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1	IND ADAM PAUL LAXALT	· .
2	Attorney General Daniel E. Westmeyer (Bar. No. 10273)	FILED IN OPEN COURT STEVEN D. GRIERSON
3	Senior Deputy Attorney General State of Nevada	CLERK OF THE COURT
4	Office of the Attorney General 555 E. Washington Ave., Ste. 3900	MAR 1 4. 2018
5	Las Vegas, NV 89101 P: (702) 486-3420	BY,
6	F: (702) 486-0660 dwestmeyer@ag.nv.gov	DULCE MARIE ROMEA, DEPUTY
7	Attorneys for State of Nevada	
8	DISTRICT COURT	
9	CLARK COUNTY, NEVADA	
10	STATE OF NEVADA,	Case No. C-18-330565-1
11	Plaintiff(s),	Dept. No. XXIII
12	vs.	
13	PATRICK JAMES DUFFY, aka James Patrick Duffy	
14	Defendant.	
15		<u>.</u>
16	INDICTMENT	
17	Defendant, PATRICK JAMES DUFFY, above named, is accused by the Grand Jury of having	
18	committed the following offenses:	
19	MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in	
20	violation of NRS 205.125; OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION	
21	OF ANOTHER, a category "B" felony in violation of NRS 205.463; and PERJURY, a category "D"	
22	felony in violation of NRS 199.145.	
23	All of the acts alleged herein have been committed or consummated on or between May 26,	
24	2016, and June 1, 2016, by the above-named Defendant, executed in whole or in part within the County	
25	of Clark, State of Nevada, in the following manner:	
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MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION Category "D" Felony - NRS 205.125

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Clay Abajian, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

<u>COUNT 2</u> <u>MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION</u> Category "D" Felony - NRS 205.125

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Debra Allison Copening, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION Category "D" Felony - NRS 205.125

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Nicole Veater, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

<u>COUNT 4</u> <u>MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION</u> Category "D" Felony - NRS 205.125

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Fluer Abajian, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125

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COUNT 5 G FILING OR ALTERING

MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION Category "D" Felony - NRS 205.125

On or about May 26, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Stuart Scott Veaudry, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

COUNT 6

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER Category "B" Felony - NRS 205.463

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, knowingly obtained and used personal identifying information of another person for an unlawful purpose, to wit:

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the personal identifying information of Clay Abajian, to-wit: Clay Abajian's address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 1, incorporated by reference as though fully set forth herein;

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

COUNT 7

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER Category "B" Felony - NRS 205.463

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, knowingly obtained and used personal identifying information of another person for an unlawful purpose, to wit:

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the personal identifying information of Debra Allison Copening, to-wit: Debra Allison Coopening's address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 2, incorporated by reference as though fully set forth herein;

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

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER Category "B" Felony - NRS 205.463

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, knowingly obtained and used personal identifying information of another person for an unlawful purpose, to wit:

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the personal identifying information of Nicole Veater, to-wit: Nicole Veater's address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 3, incorporated by reference as though fully set forth herein;

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

COUNT 9

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER Category "B" Felony - NRS 205.463

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, knowingly obtained and used personal identifying information of another person for an unlawful purpose, to wit:

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the personal identifying information of Fluer Abajian, to-wit: Fluer Abajian's address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 4, incorporated by reference as though fully set forth herein;

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

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COUNT 10

OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER Category "B" Felony - NRS 205.463

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, knowingly obtained and used personal identifying information of another person for an unlawful purpose, to wit:

On or about May 26, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the personal identifying information of Stuart Scott Veaudry, to-wit: Stuart Scott Veaudry's address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 5, incorporated by reference as though fully set forth herein;

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

COUNT 11 Category "D" Felony - NRS 199.145

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

On or about May 26, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election ballot access contained signatures affixed in his presence, knowing that statement to be false, which statement was material to the filing in question;

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

Category "D" Felony - NRS 199.145

Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election ballot access contained signatures affixed in his presence, knowing that statement to be false, which

statement was material to the filing in question; 1 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS 2 3 199.145. 4 <u>COUNT 13</u> 5 Category "D" Felony - NRS 199.145 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful 6 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit: 7 On or about May 28, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely 8 declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election 9 ballot access contained signatures affixed in his presence, knowing that statement to be false, which 10 statement was material to the filing in question; 11 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS 12 13 199.145. day of, 2017. DATED this 14 SUBMITTED BY 15 16 ADAM PAUL LAXALT Attorney General 17 18 Daniel Westmeyer 19 Senior Deputy Attorney General Nevada Bar No. 10273 20 Attorneys for the State of Nevada 21 22 ENDORSEMENT: A True Bill 23 24 By: person/Glark County Grand Jury 25 26 27 28