

1 **COMP**

2 ADAM PAUL LAXALT

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FILED

2017 DEC -1 A 8:06

JUSTICE COURT
LAS VEGAS NEVADA

BY GEG
DEPUTY

8 **JUSTICE COURT, LAS VEGAS TOWNSHIP**

9 **CLARK COUNTY, STATE OF NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 PAUL VALDEZ and JOSE NAVARRETE,

14 Defendants.

Case No.: 17F20960A/B

Dept. No.: 7

15
16 **CRIMINAL COMPLAINT**

17 ADAM PAUL LAXALT, Attorney General for the State of Nevada, complains and charges that:

18 The above-named defendants, PAUL VALDEZ and JOSE NAVARRETE, have committed the
19 crimes of one (1) count of OPPRESSION UNDER COLOR OF OFFICE, a category "D" felony in
20 violation of NRS 197.200(2)(a), one (1) count of INHUMANITY TO PRISONER, a Gross Misdemeanor
21 in violation of NRS 212.020(1)(b), and one (1) count of FALSE REPORT BY PUBLIC OFFICER, a
22 Gross Misdemeanor in violation of NRS 197.130.

23 All of the acts alleged herein have been committed or completed on or about October 9, 2016, by
24 the above-named defendants, within the County of Clark, State of Nevada, in the following manner:

25 **COUNT 1**
26 **OPPRESSION UNDER COLOR OF OFFICE**
27 **Category "D" Felony - NRS 197.200(2)(a)**

28 That the defendants, PAUL VALDEZ and JOSE NAVARRETE, in the County of Clark, State of
Nevada, while correctional officers at Southern Desert Correctional Center, unlawfully and maliciously, under

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pretense or color of official authority, used physical force or the immediate threat of physical force to injure the person, property, or rights of another person, to wit:

On or about October 9, 2016, correctional officer VALDEZ and/or correctional officer NAVARRETE, both officers employed by the state of Nevada at that time, ordered inmate Rickie Norelus to stand with his hands raised while facing a wall at the Southern Desert Correctional Center. After Norelus had complied for an extended period of time, VALDEZ approached Norelus from behind and threw him to the ground. VALDEZ and NAVARRETE then used physical force to detain Norelus against his will.

COUNT 2
INHUMANITY TO PRISONER
Gross Misdemeanor - NRS 212.020(1)(b)

That the defendants, PAUL VALDEZ and JOSE NAVARRETE, in the County of Clark, State of Nevada, while correctional officers at Southern Desert Correctional Center, did unlawfully and willfully affect inhumanity or oppression to a prisoner under the care or custody of the Defendants, to wit:

On or about October 9, 2016, correctional officer VALDEZ and/or correctional officer NAVARRETE, both employed by the state of Nevada at the time, ordered inmate Rickie Norelus to stand with his hands raised while facing a wall at the Southern Desert Correctional Center. After Norelus had complied for an extended period of time, VALDEZ approached Norelus from behind and threw him to the ground. VALDEZ and NAVARRETE then used physical force to detain Norelus against his will.

COUNT 3
FALSE REPORT BY PUBLIC OFFICER
Gross Misdemeanor - NRS 197.130

That the defendants, PAUL VALDEZ and JOSE NAVARRETE, in the County of Clark, State of Nevada, while public officers, each knowingly made false or misleading statements in their official reports or statements, to wit:

On or about October 9, 2016, VALDEZ and NAVARRETE each made individual official reports and/or statements about the use of physical force on inmate Rickie Norelus on October 9, 2016. Defendants both knowingly made false or misleading statements about Norelus's conduct in their respective reports.

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.

The Complainant requests a Summons be issued at this time pursuant to NRS 171.106.

1 That Complainant knows these crimes occurred and that the defendants, PAUL VALDEZ and JOSE
2 NAVARRETE, have committed these crimes because Complainant is a Senior Deputy Attorney General,
3 and is in possession of, among other things, an affidavit written by Retired Criminal Investigator David
4 Molnar, known to Complainant to be formerly employed with the Office of the Inspector General, a copy
5 of which is attached and incorporated by reference for the limited purpose of securing a summons.

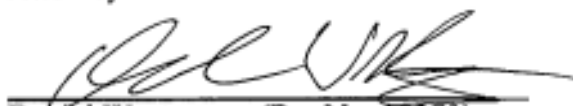
6 Said Complainant makes this declaration under penalty of perjury.

7 DATED this 30 day of November, 2017.

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9 SUBMITTED BY

10 ADAM PAUL LAXALT
11 Attorney General

12 By:

13 
14 Daniel Westmeyer (Bar No. 10273)
15 Senior Deputy Attorney General
16 Attorneys for the State of Nevada
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