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

JUL 19 2017

BY, _____
DULCE MARIE ROMEA, DEPUTY

8
9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,

12 Plaintiff,

13 v.

14 CARL ROBERTSON, ID #1133848

15 Defendant.

Case No.: C-17-325123-1

Dept. No.: XXV

16
17 **INDICTMENT**

18 The above named defendant, Carl Robertson, is accused by the Clark County Grand Jury of the
19 crimes(s) of One (1) count of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B" felony in
20 violation of NRS 205.0832, one count of ATTEMPTED THEFT IN THE AMOUNT OF \$3,500 OR
21 MORE, a category "C" felony in violation of NRS 205.0832 and NRS 193.330, two (2) counts of
22 FORGERY, OTHER ACTS CONSTITUTING FORGERY, a category "D" felony in violation of NRS
23 205.090 and NRS 205.095, and three (3) counts of POSSESSION OF DOCUMENT OR PERSONAL
24 IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "C"
25 felony in violation of NRS 205.465, in Clark County, State of Nevada as follows:

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1 On or between March 2017 and June 2017, Carl Robertson, while knowing that Erwin Robertson
2 was deceased, knowingly misrepresented to NVPERS that he was Erwin Robertson to unlawfully take
3 possession and/or control of retirement benefit payments from NVPERS. These retirement payments
4 would have totaled more than \$3,500 and would have been intended for Erwin Robertson.

5 All of which constitutes the crime of ATTEMPT THEFT IN THE AMOUNT OF \$3500 OR MORE, a
6 Category "C" felony, in violation NRS 205.0832 and NRS 193.330.

7 **COUNT III**
8 **FORGERY; OTHER ACTS CONSTITUTING FORGERY**
9 **Category "D" Felony – NRS 205.090, NRS 205.095**

10 That the Defendant, Carl Robertson, in the County of Clark, State of Nevada, did with intent to
11 injure or defraud: forge a letter or written communication or copy or purported copy thereof, or sent or
12 delivered, or connived at the sending or delivery of a false or fictitious telegraph message or copy or
13 purported copy thereof, whereby or wherein the sentiments, opinions, conduct, character, purpose,
14 property, interests or rights of any person shall be misrepresented or may be injuriously affected, or
15 knowing any such letter, communication or message or any copy or purported copy thereof to be false,
16 shall utter or publish the same or any copy or purported copy thereof as true; and/or Carl Robertson falsely
17 made, altered, or forged or counterfeited a request for the payment of money and/or power to receive
18 money, and/or the seal and/or handwriting of another, with the intent to damage or defraud any person
19 body politic or corporate, or uttered, published, passed or attempted to pass, as true and genuine, the above
20 named false, altered, forged or counterfeited matters, as above specified and described, knowing it to be
21 false, altered, forged or counterfeited with the intent to prejudice, damage or defraud any person, body
22 politic or corporate, whether the person, body politic or corporate, resides in this State or not, to wit:

23 On or about May 1, 2017, Carl Robertson knowingly forged, altered, and/or counterfeited a
24 document designed to acquire from NVPERS retirement benefit payments intended for Erwin Robertson.
25 Carl Robertson knowingly forged, altered, and/or counterfeited this document, dated April 25, 2017, by:
26 forging the signature of Erwin Robertson; and/or forging the handwriting and signature of the notary,
27 Dunisley San Juan; and/or forging, altering, or counterfeiting the document to appear as if it had been
28 notarized by Dunisley San Juan. Despite knowing that this document was forged or otherwise false, Carl
Robertson communicated/uttered the document to NVPERS which it received on or about May 4, 2017.

1 All of which constitutes the crime of FORGERY and/or OTHER ACTS CONSTITUTING
2 FORGERY, a Category "D" felony, in violation of NRS 205.090 and/or 205.095.

3 **COUNT IV**
4 **FORGERY; OTHER ACTS CONSTITUTING FORGERY**
5 **Category "D" Felony – NRS 205.090, NRS 205.095**

6 That the Defendant, Carl Robertson, in the County of Clark, State of Nevada, did with intent to
7 injure or defraud: forge a letter or written communication or copy or purported copy thereof, or sent or
8 delivered, or connived at the sending or delivery of a false or fictitious telegraph message or copy or
9 purported copy thereof, whereby or wherein the sentiments, opinions, conduct, character, purpose,
10 property, interests or rights of any person shall be misrepresented or may be injuriously affected, or
11 knowing any such letter, communication or message or any copy or purported copy thereof to be false,
12 shall utter or publish the same or any copy or purported copy thereof as true; and/or Carl Robertson falsely
13 made, altered, or forged or counterfeited a request for the payment of money and/or power to receive
14 money, and/or the seal and/or handwriting of another, with the intent to damage or defraud any person
15 body politic or corporate, or uttered, published, passed or attempted to pass, as true and genuine, the above
16 named false, altered, forged or counterfeited matters, as above specified and described, knowing it to be
17 false, altered, forged or counterfeited with the intent to prejudice, damage or defraud any person, body
18 politic or corporate, whether the person, body politic or corporate, resides in this State or not, to wit:

19 On or about May 25, 2017, Carl Robertson knowingly forged, altered, and/or counterfeited a document
20 designed to acquire from NVPERS retirement benefit payments intended for Erwin Robertson. Carl
21 Robertson knowingly forged, altered, and/or counterfeited this document, dated May 25, 2017, by: forging
22 the signature of Erwin Robertson; and/or forging or counterfeiting the document to appear as if it had been
23 notarized by a fictitious notary, Mark Rogers. Despite knowing that this document was
24 forged/counterfeited or otherwise false, Carl Robertson communicated/uttered the document to NVPERS
25 which it received on or about May 31, 2017.

26 All of which constitutes the crime of FORGERY and/or OTHER ACTS CONSTITUTING
27 FORGERY, a Category "D" felony, in violation of NRS 205.090 and/or 205.095.

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1 **COUNT V**
2 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**
3 **ESTABLISH FALSE STATUS OR IDENTITY**

4 **Category "C" Felony – NRS 205.465**

5 That the Defendant, Carl Robertson, in the County of Clark, State of Nevada, did unlawfully
6 possess, sell or transfer any document or personal identifying information for the purpose of establishing a
7 false status, occupation, membership, license or identity for himself or herself or any other person, to wit:

8 On or about May 4, 2017, Carl Robertson, did possess and/or transfer the NVPERS document
9 described more fully in Count 3, to NVPERS for the purpose of establishing himself as Erwin Robertson
10 and/or to receive retirement benefit payments as a member of NVPERS.

11 All of which constitutes the crime of POSSESSION OR SALE OF DOCUMENT OR PERSONAL
12 IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a Category "C"
13 felony, in violation of NRS 205.465.

14 **COUNT VI**
15 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**
16 **ESTABLISH FALSE STATUS OR IDENTITY**

17 **Category "C" Felony – NRS 205.465**

18 That the Defendant, Carl Robertson, in the County of Clark, State of Nevada, did unlawfully
19 possess, sell or transfer any document or personal identifying information for the purpose of establishing a
20 false status, occupation, membership, license or identity for himself or herself or any other person, to wit:

21 On or about May 31, 2017, Carl Robertson, did possess and/or transfer the NVPERS document
22 described more fully in Count 4, to NVPERS for the purpose of establishing himself as Erwin Robertson
23 and/or to receive retirement benefit payments as a member of NVPERS.

24 All of which constitutes the crime of POSSESSION OR SALE OF DOCUMENT OR PERSONAL
25 IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a Category "C"
26 felony, in violation of NRS 205.465.

27 **COUNT VII**
28 **POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**
29 **ESTABLISH FALSE STATUS OR IDENTITY**

30 **Category "C" Felony – NRS 205.465**

31 That the Defendant, Carl Robertson, in the County of Clark, State of Nevada, did unlawfully
32 possess, sell or transfer any document or personal identifying information for the purpose of establishing a
33 false status, occupation, membership, license or identity for himself or herself or any other person, to wit:

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1 On or about May 10, 2017, Carl Robertson, for the purpose of establishing himself as Erwin
2 Robertson and/or to receive retirement benefit payments as a member of NVPERS, did possess and/or
3 transfer a document entitled "Change of Personal Information Form," to NVPERS. In this document Carl
4 Robertson, using the identity of Erwin Robertson, requested that Erwin's contact information, including
5 address and telephone numbers, be switched to his own. This document was purportedly signed by Erwin
6 Robertson on May 8, 2017 and received by NVPERS on or about May 10, 2017.

7 All of which constitutes the crime of POSSESSION OR SALE OF DOCUMENT OR PERSONAL
8 IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a Category "C"
9 felony, in violation of NRS 205.465.

10 All of which is contrary to the form, force and effect of the statutes in such cases made and
11 provided, and against the peace and dignity of the state of Nevada.

12 DATED this 18th day of July, 2016.

13 SUBMITTED BY

14 ADAM PAUL LAXALT
15 Attorney General

16 By: 

17 MICHAEL DETMER, Bar No. 10873
18 Deputy Attorney General

Attorneys for the State of Nevada

19 ENDORSEMENT: A True Bill

20
21 By: 
22 Foreperson, Clark County Grand Jury
23 GJ#_17AGJ028X
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