

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

DEC 15 2016

BY,
ALAN PAUL CASTLE, SR, DEPUTY

1 **IND**
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8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 STATE OF NEVADA,

11 Plaintiff(s),

12 vs.

13 RENALDO JOHNSON, ID#2596260

14 Defendant(s).

Case No. C-16-320056-1

Dept. No. IV

15 **INDICTMENT**

16 Defendant, RENALDO JOHNSON, above named, is accused by the Grand Jury of having
17 committed the following offenses:

18 MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in
19 violation of NRS 205.125; OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION
20 OF ANOTHER, a category "B" felony in violation of NRS 205.463; and PERJURY, a category "D"
21 felony in violation of NRS 199.145.

22 All of the acts alleged herein have been committed or consummated on or between May 29,
23 2016, and June 1, 2016, by the above-named Defendant, executed in whole or in part within the County
24 of Clark, State of Nevada, in the following manner:

25 **COUNT 1**
26 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
Category "D" Felony - NRS 205.125

27 On or about May 29, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
28 Nevada, without lawful authority, willfully signed the name of another person, to-wit: Susan Rush

1 Michael, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;
2 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
3 PETITION, a category "D" felony in violation of NRS 205.125.

4 **COUNT 2**
5 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
6 **Category "D" Felony - NRS 205.125**

7 On or about May 29, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
8 Nevada, without lawful authority, willfully signed the name of another person, to-wit: Andrew
9 Brockway Bates, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;
10 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
11 PETITION, a category "D" felony in violation of NRS 205.125.

12 **COUNT 3**
13 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
14 **Category "D" Felony - NRS 205.125**

15 On or about May 30, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
16 Nevada, without lawful authority, willfully signed the name of another person, to-wit: Nancy
17 LaCombe, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;
18 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
19 PETITION, a category "D" felony in violation of NRS 205.125.

20 **COUNT 4**
21 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
22 **Category "D" Felony - NRS 205.125**

23 On or about May 30, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
24 Nevada, without lawful authority, willfully signed the name of another person, to-wit: Anthony
25 Abraham, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;
26 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
27 PETITION, a category "D" felony in violation of NRS 205.125.

28 **COUNT 5**
29 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
30 **Category "D" Felony - NRS 205.125**

31 On or about June 1, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
32 Nevada, without lawful authority, willfully signed the name of another person, to-wit: John David Lee,

1 to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

2 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
3 PETITION, a category "D" felony in violation of NRS 205.125

4 **COUNT 6**
5 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
6 **Category "D" Felony - NRS 205.125**

7 On or about June 1, 2016, Defendant RENALDO JOHNSON, in the County of Clark, State of
8 Nevada, without lawful authority, willfully signed the name of another person, to-wit: Brian
9 Vanderpool, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

10 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
11 PETITION, a category "D" felony in violation of NRS 205.125.

12 **COUNT 7**
13 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
14 **Category "B" Felony - NRS 205.463**

15 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
16 authority, knowingly obtained and used personal identifying information of another person for an
17 unlawful purpose, to wit:

18 On or about May 29, 2016, Defendant RENALDO JOHNSON knowingly obtained and used the
19 personal identifying information of Susan Rush Michael, to-wit: Susan Rush Michael's address and
20 signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 1, incorporated by
21 reference as though fully set forth herein;

22 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
23 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

24 **COUNT 8**
25 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
26 **Category "B" Felony - NRS 205.463**

27 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
28 authority, knowingly obtained and used personal identifying information of another person for an
unlawful purpose, to wit:

On or about May 29, 2016, Defendant RENALDO JOHNSON knowingly obtained and used the
personal identifying information of Andrew Brockway Bates, to-wit: Andrew Brockway Bates's

1 address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 2,
2 incorporated by reference as though fully set forth herein;

3 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
4 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

5 **COUNT 9**
6 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
7 **Category "B" Felony - NRS 205.463**

8 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
9 authority, knowingly obtained and used personal identifying information of another person for an
10 unlawful purpose, to wit:

11 On or about May 30, 2016, Defendant RENALDO JOHNSON knowingly obtained and used the
12 personal identifying information of Nancy LaCombe, to-wit: Nancy LaCombe's address and signature,
13 for an unlawful purpose, to-wit: to commit the acts alleged in Count 3, incorporated by reference as
14 though fully set forth herein;

15 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
16 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

17 **COUNT 10**
18 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
19 **Category "B" Felony - NRS 205.463**

20 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
21 authority, knowingly obtained and used personal identifying information of another person for an
22 unlawful purpose, to wit:

23 On or about May 30, 2016, Defendant RENALDO JOHNSON knowingly obtained and used the
24 personal identifying information of Anthony Abraham, to-wit: Anthony Abraham's address and
25 signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 4, incorporated by
26 reference as though fully set forth herein;

27 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
28 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

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1 access contained signatures affixed in his presence, knowing that statement to be false, which statement
2 was material to the filing in question;

3 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
4 199.145.

5 **COUNT 14**
6 **PERJURY**
7 **Category "D" Felony - NRS 199.145**

8 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
9 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

10 On or about May 30, 2016, Defendant RENALDO JOHNSON willfully and falsely declared,
11 under penalty of perjury, that a petition to qualify the Nevada Green Party for general election ballot
12 access contained signatures affixed in his presence, knowing that statement to be false, which statement
13 was material to the filing in question;

14 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
15 199.145.

16 **COUNT 15**
17 **PERJURY**
18 **Category "D" Felony - NRS 199.145**

19 Defendant RENALDO JOHNSON, in the County of Clark, State of Nevada, without lawful
20 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

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1 On or about June 1, 2016, Defendant RENALDO JOHNSON willfully and falsely declared,
2 under penalty of perjury, that a petition to qualify the Nevada Green Party for general election ballot
3 access contained signatures affixed in his presence, knowing that statement to be false, which statement
4 was material to the filing in question;

5 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
6 199.145.

7 DATED this _____ day of December, 2016.

8 SUBMITTED BY

9 ADAM PAUL LAXALT
10 Attorney General

11 By: _____
12 Daniel Westmeyer
13 Senior Deputy Attorney General
14 Nevada Bar No. 10273
15 *Attorneys for the State of Nevada*

16 ENDORSEMENT: A True Bill

17 By: _____
18 Foreperson, Clark County Grand Jury
19 GJ #
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