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ADAM PAUL LAXALT
Attorney General
Samuel R. Kern (Bar No. 10638)
Chief Deputy Attorney General
Jason Gunnell (Bar No. 13997)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101-1068
P: (702) 486-3904
F: (702) 486-0660
Jgunnell@ag.nv.gov
Attorneys for the State of Nevada

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

DISTRICT COURT

CLARK COUNTY, NEVADA

Case No. C-17-322203-1

Dept. No. XXV

INDICTMENT

The above-named defendant, THOMAS ARVEL BENSON, is accused by the Clark County Grand Jury of the following crimes(s):

- One (1) count of OFFERING A FALSE INSTRUMENT FOR FILING OR RECORD, a category "C" felony, in violation of NRS 239.330;
- one (1) count of THEFT IN THE AMOUNT OF \$3,500.00 OR MORE, a category "B" felony, in violation of NRS 205.0832, 205.0835(4);
- two (2) counts of BURGLARY, a category "B" felony, in violation of NRS 205.060;
- one (1) count of INTERFERING WITH PUBLIC OFFICER, a gross misdemeanor, in

violation of NRS 197.090; 28 / / /

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Indictment
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- one (I) count of PREVENTING OR DISSUADING PERSON FROM TESTIFYING OR PRODUCING EVIDENCE, a gross misdemeanor, in violation of NRS 199.230(2); and
- one (I) count of BRIBING OR INTIMIDATING WITNESS TO INFLUENCE TESTIMONY, a category "C" felony, in violation of NRS 199.240.

All of the above-referenced crimes occurred in Clark County, State of Nevada as follows:

COUNT 1
OFFERING A FALSE INSTRUMENT FOR FILING OR RECORDING
Category "C" Felony - NRS 239.330

That the defendant, THOMAS ARVEL BENSON, in the County of Clark, State of Nevada, by virtue of his own actions or by the actions of his agents or employees, without lawful authority, did knowingly procure or offer any false or forged instrument to be filed, registered or recorded in any public office, which instrument, if genuine, might be filed, registered or recorded in a public office under any law of this State or of the United States, to wit:

On or about May 4, 2016, the Defendant and/or one of Defendant's agents acting at his direction did knowingly offer a falsified Nevada Residential Lease Agreement to be recorded by the Clark County Recorder, which document, if genuine, might be filed under NRS 111.310.

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime, all of which is a felony in violation of NRS 239.330.

COUNT 2
BURGLARY
Category "B" Felony - NRS 205.060

That the Defendant, THOMAS ARVEL BENSON, in County of Clark, State of Nevada, did by the virtue of his own actions or by the actions of his agents or employees, did knowingly, willfully, and unlawfully, by day or night, enter any house, room, apartment, tenement or other building, with the intent to obtain property by false pretenses and/or to commit any felony, to wit:

On or about May 4, 2016, the Defendant and/or one of Defendant's agents acting at his direction did enter the building of the Clark County Recorder, 500 S Grand Central Pkwy, Las Vegas,

NV 89155, with the specific intent to commit the felony crime of Offering a False Instrument for Filing or Record as set forth more fully in Count I .

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime, all of which is a felony in violation of NRS 205.060.

COUNT 3
THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "8" Felony -NRS205.0832, NRS205.0835(4)

That the Defendant, THOMAS ARVEL BENSON, in the County of Clark, State of Nevada, did by virtue of his own actions or by the actions of his agents or employees, without lawful authority knowingly: control property of another person with the intent to deprive that person of the property; and/or convert, make an unauthorized transfer of an interest in, or without authorization control property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use; and/or obtain property or services of another person by a material misrepresentation with intent to deprive that person of the property or services; and/or control property of another person knowing or having reason to know that the property was stolen, and the value of said property was \$3,500 or more, to wit:

Between on or about April 20, 2016 and May 15, 2016, the Defendant and/or one or more of Defendant's agents acting at his direction controlled the personal property of

and/or located at

, Las Vegas, Nevada with the intent to deprive

and/or of the personal property that

has a value of \$3,500 or more.

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding,

inducing and/or otherwise procuring the other to commit the crime, all of which is a felony in violation of NRS 205.0832, 205.0835(4).

COUNT 4
BURGLARY
Category "B" Felony - NRS 205.060

That the Defendant, THOMAS ARVEL BENSON, in County of Clark, State of Nevada, did by the virtue of his own actions or by the actions of his agents or employees, did knowingly, willfully, and unlawfully, by day or night, enter any house, room, apartment, tenement or other building, with the intent to obtain property by false pretenses and/or to commit any felony, to wit:

Between on or about April 20, 2016 and May 15, 2016, the Defendant and/or one or more of Defendant's agents acting at his direction did enter the residential property located at

Las Vegas, NV with the specific intent to commit the felony crime of Theft in the Amount of \$3,500 or More as set forth more fully in Count 3.

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime, all of which is a felony in violation of NRS 205.060.

COUNT 5
INTERFERING WITH PUBLIC OFFICER
Gross Misdemeanor - NRS 197.090

That the Defendant, THOMAS ARVEL BENSON, in County of Clark, State of Nevada, did, by virtue of his own actions or by the actions of his agents or employees, by means of threat, force, or violence, attempt to deter or prevent any executive or administrative officer from performing any duty imposed upon the officer by law, to wit:

On or about March 2, 2017, the Defendant and/or one of Defendant's agents acting at his direction filed a purported cease and desist order in the United States District Court District of Nevada naming Las Vegas Metropolitan Police Department Detective Kenneth Mead as a defendant and threatening that Mead, the lead detective on the present case, shall be held in contempt should he assist in grand jury proceedings instituted against Defendant in the present case.

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime, all of which is a gross misdemeanor in violation of NRS 197.090.

COUNT 6
PREVENTING OR DISSUADING PERSON FROM TESTIFYING
OR PRODUCING EVIDENCE
Gross Misdemeanor - NRS 199.230(2)

That the Defendant, THOMAS ARVEL BENSON, in County of Clark, State of Nevada, did, by virtue of his own actions or by the actions of his agents or employees, by persuasion, force, threat, intimidation, deception or otherwise, and with the intent to obstruct the course of justice, prevent or attempt to prevent another person from appearing before any court, or person authorized to subpoena witnesses, as a witness in any action, investigation or other official proceeding, or cause or induce another person to be absent from such a proceeding or evade the process which requires the person to appear as a witness to testify or produce a record, document or other object to wit:

On or about March 2, 2017, the Defendant and/or one of Defendant's agents acting at his direction filed a purported cease and desist order in the United States District Court District of Nevada naming Las Vegas Metropolitan Police Department Detective Kenneth Mead as a defendant and threatening that Mead, the lead detective on the present case, shall be held in contempt should he assist in grand jury proceedings instituted against him in the present case.

Defendant being criminally liable under one or more of the following principles of criminal liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime, all of which is a gross misdemeanor in violation of NRS 199.230(2).

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COUNT 7
BRIBING OR INTIMIDATING WITNESS TO INFLUENCE TESTIMONY
Category "C" Felony - NRS 199.240

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3 That the Defendant, THOMAS ARVEL BENSON, in County of Clark, State of Nevada, did by
4 virtue of his own actions or by the actions of his agents or employees use any force, threat, intimidation
5 or deception with the intent to:

- 6 (a) Influence the testimony of any witness or person who may be called
7 as a witness in an official proceeding;
8 (b) Cause or induce him or her to give false testimony or to withhold true
9 testimony; or
10 (c) Cause or induce him or her to withhold a record, document or other
11 object from the proceeding, to wit:

12 On or about March 2, 2017, the Defendant and/or one of Defendant's agents acting at his
13 direction filed a purported cease and desist order in the United States District Court District of Nevada
14 naming Las Vegas Metropolitan Police Department Detective Kenneth Mead as a defendant and
15 threatening that Mead, the lead detective on the present case, shall be held in contempt should he assist
16 in grand jury proceedings instituted against him in the present case.

17 Defendant being criminally liable under one or more of the following principles of criminal
18 liability (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
19 crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding,
20 inducing and/or otherwise procuring the other to commit the crime, all of which is a felony in violation
21 of NRS 199.240.

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

DATED this 22nd day of March, 2017.


SUBMITTED BY

ADAM PAUL LAXALT
Attorney General

By:  on behalf o

el R. K
evada Bar No. 10638
JASON GUNNELL
Nevada 13ar No. J3997C
Attorneys for the State of Nevada

ENDORSEMENT: A True Bill

By: 
representon, Clark County Grand Jury
OJ#16BGJ087X

