IND **CATHERINE CORTEZ MASTO Attorney General** RUSSÉLL D. SMITH **Chief Deputy Attorney General** Nevada Bar No. 008891 rsmith@ag.nv.gov SARAH E. OVERLY **Deputy Attorney General** Nevada Bar No. 12842 soverly@ag.nv.gov Office of the Attorney General 555 E. Washington Ave., Ste. 3900 Las Vegas, Nevada 89101 (702) 486-3348 - office (702) 486-3768 – fax Attorneys for the State of Nevada

Alm N. Elmin

**CLERK OF THE COURT** 

#### **DISTRICT COURT**

#### **CLARK COUNTY, NEVADA**

THE STATE OF NEVADA,

Plaintiff,

VS.

IAN E. LLOYD,

Defendant.

Case No.: C-13-294242-1

Dept. No.: XII

#### INDICTMENT

The Defendant(s) above named, IAN E. LLOYD (hereinafter "LLOYD") accused by the Clark County Grand Jury of the crimes(s) of one (1) count of KIDNAPPING IN THE FIRST DEGREE, a category "A" felony in violation of NRS 200.310(1) and NRS 200.320(2); one (1) count of SEX TRAFFICKING, a category "A" felony in violation of NRS 201.300, one (1) count of LIVING FROM THE EARNINGS OF A PROSTITUTE, a category "D" felony in violation of NRS 201.320; and two (2) counts of CHILD ABUSE & NEGLECT, a category "B" felony in violation of NRS 200.508, committed on or about July 26, 2013 to August 30, 2013, in the County of Clark, State of Nevada, as follows:

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#### **COUNT 1**

### KIDNAPPING IN THE FIRST DEGREE A Category 'A' Felony – NRS 200.310(1), NRS 200.320(2)

That IAN E. LLOYD ("LLOYD") in the County of Clark, State of Nevada, did willfully, unlawfully, feloniously, and without authority of law, lead, take, entice, carry away or kidnap a known but unnamed female child under the age of 18 years old, with the intent to keep, imprison, or confine said child from her parents, guardians, or other person or person having lawful custody of said minor, or with the intent to hold said minor to unlawful service, or perpetrate upon the person of said minor, any unlawful act for the purpose of prostitution, to wit:

On or about July 26, 2013 to August 30, 2013, **LLOYD** induced a child under the age of 18 years old to travel to Las Vegas, Nevada from Ogden, Utah and kept said child away from her parents for the purpose of engaging said child in the unlawful act of prostitution.

All of which constitutes the crime of KIDNAPPING IN THE FIRST DEGREE, a category 'A' felony, in violation of NRS 220.310(1) and NRS 200.320(2).

#### **COUNT 2**

## SEX TRAFFICKING A Category 'A' Felony – NRS 201.300

That IAN E. LLOYD ("LLOYD") in the County of Clark, State of Nevada, did induce, cause, recruit, harbor, transport, provide, obtain or maintain a child to engage in prostitution, to wit:

On or about July 26, 2013 to August 30, 2013, **LLOYD** contacted and persuaded a known but unnamed female child at least 16 years of age but less than 18 years of age to travel to Las Vegas, Nevada from Ogden, Utah, in order to engage in prostitution with all illegally obtained proceeds kept in **LLOYD's** exclusive control.

All of which constitutes the crime of SEX TRAFFICKING, a category 'A' felony, in violation of NRS 201.300.

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#### **COUNT 3**

#### LIVING FROM THE EARNINGS OF A PROSTITUTE A Category 'D' Felony - NRS 201.320

That IAN E. LLOYD ("LLOYD") in the County of Clark, State of Nevada, did willfully, unlawfully, feloniously, and knowingly accept, receive, levy, or appropriate money, without consideration, from a child at least 16 years of age but less than 18 years of age, the proceeds of prostitution activity, to wit:

On or about August 1, 2013 to August 30, 2013, LLOYD accepted and received proceeds of prostitution activity from a known but unnamed female child at least 16 years of age but less than 18 years of age.

All of which constitutes the crime of LIVING FROM THE EARNINGS OF A PROSTITUTE, a category 'D' felony, in violation of NRS 201.320.

#### **COUNT 4**

#### CHILD ABUSE & NEGLECT A Category 'B' Felony - NRS 200.508

That IAN E. LLOYD ("LLOYD") in the County of Clark, State of Nevada, did willfully, unlawfully, feloniously and knowingly neglect, cause, or permit a child under the age of 18 years old to suffer unjustifiable physical pain or mental suffering, or by permitting said child to be placed in a situation where she might have suffered unjustifiable physical pain or mental suffering, to wit:

On or about August 1, 2013 to August 30, 2013, LLOYD caused and permitted a known but unnamed 16 year old female child to be transported around in a vehicle for the purposes of engaging said child in prostitution. LLOYD caused and permitted a known but unnamed 16 year old female child to engage in child prostitution.

All of which constitutes the crime of CHILD ABUSE & NEGLECT, a category 'B' felony, in violation of NRS 200.508.

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#### **COUNT 5**

#### **CHILD ABUSE & NEGLECT** A Category 'B' Felony - NRS 200.508

That IAN E. LLOYD ("LLOYD") in the County of Clark, State of Nevada, did willfully, unlawfully, feloniously and knowingly neglect, cause, or permit a child under the age of 18 years old to suffer unjustifiable physical pain or mental suffering, or by permitting said child to be placed in a situation where she might have suffered unjustifiable physical pain or mental suffering, to wit:

On or about August 1, 2013 to August 30, 2013, LLOYD transported a 3 year old known but unnamed female child in the backseat of a vehicle whereby the vehicle was being used to transport a 16 year old female child for the purposes of engaging in child prostitution.

All of which constitutes the crime of CHILD ABUSE & NEGLECT, a category 'B' felony, in violation of NRS 200.508.

#### **COUNT 6**

#### **FORFEITURE** NRS 179.1217, 179.1219, 205A.030

The offenses alleged in counts one through four, incorporated by reference as though fully set forth herein, constitute technological crimes pursuant to NRS 179.1217 and NRS 205A.030, and as such, all property derived from, realized through, used, or intended to be used in the course of said technological crimes is subject to forfeiture pursuant to NRS 179.1219.

The property involved, derived from, realized through, used or intended to be used to facilitate the aforementioned technological crimes includes, without limitation:

- 1. A Nissan Sedan automobile, License Plate 463YZF; and
- 2. A Lincoln Sedan automobile, License Plate 882XLV; and
- 3. Real property located at 1420 Beams Avenue, North Las Vegas, Nevada, 89081.

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

Dated this 21 day of November, 2013.

**CATHERINE CORTEZ MASTO Attorney General** 

By:

RUSSELL D. SMITH Chief Deputy Attorney General SARAH E. OVERLY

Deputy Attorney General Fraud Unit

ENDORSEMENT: A True Bill

Foreperson, Clark County Grand Jury