

1 **IND**
2 AARON D. FORD
3 Attorney General
4 DANIEL WESTMEYER
5 State of Nevada
6 Senior Deputy Attorney General
7 Nevada Bar Number 10273
8 555 E Washington Ave, Ste. 3900
9 Las Vegas, NV 89101-1608
10 dwestmeyer@ag.nv.gov
11 Attorneys for the State of Nevada

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

MAY 15 2019

BY, _____
KIMBERLY ESTALA, DEPUTY

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

9
10 THE STATE OF NEVADA,
11 Plaintiff,
12 vs
13 ERNEST C. ALDRIDGE,
14 and CLARENCE MOSES WILLIS,
15 Defendants.

Case No.:

Dept. No.:

C-19-340365-1/2

10

16 **INDICTMENT**

17
18 Defendants, ERNEST C. ALDRIDGE and CLARENCE MOSES WILLIS, above named, are
19 accused by the Grand Jury of having committed the following offenses:

20 BURGLARY, a category "B" felony, in violation of NRS 205.060; THEFT, a category "B"
21 felony in violation of NRS 205.0832, 205.0835; and MULTIPLE TRANSACTIONS INVOLVING
22 FRAUD OR DECEIT, a category "B" felony, in violation of NRS 205.377.

23 All of the acts alleged herein have been committed or consummated on or between July 21,
24 2015, and October 12, 2015, by the above-named Defendants, executed in whole or in part within the
25 County of Clark, State of Nevada, in the following manner:

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 1
BURGLARY
CATEGORY "B" felony - NRS 205.060

On or about July 21, 2015, Defendant CLARENCE MOSES WILLIS, in the County of Clark, State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony, to wit: Theft and/or Offering False Instrument for Filing or Record and/or Obtaining Money or Property Under False Pretenses, that certain building occupied by the Clark County Recorder's Office, located at 500 South Grand Central Parkway, Las Vegas, Nevada.

All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS 205.060.

COUNT 2
BURGLARY
CATEGORY "B" felony - NRS 205.060

On or about September 8, 2015, Defendant CLARENCE MOSES WILLIS, in the County of Clark, State of Nevada, did then and there willfully, unlawfully, and feloniously enter, with intent to commit a felony, to wit: Theft and/or Offering False Instrument for Filing or Record and/or Obtaining Money or Property Under False Pretenses, that certain building occupied by the Clark County Recorder's Office, located at 3211 North Tenaya Way, Las Vegas, Nevada.

All of which constitutes the crime of BURGLARY, a category "B" felony in violation of NRS 205.060.

COUNT 3
THEFT
Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020

On or about July 21, 2015, within the County of Clark, State of Nevada, Defendants ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or through an agent or employee, make a transfer of interest in real property of another person, or were instrumental in causing an unlawful transfer or control of property belonging to another person by virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at \$3,500.00 or more, to wit:

Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real property, located at 4912 Canadian Drive, Las Vegas, Nevada, and belonging to the Federal National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's Office,

1 transferring said property into the name of a corporation owned by ALDRIDGE, and depriving the
2 Federal National Mortgage Association of its property, without its prior knowledge or consent, valued
3 over \$3,500.00. Defendants are criminally liable under one or more of the following principles of
4 criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
5 commission of this crime, with the intent that this crime be committed, by providing counsel and/or
6 encouragement and by entering into a course of conduct whereby WILLIS obtained a Nevada business
7 license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or
8 WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's
9 Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
10 committed.

11 All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832,
12 NRS 205.0835, and NRS 195.020.

13 **COUNT 4**
14 **THEFT**

15 **Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020**

16 On or about September 8, 2015, within the County of Clark, State of Nevada, Defendants
17 ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or
18 through an agent or employee, make a transfer of interest in real property of another person, or were
19 instrumental in causing an unlawful transfer or control of property belonging to another person by
20 virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at
\$3,500.00 or more, to wit:

21 Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real
22 property, located at 5654 Thunder Spirit Street, Las Vegas, Nevada, and belonging to the Federal
23 National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's
24 Office, transferring said property into the name of a corporation owned by ALDRIDGE, and depriving
25 the Federal National Mortgage Association of its property, without its prior knowledge or consent,
26 valued over \$3,500.00. Defendants are criminally liable under one or more of the following principles
27 of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
28 commission of this crime, with the intent that this crime be committed, by providing counsel and/or

1 encouragement and by entering into a course of conduct whereby WILLIS obtained a Nevada business
2 license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or
3 WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's
4 Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
5 committed.

6 All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832,
7 NRS 205.0835, and NRS 195.020.

8 **COUNT 5**

9 **THEFT**

10 **Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020**

11 On or about September 18, 2015, within the County of Clark, State of Nevada, Defendants
12 ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or
13 through an agent or employee, make a transfer of interest in real property of another person, or were
14 instrumental in causing an unlawful transfer or control of property belonging to another person by
15 virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at
\$3,500.00 or more, to wit:

16 Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real
17 property, located at 2523 Palma Vista Avenue, Las Vegas, Nevada, and belonging to the Federal
18 National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's
19 Office, transferring said property into the name of a corporation owned by ALDRIDGE, and depriving
20 the Federal National Mortgage Association of its property, without its prior knowledge or consent,
21 valued over \$3,500.00. Defendants are criminally liable under one or more of the following principles
22 of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
23 commission of this crime, with the intent that this crime be committed, by providing counsel and/or
24 encouragement and by entering into a course of conduct whereby WILLIS obtained a Nevada business
25 license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or
26 WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's
27 Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
28 committed.

1 All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832,
2 NRS 205.0835, and NRS 195.020.

3 **COUNT 6**
4 **THEFT**

5 **Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020**

6 On or about September 18, 2015, within the County of Clark, State of Nevada, Defendants
7 ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or
8 through an agent or employee, make a transfer of interest in real property of another person, or were
9 instrumental in causing an unlawful transfer or control of property belonging to another person by
10 virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at
\$3,500.00 or more, to wit:

11 Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real
12 property, located at 7240 Mountain Moss Drive, Las Vegas, Nevada, and belonging to the Federal
13 National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's
14 Office, transferring said property into the name of a corporation owned by ALDRIDGE, and depriving
15 the Federal National Mortgage Association of its property, without its prior knowledge or consent,
16 valued over \$3,500.00. Defendants are criminally liable under one or more of the following principles
17 of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
18 commission of this crime, with the intent that this crime be committed, by providing counsel and/or
19 encouragement and by entering into a course of conduct whereby WILLIS obtained a Nevada business
20 license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or
21 WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's
22 Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be
23 committed.

24 All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832,
25 NRS 205.0835, and NRS 195.020.

26 ///

27 ///

28 ///

COUNT 7
THEFT

Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020

On or about October 12, 2015, within the County of Clark, State of Nevada, Defendants ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or through an agent or employee, make a transfer of interest in real property of another person, or were instrumental in causing an unlawful transfer or control of property belonging to another person by virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at \$3,500.00 or more, to wit:

Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real property, located at 7116 Cornflower Drive, Las Vegas, Nevada, and belonging to the Federal National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's Office, transferring said property into the name of a corporation owned by ALDRIDGE, and depriving the Federal National Mortgage Association of its property, without its prior knowledge or consent, valued over \$3,500.00. Defendants are 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 WILLIS obtained a Nevada business license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832, NRS 205.0835, and NRS 195.020.

///

///

///

///

///

COUNT 8
THEFT

Category "B" Felony – NRS 205.0832, NRS 205.0835, and NRS 195.020

On or about October 12, 2015, within the County of Clark, State of Nevada, Defendants ALDRIDGE and WILLIS, did without lawful authority, knowingly and willfully, either on their own or through an agent or employee, make a transfer of interest in real property of another person, or were instrumental in causing an unlawful transfer or control of property belonging to another person by virtue of a material misrepresentation, with the intent to deprive said person of the property, valued at \$3,500.00 or more, to wit:

Defendants ALDRIDGE and WILLIS gained control either directly or indirectly of real property, located at 5373 Homeria Street, Las Vegas, Nevada, and belonging to the Federal National Mortgage Association, by filing a fraudulent quitclaim deed with the Clark County Recorder's Office, transferring said property into the name of a corporation owned by ALDRIDGE, and depriving the Federal National Mortgage Association of its property, without its prior knowledge or consent, valued over \$3,500.00. Defendants are 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 WILLIS obtained a Nevada business license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or WILLIS filed or caused to be filed a fraudulent quitclaim deed with the Clark County Recorder's Office; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

All of which constitutes the crime of THEFT, a category "B" felony in violation NRS 205.0832, NRS 205.0835, and NRS 195.020.

///

///

///

///

///

1 **COUNT 9**
2 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**
3 **CATEGORY "B" felony - NRS 205.377**

4 Between July 2015 and October 2015, Defendants ALDRIGE and WILLIS, without lawful
5 authority, with the Defendants being criminally liable under one or more of the following principles of
6 criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
7 commission of this crime, with the intent that this crime be committed, by providing counsel and/or
8 encouragement and by entering into a course of conduct whereby WILLIS obtained a Nevada business
9 license under the name "Federal National Mortgage Association," and whereby ALDRIDGE and/or
10 WILLIS filed or caused to be filed fraudulent quitclaim deeds with the Clark County Recorder's Office;
and/or (3) pursuant to a conspiracy to commit this crime, with the intent that the crime be committed.

11 As set forth in Counts Three (3) through Eight (8), incorporated by reference as though fully set
12 forth herein, Defendants have committed multiple transactions involving fraud or deceit in the course of
13 enterprise or occupation, in two or more transactions in which the purpose, results, methods, or
14 commission was the same or similar; each having a value of \$650 or more.

15 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
16 OR DECEIT, a category "B" felony in violation of NRS 205.377 and NRS 195.020.

17 DATED this _____ day of May, 2019.

18 AARON D. FORD
19 Attorney General

20
21 By: 

22 Daniel Westmeyer
23 Senior Deputy Attorney General

24 ENDORSEMENT: A True Bill

25
26 By: _____
27 Foreperson, Clark County Grand Jury
28 GJ# 18BGJ138A-B