the intent to influence the person with respect to any
26 act, decision, vote or other proceeding in the exercise of his powers or functions, to wit: On or
27 about May 8, 2014, the defendant promised and/or gave a corrections officer cash or other
28 compensation in order to influence the officer to smuggle cellular telephones, food, and/or

1 alcohol into High Desert State Prison; (1) by Colon directly committing the offense, and/or (2)
2 by Colon and/or other coconspirators directly or indirectly aiding or abetting one another in the
3 commission of the offense by Colon encouraging, commanding, and/or procuring other
4 coconspirators to commit the offense and/or financial support to other coconspirators with the
5 intent that the crime of bribery be committed, and/or (3) Colon and/or other coconspirators
6 conspiring with one another to commit the offense of Bribery of a Public Officer with the
7 specific intent to commit the offense.

8 **COUNT FIFTEEN**

9 **CONSPIRACY**

10 **(Gross Misdemeanor – NRS 199.480)**

11 That the defendants, **DERLAND BLAKE, AMMAR HARRIS, DERRICK MCKNIGHT,**
12 and **AMY COLON,** did conspire to accomplish the criminal or unlawful purpose of Furnishing a
13 Portable Telecommunication Device to a State Prisoner in violation of NRS 212.165 and/or
14 Bribery of Other Public Officers in violation of NRS 197.020, to wit: On or about May 8, 2014,
15 the defendants did conspire with one another in providing and acquiring cellular telephones
16 unlawfully smuggled into High Desert State Prison by communicating and meeting for the
17 purpose of facilitating trafficking of necessary funds, purchasing the cellular telephones,
18 arranging to have the cellular telephones smuggled into High Desert State Prison, and
19 providing the cellular telephones to inmates.

20 Complainant knows said crimes occurred and that the Defendants committed the same
21 based upon the following: because the complainant is a Deputy Attorney General, and is in
22 possession of investigative declarations written and signed by David Molnar, known to be a
23 Supervisory Criminal Investigator for the Office of the Inspector General, copies of which are
24 attached hereto and hereby incorporated by reference herein, for the limited purpose of
25 securing warrants of arrest for the Defendants. Complainant makes this declaration subject to
26 the penalty of perjury.

27 ///

28 ///

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.

3 DATED this 13th day of August, 2014.

4 CATHERINE CORTEZ MASTO
5 Attorney General

6 By: 
7 KAREN A. WHELAN
8 Deputy Attorney General

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Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

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

AUG 14 8 35 AM '14

THE STATE OF NEVADA, JUSTICE COURT
LAS VEGAS NEVADA)
Plaintiff,)
vs.)
DERLAND BLAKE,)
Defendant.)

CASE NO.:

DEPT NO.:

**DECLARATION OF PROBABLE CAUSE
FOR ARREST OF DERLAND BLAKE**

STATE OF NEVADA)
COUNTY OF CLARK) ss:

I, David Molnar, based upon information and belief, do hereby swear the assertions of this declaration are true:

1. That I am an investigator for the State of Nevada, Office of the Inspector General, responsible for investigating cases generated by the Nevada Department of Corrections. In that capacity, I have become involved with a criminal investigation and information relative to an allegation that the above named defendant, DERLAND BLAKE, has committed FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER (Category "E" Felony - NRS 212.165), ASKING OR RECEIVING A BRIBE BY A PUBLIC OFFICER (Category "C" Felony - NRS 197.040), MISCONDUCT OF PUBLIC OFFICER (Category "E" Felony - NRS 197.110), and CONSPIRACY (Gross Misdemeanor - NRS 199.480);

2. That I believe the following facts and circumstances give rise for finding probable cause to believe that the crimes of FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER (Category "E" Felony - NRS 212.165), BRIBERY OF A PUBLIC OFFICIAL (Category "C" Felony - NRS 197.020), and CONSPIRACY (Gross Misdemeanor - NRS 199.480) were committed, within Clark County, Nevada;

///

Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

1 3. That according to the official investigation, the following occurred:

2 a. On May 13, 2014, at approximately 0700 hours, during a search of
3 inmates Ammar Harris's, #116547 and Derrick McKnight's, #116547 cells, officials
4 located two cellular telephones, corresponding chargers, and manuals. Due to that fact
5 that furnishing a telecommunication device to a state prisoner as well as possession of
6 a cellular telecommunication device by a state prisoner is a violation of NRS 212.165,
7 Supervisory Criminal Investigator David Molnar and Criminal Investigator James Jones
8 were assigned to investigate and determine how and who provided the cellular phones
9 to the inmates.

10 b. On May 14, 2014, an Application and Affidavit for Search and Seizure
11 Warrant for information contained in the cellular telephones found in High Desert State
12 Prison on May 13, 2014, was approved and served upon Verizon Wireless.
13 Investigators spoke with a Verizon representative who stated that the phones were
14 activated at approximately 2327 hours on May 8, 2014. The phones were purchased
15 and activated at Wal-Mart store #2593, located at 2310 E. Serene Ave., Las Vegas,
16 NV.

17 c. Investigators responded to the Wal-Mart store on Serene Ave.
18 Investigators were provided with a copy of the receipt that showed the phones were
19 paid for with cash. Investigators also obtained video footage and still photos of an
20 unknown female, later identified at Re'Ann Atkinson, purchasing the phones. The
21 video footage showed that Atkinson was speaking on her cellular telephone for a
22 significant time period during the selection and purchase of the cellular telephones.

23 d. On May 15, 2014, Investigators returned to the Wal-Mart on Serene Ave.
24 and spoke with the electronics supervisor who activated the phones for the female.
25 The supervisor stated that the female told him that she had been to the Wal-Mart at
26 Eastern and Russell Road right before coming to the Wal-Mart on Serene. The female
27 stated that she was looking for a specific smart phone but had to settle for the ones
28 purchased. Investigators then responded to the Wal-Mart on Eastern and Russell Road

1 where loss prevention personnel were able to provide investigators with surveillance
2 footage of Atkinson arriving and leaving in what was identified as a red 2 door
3 Chevrolet Cavalier with a sunroof.

4 e. Investigators then reviewed inmate Harris's and inmate McKnight's
5 recorded inmate phone calls.

6 f. Investigators overheard a call placed by inmate Harris to Amy Colon on
7 May 2, 2014 that led investigators to believe that Harris was enlisting the assistance of
8 Colon to have a cellular telephone smuggled in to the High Desert State Prison, mostly
9 likely by a staff member.

10 g. Investigators reviewed inmate Harris's banking records and discovered
11 that inmate Harris had sent Colon \$2,000.00. A copy of the canceled check dated April
12 23, 2014, was obtained from NDOC banking staff.

13 h. Investigators overheard a call placed by inmate McKnight to his mother
14 Charmaine Simmons on May 7, 2014. Simmons stated that she talked to a female who
15 informed Simmons that she could only send "nineteen today." Simmons also stated
16 that the female had sent her the "transaction number" and Simmons indicated that she
17 would pick it up after work.

18 i. On May 16, 2014, while traveling westbound on Centennial Parkway
19 coming to the Sky Point Drive intersection to get on the 215, investigators encountered
20 a red 2 door Chevrolet Cavalier with a female driver. Investigators logged the license
21 plate, 346LDS. Investigators were only able to acquire limited information on the
22 driver.

23 j. On May 17, 2014, at approximately 0600 hours, investigators interviewed
24 inmate McKnight at High Desert State Prison. McKnight stated that his mother,
25 Simmons, received \$1,900.00 from a female and that Simmons later gave the money to
26 another female. Investigators also questioned McKnight regarding how the cellular
27 telephones were smuggled into the prison. McKnight stated that it was either a white
28 male corrections officer or a tall African-American officer that assists in conducting the

1 evening count in Unit 2. He described the African-American officer as younger with a
2 stripe on his uniform.

3 k. On May 19, 2014, investigators requested and received a warrant to
4 recover Simmons's cellular phone. The warrant was also approved for the Simmons's
5 phone records. Simmons was provided with a copy of the warrant and her phone was
6 taken.

7 l. Simmons's phone contained documentation that Simmons has the phone
8 number of Colon 678-386-5981. There was also a text message string with 702-510-
9 9828, regarding a meeting on May 8, 2014.

10 m. On May 20, 2014, Simmons met with investigators. Simmons stated that
11 she had received \$1,900.00 from Colon. The money was sent via Western Union and
12 received at the Moneytree check cashing store located on Charleston and Rainbow
13 Blvd. At the direction of her son, inmate McKnight, Simmons made contact with a
14 female at 702-510-9828 and they met on the evening of May 8, 2014, at a 7-11 store.
15 Simmons stated that the female drove a red 2 door car. Simmons provided the female
16 all the \$1,900.00. Simmons only knew the female as "Erica" and had never met her
17 before. Simmons stated that "Erica" told her that she had to drive 45 minutes to pick up
18 the money.

19 n. Investigators retrieved documentation from Moneytree which
20 demonstrates that Colon wired \$1,900.00 to Simmons via Western Union on May 8,
21 2014.

22 o. Investigators deduced the Northwest part of Las Vegas to be about 45
23 minutes from the area where Simmons met with "Erica." This prompted investigators to
24 conduct a Nevada Department of Motor Vehicles check on the red Chevrolet Cavalier.
25 The vehicle was registered to Re'Ann Atkinson a.k.a. Gadson. Atkinson's driver's
26 license photo bore a striking resemblance to the female from the Wal-Mart video
27 footage purchasing the cellular telephones. Atkinson was also currently under
28

1 supervision of the Nevada Department of Parole and Probation and her contact number
2 with Parole and Probation was the same number Simmons used to contact "Erica."

3 p. Investigators contacted Atkinson's parole officer who provided them with
4 her home address. Investigators responded to the apartment and located her red
5 Chevrolet Cavalier which appeared to be the same vehicle from the Wal-Mart video
6 footage. Atkinson admitted to purchasing the cellular telephones at the Wal-Mart on
7 Serene. When investigators informed her that the phones were found in High Desert
8 State Prison, she stated that she provided the phones to a female named "Olga" who
9 lives on the "eastside" of Las Vegas. Atkinson also admitted to meeting with a female
10 who gave her an undisclosed amount of money. She then purchased the phones and
11 gave them to Olga. Atkinson showed investigators the number she used to contact
12 Olga, 702-785-1474.

13 q. Investigators entered 702-785-1474 into the inmate telephone system
14 and learned that it is listed under an account maintained by Olga Gonzalez and is
15 called by inmate Jose Elena, #1084648. Investigators responded to Gonzalez's
16 residence and she agreed to be interviewed. Gonzalez stated that she was in contact
17 with a female who came to her home and provided her with two cellphones and
18 \$900.00 in cash. She stated that she met with a corrections officer the next day at the
19 Smith's Grocery Store on Aliante Parkway and the 215 beltway. Gonzalez stated that
20 she kept \$50 for herself and provided the officer with the two cellphones and \$850.
21 Gonzalez described the corrections officer as being African-American with "round eyes"
22 who drove a silver car. Investigators returned to their offices and retrieved photographs
23 of African-American officers working in Unit 2. They returned to Gonzalez's residence
24 where she identified the officer as High Desert Correctional Officer, Derland Blake.
25 Gonzalez admitted to meeting with the corrections officer on previous occasions where
26 she provided him with other contraband including at least one other cellular telephone.

27 r. Gonzalez showed investigators her cellular telephone and allowed them
28 to photograph text strings between herself and Atkinson's cellular telephone making

1 arrangements to meet with the corrections officer and give him money and contraband.
2 Gonzalez told investigators that the two also spoke to each other and decided to meet
3 at the Smith's Grocery store parking lot on Aliante Parkway and the 215 Beltway.

4 s. Gonzalez described meeting with Blake in the Southern end of the
5 Smith's parking lot, describing his vehicle as silver and was backed into the parking
6 stall prior to her arrival. Gonzalez also stated the vehicle had an emblem she
7 described as being a BMW model car. Investigators subsequently learned that Blake
8 owns a silver BMW car. NDOC personnel records revealed that Blake lives in close
9 proximity to the Aliante Smith's Grocery Store.

10 t. Investigators went to the Smith's Grocery store on Aliante Parkway and
11 the 215 Beltway where the store manager allowed investigators to view security
12 footage of the store's parking lot for May 9, 2014. The footage revealed that at
13 approximately 1410 hours, a vehicle closely resembling Atkinson's red Chevrolet
14 Cavalier enter the parking lot and drove up and down the aisles. The vehicle then
15 backed up into a parking stall where a vehicle resembling Blake's vehicle backed into
16 the spot next to it. Investigators did not see anyone walk away from the vehicles or
17 towards any of the surrounding businesses. A short time later the red vehicle exited
18 the parking lot, but the other vehicle remained. Later a vehicle resembling Gonzalez's
19 vehicle entered the parking lot as described by Gonzalez, and parked next to the
20 vehicle resembling Blake's vehicle. The vehicle resembling Blake's vehicle is then
21 seen leaving the parking lot.

22 u. Based on the allegations made against Blake, he was placed on
23 Administrative leave with pay on May 22, 2014. Blake signed an administrative leave
24 acknowledgement form, indicating his contact telephone number is 702-526-3384.
25 Investigators also obtained photographs of Blake's silver colored BMW he utilized to
26 travel to the NDOC Personnel Office.

27 v. A warrant for Gonzalez's phone records beginning May 1, 2014, was
28 obtained and investigators located approximately 45 contacts between Blake's cellular

1 telephone and Gonzalez with approximately 30 of the contacts noted on May 9, 2014,
2 the day Gonzalez admitted to their meeting.

3 w. Investigators also noted two telephone numbers, 702-715-1875 and 702-
4 279-6191, which share contacts with Colon, Gonzalez, Atkinson, and Simmons.
5 Investigators opine that these are two cellular telephones which were previously
6 smuggled into High Desert State Prison.

7 x. On May 30, 2014, Gonzalez gave a recorded interview – Gonzalez was
8 told by her boyfriend, inmate Elena that she was going to be contacted by a female she
9 identified as “Reann.” Gonzalez had previously provided Blake with a cellular
10 telephone to be taken to High Desert State Prison. She stated it was a Verizon
11 telephone which she purchased at Wal-Mart. She confirmed that the number for the
12 smuggled phone was 702-279-6191. Gonzalez stated that she had not met with Blake
13 more than 10 times. Gonzalez added that Blake’s nickname was “Uno.”

14 y. Gonzalez stated that when she met with Blake to provide him with the two
15 cellular telephones, she also gave him two bottles of vodka and \$900. She stated that
16 Blake gave her \$100 in return. Gonzalez stated that on May 9, 2014, she was in
17 telephone contact with Blake and “Re’Ann.” Gonzalez stated that Re’Ann and Blake
18 met prior to her meeting with Blake.

19 z. Gonzalez was questioned regarding the telephone call between her and
20 Blake which occurred on May 12th, the day the cellular telephones were discovered
21 within High Desert State Prison. Gonzalez recalled that Blake stated he received a text
22 from an unknown person who alleged that Blake “got her man into some shit.” When
23 shown a photo of Blake’s vehicle, she confirmed that it was the car driven by Blake
24 during their meetings.

25 aa. On June 19, 2014, investigators received a warrant return for the call
26 detail records of Blake's cellular telephone, 702-526-3384. Investigators noticed Blake
27 was in communication with 702-488-1146. When investigators entered the 702-488-
28 1146 number into the inmate telephone system, they learned that High Desert State

1 Prison inmate Martin Romero, #1089214, housed in Unit 2, also called that number.
2 The inmate telephone system reflects that the 702-488-1146 number is operated by
3 Maura Lizette Aguilar. NOTIS also reflects that Aguilar is a visitor of inmate Romero.

4 bb. On June 19, 2014, investigators met with Aguilar. When asked, she
5 identified Blake as the corrections officer she met with. She stated that she has
6 provided Blake with methamphetamine, food, vodka, and a cellular telephone,
7 specifically an iPhone serviced by Verizon. She stated the telephone number for the
8 contraband phone is 702-908-6432. She stated she met with Blake twice, once at a
9 convenience store near Cheyenne and Civic Center and the other time, at the Wells
10 Fargo Bank on Aliante Parkway. The Wells Fargo is in the parking lot of the Smith's
11 Grocery Store where Gonzalez admittedly met with Blake. Aguilar stated that she has
12 provided Blake with approximately \$1,100.00 for smuggling the items into the prison for
13 inmate Romero. Aguilar stated that the code word that she and inmate Romero used
14 for Blake when talking on the inmate phone system is "Uno," the same moniker used by
15 Gonzalez when referring to Blake. Aguilar stated that inmate Romero told her that
16 Blake was smuggling items because he needed the money for his upcoming marriage.

17 cc. On June 19, 2014, investigators re-interviewed Atkinson at her home.
18 She admitted to the fact that she was contacted by inmate Uceda on his cellular
19 telephone, 702-715-1875. She stated she was directed to purchase the two cellular
20 telephones and provide them to Gonzalez. She stated she was later contacted by
21 inmate Uceda who told her to meet with an associate of his and get \$50 to purchase
22 food and alcohol. Atkinson then got in touch with Gonzalez and the two set up the May
23 9, 2014, meeting. Atkinson stated that she was supposed to meet up with Gonzalez,
24 but since Gonzalez was late, she met Blake at the Smith's Grocery parking lot.
25 Atkinson identified Blake by photo, as well as his vehicle.

26 4. As a result of this investigation, I believe that there is probable cause to believe
27 that the criminal offenses of FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO
28 A STATE PRISONER (Category "E" Felony – NRS 212.165), ASKING OR RECEIVING A

1 BRIBE BY A PUBLIC OFFICER (Category "C" Felony – NRS 197.040), MISCONDUCT BY A
2 PUBLIC OFFICER (Category "E" Felony – NRS 197.110), and CONSPIRACY (Gross
3 Misdemeanor – NRS 199.480) were committed, within Clark County, Nevada.

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

5 EXECUTED ON this 11 day of August, 2014.

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7 
8 David Molnar
9 Supervisory Criminal Investigator
10 Office of the Inspector General
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IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, STATE OF NEVADA

FILED

AUG 14 8 34 AM '14

THE STATE OF NEVADA,

Plaintiff,

vs.

AMMAR HARRIS,

Defendant.

JUSTICE COURT
LAS VEGAS, NEVADA
CASE NO.:
DEPT NO.:

DECLARATION OF PROBABLE CAUSE
FOR ARREST OF AMMAR HARRIS

STATE OF NEVADA)
COUNTY OF CLARK) ss:

I, David Molnar, based upon information and belief, do hereby swear the assertions of this declaration are true:

1. That I am an investigator for the State of Nevada, Office of the Inspector General, responsible for investigating cases generated by the Nevada Department of Corrections. In that capacity, I have become involved with a criminal investigation and information relative to an allegation that the above named defendant, AMMAR HARRIS, has committed POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE PRISONER (Category "D" Felony - NRS 212.165(3)), BRIBERY OF A PUBLIC OFFICER (Category "C" Felony - NRS 197.020), and CONSPIRACY (Gross Misdemeanor - NRS 199.480);

2. That I believe the following facts and circumstances give rise for finding probable cause to believe that the crimes of POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE PRISONER (Category "E" Felony - NRS 212.165(3)), BRIBERY OF A PUBLIC OFFICER (Category "C" Felony - NRS 197.020), and CONSPIRACY (Gross Misdemeanor - NRS 199.480) were committed, within Clark County, Nevada;

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Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

1 3. That according to the official investigation, the following occurred:

2 a. On May 13, 2014, at approximately 0630 hours, Correctional Officer
3 Naylor was assigned as the Control officer in Unit 2 C/D at High Desert State Prison
4 (HDSP). Naylor observe the unit porter, inmate Derrick McKnight, #1056816, outside
5 the cell door of 2D41. Unit 2 C/D at HDSP is a segregation unit in which inmates have
6 limited movement and are only taken from their cells in restraints. Inmates utilized as
7 "porters" are allowed unrestrained access out of their cells to assist officers in feeding
8 and other housekeeping duties. Often times, inmate porters have been found to pass
9 contraband and messages between other inmates. The sole occupant of cell 2D41
10 was inmate Ammar Harris, #1116547. Officer Naylor began to monitor the cell
11 intercom speaker of cell 2D41. Officer Naylor heard inmate Harris ask inmate
12 McKnight, "Where are you putting it, but where are you putting it?" Inmate McKnight
13 then waked away from the cell. A few minutes passed and Officer Naylor again
14 monitored the intercom speaker of cell 2D41. Officer Naylor heard inmate Harris state,
15 "I need you to buy a Verizon refill card, the prepaid ones, try to use cash, don't charge
16 it." Officer Naylor listened to the cell intercoms of the cells surrounding 2D41 and no
17 other inmates were communicating with inmate Harris. Naylor concluded that inmate
18 Harris was using a cellular phone due to the one sided conversation and the reference
19 to "Verizon." Officer Naylor called Senior Correctional Officer Radcliff and Correctional
20 Officer Crutchfield to the Unit 2 Control center and all three continued to monitor the
21 intercom of cell 2D41. They continued to hear inmate Harris reference Verizon and text
22 messaging. Officer Radcliff then notified Lieutenant Day and the Correctional
23 Emergency Response Team office and informed them that an inmate was in his cell
24 and currently using a cellular telephone.

25 b. On May 13, 2014, at approximately 0700 hours, Officers Radcliff and
26 Crutchfield conducted a videotaped cell search of inmate Harris's cell. Officer
27 Crutchfield located one LG smartphone under a pillow and bed sheets which was
28

1 connected to a charger. Radcliff later found another LG smartphone located in an open
2 bag of potato chips.

3 c. After completing the cell search of 2D41, a cell search of 2D21 was
4 completed where inmate McKnight was the sole occupant. A cellular phone charger
5 matching the charger found inside 2D41 was found inside cell 2D21.

6 d. Due to the fact that furnishing a telecommunication device to a state
7 prisoner as well as possession of a cellular telecommunication device by a state
8 prisoner is a violation of NRS 212.165, Supervisory Criminal Investigator David Molnar
9 and Criminal Investigator James Jones were assigned to investigate and determine
10 how and who provided the cellular telephones to the inmates.

11 e. On May 14, 2014, an Application and Affidavit for Search and Seizure
12 Warrant for information contained in the cellular telephones found in cell 2D41 in High
13 Desert State Prison on May 13, 2014, was approved and served upon Verizon
14 Wireless.

15 f. One of the cellular telephones found in cell 2D41 was password protected
16 and could not be opened. The other cellular telephone was found to have been
17 assigned the telephone number of 702-218-7186 and was able to be opened. Inside
18 the call log showed three calls to a female known as Amy Colon, 678-386-5981, made
19 the morning of May 13, 2014, at approximately 0640 hours. Colon is a personal
20 contact of inmate Harris and he speaks with her on calls he placed using the inmate
21 telephone system. The calls to Colon coincide with the time of day that Officer Naylor
22 was listening to inmate Harris's conversation on the intercom. Self-photographs and
23 contacts of inmate McKnight were also found on the cellular telephone, indicating he
24 was also in possession of the cellular telephone(s).

25 g. Investigators spoke with a Verizon representative who stated that the
26 phones were activated at approximately 2327 hours on May 8, 2014. The phones were
27 purchased and activated at Wal-Mart store #2593, located at 2310 E. Serene Ave., Las
28 Vegas, NV.

1 h. Investigators responded to the Wal-Mart store on Serene Ave.
2 Investigators were provided with a copy of the receipt that showed the phones were
3 paid for with cash. Investigators also obtained video footage and still photos of an
4 unknown female, later identified at Re'Ann Atkinson, purchasing the phones. The
5 video footage showed that Atkinson was speaking on her cellular telephone for a
6 significant time period during the selection and purchase of the cellular telephones.

7 i. On May 15, 2014, Investigators returned to the Wal-Mart on Serene Ave.
8 and spoke with the electronics supervisor who activated the phones for the female.
9 The supervisor stated that the female told him that she had been to the Wal-Mart at
10 Eastern and Russell Road right before coming to the Wal-Mart on Serene. The female
11 stated that she was looking for a specific smart phone but had to settle for the ones
12 purchased. Investigators then responded to the Wal-Mart on Eastern and Russell
13 Road where loss prevention personnel were able to provide investigators with
14 surveillance footage Atkinson arriving and leaving in what was identified as a red 2
15 door Chevrolet Cavalier with a sunroof.

16 j. Investigators then reviewed inmate Harris's and inmate McKnight's
17 recorded inmate phone calls.

18 k. Investigators overheard a call placed by inmate Harris to Amy Colon on
19 May 2, 2014, that led investigators to believe that Harris was enlisting the assistance of
20 Colon to have a cellular telephone smuggled in to the High Desert State Prison.

21 l. Investigators reviewed inmate Harris's banking records and discovered
22 that inmate Harris had sent Colon \$2,000.00. A copy of the canceled check dated April
23 23, 2014, was obtained from NDOC banking staff.

24 m. Investigators overheard a call placed by inmate McKnight to his mother
25 Charmaine Simmons on May 7, 2014. Simmons stated that she talked to a female who
26 informed Simmons that she could only send "nineteen today." Simmons also stated
27 that the female had sent her the "transaction number" and Simmons indicated that she
28 would pick it up after work.

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n. On May 16, 2014, while traveling westbound on Centennial Parkway coming to the Sky Point Drive intersection to get on the 215, investigators encountered a red 2-door Chevrolet Cavalier with a female driver. Investigators logged the license plate, 346LDS. Investigators were only able to acquire limited information on the driver.

o. On May 17, 2014, at approximately 0600 hours, investigators interviewed inmate McKnight at High Desert State Prison. McKnight state that his mother, Simmons, received \$1,900.00 from a female and that Simmons later gave the money to another female. McKnight stated the purpose of the phones found in cell 2D41 in HDSP were for inmate Harris to facilitate an escape from prison.

p. On May 19, 2014, investigators requested and received a warrant to recover Simmons' cellular phone. The warrant was also approved for the Simmons's phone records. Simmons was provided with a copy of the warrant and her phone was taken.

q. Simmons' phone contained documentation that Simmons has the phone number of Colon, 678-386-5981. There was also a text message string with 702-510-9828, regarding a meeting on May 8, 2014.

r. On May 20, 2014, Simmons met with investigators. Simmons stated that she had received \$1,900.00 from Colon. The money was sent via Western Union and received at the Moneytree check cashing store located on Charleston and Rainbow Blvd. At the direction of her son, inmate McKnight, Simmons made contact with a female at 702-510-9828 and they met on the evening of May 8, 2014, at a 7-11 store. Simmons stated that the female drove a red 2 door car. Simmons provided the female all the \$1,900.00. Simmons only knew the female as "Erica" and had never met her before. Simmons stated that "Erica" told her that she had to drive 45 minutes to pick up the money.

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s. Investigators retrieved documentation from Moneytree which demonstrates that Colon wired \$1,900.00 to Simmons via Western Union on May 8, 2014.

t. Investigators deduced the Northwest part of Las Vegas to be about 45 minutes from the area where Simmons met with "Erica." This prompted investigators to conduct a Nevada Department of Motor Vehicles check on the red Chevrolet Cavalier. The vehicle was registered to Re'Ann Atkinson a.k.a. Gadson. Atkinson's driver's license photo bore a striking resemblance to the female from the Wal-Mart video footage purchasing the cellular telephones. Atkinson was also currently under supervision of the Nevada Department of Parole and Probation and her contact number with Parole and Probation was the same number Simmons used to contact "Erica."

u. Investigators contacted Atkinson's parole officer who provided them with her home address. Investigators responded to the apartment and located her red Chevrolet Cavalier which appeared to be the same vehicle from the Wal-Mart video footage. Atkinson admitted to purchasing the cellular telephones at the Wal-Mart on Serene. When investigators informed her that the phones were found in High Desert State Prison, she stated that she provided the phones to a female named "Olga" who lives on the "eastside" of Las Vegas. Atkinson also admitted to meeting with a female who gave her an undisclosed amount of money. She then purchased the phones and gave them to Olga. Atkinson showed investigators the number she used to contact Olga, 702-785-1474.

v. Investigators entered 702-785-1474 into the inmate telephone system and learned that it is listed under an account maintained by Olga Gonzalez and is called by inmate Jose Elena, #1084648. Investigators responded to Gonzalez's residence and she agreed to be interviewed. Gonzalez stated that she was in contact with a female who came to her home and provided her with two cellphones and \$900.00 in cash. She stated that she met with a corrections officer the next day at the Smith's Grocery Store on Aliante Parkway and the 215 beltway. Gonzalez stated that

1 she kept \$50 for herself and provided the officer with the two cellphones and \$850.
2 Gonzalez admitted to meeting with the corrections officer on previous occasions where
3 she provided him with other contraband including at least one other cellular telephone.

4 w. Gonzalez showed investigators her cellular telephone and allowed them
5 to photograph text strings between herself and Atkinson's cellular telephone making
6 arrangements to meet with the corrections officer and give him money and contraband.
7 Gonzalez told investigators that the two also spoke to each other and decided to meet
8 at the Smith's Grocery store parking lot on Aliante Parkway and the 215 Beltway.
9 Gonzalez described meeting with the officer.

10 x. Investigators went to the Smith's Grocery store on Aliante Parkway and
11 the 215 Beltway where the store manager allowed investigators to view security
12 footage of the store's parking lot for May 9, 2014. The footage revealed that at
13 approximately 1410 hours, a vehicle closely resembling Atkinson's red Chevrolet
14 Cavalier enter the parking lot and drove up and down the aisles. The vehicle then
15 backed up into a parking stall where a vehicle resembling that of the correction officer's
16 vehicle backed into the spot next to it. Investigators did not see anyone walk away
17 from the vehicles or towards any of the surrounding businesses. A short time later the
18 red vehicle exited the parking lot, but the other vehicle remained. Later a vehicle
19 resembling Gonzalez's vehicle entered the parking lot as described by Gonzalez, and
20 parked next to the vehicle resembling the correction officer's vehicle. The vehicle
21 resembling the correction officer's vehicle is then seen leaving the parking lot.

22 y. Investigators also noted two telephone numbers, 702-715-1875 and 702-
23 279-6191, which share contacts with Colon, Gonzalez, Atkinson, and Simmons.
24 Investigators opine that these are two cellular telephones which were previously
25 smuggled into High Desert State Prison.

26 z. On May 30, 2014, Gonzalez gave a recorded interview – Gonzalez was
27 told by her boyfriend, inmate Elena, that she was going to be contacted by a female
28 she identified as "Reann."

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aa. Documentation from Atkinson's cellular telephone records also reveal that on May 8, 2014, during the time when she was selecting and purchasing the cellular telephones subsequently found in the prison, she was in constant telephonic and text contact with 702-715-1875. The 702-715-1875 number is also contacted by Atkinson prior to her receiving \$50 from Diaz and meeting with the corrections officer.

bb. On June 19, 2014, investigators re-interviewed Atkinson at her home. She admitted to the fact that she was contacted by inmate Uceda on his cellular telephone, 702-715-1875. She stated she was directed to purchase the two cellular telephones and provide them to Gonzalez. Atkinson then got in touch with Gonzalez and the two set up the May 9, 2014, meeting. Atkinson stated that she was supposed to meet up with Gonzalez, but since Gonzalez was late, she met the corrections officer at the Smith's Grocery parking lot.

4. As a result of this investigation, I believe that there is probable cause to believe that the criminal offenses of POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE PRISONER (Category "E" Felony – NRS 212.165(3)), BRIBERY OF A PUBLIC OFFICIAL (Category "C" Felony – NRS 197.020), and CONSPIRACY (Gross Misdemeanor – NRS 199.480) were committed, within Clark County, Nevada

I declare under penalty of perjury that the foregoing is true and correct.
EXECUTED ON this 11 day of August, 2014.



David Molnar
Supervisory Criminal Investigator
Office of the Inspector General

1 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
2 CLARK COUNTY, STATE OF NEVADA

FILED

AUG 14 8 34 AM '14

3
4 THE STATE OF NEVADA,

5 Plaintiff,

6 vs.

7 DERRICK MCKNIGHT,

8 Defendant.

JUSTICE COURT CASE NO.:
LAS VEGAS NEVADA
DEPT NO.:

DECLARATION OF PROBABLE CAUSE
FOR ARREST OF DERRICK MCKNIGHT

9
10 STATE OF NEVADA)

11 COUNTY OF CLARK)

ss:

12 I, David Molnar, based upon information and belief, do hereby swear the assertions of
13 this declaration are true:

14 1. That I am an investigator for the State of Nevada, Office of the Inspector
15 General, responsible for investigating cases generated by the Nevada Department of
16 Corrections. In that capacity, I have become involved with a criminal investigation and
17 information relative to an allegation that the above named defendant, DERRICK MCKNIGHT,
18 has committed POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A
19 STATE PRISONER (Category "D" Felony - NRS 212.165(3)), BRIBERY OF A PUBLIC
20 OFFICER (Category "C" Felony - NRS 197.020), and CONSPIRACY (Gross Misdemeanor -
21 NRS 199.480);

22 2. That I believe the following facts and circumstances give rise for finding probable
23 cause to believe that the crimes of POSSESSION OF A PORTABLE TELECOMMUNICATION
24 DEVICE BY A STATE PRISONER (Category "E" Felony - NRS 212.165(3)), BRIBERY OF A
25 PUBLIC OFFICER (Category "C" Felony - NRS 197.020), and CONSPIRACY (Gross
26 Misdemeanor - NRS 199.480) were committed, within Clark County, Nevada;

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Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

1 3. That according to the official investigation, the following occurred:
2 a. On May 13, 2014, at approximately 0630 hours, Correctional Officer
3 Naylor was assigned as the Control officer in Unit 2 C/D at High Desert State Prison
4 (HDSP). Naylor observed the unit porter, inmate Derrick McKnight, #1056816, outside
5 the cell door of 2D41. Unit 2 C/D at HDSP is a segregation unit in which inmates have
6 limited movement and are only taken from their cells in restraints. Inmates utilized as
7 "porters" are allowed unrestrained access out of their cells to assist officers in feeding
8 and other housekeeping duties. Often times, inmate porters have been found to pass
9 contraband and messages between other inmates. The sole occupant of cell 2D41
10 was inmate Ammar Harris, #1116547. Officer Naylor began to monitor the cell
11 intercom speaker of cell 2D41. Officer Naylor heard inmate Harris ask inmate
12 McKnight, "Where are you putting it, but where are you putting it?" Inmate McKnight
13 then waked away from the cell. A few minutes passed and Officer Naylor again
14 monitored the intercom speaker of cell 2D41. Officer Naylor heard inmate Harris state,
15 "I need you to buy a Verizon refill card, the prepaid ones, try to use cash, don't charge
16 it." Officer Naylor listened to the cell intercoms of the cells surrounding 2D41 and no
17 other inmates were communicating with inmate Harris. Naylor concluded that inmate
18 Harris was using a cellular phone due to the one sided conversation and the reference
19 to "Verizon." Officer Naylor called Senior Correctional Officer Radcliff and Correctional
20 Officer Crutchfield to the Unit 2 Control center and all three continued to monitor the
21 intercom of cell 2D41. They continued to hear inmate Harris reference Verizon and text
22 messaging. Officer Radcliff then notified Lieutenant Day and the Correctional
23 Emergency Response Team office and informed them that an inmate was in his cell
24 and currently using a cellular telephone.

25 b. On May 13, 2014, at approximately 0700 hours, Officers Radcliff and
26 Crutchfield conducted a videotaped cell search of inmate Harris's cell. Officer
27 Crutchfield located one LG smartphone under a pillow and bed sheets which was
28

1 connected to a charger. Radcliff later found another LG smartphone located in an open
2 bag of potato chips.

3 c. After completing the cell search of 2D41, a cell search of 2D21 was
4 completed where inmate McKnight was the sole occupant. A cellular phone charger
5 matching the charger found inside 2D41 was found inside cell 2D21.

6 d. Due to the fact that furnishing a telecommunication device to a state
7 prisoner as well as possession of a cellular telecommunication device by a state
8 prisoner is a violation of NRS 212.165, Supervisory Criminal Investigator David Molnar
9 and Criminal Investigator James Jones were assigned to investigate and determine
10 how and who provided the cellular telephones to the inmates.

11 e. On May 14, 2014, an Application and Affidavit for Search and Seizure
12 Warrant for information contained in the cellular telephones found in cell 2D41 in High
13 Desert State Prison on May 13, 2014, was approved and served upon Verizon
14 Wireless.

15 f. One of the cellular telephones found in cell 2D41 was password protected
16 and could not be opened. The other cellular telephone was found to have been
17 assigned the telephone number of 702-218-7186 and was able to be opened. Inside
18 the call log showed three calls to a female known as Amy Colon, 678-386-5981, made
19 the morning of May 13, 2014, at approximately 0640 hours. Colon is a personal
20 contact of inmate Harris and he speaks with her on calls he placed using the inmate
21 telephone system. The calls to Colon coincide with the time of day that Officer Naylor
22 was listening to inmate Harris's conversation on the intercom. Self-photographs and
23 contacts of inmate McKnight were also found on the cellular telephone, indicating he
24 was also in possession of the cellular telephone(s).

25 g. Investigators spoke with a Verizon representative who stated that the
26 phones were activated at approximately 2327 hours on May 8, 2014. The phones were
27 purchased and activated at Wal-Mart store #2593, located at 2310 E. Serene Ave., Las
28 Vegas, NV.

1 h. Investigators responded to the Wal-Mart store on Serene Ave.
2 Investigators were provided with a copy of the receipt that showed the phones were
3 paid for with cash. Investigators also obtained video footage and still photos of an
4 unknown female, later identified at Re'Ann Atkinson, purchasing the phones. The
5 video footage showed that Atkinson was speaking on her cellular telephone for a
6 significant time period during the selection and purchase of the cellular telephones.

7 i. On May 15, 2014, Investigators returned to the Wal-Mart on Serene Ave.
8 and spoke with the electronics supervisor who activated the phones for the female.
9 The supervisor stated that the female told him that she had been to the Wal-Mart at
10 Eastern and Russell Road right before coming to the Wal-Mart on Serene. The female
11 stated that she was looking for a specific smart phone but had to settle for the ones
12 purchased. Investigators then responded to the Wal-Mart on Eastern and Russell
13 Road where loss prevention personnel were able to provide investigators with
14 surveillance footage of Atkinson arriving and leaving in what was identified as a red 2
15 door Chevrolet Cavalier with a sunroof.

16 j. Investigators then reviewed inmate Harris's and inmate McKnight's
17 recorded inmate phone calls.

18 k. Investigators overheard a call placed by inmate Harris to Amy Colon on
19 May 2, 2014, that led investigators to believe that Harris was enlisting the assistance of
20 Colon to have a cellular telephone smuggled in to the High Desert State Prison.

21 l. Investigators reviewed inmate Harris's banking records and discovered
22 that inmate Harris had sent Colon \$2,000.00. A copy of the canceled check dated April
23 23, 2014, was obtained from NDOC banking staff.

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25 Charmaine Simmons on May 7, 2014. Simmons stated that she talked to a female who
26 informed Simmons that she could only send "nineteen today." Simmons also stated
27 that the female had sent her the "transaction number" and Simmons indicated that she
28 would pick it up after work.

1 n. On May 16, 2014, while traveling westbound on Centennial Parkway
2 coming to the Sky Point Drive intersection to get on the 215, investigators encountered
3 a red 2-door Chevrolet Cavalier with a female driver. Investigators logged the license
4 plate, 346LDS. Investigators were only able to acquire limited information on the
5 driver.

6 o. On May 17, 2014, at approximately 0600 hours, investigators interviewed
7 inmate McKnight at High Desert State Prison. McKnight stated that his mother,
8 Simmons, received \$1,900.00 from a female and that Simmons later gave the money to
9 another female. McKnight stated the purpose of the phones found in cell 2D41 in
10 HDSP were for inmate Harris to facilitate an escape from prison.

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12 recover Simmons' cellular phone. The warrant was also approved for the Simmons's
13 phone records. Simmons was provided with a copy of the warrant and her phone was
14 taken.

15 q. Simmons' phone contained documentation that Simmons has the phone
16 number of Colon 678-386-5981. There was also a text message string with 702-510-
17 9828, regarding a meeting on May 8, 2014.

18 r. On May 20, 2014, Simmons met with investigators. Simmons stated that
19 she had received \$1,900.00 from Colon. The money was sent via Western Union and
20 received at the Moneytree check cashing store located on Charleston and Rainbow
21 Blvd. At the direction of her son, inmate McKnight, Simmons made contact with a
22 female at 702-510-9828 and they met on the evening of May 8, 2014, at a 7-11 store.
23 Simmons stated that the female drove a red 2 door car. Simmons provided the female
24 all the \$1,900.00. Simmons only knew the female as "Erica" and had never met her
25 before. Simmons stated that "Erica" told her that she had to drive 45 minutes to pick up
26 the money.

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1 s. Investigators retrieved documentation from Moneytree which
2 demonstrates that Colon wired \$1,900.00 to Simmons via Western Union on May 8,
3 2014.

4 t. Investigators deduced the Northwest part of Las Vegas to be about 45
5 minutes from the area where Simmons met with "Erica." This prompted investigators to
6 conduct a Nevada Department of Motor Vehicles check on the red Chevrolet Cavalier.
7 The vehicle was registered to Re'Ann Atkinson a.k.a. Gadson. Atkinson's driver's
8 license photo bore a striking resemblance to the female from the Wal-Mart video
9 footage purchasing the cellular telephones. Atkinson was also currently under
10 supervision of the Nevada Department of Parole and Probation and her contact number
11 with Parole and Probation was the same number Simmons used to contact "Erica."

12 u. Investigators contacted Atkinson's parole officer who provided them with
13 her home address. Investigators responded to the apartment and located her red
14 Chevrolet Cavalier which appeared to be the same vehicle from the Wal-Mart video
15 footage. Atkinson admitted to purchasing the cellular telephones at the Wal-Mart on
16 Serene. When investigators informed her that the phones were found in High Desert
17 State Prison, she stated that she provided the phones to a female named "Olga" who
18 lives on the "eastside" of Las Vegas. Atkinson also admitted to meeting with a female
19 who gave her an undisclosed amount of money. She then purchased the phones and
20 gave them to Olga. Atkinson showed investigators the number she used to contact
21 Olga, 702-785-1474.

22 v. Investigators entered 702-785-1474 into the inmate telephone system
23 and learned that it is listed under an account maintained by Olga Gonzalez and is
24 called by inmate Jose Elena, #1084648. Investigators responded to Gonzalez's
25 residence and she agreed to be interviewed. Gonzalez stated that she was in contact
26 with a female who came to her home and provided her with two cellphones and
27 \$900.00 in cash. She stated that she met with a corrections officer the next day at the
28 Smith's Grocery Store on Aliante Parkway and the 215 beltway. Gonzalez stated that

1 she kept \$50 for herself and provided the officer with the two cellphones and \$850.
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4 w. Gonzalez showed investigators her cellular telephone and allowed them
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18 red vehicle exited the parking lot, but the other vehicle remained. Later a vehicle
19 resembling Gonzalez's vehicle entered the parking lot as described by Gonzalez, and
20 parked next to the vehicle resembling the correction officer's vehicle. The vehicle
21 resembling the correction's officer's vehicle is then seen leaving the parking lot.

22 y. Investigators also noted two telephone numbers, 702-715-1875 and 702-
23 279-6191, which share contacts with Colon, Gonzalez, Atkinson, and Simmons.
24 Investigators opine that these are two cellular telephones which were previously
25 smuggled into High Desert State Prison.

26 z. On May 30, 2014, Gonzalez gave a recorded interview – Gonzalez was
27 told by her boyfriend, inmate Elena, that she was going to be contacted by a female
28 she identified as "Reann."

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Las Vegas, NV 89101

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aa. On June 19, 2014, investigators re-interviewed Atkinson at her home. She admitted to the fact that she was contacted by inmate Uceda on his cellular telephone, 702-715-1875. She stated she was directed to purchase the two cellular telephones and provide them to Gonzalez. Atkinson then got in touch with Gonzalez and the two set up the May 9, 2014, meeting. Atkinson stated that she was supposed to meet up with Gonzalez, but since Gonzalez was late, she met the corrections officer at the Smith's Grocery parking lot.

4. As a result of this investigation, I believe that there is probable cause to believe that the criminal offenses of POSSESSION OF A PORTABLE TELECOMMUNICATION DEVICE BY A STATE PRISONER (Category "E" Felony – NRS 212.165(3)), BRIBERY OF A PUBLIC OFFICIAL (Category "C" Felony – NRS 197.020), and CONSPIRACY (Gross Misdemeanor – NRS 199.480) were committed, within Clark County, Nevada

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

EXECUTED ON this 11 day of August, 2014.



David Molnar
Supervisory Criminal Investigator
Office of the Inspector General

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

FILED

AUG 14 8 34 AM '14

THE STATE OF NEVADA,

Plaintiff,

vs.

AMY COLON,

Defendant.

JUSTICE COURT
LAS VEGAS NEVADA

CASE NO.:

DEPT NO.:

DECLARATION OF PROBABLE CAUSE
FOR ARREST OF AMY COLON

STATE OF NEVADA)

COUNTY OF CLARK)

ss:

I, David Molnar, based upon information and belief, do hereby swear the assertions of this declaration are true:

1. That I am an investigator for the State of Nevada, Office of the Inspector General, responsible for investigating cases generated by the Nevada Department of Corrections. In that capacity, I have become involved with a criminal investigation and information relative to an allegation that the above named defendant, AMY COLON, has committed FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER (Category "E" Felony - NRS 212.165), BRIBERY OF A PUBLIC OFFICER (Category "C" Felony - NRS 197.020) and CONSPIRACY (Gross Misdemeanor - NRS 199.480);

2. That I believe the following facts and circumstances give rise for finding probable cause to believe that the crimes of FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER (Category "E" Felony - NRS 212.165), BRIBERY OF A PUBLIC OFFICER (Category "C" Felony - NRS 197.020) and CONSPIRACY (Gross Misdemeanor - NRS 199.480) were committed, within Clark County, Nevada;

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1 3. That according to the official investigation, the following occurred:

2 a. On May 13, 2014, at approximately 0630 hours, Correctional Officer
3 Naylor was assigned as the Control officer in Unit 2 C/D at High Desert State Prison
4 (HDSP). Naylor observed the unit porter, inmate Derrick McKnight, #1056816, outside
5 the cell door of 2D41. Unit 2 C/D at HDSP is a segregation unit in which inmates have
6 limited movement and are only taken from their cells in restraints. Inmates utilized as
7 "porters" are allowed unrestrained access out of their cells to assist officers in feeding
8 and other housekeeping duties. Often times, inmate porters have been found to pass
9 contraband and messages between other inmates. The sole occupant of cell 2D41
10 was inmate Ammar Harris, #1116547. Officer Naylor began to monitor the cell
11 intercom speaker of cell 2D41. Officer Naylor heard inmate Harris ask inmate
12 McKnight, "Where are you putting it, but where are you putting it?" Inmate McKnight
13 then waked away from the cell. A few minutes passed and Officer Naylor again
14 monitored the intercom speaker of cell 2D41. Officer Naylor heard inmate Harris state,
15 "I need you to buy a Verizon refill card, the prepaid ones, try to use cash, don't charge
16 it." Officer Naylor listened to the cell intercoms of the cells surrounding 2D41 and no
17 other inmates were communicating with inmate Harris. Naylor concluded that inmate
18 Harris was using a cellular phone due to the one sided conversation and the reference
19 to "Verizon." Officer Naylor called Senior Correctional Officer Radcliff and Correctional
20 Officer Crutchfield to the Unit 2 Control center and all three continued to monitor the
21 intercom of cell 2D41. They continued to hear inmate Harris reference Verizon and text
22 messaging. Officer Radcliff then notified Lieutenant Day and the Correctional
23 Emergency Response Team office and informed them that an inmate was in his cell
24 and currently using a cellular telephone.

25 b. On May 13, 2014, at approximately 0700 hours, during a search of
26 inmates Ammar Harris's, #116547 and Derrick McKnight's, #116547, cells, officials
27 located two cellular telephones, corresponding chargers, and manuals. Due to the fact
28 that furnishing a telecommunication device to a state prisoner as well as possession of

1 a cellular telecommunication device by a state prisoner is a violation of NRS 212.165,
2 Supervisory Criminal Investigator David Molnar and Criminal Investigator James Jones
3 were assigned to investigate and determine how and who provided the cellular
4 telephones to the inmates.

5 c. On May 14, 2014, an Application and Affidavit for Search and Seizure
6 Warrant for information contained in the cellular telephones found in High Desert State
7 Prison on May 13, 2014, was approved and served upon Verizon Wireless.

8 d. One of the cellular telephones found in cell 2D41 was password protected
9 and could not be opened. The other cellular telephone was found to have been
10 assigned the telephone number of 702-218-7186 and was able to be opened. Inside
11 the call log showed three calls to a female known as Amy Colon, 678-386-5981, made
12 the morning of May 13, 2014, at approximately 0640 hours. Colon is a personal
13 contact of inmate Harris and he speaks with her on calls he placed using the inmate
14 telephone system. The calls to Colon coincide with the time of day that Officer Naylor
15 was listening to inmate Harris's conversation on the intercom. Self-photographs and
16 contacts of inmate McKnight were also found on the cellular telephone, indicating he
17 was also in possession of the cellular telephone(s).

18 e. Investigators spoke with a Verizon representative who stated that the
19 phones were activated at approximately 2327 hours on May 8, 2014. The phones were
20 purchased and activated at Wal-Mart store #2593, located at 2310 E. Serene Ave., Las
21 Vegas, NV.

22 f. Investigators responded to the Wal-Mart store on Serene Ave.
23 Investigators were provided with a copy of the receipt that showed the phones were
24 paid for with cash. Investigators also obtained video footage and still photos of an
25 unknown female, later identified at Re'Ann Atkinson, purchasing the phones.

26 g. On May 15, 2014, Investigators returned to the Wal-Mart on Serene Ave.
27 and spoke with the electronics supervisor who activated the phones for the female.
28 The supervisor stated that the female told him that she had been to the Wal-Mart at

1 Eastern and Russell Road right before coming to the Wal-Mart on Serene.
2 Investigators then responded to the Wal-Mart on Eastern and Russell Road where loss
3 prevention personnel were able to provide investigators with surveillance footage of
4 Atkinson arriving and leaving in what was identified as a red 2-door Chevrolet Cavalier
5 with a sunroof.

6 h. Investigators then reviewed inmate Harris's and inmate McKnight's
7 recorded inmate phone calls.

8 i. Investigators overheard a call placed by inmate Harris to Amy Colon on
9 May 2, 2014, that led investigators to believe that Harris was enlisting the assistance of
10 Colon to have a cellular telephone smuggled in to the High Desert State Prison.

11 j. Investigators reviewed inmate Harris's banking records and discovered
12 that inmate Harris had sent Colon \$2,000.00. A copy of the canceled check dated April
13 23, 2014, was obtained from NDOC banking staff.

14 k. Investigators overheard a call placed by inmate McKnight to his mother
15 Charmaine Simmons on May 7, 2014. Simmons stated that she talked to a female who
16 informed Simmons that she could only send "nineteen today." Simmons also stated
17 that the female had sent her the "transaction number" and Simmons indicated that she
18 would pick it up after work.

19 l. On May 16, 2014, while traveling westbound on Centennial Parkway
20 coming to the Sky Point Drive intersection to get on the 215, investigators encountered
21 a red 2 door Chevrolet Cavalier with a female driver. Investigators logged the license
22 plate, 346LDS. Investigators were only able to acquire limited information on the
23 driver.

24 m. On May 17, 2014, at approximately 0600 hours, investigators interviewed
25 inmate McKnight at High Desert State Prison. McKnight state that his mother,
26 Simmons, received \$1,900.00 from a female and that Simmons later gave the money to
27 another female.
28

1 n. On May 19, 2014, investigators requested and received a warrant to
2 recover Simmons' cellular phone. The warrant was also approved for Simmons' phone
3 records. Simmons was provided with a copy of the warrant and her phone was taken.

4 o. Simmons' phone contained documentation that Simmons has the phone
5 number of Colon 678-386-5981. There was also a text message string with 702-510-
6 9828, regarding a meeting on May 8, 2014.

7 p. On May 20, 2014, Simmons met with investigators. Simmons stated that
8 she had received \$1,900.00 from Colon. The money was sent via Western Union and
9 received at the Moneytree check cashing store located on Charleston and Rainbow
10 Blvd. At the direction of her son, inmate McKnight, Simmons made contact with a
11 female at 702-510-9828 and they met on the evening of May 8, 2014. Simmons stated
12 that the female drove a red 2-door car. Simmons provided the female all the
13 \$1,900.00. Simmons only knew the female as "Erica" and had never met her before.
14 Simmons stated that "Erica" told her that she had to drive 45 minutes to pick up the
15 money.

16 q. Investigators retrieved documentation from Moneytree which
17 demonstrates that Colon wired \$1,900.00 to Simmons via Western Union on May 8,
18 2014.

19 r. Investigators deduced the Northwest part of Las Vegas to be about 45
20 minutes from the area where Simmons met with "Erica." This prompted investigators to
21 conduct a Nevada Department of Motor Vehicles check on the red Chevrolet Cavalier.
22 The vehicle was registered to Re'Ann Atkinson a.k.a. Gadson. Atkinson's driver's
23 license photo bore a striking resemblance to the female from the Wal-Mart video
24 footage purchasing the cellular telephones. Atkinson was also currently under
25 supervision of the Nevada Department of Parole and Probation and her contact number
26 with Parole and Probation was the same number Simmons used to contact "Erica."

27 s. Investigators contacted Atkinson's parole officer who provided them with
28 her home address. Investigators responded to the apartment and located her red

1 Chevrolet Cavalier which appeared to be the same vehicle from the Wal-Mart video
2 footage. Atkinson admitted to purchasing the cellular telephones at the Wal-Mart on
3 Serene. When investigators informed her that the phones were found in High Desert
4 State Prison, she stated that she provided the phones to a female named "Olga" who
5 lives on the "eastside" of Las Vegas. Atkinson also admitted to meeting with a female
6 who gave her an undisclosed amount of money. She then purchased the phones and
7 gave them to Olga. Atkinson showed investigators the number she used to contact
8 Olga, 702-785-1474.

9 t. Investigators entered 702-785-1474 into the inmate telephone system
10 and learned that it is listed under an account maintained by Olga Gonzalez and is
11 called by inmate Jose Elena, #1084648. Investigators responded to Gonzalez's
12 residence and she agreed to be interviewed. Gonzalez stated that she was in contact
13 with a female who came to her home and provided her with two cellphones and
14 \$900.00 in cash. She stated that she met with a corrections officer the next day at the
15 Smith's Grocery Store on Aliante Parkway and the 215 beltway. Gonzalez stated that
16 she kept \$50 for herself and provided the officer with the two cellphones and \$850.

17 u. Gonzalez showed investigators her cellular telephone and allowed them
18 to photograph text strings between herself and Atkinson's cellular telephone making
19 arrangements to meet with corrections officer and give him money and contraband.
20 Gonzalez told investigators that the two also spoke to each other and decided to meet
21 at the Smith's Grocery store parking lot on Aliante Parkway and the 215 Beltway.
22 Gonzalez described meeting with the officer.

23 v. Investigators went to the Smith's Grocery store on Aliante Parkway and
24 the 215 Beltway where the store manager allowed investigators to view security
25 footage of the store's parking lot for May 9, 2014. The footage revealed that at
26 approximately 1410 hours, a vehicle closely resembling Atkinson's red Chevrolet
27 Cavalier enter the parking lot and drove up and down the aisles. The vehicle then
28 backed up into a parking stall where a vehicle resembling that of the correction officer's

1 vehicle backed into the spot next to it. Investigators did not see anyone walk away
2 from the vehicles or towards any of the surrounding businesses. A short time later the
3 red vehicle exited the parking lot, but the other vehicle remained. Later a vehicle
4 resembling Gonzalez's vehicle entered the parking lot as described by Gonzalez, and
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16 I declare under penalty of perjury that the foregoing is true and correct.

17 EXECUTED ON this 11 day of August, 2014.

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20 David Molnar
21 Supervisory Criminal Investigator
22 Office of the Inspector General
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