

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

MAY 02 2018

BY, _____
DULCE MARIE ROMEA, DEPUTY

7
8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,
11
12 Plaintiff,
13 v.
14 GERI LYN MCKINNON, __
15 Defendant.

Case No.: C-18-331720-1
Dept. No.: 1

16
17 **INDICTMENT**

18 The above named defendant, GERI LYN MCKINNON, is accused by the Clark County Grand Jury
19 of the crimes(s) of three (3) counts of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category "B"
20 felony in violation of NRS 205.0832 and one (1) count of PATTERN OF FALSE REPRESENTATION
21 CONCERNING TITLE, a category "B" felony in violation of NRS 205.395, in Clark County, State of
22 Nevada as follows:

23 **COUNT I**
24 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
Category "B" Felony - NRS 205.0832

25 That the Defendant, GERI LYN MCKINNON, in the County of Clark, State of Nevada, did
26 without lawful authority knowingly: control property of another person with the intent to deprive that
27 person of the property; and/or control property of another person knowing or having reason to know that
28 the property was stolen, and the value of said property was \$3,500 or more, to wit:

1 On or about September 18, 2015, GERI LYN MCKINNON, by virtue of her own actions or by the
2 actions of her agents or employees, did knowingly, and without lawful authority, sign and cause to be
3 recorded with the Clark County Recorder's Office a deed to real property bearing assessor's parcel number
4 163-30-816-006 and commonly known as 5654 Thunder Spirit Street, Las Vegas, falsely purporting to
5 take title, on behalf of "Creative Solutions 4 U", from "Pastor Ernest C. Aldridge and his successors, a
6 corpoeation sole" [sic]. She subsequently exercised control of the real property at 5654 Thunder Spirit
7 Street, asserting herself as having ownership interest in and/or legal control over the property. When she
8 did these acts, she knew or had reason to know that the property, which was worth more than \$3,500, was
9 stolen from the true owner, Federal National Mortgage Association, a Government Sponsored Enterprise,
10 and did the acts with the intent to deprive the true owner.

11 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category
12 "B" felony, in violation NRS 205.0832.

13 **COUNT II**
14 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
15 **Category "B" Felony - NRS 205.0832**

16 That the Defendant, GERI LYN MCKINNON, in the County of Clark, State of Nevada, did
17 without lawful authority knowingly: control property of another person with the intent to deprive that
18 person of the property; and/or control property of another person knowing or having reason to know that
19 the property was stolen, and the value of said property was \$3,500 or more, to wit:

20 On or between about September 23, 2015 and September 25, 2015, GERI LYN MCKINNON, by
21 virtue of her own actions or by the actions of her agents or employees, did knowingly, and without lawful
22 authority, sign and cause to be recorded with the Clark County Recorder's Office a deed to real property
23 bearing assessor's parcel number 163-15-710-093 and commonly known as 7240 Mountain Moss Drive,
24 Las Vegas, falsely purporting to take title on behalf of her company, "Creative Solutions 4 U", from
25 "Pastor Ernest C. Aldridge, and his successors, a corporation sole". She subsequently exercised control of
26 7240 Mountain Moss Drive, asserting herself as having ownership interest in and/or legal control over the
27 property. When she did these acts, she knew or had reason to know that the property, which was worth
28 more than \$3,500, was stolen from the true owner, Federal National Mortgage Association, a Government
Sponsored Enterprise, and did the acts with the intent to deprive the true owner.

1 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a
2 category "B" felony, in violation NRS 205.0832.

3 **COUNT III**
4 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
5 **Category "B" Felony - NRS 205.0832**

6 That the Defendant, GERI LYN MCKINNON, in the County of Clark, State of Nevada, did
7 without lawful authority knowingly: control property of another person with the intent to deprive that
8 person of the property; and/or control property of another person knowing or having reason to know that
9 the property was stolen, and the value of said property was \$3,500 or more, to wit:

10 On or about December 8, 2015, GERI LYN MCKINNON, by virtue of her own actions or by the
11 actions of her agents or employees, did knowingly, and without lawful authority, sign and cause to be
12 recorded with the Clark County Recorder's Office a deed to real property bearing assessor's parcel number
13 162-12-310-045 and commonly known as 2523 Palma Vista Avenue, Las Vegas, falsely purporting to take
14 title, on behalf of her company, "Creative Solutions 4 U", from "Pastor Ernest C. Aldridge, and his
15 successors, a corporation sole". She subsequently exercised control over the real property by asserting
16 herself as having ownership interest in and/or legal control over the property. When she did these acts, she
17 knew or had reason to know that the property, which was worth more than \$3,500, was stolen from the
18 true owner, Federal National Mortgage Association, a Government Sponsored Enterprise, and did the acts
19 with the intent to deprive the true owner.

20 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a
21 category "B" felony, in violation NRS 205.0832.

22 **COUNT IV**
23 **PATTERN OF FALSE REPRESENTATION CONCERNING TITLE**
24 **Category "B" Felony - NRS 205.395**

25 That the Defendant, GERI LYN MCKINNON, in the County of Clark, State of Nevada, did
26 through her own actions, or by the actions of her agents or employees, in two or more transactions, claim an
27 interest in real property in a document that is recorded in the office of the county recorder in which the real property
28 is located and who knows or has reason to know that the document is forged or groundless, contains a material
misstatement or false claim or is otherwise invalid; and/or by causing such a document to be recorded in the office

1 of the county recorder in which the real property is located and who knows or has reason to know that the document
2 is forged or groundless, contains a material misstatement or false claim or is otherwise invalid, to wit:

3 On September 18, 2015, September 25, 2015 and December 8, 2015, GERI LYN MCKINNON,
4 did through her own actions, or by the actions of her agents or employees, claim an interest in real
5 property bearing assessor's parcel numbers: 163-30-816-006 (commonly known as 5654 Thunder Spirit
6 Street, Las Vegas); 162-12-310-045 (commonly known as 2523 Palma Vista Avenue, Las Vegas); and
7 163-15-710-093 (commonly known as 7240 Mountain Moss Drive, Las Vegas), through recording with
8 the Clark County Recorder's Office, deeds bearing the following Instrument numbers, respectively:
9 20150918-0001381, 20151208-0003905, 20150925-0004238. When the deeds were recorded, GERI LYN
10 MCKINNON knew or had reason to know that the documents were forged or groundless, contained
11 material misstatements or false claims or were otherwise invalid.

12 All of which constitutes the crime of PATTERN OF FALSE REPRESENTATION
13 CONCERNING TITLE, a category "B" felony, in violation NRS 205.395.


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

16 DATED this 2nd day of May, 2018.

17 SUBMITTED BY

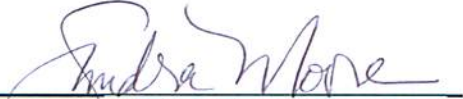
18 ADAM PAUL LAXALT
19 Attorney General

20 By:


21 RAYA M. SWIFT, Bar No. 11108
22 Senior Deputy Attorney General
23 *Attorneys for the State of Nevada*

24 ENDORSEMENT: A True Bill

25 By:


26 Foreperson, Clark County Grand Jury
27 GJ#17AG199X
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