

1 **IND**

2 ADAM PAUL LAXALT  
3 Attorney General  
4 DANIEL WESTMEYER  
5 Senior Deputy Attorney General  
6 Nevada Bar Number 10273  
7 555 E Washington Ave, Ste. 3900  
8 Las Vegas, NV 89101-1608  
9 P: (702) 486-3191  
10 F: (702) 486-0660  
11 dwestmeyer@ag.nv.gov  
12 Attorneys for the State of Nevada

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

**OCT 26 2016**

BY, \_\_\_\_\_  
**ALAN PAUL CASTLE, SR, DEPUTY**

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA, )

11 Plaintiff, )

12 vs. )

13 ROBERT MILK ID#1261837 )  
14 KENNETH JOHNSON ID#2584164 )  
15 CURTIS ACREE ID#3029209 )  
16 and ROOSEVELT WARREN ID#2722938 )

17 Defendants. )

CASE NO: C-16-318998-4

DEPT NO: IX

18 **INDICTMENT**

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

21 OFFERING FALSE INSTRUMENT FOR FILING OR RECORD, a category "C" felony in  
22 violation of NRS 239.330; OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES, a  
23 category "B" felony in violation of NRS 205.380; POSSESSION OF STOLEN VEHICLE, a category  
24 "B" felony in violation of NRS 205.273; POSSESSION OF PERSONAL IDENTIFYING  
25 INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "B" felony in  
26 violation of NRS 205.465; POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO  
27 SELL, a category "D" felony in violation of 453.337; PERJURY, a category "D" felony in violation of  
28 NRS 199.145; MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT, a category "B"

1 felony, in violation of NRS 205.377; and RACKETEERING, a category "B" felony, in violation of  
2 NRS 207.400.

3 All of the acts alleged herein have been committed or consummated on or between July 2013  
4 and January 2015, by the above-named Defendants, executed in whole or in part within the County of  
5 Clark, State of Nevada, in the following manner:

6 **COUNT 1**  
7 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
8 **Category "C" Felony - NRS 239.330**

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

12 On or about November 22, 2013, Defendants ROBERT MILK, KENNETH JOHNSON,  
13 CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being  
14 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by  
15 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
16 the intent that this crime be committed, by providing counsel and/or encouragement and by entering  
17 into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and  
18 ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
19 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
20 Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH  
21 JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or  
22 obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to  
23 commit this crime, with the intent that the crime be committed; knowingly offered for filing with the  
24 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
25 2005 Pontiac Aztec, bearing VIN 3G7DA03E05S506562, knowing said documents to be false, which  
26 documents if genuine might be filed with the Department of Motor Vehicles under the laws of the State  
27 of Nevada;

28 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 **COUNT 2**  
3 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
4 **Category "C" Felony - NRS 239.330**

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

9 On or about September 17, 2013, Defendants ROBERT MILK, KENNETH JOHNSON,  
10 CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being  
11 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by  
12 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
13 the intent that this crime be committed, by providing counsel and/or encouragement and by entering  
14 into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and  
15 ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
16 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
17 Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH  
18 JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or  
19 obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to  
20 commit this crime, with the intent that the crime be committed; knowingly offered for filing with the  
21 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
22 2006 Pontiac Torrent, bearing VIN 2CKDL63F166096533, knowing said documents to be false, which  
23 documents if genuine might be filed with the Department of Motor Vehicles under the laws of the State  
24 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 ///

28 ///

///

**COUNT 3**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
**Category "C" Felony - NRS 239.330**

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

On or about July 23, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (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 providing counsel and/or encouragement and by entering into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2001 Lincoln LS, bearing VIN 1LNHM87A71Y617673, knowing said documents to be false, which documents if genuine might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

**COUNT 4**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
**Category "C" Felony - NRS 239.330**

Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, without lawful authority, knowingly procured or offered a false

1 instrument to be filed, to wit:

2 On or about August 9, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
3 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
4 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
5 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
6 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
7 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
8 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
9 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
10 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
11 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
12 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
13 the intent that the crime be committed; knowingly offered for filing with the Department of Motor  
14 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2000 Cadillac Deville,  
15 bearing VIN 1G6KD54Y4YU174283, knowing said documents to be false, which documents if  
16 genuine might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

19 **COUNT 5**  
20 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
21 **Category "C" Felony - NRS 239.330**

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

25 On or about May 26, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
26 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
27 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
28 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent

1 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
2 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
3 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
4 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
5 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
6 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
7 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
8 the intent that the crime be committed; knowingly offered for filing with the Department of Motor  
9 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2013 Ford Taurus,  
10 bearing VIN 1FAHP2KT3DG136398, knowing said documents to be false, which documents if  
11 genuine might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

14 **COUNT 6**

15 **OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
16 **Category "C" Felony - NRS 239.330**

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

20 On or about December 4, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
21 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
22 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
23 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
24 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
25 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
26 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
27 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
28 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS

1 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
2 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
3 the intent that the crime be committed; knowingly offered for filing with the Department of Motor  
4 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2014 Kia Sorento,  
5 bearing VIN 5XYKT3A6XEG524990, knowing said documents to be false, which documents if  
6 genuine might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

9 **COUNT 7**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
10 **Category "C" Felony - NRS 239.330**

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

15 On or about March 12, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
16 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
17 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
18 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
19 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
20 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
21 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
22 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
23 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
24 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
25 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
26 the intent that the crime be committed; knowingly offered for filing with the Department of Motor  
27 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2007 Dodge Charger,  
28 bearing VIN 2B3LA53H37H783525, knowing said documents to be false, which documents if genuine

1 might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

4 **COUNT 8**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**

5 **Category "C" Felony - NRS 239.330**

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

10 On or about July 31, 2013, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
11 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
12 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
13 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
14 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
15 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
16 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
17 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
18 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
19 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
20 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
21 the intent that the crime be committed; knowingly offered for filing with the Department of Motor  
22 Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2006 Mercedes C4,  
23 bearing VIN WDDDJ75X76A051372, knowing said documents to be false, which documents if  
24 genuine might be filed with the Department of Motor 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 ///

28 ///



**COUNT 9**  
**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**  
**Category "C" Felony - NRS 239.330**

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

On or about July 23, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (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 providing counsel and/or encouragement and by entering into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 1997 Honda Civic, bearing VIN 2HGEJ864XVH552394, knowing said documents to be false, which documents if genuine might be filed with the Department of Motor Vehicles under the laws of the State of Nevada;

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

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

Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, in the County of Clark, State of Nevada, either by virtue of their own actions or by the actions of their agents or employees, without lawful authority, knowingly, by false pretense, obtained

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

3 On or about November 22, 2013, Defendants ROBERT MILK, KENNETH JOHNSON,  
4 CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being  
5 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by  
6 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
7 the intent that this crime be committed, by providing counsel and/or encouragement and by entering  
8 into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and  
9 ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
10 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
11 Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH  
12 JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or  
13 obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to  
14 commit this crime, with the intent that the crime be committed; knowingly and designedly offered for  
15 filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's  
16 Certification" for a 2005 Pontiac Aztec, bearing VIN 3G7DA03E05S506562, which documents  
17 misrepresented that Defendants and/or their agents or employees had sent required notice to Loan Max  
18 Title Loans, thereby obtaining a security interest in said vehicle by false pretense, with the value of said  
19 vehicle and/or security interest being \$650 or more;

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

22 **COUNT 11**  
23 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**  
24 **CATEGORY "B" felony - NRS 205.380**

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

On or about September 17, 2013, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (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 providing counsel and/or encouragement and by entering into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2006 Pontiac Torrent, bearing VIN 2CKDL63F166096533, which documents misrepresented that Defendants and/or their agents or employees had sent required notice to Carmax Business Services, thereby obtaining a security interest in said vehicle by false pretense, with the value of said vehicle and/or security interest being \$650 or more;

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 12**

**OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**

**CATEGORY "B" felony - NRS 205.380**

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

On or about July 23, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally

liable under one or more of the following principles of criminal liability, to-wit: (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 providing counsel and/or encouragement and by entering into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2001 Lincoln LS, bearing VIN 1LNHM87A71Y617673, which documents misrepresented that Defendants and/or their agents or employees had sent required notice to Nevada Title and Payday Loans, thereby obtaining a security interest in said vehicle by false pretense, with the value of said vehicle and/or security interest being \$650 or more;

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 13**

**OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**  
**CATEGORY "B" felony - NRS 205.380**

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

On or about August 9, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent

1 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
2 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
3 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
4 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
5 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
6 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
7 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
8 the intent that the crime be committed; knowingly and designedly offered for filing with the  
9 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
10 2000 Cadillac Deville, bearing VIN 1G6KD54Y4YU174283, which documents misrepresented that  
11 Defendants and/or their agents or employees had sent required notice to Nevada Title and Payday  
12 Loans, thereby obtaining a security interest in said vehicle by false pretense, with the value of said  
13 vehicle and/or security interest being \$650 or more;

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

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

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

23 On or about May 27, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
24 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
25 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
26 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
27 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
28 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT

WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed; knowingly and designedly offered for filing with the Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a 2013 Ford Taurus, bearing VIN 1FAHP2KT3DG136398, which documents misrepresented that Defendants and/or their agents or employees had sent required notice to Carey McGill, thereby obtaining a security interest in said vehicle by false pretense, with the value of said vehicle and/or security interest being \$650 or more;

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

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

On or about December 4, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (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 providing counsel and/or encouragement and by entering into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or

1 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
2 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
3 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
4 the intent that the crime be committed; knowingly and designedly offered for filing with the  
5 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
6 2014 Kia Sorento, bearing VIN 5XYKT3A6XEG524990, which documents misrepresented that  
7 Defendants and/or their agents or employees had sent required notice to Jim Marsh Kia and/or EAN  
8 Holding LLC, thereby obtaining a security interest in said vehicle by false pretense, with the value of  
9 said vehicle and/or security interest being \$650 or more;

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

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

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

19 On or about March 12, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
20 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
21 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
22 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
23 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
24 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
25 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
26 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
27 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
28 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a

1 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
2 the intent that the crime be committed; knowingly and designedly offered for filing with the  
3 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
4 2007 Dodge Charger, bearing VIN 2B3LA53H37H783525, which documents misrepresented that  
5 Defendants and/or their agents or employees had sent required notice to On Call Cash, thereby  
6 obtaining a security interest in said vehicle by false pretense, with the value of said vehicle and/or  
7 security 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 **COUNT 17**  
11 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**  
12 **CATEGORY "B" felony - NRS 205.380**

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

18 On or about July 31, 2013, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
19 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
20 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
21 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
22 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
23 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
24 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
25 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
26 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
27 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
28 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
the intent that the crime be committed; knowingly and designedly offered for filing with the



1 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
2 2006 Mercedes C4, bearing VIN WDDDJ75X76A051372, which documents misrepresented that  
3 Defendants and/or their agents or employees had sent required notice to Statewide Auto Service,  
4 thereby obtaining a security interest in said vehicle by false pretense, with the value of said vehicle  
5 and/or security interest being \$650 or more;

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

8 **COUNT 18**  
9 **OBTAINING MONEY OR PROPERTY UNDER FALSE PRETENSES**  
10 **CATEGORY "B" felony - NRS 205.380**

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

16 On or about July 23, 2014, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
17 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
18 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
19 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
20 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
21 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
22 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
23 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
24 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
25 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
26 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
27 the intent that the crime be committed; knowingly and designedly offered for filing with the  
28 Department of Motor Vehicles a "Lien Sale Affidavit" and/or a "Lien Claimant's Certification" for a  
1997 Honda Civic, bearing VIN 2HGEJ864XVH552394, which documents misrepresented that

1 Defendants and/or their agents or employees had sent required notice to Title Max of Nevada, thereby  
2 obtaining a security interest in said vehicle by false pretense, with the value of said vehicle and/or  
3 security interest being \$650 or more;

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

6 **COUNT 19**  
7 **POSSESSION OF STOLEN VEHICLE**  
8 **CATEGORY "B" felony - NRS 205.273**

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

14 On or about January 21, 2015, Defendants ROBERT MILK, KENNETH JOHNSON, CURTIS  
15 ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being criminally  
16 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly  
17 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent  
18 that this crime be committed, by providing counsel and/or encouragement and by entering into a course  
19 of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT  
20 WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc. and/or NVT  
21 Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison Inc. and/or  
22 Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH JOHNSON, CURTIS  
23 ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or obtained monies from a  
24 bank account in the name of said entities; and/or (3) pursuant to a conspiracy to commit this crime, with  
25 the intent that the crime be committed; knowingly had in their possession a motor vehicle which they  
26 knew or had reason to believe had been stolen from JIM MARSH KIA, to-wit: a 2014 Kia Sorrento  
27 bearing VIN 5XYKT3A6XEG524990;

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 20**  
**POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO SELL**  
**CATEGORY "D" felony - NRS 453.337**

On or about January 21, 2015, Defendant ROBERT MILK, in the County of Clark, State of Nevada, did knowingly possess, either actually or constructively, without lawful authority, for the purpose of sale, a controlled substance, to-wit: morphine;

All of which constitutes the crime of POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO SELL, a category "D" felony in violation of NRS 453.337.

**COUNT 21**  
**POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**  
**ESTABLISH FALSE STATUS OR IDENTITY**  
**CATEGORY "E" felony - NRS 205.465**

On or about January 21, 2015, Defendant ROBERT MILK, in the County of Clark, State of Nevada, did knowingly possess, either actually or constructively, a document or personal identifying information for the purpose of establishing a false status or identity for himself, to-wit: a Nevada ID card in the name of David Miller;

All of which constitutes the crime of POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "E" felony in violation of NRS 205.465.

**COUNT 22**  
**POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO**  
**ESTABLISH FALSE STATUS OR IDENTITY**  
**CATEGORY "E" felony - NRS 205.465**

On or about January 21, 2015, Defendant ROBERT MILK, in the County of Clark, State of Nevada, did knowingly possess, either actually or constructively, a document or personal identifying information for the purpose of establishing a false status or identity for himself, to-wit: a Nevada driver's license in the name of Curtis Delray;

All of which constitutes the crime of POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "E" felony in violation of NRS 205.465.

///

///

**COUNT 23**

**POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO  
ESTABLISH FALSE STATUS OR IDENTITY**

**CATEGORY "E" felony - NRS 205.465**

On or about January 21, 2015, Defendant ROBERT MILK, in the County of Clark, State of Nevada, did knowingly possess, either actually or constructively, a document or personal identifying information for the purpose of establishing a false status or identity for himself, to-wit: a Nevada driver's license in the name of Robert Miller;

All of which constitutes the crime of POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "E" felony in violation of NRS 205.465.

**COUNT 24**

**POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO  
ESTABLISH FALSE STATUS OR IDENTITY**

**CATEGORY "E" felony - NRS 205.465**

On or about January 21, 2015, Defendant ROBERT MILK, in the County of Clark, State of Nevada, did knowingly possess, either actually or constructively, a document or personal identifying information for the purpose of establishing a false status or identity for himself, to-wit: a Nevada driver's license in the name of Edward Milk;

All of which constitutes the crime of POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY, a category "E" felony in violation of NRS 205.465.

**COUNT 25**

**OFFERING FALSE INSTRUMENT FOR FILING OR RECORD**

**Category "C" Felony - NRS 239.330**

Defendant ROBERT MILK, in the County of Clark, State of Nevada, either by virtue of his own actions or by the actions of his agents or employees, without lawful authority, knowingly procured or offered a false instrument to be filed, to wit:

On or about October 7, 2014, Defendant ROBERT MILK knowingly offered for filing with the Nevada Secretary of State, Articles of Incorporation for Great Buy Inc., which document listed David Miller as Registered Agent, knowing said document to be false, which document if genuine might be filed with the Secretary of State under the laws of the State of Nevada;

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

3 **COUNT 26**

4 **PERJURY**

5 **Category "D" Felony - NRS 199.145**

6 Defendant ROBERT MILK, in the County of Clark, State of Nevada, either by virtue of his own  
7 actions or by the actions of his agents or employees, without lawful authority, willfully made a false  
8 statement in a declaration made under penalty of perjury, to wit:

9 On or about October 7, 2014, Defendant ROBERT MILK willfully offered for filing with the  
10 Nevada Secretary of State, Articles of Incorporation for Great Buy Inc., which document listed David  
11 Miller as Registered Agent, knowing that statement to be false and that David Miller is not a real  
12 person, which statement was material to the filing in question;

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

15 **COUNT 27**

16 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**

17 **ENTERPRISE OR OCCUPATION**

18 **Category "B" Felony - NRS 205.377**

19 Between July 2013 and January 2015, Defendants ROBERT MILK, KENNETH JOHNSON,  
20 CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being  
21 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by  
22 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
23 the intent that this crime be committed, by providing counsel and/or encouragement and by entering  
24 into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and  
25 ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
26 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
27 Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH  
28 JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or  
obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to  
commit this crime, with the intent that the crime be committed;

As set forth in Counts One (1) through Eighteen (18), incorporated by reference as though fully

1 set forth herein, Defendants have committed multiple transactions involving fraud or deceit in the  
2 course of enterprise or occupation, in two or more transactions in which the purpose, results, methods  
3 or commission was the same or similar; each having a value of \$650 or more.

4 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD  
5 OR DECEIT, a category "B" felony in violation of NRS 205.377.

6 **COUNT 28**  
7 **RACKETEERING**

8 **Category "B" Felony - NRS 207.400, 207.360, 207.390**

9 Between July 2013 and January 2015, Defendants ROBERT MILK, KENNETH JOHNSON,  
10 CURTIS ACREE, and ROOSEVELT WARREN, without lawful authority, with the Defendants being  
11 criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by  
12 directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
13 the intent that this crime be committed, by providing counsel and/or encouragement and by entering  
14 into a course of conduct whereby ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and  
15 ROOSEVELT WARREN operated Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
16 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
17 Inc. and/or Aquarius Towing and/or Great Buy, and whereby ROBERT MILK, KENNETH  
18 JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN acted as agents of said entities and/or  
19 obtained monies from a bank account in the name of said entities; and/or (3) pursuant to a conspiracy to  
20 commit this crime, with the intent that the crime be committed;

21 Defendants have engaged in at least two crimes related to racketeering that have the same or  
22 similar pattern, intents, results, or methods of commission, or are otherwise interrelated. Defendants  
23 ROBERT MILK, KENNETH JOHNSON, CURTIS ACREE, and ROOSEVELT WARREN were  
24 employed by or associated with Tow Guys, Inc. and/or State Wide Towing and/or NV Ranch Inc.  
25 and/or NVT Storage and/or ASAP Towing and/or Roosevelt Cash for Cars Inc. and/or Towing Jamison  
26 Inc. and/or Aquarius Towing and/or Great Buy, and while so employed or associated, conducted or  
27 participated, directly or indirectly, in the affairs of said entities through racketeering activity, and/or in  
28 racketeering activity through the affairs of said entities, as set forth in Counts Ten (10) through  
Eighteen (18) and in Count Twenty-Seven (27), incorporated by reference as though fully set forth

1 herein.

2 As a result of said acts, Defendants unlawfully obtained or derived at least \$2,000,000.00 from  
3 racketeering activity.

4 All of which constitutes the crime of RACKETEERING, a category "B" felony in violation of  
5 NRS 205.377.

6 DATED this 25<sup>th</sup> day of October, 2016.

7  
8 ADAM PAUL LAXALT  
Attorney General

9  
10 By: 

Daniel Westmeyer  
Senior Deputy Attorney General

11  
12 ENDORSEMENT: A True Bill

13 By: 

Foreperson, Clark County Grand Jury