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8

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

AUG 02 2017

BY, _____
DULCE MARIE ROMEA, DEPUTY

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

11 THE STATE OF NEVADA,
12 Plaintiff,
13 vs

Case No.: C-17-325448-3

Dept. No.: XXV

14 ROBERT MILK ID#1261837,
KENNETH JOHNSON ID#2584164,
15 **CURTIS ACREE ID#3029209,**
ROOSEVELT WARREN ID#2722938,
16 KRISTI MILK,
and JOEL HENDRIX ID#1524787

17 Defendants.

18 **INDICTMENT**

19
20 Defendants, ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, ROOSEVELT
21 WARREN, KRISTI MILK, and JOEL HENDRIX, above named, are accused by the Grand Jury of
22 having committed the following offenses:

23 OFFERING FALSE INSTRUMENT FOR FILING OR RECORD, a category "C" felony in
24 violation of NRS 239.330; OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES, a
25 category "B" felony in violation of NRS 205.380; MORTGAGE LENDING FRAUD, a category "C"
26 felony in violation of NRS 205.372; OBTAINING AND USING PERSONAL IDENTIFYING
27 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463; and
28 BURGLARY, a category "B" felony, in violation of NRS 205.060.

1 All of the acts alleged herein have been committed or consummated on or between November
2 2013 and February 2017, by the above-named Defendants, executed in whole or in part within the
3 County of Clark, State of Nevada, in the following manner:

4 **COUNT 1**
5 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
6 **CATEGORY "C" Felony - NRS 239.330**

7 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
8 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
9 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
10 wit:

11 On or about August 25, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and
12 CURTIS ACREE, without lawful authority, with the Defendants being criminally liable under one or
13 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
14 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
15 committed, by providing counsel and/or encouragement and by entering into a course of conduct
16 whereby KENNETH JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS
17 ACREE owned or operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and
18 KENNETH JOHNSON acted as agents of said entities and/or received monies from a bank account in
19 the name of said entities; and whereby CURTIS ACREE offered false documents for filing; and/or (3)
20 pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly
21 offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien
22 Claimant's Certification" for a 2007 BMW, bearing VIN WBXPC934X7WJ02201, knowing said
23 documents to be false, which documents if genuine might be filed with the Department of Motor
24 Vehicles under the laws of the State of Nevada.

25 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
26 RECORD, a category "C" felony in violation of NRS 239.330.

27 **COUNT 2**
28 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
CATEGORY "C" Felony - NRS 239.330

1 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
2 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
3 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
4 wit:

5 On or about June 16, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS
6 ACREE, without lawful authority, with the Defendants being criminally liable under one or more of the
7 following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
8 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
9 providing counsel and/or encouragement and by entering into a course of conduct whereby KENNETH
10 JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS ACREE owned or
11 operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and KENNETH
12 JOHNSON acted as agents of said entities and/or received monies from a bank account in the name of
13 said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
14 committed; knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit"
15 and/or a "Lien Claimant's Certification" for a 2013 Ford Taurus, bearing VIN 1FAHP2KT3DG136398,
16 knowing said documents to be false, which documents if genuine might be filed with the Department of
17 Motor Vehicles under the laws of the State of Nevada.

18 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
19 RECORD, a category "C" felony in violation of NRS 239.330.

20 **COUNT 3**
21 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
22 **CATEGORY "C" Felony - NRS 239.330**

23 Defendants ROBERT MILK, KENNETH JOHNSON, and ROOSEVELT WARREN, in the
24 County of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents
25 or employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
26 wit:

27 On or about November 5, 2013, Defendants ROBERT MILK, KENNETH JOHNSON, and
28 ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under

1 one or more of the following principles of criminal liability, to-wit: (1) by directly committing this
2 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
3 committed, by providing counsel and/or encouragement and by entering into a course of conduct
4 whereby KENNETH JOHNSON owned or operated NV Ranch Inc. and/or Aquarius Towing and/or
5 NVT Storage, and ROOSEVELT WARREN claimed to be a registered owner; and whereby ROBERT
6 MILK and KENNETH JOHNSON acted as agents of said entities and/or obtained monies from a bank
7 account in the name of said entities; and whereby KENNETH JOHNSON offered false documents for
8 filing; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
9 committed; knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit"
10 and/or a "Lien Claimant's Certification" for a 2008 Toyota Sienna, bearing VIN
11 5TDZK22C68S135805, knowing said documents to be false, which documents if genuine might be
12 filed with the Department of Motor Vehicles under the laws of the State of Nevada.

13 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
14 RECORD, a category "C" felony in violation of NRS 239.330.

15
16 **COUNT 4**
OFFERING FALSE INSTRUMENT FOR FILING OR RECORD
17 **CATEGORY "C" Felony - NRS 239.330**

18 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX in the County of
19 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
20 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
21 wit:

22 On or about September 6, 2016, Defendants ROBERT MILK, ROOSEVELT WARREN, and
23 JOEL HENDRIX, without lawful authority, with the Defendants being criminally liable under one or
24 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
25 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
26 committed, by providing counsel and/or encouragement and by entering into a course of conduct
27 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
28 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX

1 acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
2 and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended
3 "Westside Auto & Storage" and/or "David Smith" and/or "Tow Guys" to lien sale documents; and/or
4 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed;
5 knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a
6 "Lien Claimant's Certification" for a 2014 BMW 750I, bearing VIN WBAYA8C50EDS15400,
7 knowing said documents to be false, which documents if genuine might be filed with the Department of
8 Motor Vehicles under the laws of the State of Nevada.

9 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
10 RECORD, a category "C" felony in violation of NRS 239.330.

11
12 **COUNT 5**
13 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
14 **CATEGORY "C" Felony - NRS 239.330**

15 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX in the County of
16 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
17 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
18 wit:

19 On or about February 1, 2017, Defendants ROBERT MILK, ROOSEVELT WARREN, and
20 JOEL HENDRIX without lawful authority, with the Defendants being criminally liable under one or
21 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
22 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
23 committed, by providing counsel and/or encouragement and by entering into a course of conduct
24 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
25 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX
26 acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
27 and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended
28 "Flying O Mini Storage" and/or "Brandon Crawford" to lien sale documents; and whereby JOEL
HENDRIX falsely claimed to have attended a lien sale; and/or (3) pursuant to a conspiracy to commit

1 this crime, with the intent that the crime be committed; knowingly offered for filing with the
2 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a
3 2012 Dodge Challenger, bearing VIN 2C3CDYBT9CH145615, knowing said documents to be false,
4 which documents if genuine might be filed with the Department of Motor Vehicles under the laws of
5 the State of Nevada.

6 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
7 RECORD, a category "C" felony in violation of NRS 239.330.

8
9 **COUNT 6**
10 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
11 **CATEGORY "C" Felony - NRS 239.330**

12 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
13 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
14 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
15 wit:

16 On or about June 5, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS
17 ACREE, without lawful authority, with the Defendants being criminally liable under one or more of the
18 following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
19 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
20 providing counsel and/or encouragement and by entering into a course of conduct whereby KENNETH
21 JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS ACREE owned or
22 operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and KENNETH
23 JOHNSON acted as agents of said entities and/or received monies from a bank account in the name of
24 said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
25 committed; knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit"
26 and/or a "Lien Claimant's Certification" for a 2007 Lexus LS, bearing VIN JTHBL46F775046083,
27 knowing said documents to be false, which documents if genuine might be filed with the Department of
28 Motor Vehicles under the laws of the State of Nevada.

All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR

1 RECORD, a category "C" felony in violation of NRS 239.330.

2
3 **COUNT 7**
4 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**
5 **CATEGORY "C" Felony - NRS 239.330**

6 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX, in the County
7 of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
8 employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to
9 wit:

10 On or about February 7, 2017, Defendants ROBERT MILK, ROOSEVELT WARREN, and
11 JOEL HENDRIX, without lawful authority, with the Defendants being criminally liable under one or
12 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
13 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
14 committed, by providing counsel and/or encouragement and by entering into a course of conduct
15 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
16 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX
17 acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
18 and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended
19 "Flying O Mini Storage" and/or "Brandon Crawford" to lien sale documents; and/or (3) pursuant to a
20 conspiracy to commit this crime, with the intent that the crime be committed; knowingly offered for
21 filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's
22 Certification" for a 2015 Mercedes, bearing VIN WDDXJ8FBXFA009106, knowing said documents to
23 be false, which documents if genuine might be filed with the Department of Motor Vehicles under the
24 laws of the State of Nevada.

25 All of which constitutes the crime of OFFERING FALSE INSTRUMENT FOR FILING OR
26 RECORD, a category "C" felony in violation of NRS 239.330.

27 **COUNT 8**
28 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
CATEGORY "B" felony - NRS 205.380

1 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
2 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
3 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
4 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
5 person, and the value of said thing was \$650 or more, to wit:

6 On or about August 25, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and
7 CURTIS ACREE, without lawful authority, with the Defendants being criminally liable under one or
8 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
9 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
10 committed, by providing counsel and/or encouragement and by entering into a course of conduct
11 whereby KENNETH JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS
12 ACREE owned or operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and
13 KENNETH JOHNSON acted as agents of said entities and/or received monies from a bank account in
14 the name of said entities; and whereby CURTIS ACREE offered false documents for filing; and/or (3)
15 pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly
16 and designedly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or
17 a "Lien Claimant's Certification" for a 2007 BMW, bearing VIN WBXPC934X7WJ02201, which
18 documents misrepresented that Defendants and/or their agents or employees had sent required notice to
19 California Auto Finance, thereby obtaining a security interest in said vehicle by false pretense, with the
20 value of said vehicle and/or security interest being \$650 or more.

21 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
22 PRETENSES, a category "B" felony in violation of NRS 205.380.

23
24 **COUNT 9**
OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES
25 **CATEGORY "B" felony - NRS 205.380**

26 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
27 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
28 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any

1 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
2 person, and the value of said thing was \$650 or more, to wit:

3 On or about June 16, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS
4 ACREE, without lawful authority, with the Defendants being criminally liable under one or more of the
5 following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
6 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
7 providing counsel and/or encouragement and by entering into a course of conduct whereby KENNETH
8 JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS ACREE owned or
9 operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and KENNETH
10 JOHNSON acted as agents of said entities and/or received monies from a bank account in the name of
11 said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
12 committed; knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien
13 Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2013 Ford Taurus, bearing VIN
14 1FAHP2KT3DG136398, which documents misrepresented that Defendants and/or their agents or
15 employees had sent required notice to Ford Motor Credit, thereby obtaining a security interest in said
16 vehicle by false pretense, with the value of said vehicle and/or security interest being \$650 or more.

17 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
18 PRETENSES, a category "B" felony in violation of NRS 205.380.

19
20 **COUNT 10**
OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES
21 **CATEGORY "B" felony - NRS 205.380**

22 Defendants ROBERT MILK, KENNETH JOHNSON, and ROOSEVELT WARREN, in the
23 County of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents
24 or employees, without lawful authority, knowingly, by false pretense, obtained from any other person
25 any money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
26 person, and the value of said thing was \$650 or more, to wit:

27 On or about November 5, 2013, Defendants ROBERT MILK, KENNETH JOHNSON, and
28 ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under

1 one or more of the following principles of criminal liability, to-wit: (1) by directly committing this
2 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
3 committed, by providing counsel and/or encouragement and by entering into a course of conduct
4 whereby KENNETH JOHNSON owned or operated NV Ranch Inc. and/or Aquarius Towing and/or
5 NVT Storage, and ROOSEVELT WARREN claimed to be a registered owner; and whereby ROBERT
6 MILK and KENNETH JOHNSON acted as agents of said entities and/or obtained or used monies from
7 a bank account in the name of said entities; and whereby KENNETH JOHNSON offered false
8 documents for filing; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the
9 crime be committed; knowingly and designedly offered for filing with the Department of Motor
10 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2008 Toyota Sienna,
11 bearing VIN 5TDZK22C68S135805, which documents misrepresented that Defendants and/or their
12 agents or employees had sent required notice to Toyota Motor Credit, thereby obtaining a security
13 interest in said vehicle by false pretense, with the value of said vehicle and/or security interest being
14 \$650 or more.

15 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
16 PRETENSES, a category "B" felony in violation of NRS 205.380.

17
18 **COUNT 11**
19 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
20 **CATEGORY "B" felony - NRS 205.380**

21 Defendant ROBERT MILK, in the County of Clark, State of Nevada, without lawful authority,
22 knowingly, by false pretense, obtained from any other person any money, goods, wares, chattels, or
23 other valuable thing, with the intent to cheat or defraud the other person, and the value of said thing was
24 \$650 or more, to wit:

25 On or about September 9, 2016, Defendant ROBERT MILK knowingly and designedly
26 provided false information on loan documents submitted to TD Auto Finance and/or Chapman Dodge,
27 in order to obtain a 2016 Dodge Ram bearing VIN 3C63RRHL5GG278217, which documents
28 misrepresented Defendant's financial condition and/or source of income and/or employment and/or
residence, thereby obtaining an interest in said vehicle by false pretense, with the value of said vehicle

1 and/or interest being \$650 or more.

2 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
3 PRETENSES, a category "B" felony in violation of NRS 205.380.

4
5 **COUNT 12**
6 **BURGLARY**
7 **CATEGORY "B" felony - NRS 205.060**

8 On or about September 9, 2016, Defendant ROBERT MILK, in the County of Clark, State of
9 Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony,
10 to wit: Obtaining Money or Property by False Pretense, that certain building occupied by Chapman
11 Dodge, located at 3175 East Sahara Avenue, Las Vegas, Clark County, Nevada.

12 All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS
13 205.060.

14 **COUNT 13**
15 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
16 **CATEGORY "B" felony - NRS 205.380**

17 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX, in the County
18 of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
19 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
20 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
21 person, and the value of said thing was \$650 or more, to wit:

22 On or about September 6, 2016, Defendants ROBERT MILK, ROOSEVELT WARREN, and
23 JOEL HENDRIX, without lawful authority, with the Defendants being criminally liable under one or
24 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
25 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
26 committed, by providing counsel and/or encouragement and by entering into a course of conduct
27 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
28 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX
acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended

1 "Westside Auto & Storage" and/or "David Smith" and/or "Tow Guys" to lien sale documents; and/or
2 (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed;
3 knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien Sale
4 Affidavit" and/or a "Lien Claimant's Certification" for a 2014 BMW 750I, bearing VIN
5 WBAYA8C50EDS15400, which documents misrepresented that Defendants and/or their agents or
6 employees obtained said vehicle via auction, thereby obtaining an interest in said vehicle by false
7 pretense, with the value of said vehicle and/or interest being \$650 or more.

8 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
9 PRETENSES, a category "B" felony in violation of NRS 205.380.

10
11 **COUNT 14**
12 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
13 **CATEGORY "B" felony - NRS 205.380**

14 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX in the County of
15 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
16 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
17 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
18 person, and the value of said thing was \$650 or more, to wit:

19 On or about February 1, 2017, Defendants ROBERT MILK, ROOSEVELT WARREN, and
20 JOEL HENDRIX, without lawful authority, with the Defendants being criminally liable under one or
21 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
22 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
23 committed, by providing counsel and/or encouragement and by entering into a course of conduct
24 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
25 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX
26 acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
27 and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended
28 "Flying O Mini Storage" and/or "Brandon Crawford" to lien sale documents; and whereby JOEL
HENDRIX falsely claimed to have attended a lien sale; and/or (3) pursuant to a conspiracy to commit

1 this crime, with the intent that the crime be committed; knowingly and designedly offered for filing
2 with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's
3 Certification" for a 2012 Dodge Challenger, bearing VIN 2C3CDYBT9CH145615, which documents
4 misrepresented that Defendants and/or their agents or employees obtained said vehicle via auction,
5 thereby obtaining an interest in said vehicle by false pretense, with the value of said vehicle and/or
6 interest being \$650 or more.

7 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
8 PRETENSES, a category "B" felony in violation of NRS 205.380.

9
10 **COUNT 15**
11 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
12 **CATEGORY "B" felony - NRS 205.380**

13 Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS ACREE, in the County of
14 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
15 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
16 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
17 person, and the value of said thing was \$650 or more, to wit:

18 On or about June 5, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, and CURTIS
19 ACREE, without lawful authority, with the Defendants being criminally liable under one or more of the
20 following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
21 aiding or abetting in the commission of this crime, with the intent that this crime be committed, by
22 providing counsel and/or encouragement and by entering into a course of conduct whereby KENNETH
23 JOHNSON owned or operated NV Ranch dba Statewide Towing, and/or CURTIS ACREE owned or
24 operated Towing Jamison dba Statewide Towing; and whereby ROBERT MILK and KENNETH
25 JOHNSON acted as agents of said entities and/or received monies from a bank account in the name of
26 said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
27 committed; knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien
28 Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2007 Lexus LS, bearing VIN
JTHBL46F775046083, which documents misrepresented that Defendants and/or their agents or

1 employees had sent required notice to Toyota Motor Credit, thereby obtaining a security interest in said
2 vehicle by false pretense, with the value of said vehicle and/or security interest being \$650 or more.

3 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
4 PRETENSES, a category "B" felony in violation of NRS 205.380.

5
6 **COUNT 16**
7 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
8 **CATEGORY "B" felony - NRS 205.380**

9 Defendants ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX in the County of
10 Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
11 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
12 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
13 person, and the value of said thing was \$650 or more, to wit:

14 On or about February 7, 2017, Defendants ROBERT MILK, ROOSEVELT WARREN, and
15 JOEL HENDRIX, without lawful authority, with the Defendants being criminally liable under one or
16 more of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
17 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
18 committed, by providing counsel and/or encouragement and by entering into a course of conduct
19 whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX operated Tow Guys, Inc.
20 and/or KBR Auto; and whereby ROBERT MILK, ROOSEVELT WARREN, and JOEL HENDRIX
21 acted as agents of said entities and/or obtained monies from a bank account in the name of said entities;
22 and whereby ROBERT MILK, ROOSEVELT WARREN, and/or JOEL HENDRIX falsely appended
23 "Flying O Mini Storage" and/or "Brandon Crawford" to lien sale documents; and/or (3) pursuant to a
24 conspiracy to commit this crime, with the intent that the crime be committed; knowingly and
25 designedly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a
26 "Lien Claimant's Certification" for a 2015 Mercedes, bearing VIN WDDXJ8FBXFA009106, which
27 documents misrepresented that Defendants and/or their agents or employees and/or a third party
28 obtained said vehicle via auction, thereby obtaining an interest in said vehicle by false pretense, with
the value of said vehicle and/or interest being \$650 or more.

1 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
2 PRETENSES, a category "B" felony in violation of NRS 205.380.

3
4 **COUNT 17**
5 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**
6 **CATEGORY "B" felony - NRS 205.380**

7 Defendants ROBERT MILK, CURTIS ACREE, and ROOSEVELT WARREN, in the County
8 of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or
9 employees, without lawful authority, knowingly, by false pretense, obtained from any other person any
10 money, goods, wares, chattels, or other valuable thing, with the intent to cheat or defraud the other
11 person, and the value of said thing was \$650 or more, to wit:

12 On or about November 15 2014, Defendants ROBERT MILK, CURTIS ACREE, and
13 ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under
14 one or more of the following principles of criminal liability, to-wit: (1) by directly committing this
15 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
16 committed, by providing counsel and/or encouragement and by entering into a course of conduct
17 whereby ROBERT MILK, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc.
18 and/or State Wide Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or
19 Great Buy, and whereby ROBERT MILK, CURTIS ACREE, and ROOSEVELT WARREN acted as
20 agents of said entities and/or obtained monies from a bank account in the name of said entities, and
21 whereby ROBERT MILK and ROOSEVELT WARREN provided insufficient title to Carlos Penagos
22 after received money in exchange for said title; and/or (3) pursuant to a conspiracy to commit this
23 crime, with the intent that the crime be committed; knowingly and designedly sold a vehicle to Carlos
24 Penagos, to-wit: a 2014 Nissan Sentra, bearing VIN 3N1AB7AP0EL608908, with Defendants and/or
25 their agents or employees misrepresenting that they would provide legally sufficient title for said
26 vehicle to Carlos Penagos, thereby obtaining cash by false pretense, with the value of said cash being
27 \$650 or more.

28 All of which constitutes the crime of OBTAINING MONEY OR PROPERTY UNDER FALSE
PRETENSES, a category "B" felony in violation of NRS 205.380.

COUNT 18

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER
CATEGORY "B" felony – NRS 205.463

Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful authority, obtained personal identifying information of another with the intent to commit an unlawful act, and/or used the personal identifying information for an unlawful purpose, including, without limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

On or about June 16, 2016, Defendant ROOSEVELT WARREN, without lawful authority, used the social security number XXX-XX-9368, rightfully belonging to another person, at Wells Fargo Bank, located at 801 North Rancho Drive, Las Vegas, Nevada, in order to cash a check.

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

COUNT 19

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER
CATEGORY "B" felony – NRS 205.463

Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful authority, obtained personal identifying information of another with the intent to commit an unlawful act, and/or used the personal identifying information for an unlawful purpose, including, without limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

On or about December 29, 2014, Defendant, ROOSEVELT WARREN, without lawful authority, used the social security number XXX-XX-6391, rightfully belonging to another person, at Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Nevada, in order to withdraw cash.

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

COUNT 20

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER
CATEGORY "B" felony – NRS 205.463

Defendant, ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful

1 authority, obtained personal identifying information of another with the intent to commit an unlawful
2 act, and/or used the personal identifying information for an unlawful purpose, including, without
3 limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

4 On or about October 23, 2015, Defendant, ROOSEVELT WARREN, without lawful authority,
5 used the social security number XXX-XX-6898, rightfully belonging to another person, at Bank of
6 America, located at 48101 West Charleston Boulevard, Las Vegas, Nevada, in order to withdraw cash.

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

9
10 **COUNT 21**
11 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
12 **CATEGORY "B" felony – NRS 205.463**

13 Defendant, ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful
14 authority, obtained personal identifying information of another with the intent to commit an unlawful
15 act, and/or used the personal identifying information for an unlawful purpose, including, without
16 limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

17 On or about September 15, 2015, Defendant ROOSEVELT WARREN, without lawful
18 authority, used the social security number XXX-XX-8398, rightfully belonging to another person, at
19 Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Nevada, in order to deposit and/or
20 withdraw cash.

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

23 **COUNT 22**
24 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
25 **CATEGORY "B" felony – NRS 205.463**

26 Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful
27 authority, obtained personal identifying information of another with the intent to commit an unlawful
28 act, and/or used the personal identifying information for an unlawful purpose, including, without
limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

1 On or about January 12, 2015, Defendant ROOSEVELT WARREN, without lawful authority,
2 used the social security number XXX-XX-9378, rightfully belonging to another person, at Bank of
3 America, located at 801 North Nellis Boulevard, Las Vegas, Nevada, in order to withdraw cash.

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

6
7 **COUNT 23**
8 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
9 **CATEGORY "B" felony – NRS 205.463**

10 Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful
11 authority, obtained personal identifying information of another with the intent to commit an unlawful
12 act, and/or used the personal identifying information for an unlawful purpose, including, without
13 limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

14 On or about October 9, 2015, Defendant ROOSEVELT WARREN, without lawful authority,
15 used the social security number XXX-XX-9781, rightfully belonging to another person, at Bank of
16 America, located at 801 North Nellis Boulevard, Las Vegas, Nevada, in order to cash a check.

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

19 **COUNT 24**
20 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
21 **CATEGORY "B" felony – NRS 205.463**

22 Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, without lawful
23 authority, obtained personal identifying information of another with the intent to commit an unlawful
24 act, and/or used the personal identifying information for an unlawful purpose, including, without
25 limitation, to obtain credit, a good, a service, or anything of value in the name of that person, to wit:

26 On or about August 8, 2016 Defendant ROOSEVELT WARREN, without lawful authority,
27 used the social security number XXX-XX-9949, rightfully belonging to another person, at Bank of
28 America, located at 801 North Nellis Boulevard, Las Vegas, Nevada, in order to withdraw cash.

All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING

1 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

2
3 **COUNT 25**
4 **BURGLARY**

5 **CATEGORY "B" felony - NRS 205.060**

6 On or about June 16, 2016, Defendant ROOSEVELT WARREN, in the County of Clark, State
7 of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a
8 felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building
9 occupied by Wells Fargo Bank, located at 801 North Rancho Drive, Las Vegas, Nevada.

10 All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS
11 205.060.

12 **COUNT 26**
13 **BURGLARY**

14 **CATEGORY "B" felony - NRS 205.060**

15 On or about December 29, 2014, Defendant ROOSEVELT WARREN, in the County of Clark,
16 State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a
17 felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building
18 occupied by Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Clark County,
19 Nevada.

20 All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS
21 205.060.

22 **COUNT 27**
23 **BURGLARY**

24 **CATEGORY "B" felony - NRS 205.060**

25 On or about October 23, 2015, Defendant ROOSEVELT WARREN, in the County of Clark,
26 State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a
27 felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building
28 occupied by Bank of America, located at 48101 West Charleston Boulevard, Las Vegas, Clark County,
Nevada.

All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS
205.060.

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COUNT 28
BURGLARY
CATEGORY "B" felony - NRS 205.060

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On or about September 15, 2015, Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building occupied by Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Clark County, Nevada.

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All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS 205.060.

COUNT 29
BURGLARY
CATEGORY "B" felony - NRS 205.060

On or about January 12, 2015, Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building occupied by Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Clark County, Nevada.

All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS 205.060.

COUNT 30
BURGLARY
CATEGORY "B" felony - NRS 205.060

On or about October 9, 2015, Defendant ROOSEVELT WARREN, in the County of Clark, State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building occupied by Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Clark County, Nevada.

All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS 205.060.

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COUNT 31
BURGLARY
CATEGORY "B" felony - NRS 205.060

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3 On or about August 8, 2016, Defendant ROOSEVELT WARREN, in the County of Clark, State
4 of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a
5 felony, to wit: Obtaining and Using Personal Identifying Information of Another, that certain building
6 occupied by Bank of America, located at 801 North Nellis Boulevard, Las Vegas, Clark County,
7 Nevada.

8 All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS
9 205.060.

COUNT 32
MORTGAGE LENDING FRAUD
CATEGORY "C" felony - NRS 205.372

10
11
12 Defendants, ROBERT MILK and KRISTI MILK, in the County of Clark, State of Nevada,
13 without lawful authority, while acting as participants in a mortgage lending transaction, knowingly and
14 unlawfully made one or more false statements or misrepresentations concerning a material fact, or
15 knowingly concealed or failed to disclose a material fact, to wit:

16 On or about September 7, 2016, Defendants, ROBERT MILK and KRISTI MILK, submitted to
17 the Federal Housing Authority a Uniform Residential Loan Application, in which both ROBERT MILK
18 and KRISTI MILK misrepresented that ROBERT MILK was employed by Tow Guys, Inc. for over two
19 years, and/or misrepresented income and/or gifts and/or the financial status of KRISTI MILK and/or
20 ROBERT MILK.

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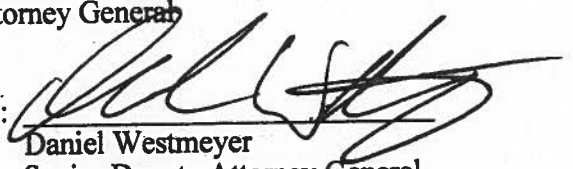
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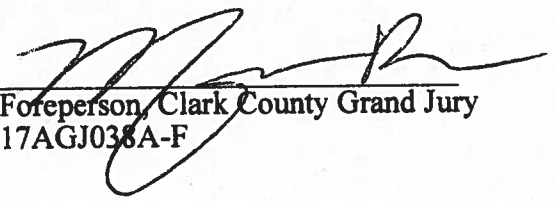
1 All of which constitutes the crime of MORTGAGE LENDING FRAUD, a category "C" felony
2 in violation of NRS 205.372.

3 DATED this 15th day of August, 2017.

4
5 ADAM PAUL LAXALT
6 Attorney General

7 By: 
8 Daniel Westmeyer
9 Senior Deputy Attorney General

10 ENDORSEMENT: A True Bill

11 By: 
12 Foreperson, Clark County Grand Jury
13 17AGJ038A-F
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