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SG

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

10 THE STATE OF NEVADA,)
11 Plaintiff,)
12 vs.)
13 OLGA GONZALEZ,)
RE'ANN ATKINSON a.k.a. REANN)
14 GADSON,)
and CHARMAINE SIMMONS,)
15 Defendants.)
16

CASE NO.: 14F12123ABC
DEPT NO.: 11

CRIMINAL COMPLAINT

17 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of
18 Nevada, by and through Deputy Attorney General KAREN A. WHELAN, complains and
19 charges the above named defendants, **OLGA GONZALEZ, RE'ANN ATKINSON a.k.a.**
20 **REANN GADSON, and CHARMAINE SIMMONS**, with having committed the crimes of
21 **FURNISHING PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER**
22 **(Category "E" Felony – NRS 212.165), BRIBERY OF A PUBLIC OFFICIAL (Category "C"**
23 **Felony – NRS 197.020), and CONSPIRACY TO COMMIT A CRIME (Gross Misdemeanor –**
24 **NRS 199.480); within the County of Clark, State of Nevada, as follows:**

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COUNT ONE

FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER

(Category "E" Felony – NRS 212.165)

That the defendant, **OLGA GONZALEZ**, did, without lawful authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution or a facility of the Department of Corrections a portable telecommunications device, to wit: On or about May 8, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a cellular telephone, 702-218-7186, by trafficking the necessary funds, purchasing the cellular telephone, arranging to have the cellular telephone smuggled into High Desert State Prison by a corrections officer, and/or providing the cellular telephone to the corrections officer.

COUNT TWO

FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER

(Category "E" Felony – NRS 212.165)

That the defendant, **OLGA GONZALEZ**, did, without lawful authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution or a facility of the Department of Corrections a portable telecommunications device, to wit: On or about May 8, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a cellular telephone by trafficking the necessary funds, purchasing the cellular telephone, arranging to have the cellular telephone smuggled into High Desert State Prison by a corrections officer, and/or providing the cellular telephone to the corrections officer.

COUNT THREE

FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER

(Category "E" Felony – NRS 212.165)

That the defendant, **OLGA GONZALEZ**, did, without lawful authorization, knowingly furnish, or aid or assist in furnishing to a prisoner confined in an institution or a facility of the Department of Corrections a portable telecommunications device, to wit: On or before May 8, 2014, the defendant did knowingly aid or assist in furnishing inmate Jose Elena, #1084648 with a cellular telephone, 702-279-6191, by purchasing the cellular telephone, arranging to

1 have the cellular telephone smuggled into High Desert State Prison by a corrections officer,
2 and providing the cellular telephone to the corrections officer.

3 **COUNT FOUR**

4 **BRIBERY OF OTHER PUBLIC OFFICERS**

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

6 That the defendant, **OLGA GONZALEZ**, did, unlawfully and feloniously, give, offer or
7 promise, directly or indirectly, any compensation, gratuity or reward to a person executing any
8 of the functions of a public officer with the intent to influence the person with respect to any
9 act, decision, vote or other proceeding in the exercise of his powers or functions, to wit: On or
10 about May 9, 2014, the defendant promised and/or gave a corrections officer cash or other
11 compensation in order to influence the officer to smuggle cellular telephones, food, and/or
12 alcohol into High Desert State Prison.

13 **COUNT FIVE**

14 **BRIBERY OF OTHER PUBLIC OFFICERS**

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

16 That the defendant, **OLGA GONZALEZ**, did, unlawfully and feloniously, give, offer or
17 promise, directly or indirectly, any compensation, gratuity or reward to a person executing any
18 of the functions of a public officer with the intent to influence the person with respect to any
19 act, decision, vote or other proceeding in the exercise of his powers or functions, to wit: On or
20 before May 9, 2014, the defendant promised and/or gave a corrections officer cash or other
21 compensation in order to influence the officer to smuggle a cellular telephone, 702-278-6191,
22 into High Desert State Prison.

23 **COUNT SIX**

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

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

26 That the defendant, **RE'ANN ATKINSON a.k.a. REANN GADSON**, did, without lawful
27 authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner
28 confined in an institution or a facility of the Department of Corrections a portable

1 telecommunications device, to wit: On or about May 8, 2014, the defendant did knowingly aid
2 or assist in furnishing a prisoner with a cellular telephone, 702-218-7186, by trafficking the
3 necessary funds, purchasing the cellular telephone, arranging to have the cellular telephone
4 smuggled into High Desert State Prison by a corrections officer, and/or providing the cellular
5 telephone to the corrections officer.

6 **COUNT SEVEN**

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

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

9 That the defendant, **RE'ANN ATKINSON a.k.a. REANN GADSON**, did, without lawful
10 authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner
11 confined in an institution or a facility of the Department of Corrections a portable
12 telecommunications, to wit: On or about May 8, 2014, the defendant did knowingly aid or
13 assist in furnishing a prisoner with a cellular telephone by trafficking the necessary funds,
14 purchasing the cellular telephone, arranging to have the cellular telephone smuggled into High
15 Desert State Prison by a corrections officer, and/or providing the cellular telephone to the
16 corrections officer.

17 **COUNT EIGHT**

18 **BRIBERY OF OTHER PUBLIC OFFICERS**

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

20 That the defendant, **RE'ANN ATKINSON a.k.a. REANN GADSON**, did, unlawfully and
21 feloniously, give, offer or promise, directly or indirectly, any compensation, gratuity or reward
22 to a person executing any of the functions of a public officer with the intent to influence the
23 person with respect to any act, decision, vote or other proceeding in the exercise of his
24 powers or functions, to wit: On or about May 9, 2014, the defendant promised and/or gave a
25 corrections officer cash or other compensation in order to influence the officer to smuggle
26 cellular telephones, food, and/or alcohol into High Desert State Prison.

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COUNT NINE

FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER

(Category "E" Felony – NRS 212.165)

That the defendant, **CHARMAINE SIMMONS**, did, without lawful authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution or a facility of the Department of Corrections a portable telecommunications device, to wit: On or about May 8, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a cellular telephone, 702-218-7186, by trafficking the necessary funds, purchasing the cellular telephone, arranging to have the cellular telephone smuggled into High Desert State Prison by a corrections officer, and/or providing the cellular telephone to the corrections officer.

COUNT TEN

FURNISHING A PORTABLE TELECOMMUNICATION DEVICE TO A STATE PRISONER

(Category "E" Felony – NRS 212.165)

That the defendant, **CHARMAINE SIMMONS**, did, without lawful authorization, knowingly furnish, attempt to furnish, or aid or assist in furnishing to a prisoner confined in an institution or a facility of the Department of Corrections a portable telecommunications device, to wit: On or about May 8, 2014, the defendant did knowingly aid or assist in furnishing a prisoner with a cellular telephone by trafficking the necessary funds, purchasing the cellular telephone, arranging to have the cellular telephone smuggled into High Desert State Prison by a corrections officer, and/or providing the cellular telephone to the corrections officer.

COUNT ELEVEN

CONSPIRACY

(Gross Misdemeanor – NRS 199.480)

That the defendants, **OLGA GONZALEZ, RE'ANN ATKINSON a.k.a. REANN GADSON**, and **CHARMAINE SIMMONS**, did conspire to accomplish the criminal or unlawful purpose of Furnishing a Portable Telecommunication Device to a State Prisoner in violation of NRS 212.165 and/or Bribery of Other Public Officers in violation of NRS 197.020, to wit: On or

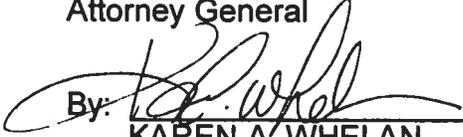
1 about May 8, 2014, the defendants did conspire with one another in providing cellular
2 telephones to inmates in High Desert State Prison by communicating and meeting for the
3 purpose of facilitating trafficking of necessary funds, purchasing the cellular telephones,
4 arranging to have the cellular telephones smuggled into High Desert State Prison by a
5 corrections officer, and providing the cellular telephones to the corrections officer.

6 Complainant knows said crimes occurred and that the Defendants committed the same
7 based upon the following: because the complainant is a Deputy Attorney General, and is in
8 possession of Declarations of Probable Cause for Arrest (Exhibits A, B and C) written and
9 signed by David Molnar, known to be a Supervisory Criminal Investigator for the Office of the
10 Inspector General, copies of which are attached hereto and hereby incorporated by reference
11 herein, for the limited purpose of securing warrants of arrest for the Defendants. Complainant
12 makes this declaration subject to the penalty of perjury.

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

15 DATED this 30 day of July, 2014.

16 CATHERINE CORTEZ MASTO
17 Attorney General

18 By: 
19 KAREN A. WHELAN
20 Deputy Attorney General