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ADAM PAUL LAXALT
2 Attorney General
DANIEL WESTMEYER
3 Deputy Attorney General
Nevada Bar Number 10273
4 555 E Washington Ave, Ste. 3900
Las Vegas, NV 89101-1608
5 P: (702) 486-3191
F: (702) 486-0660
6 dwestmeyer@ag.nv.gov
Attorneys for the State of Nevada
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FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

OCT 16 2015

BY, CAROL DONAHOO, DEPUTY

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,)

11 Plaintiff,)

12 vs.)

13 RODNEY JACKSON TAYLOR,)

14 Defendant.)
15

CASE NO: C-13-290417

DEPT NO: 17

16 SECOND AMENDED INDICTMENT

17 Defendant Rodney Jackson Taylor is accused by the Clark County Grand Jury of two (2)
18 counts of False Representation Concerning Title, category "C" felonies in violation of NRS
19 205.395.

March Feb. 5/24 (12) RT

20 All acts alleged herein were committed on or between ~~May~~ 2012 and June 2013 by the
21 above-named Defendant. The alleged acts occurred in the State of Nevada, County of Clark.

22 **COUNT ONE**
23 **FALSE REPRESENTATION CONCERNING TITLE**
24 **(Category "C" Felony - NRS 205.395)**

25 On or between March 9, 2012 and June 18, 2012, within the County of Clark, State of
26 Nevada, Defendant Taylor willfully, unlawfully, and feloniously claimed an interest in, or a lien
27 or encumbrance upon real property, or executed or notarized a document purporting to create an
28 interest in, or a lien or encumbrance upon real property, in a document that was recorded in the
office of the county recorder in which the real property was located, which he knew or had

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

1 reason to know was forged or groundless, contained a material misstatement or false claim, or
2 was otherwise invalid, to-wit:

3 Defendant Taylor executed a document entitled "Lien (Claim of Lien)," which he knew
4 or had reason to know was groundless, contained a material misstatement or false claim, or was
5 otherwise invalid, which was filed with the Clark County Recorder's Office, as instrument
6 number 201206180000831, against real property located at _____, Las Vegas, NV
7 _____, on June 18, 2012, for work ^{some of SR4 (AC) RT} which was not performed, claiming a debt of \$97,550.00 on
8 behalf of a nonexistent company, while claiming the property at issue was owned by someone
9 other than the lawful owner.

10 All of which constitutes the crime of False Representation Concerning Title, a category
11 C felony in violation of NRS 205.395.

12
13 **COUNT TWO**
14 **FALSE REPRESENTATION CONCERNING TITLE**
15 **(Category "C" Felony - NRS 205.395)**

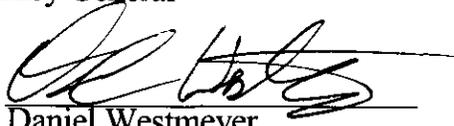
16 On or between July 15, 2012 and September 6, 2012, within the County of Clark, State
17 of Nevada, Defendant Taylor knowingly, unlawfully, and feloniously claimed an interest in, or
18 a lien or encumbrance upon real property, or executed or notarized a document purporting to
19 create an interest in, or a lien or encumbrance upon real property, in a document that was
20 recorded in the office of the county recorder in which the real property was located, which he
21 knew or had reason to know was forged or groundless, contained a material misstatement or
22 false claim, or was otherwise invalid, to-wit:

23 Defendant Taylor executed a document entitled "Lien (Claim of Lien)," which he knew
24 or had reason to know was groundless, contained a material misstatement or false claim, or was
25 otherwise invalid, which was filed with the Clark County Recorder's Office, as instrument
26 number 201209060003547, against real property located at _____, Las Vegas, Nevada,
27 on September 6, 2012, for work ^{some of SR4 (AC) RT} which was not performed, claiming a debt of \$15,055.00 on
28 behalf of a nonexistent company, while claiming the property at issue was owned by someone
other than the lawful owner.

1 All of which constitutes the crime of False Representation Concerning Title, a category
2 C felony in violation of NRS 205.395.

3
4 DATED this 15th day of _October, 2015.

5 ADAM PAUL LAXALT
6 Attorney General

7 By: 
8 Daniel Westmeyer
9 Deputy Attorney General