

# IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed  
Jan 28 2021 02:40 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

VALENTINA MONEE KNIGHT,  
Appellant(s),

vs.

THE STATE OF NEVADA,  
Respondent(s),

Case No: C-15-309123-2  
*Related Case A-20-820448-W*  
Docket No: 82316

# RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT  
VALENTINA KNIGHT # 2020010861,  
PROPER PERSON  
949 N. 9<sup>TH</sup> ST.  
MILWAUKEE, WI 53233

ATTORNEY FOR RESPONDENT  
STEVEN B. WOLFSON,  
DISTRICT ATTORNEY  
200 LEWIS AVE.  
LAS VEGAS, NV 89155-2212

**I N D E X**

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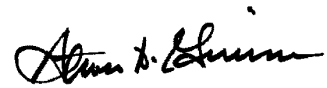
C-15-309123-2

State of Nevada  
vs  
Valentina Knight

I N D E X

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**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
1 - 71  
WILL FOLLOW VIA  
U.S. MAIL**



CLERK OF THE COURT

1 **INFM**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 NOREEN DEMONTE  
6 Chief Deputy District Attorney  
7 Nevada Bar #08213  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

7 I.A. 9/9/15  
8 10:00 AM  
9 TURCO

9 THE STATE OF NEVADA,  
10 Plaintiff,

CASE NO: C-15-309123-2

11 -vs-

DEPT NO: XIX

12 MOUSTAPHA DIOUBATE, #7018908,  
13 VALENTINA MONEE KNIGHT,  
14 #7018909

INFORMATION

14 Defendant.

16 STATE OF NEVADA }  
17 COUNTY OF CLARK } ss.

18 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State  
19 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

20 That MOUSTAPHA DIOUBATE, and VALENTINA MONEE KNIGHT, the  
21 Defendant(s) above named, having committed the crime of **BURGLARY (Category B**  
22 **Felony - NRS 205.060 - NOC 50424)**, on or about the 4th day of May, 2015, within the  
23 County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such  
24 cases made and provided, and against the peace and dignity of the State of Nevada, did  
25 willfully, unlawfully, and feloniously enter, with intent to commit larceny, that certain building


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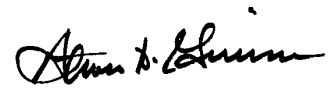
1 occupied by BELLAGIO HOTEL & CASINO, located at 3600 Las Vegas Boulevard, Las  
2 Vegas, Clark County, Nevada.

3 STEVEN B. WOLFSON  
4 Clark County District Attorney  
5 Nevada Bar #001565

6 BY   
7 NOREEN DEMONTE  
8 Chief Deputy District Attorney  
9 Nevada Bar #08213  
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27 15F06822B /mlb/L-2  
28 LVMPD EV#1505044592  
(TK3)





CLERK OF THE COURT

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Tran  
CASE NO. C-15-309123-1/C-15-309123-2

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP  
COUNTY OF CLARK, STATE OF NEVADA

-oOo-

STATE OF NEVADA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 15F06822A
	)	15F06822B
MOUSTAPHA DIOUBATE,	)	
VALENTINA MONEE KNIGHT,	)	
	)	
Defendants.	)	
	)	

REPORTER'S TRANSCRIPT  
OF  
UNCONDITIONAL WAIVER OF PRELIMINARY HEARING

BEFORE THE HON. JANIECE MARSHALL  
JUSTICE OF THE PEACE

MONDAY, AUGUST 31, 2015

APPEARANCES:

For the State: NOREEN DeMONTE, ESQ.  
Chief Deputy District  
Attorney

For the Defendants: JOHN M. TURCO, ESQ.

Reported by: CHERYL GARDNER, RMR-RPR  
CCR No. 230

CHERYL GARDNER, RPR-RMR, CCR 230

1 LAS VEGAS, CLARK COUNTY, NV, MON., AUGUST 31, 2015

2 -oOo-

3 THE COURT: Moustapha Dioubate and  
4 Valentina Monee Knight, 15F06822A and B. All  
5 right. So I have an amended criminal Complaint  
6 that was filed today. Did you receive a copy of  
7 it?

8 MR. TURCO: Yes, Judge.

9 THE COURT: Waive reading?

10 MR. TURCO: Yes. This case has been  
11 negotiated.

12 THE COURT: Are you representing both.

13 MR. TURCO: Actually what's happening  
14 is I have Ms. Knight as my client. Mr. Draskovich  
15 represents the gentleman in custody.

16 THE COURT: Dioubate.

17 MR. TURCO: Dioubate. Thank you.  
18 What's going to happen is he's agreed to waive his  
19 right to a preliminary hearing in exchange for the  
20 offer.

21 MS. DeMONTE: It's the same.

22 THE COURT: Sir, you're waiving your  
23 right to have your attorney present.

24 DEFENDANT DIOUBATE: Yes.

25 THE COURT: He spoke to you about

1 waiving your right to a preliminary hearing.

2 DEFENDANT DIOUBATE: Yes.

3 THE COURT: All right.

4 MR. TURCO: Judge, they're going to  
5 both be pleading guilty in district court to  
6 burglary. We contemplate them receiving probation,  
7 and during that period they must repay restitution  
8 in full, and at this point once they've completed  
9 all the requirements and got a honorable discharge,  
10 they would be allowed to withdraw their plea and  
11 plead guilty to a gross misdemeanor and that's as  
12 to both of them.

13 MS. DeMONTE: That's correct.

14 THE COURT: All right. So are you  
15 arguing for probation?

16 MS. DeMONTE: No. It's a  
17 stipulation. They're going to unconditionally  
18 waive up in district court. They'll plead.

19 THE COURT: I just didn't understand  
20 the probation if that was argument or you're  
21 stipulating.

22 All right. So, folks, you both have  
23 had an opportunity to speak with your counsel. You  
24 understand you have the right to a preliminary  
25 hearing. At the preliminary hearing stage the

1 State has the burden to come forward with evidence,  
2 legally sufficient evidence, that a crime was  
3 committed, you likely committed the crime.

4 At the preliminary hearing stage you  
5 have the right to remain silent, testify, call  
6 witnesses, and cross-examine witnesses.

7 You know those are the rights you are  
8 waiving if you unconditionally waive your right to  
9 a preliminary hearing, correct?

10 DEFENDANT KNIGHT: Yes.

11 THE COURT: Sir.

12 DEFENDANT DIOUBATE: Yes.

13 THE COURT: I'm assuming this is  
14 contingent on both of them going forward.

15 MS. DeMONTE: Yes.

16 THE COURT: You understand if either  
17 of you fail to go forward with entry of your guilty  
18 plea to one count of burglary, that you know you're  
19 not going to come back here for a preliminary  
20 hearing.

21 Instead if you back out of your plea  
22 agreement, you will go to trial on the original  
23 charges in the Complaint without any limitations on  
24 sentencing, correct?

25 DEFENDANT KNIGHT: Yes.

1 THE COURT: Correct, sir. You  
2 understand that.

3 DEFENDANT DIOUBATE: Yes.

4 THE COURT: You further understand an  
5 unconditional waiver of your right to a preliminary  
6 hearing means once you waive it, it's gone forever.  
7 You will never come back to justice court for a  
8 preliminary hearing in this case for any reason  
9 whatsoever, correct?

10 DEFENDANT KNIGHT: Yes.

11 DEFENDANT DIOUBATE: Yes.

12 THE COURT: So do you each wish to  
13 unconditionally waive your right to a preliminary  
14 hearing?

15 DEFENDANT KNIGHT: Yes, ma'am.

16 DEFENDANT DIOUBATE: Yes.

17 THE COURT: Are we going to keep them  
18 together on the in custody?

19 MR. TURCO: He's supposed to be out of  
20 custody. There's a fugitive matter that was  
21 dismissed today so I believe he's actually going to  
22 be released today. There's nothing holding him in  
23 custody. We can get an out of custody.

24 THE COURT: So you want the  
25 out-of-custody date.

1                   MR. TURCO: Yes. He's going to be  
2 released today.

3                   THE COURT: If for any reason you're  
4 not released, then you contact your attorney, set  
5 it earlier otherwise you'll appear in district  
6 court lower level to enter your guilty plea on  
7 September 9th at 10:00 o'clock.

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CHERYL GARDNER, RPR-RMR, CCR 230

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AFFIRMATION

Pursuant to NRS 239B.030:

The undersigned does hereby affirm that the preceding transcript of unconditional waiver of preliminary hearing in District Court Case No. C-15-309123-1/C-15-309123-2 does not contain the social security number of any person.

Dated this 16th day of September, 2015.

/s/ Cheryl Gardner, CCR 230, RPR, RMR

CHERYL GARDNER, RPR-RMR, CCR 230

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REPORTER'S CERTIFICATE

State of Nevada     )  
                                  ) ss  
County of Clark     )

I, Cheryl Gardner, CCR 230, RPR, RMR,  
do hereby certify that I took down in Stenotype  
all of the proceedings had in the before-entitled  
matter at the time and place indicated and that  
thereafter said shorthand notes were transcribed  
into typewriting by me and that the foregoing  
transcript constitutes a full, true, and accurate  
record of the proceedings had to the best of my  
ability.

IN WITNESS WHEREOF, I have hereunto  
set my hand and affixed my signature in the County  
of Clark, State of Nevada this 16th day of  
September, 2015.

/s/ Cheryl Gardner, CCR 230, RPR, RMR

CHERYL GARDNER, RPR-RMR, CCR 230



ORIGINAL

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

SEP 29 2015

BY, Kristen Brown  
KRISTEN BROWN, DEPUTY

1 NOT  
2 Michael D. Pariente  
3 The Pariente Law Firm, P.C.  
4 3960 Howard Hughes Parkway  
5 Suite 615  
6 Las Vegas, NV 89169  
7 (702) 966-5310  
8 Attorney for Defendant

9 EIGHTH JUDICIAL DISTRICT COURT  
10 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,  
12 Plaintiff,

Case No: C-15-309123-1 & C-15-  
309123-2  
Dept No: 19

13 vs.

14 VALENTINA KNIGHT &  
15 MOUSTAPHA DIOUBATE,  
16 Defendants.

17 NOTICE OF CONFLICT WAIVER

18 COMES NOW Defendants, VALENTINA KNIGHT & MOUSTAPHA  
19 DIOUBATE, by and through their attorney of record, MICHAEL D. PARIENTE, file  
20 this notice of conflict waiver attached as Exhibit D-1.

21 DATED this 22th day of September, 2015.

22 Respectfully Submitted by:

23 

24 MICHAEL D. PARIENTE, ESQ.  
25 Nevada Bar No.: 9469  
26 3960 Howard Hughes, Suite 615  
27 Las Vegas, Nevada 89169

PARIENTE LAW FIRM, P.C.  
3960 Howard Hughes Pkwy., Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 953-7055  
WWW.PARIENTELAW.COM

28 C-15-309123-2  
NOTICE  
Notice  
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MEMORANDUM

I.

Ms. Knight and Mr. Dioubate have been advised of their right to have separate lawyers represent each of them. They have also been advised of the potential of a conflict to have the same lawyer represent both of them. Ms. Knight and Mr. Dioubate consent to have Mr. Michael D. Pariente, Esq. represent them both in their criminal cases.

THE PARIENTE LAW FIRM, P.C.



MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes Pkwy  
Suite 615  
Las Vegas, NV 89169  
Attorney for Defendant

DECLARATION OF COUNSEL

STATE OF NEVADA     )  
                                  )  
COUNTY OF CLARK    )

I, MICHAEL D. PARIENTE, ESQ., being first duly sworn according to law, upon oath, deposes and says:

1. Your declarant has reviewed the attached Written Waiver of Conflict with both Mr. Dioubate and with Ms. Knight.
2. Your declarant has explained the inherent risks associated and potential conflict that may arise when the same lawyer represents

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more than one defendant.

3. Your declarant believes that both defendants understand the risks of having one lawyer represent them both.
4. Your declarant is an Attorney at Law duly licensed to practice in all courts in the State of Nevada;
2. Your declarant is the Attorney of record for the Defendant herein;

FURTHER YOUR DECLARANT SAYETH NAUGHT.



MICHAEL D. PARIENTE, ESQ.

**WRITTEN WAIVER OF CONFLICT**

THIS WAIVER OF POTENTIAL CONFLICT OF INTEREST AND CONSENT TO REPRESENTATION is made and entered into this 23<sup>rd</sup> day of September, 2015, by and between Dioubate Moustapha, Individually; and Valentina Knight, Individually.

WITNESSETH:

WHEREAS, Dioubate Moustapha is an individual residing in the State of New York; and

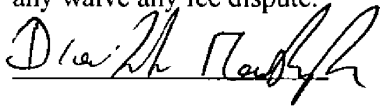
WHEREAS, Valentina Knight is an individual residing in the State of New York; and

WHEREAS, Dioubate Moustapha and Valentina Knight, and each of them, desire that MICHAEL D. PARIENTE, ESQ., represent them as defendants in criminal actions.

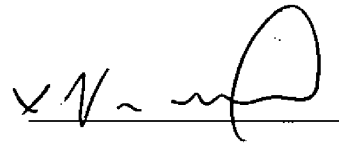
WHEREAS, MICHAEL D. PARIENTE, ESQ., has advised Dioubate Moustapha and Valentina Knight that a conflict of interest may arise between the parties by virtue of them being in an adverse position to each other during the course of the criminal proceedings; and

WHEREAS, the undersigned wish to waive any conflict of interest the foregoing may create, and further wish MICHAEL D. PARIENTE, ESQ., to represent them as defendants in the criminal proceedings despite the disclosure of any potential or actual conflict of interest.

WHEREAS, Dioubate Moustapha and Valentina Knight have thoroughly discussed potential conflicts with MICHAEL D. PARIENTE, ESQ., and believe that they have the constitutional right to their choice in counsel, and specifically waive any potential and/or actual conflicts and/or any allegations of ineffective assistance of counsel or conflict of interest and/or any waive any fee dispute.



Moustapha Dioubate



Valentina Knight

**Exhibit D-1**

**PARIENTE LAW FIRM, P.C.**  
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Las Vegas, NV 89169  
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**ROC**  
THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada State Bar No. 9469  
3960 Howard Hughes Parkway  
Suite 615  
Las Vegas, Nevada 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,  
vs.  
VALENTINA KNIGHT & MOUSTAPHA  
DIOUBATE,  
Defendants.

Case No: C-15-309123-1 & C-15-  
309123-2  
Dept. No: 19

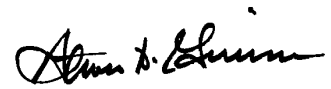
**NOTICE OF CONFLICT WAIVER**

**RECEIPT OF COPY**

RECEIPT OF COPY of the **NOTICE OF CONFLICT WAIVER** is hereby  
acknowledged this \_\_\_\_ day of September, 2015.

DISTRICT ATTORNEY'S OFFICE:

\_\_\_\_\_  
DISTRICT ATTORNEY  
200 Lewis Ave.  
Las Vegas, NV 89101



CLERK OF THE COURT

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**NOT**  
Michael D. Pariente  
The Pariente Law Firm, P.C.  
3960 Howard Hughes Parkway  
Suite 615  
Las Vegas, NV 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
  
Plaintiff,  
  
vs.  
  
VALENTINA KNIGHT &  
MOUSTAPHA DIOUBATE,  
  
Defendants.

Case No: C-15-309123-1 & C-15-  
**309123-2**  
Dept No: 19

**MOTION TO PLACE ON  
CALENDAR FOR RELEASE FROM  
HOUSE ARREST**

COMES NOW Defendants, VALENTINA KNIGHT & MOUSTAPHA  
DIOUBATE, by and through their attorney of record, MICHAEL D. PARIENTE, file  
this Motion To Place on Calendar for Release from House Arrest.

DATED this 30<sup>th</sup> day of September, 2015.

Respectfully Submitted by:



MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes, Suite 615  
Las Vegas, Nevada 89169

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**NOTICE OF MOTION**

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the <sup>12</sup> day of Oct, 2015, at 8:30 a at \_\_\_\_\_ m. of said day, in Department \_\_\_ of said Court.



\_\_\_\_\_  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes, Suite 615  
Las Vegas, Nevada 89169

**MEMORANDUM**

**I.**

Ms. Valentina Knight and Mr. Moustapha Dioubate have been on house arrest imposed by Justice of the Peace Janiece Marshall since May 11, 2015.

Both Ms. Knight and Mr. Dioubate live with their children and their families live in Houston, Texas. Being forced to reside in Las Vegas during the pendency of their cases has caused great hardship for them, their children, and their families.

According to House Arrest Officer Mailloux, both Ms. Knight and Mr. Dioubate have been in substantial compliance with the terms of their release on house arrest. Officer Mailloux has indicated to Defense Counsel that his office takes no position on

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whether or not defendants in general should be released or detained on house arrest. He does indicate that if he had serious concerns about their release from house arrest, or if they were not in substantial compliance, he would oppose their release. However, since they are in substantial compliance, he is taking no position and invites the Court to call him directly should the Court have any questions for him.

Both Ms. Knight and Mr. Dioubate have retained Defense Counsel to represent them in the District Court and not just for the pending motion for them to be released on house arrest. They recognize their release on house arrest is entirely within the District Court's discretion and respectfully request that they be allowed to return to Houston to be with their children and families. They will appear at all future court dates.

Respectfully submitted,

THE PARIENTE LAW FIRM, P.C.



MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes Pkwy  
Suite 615  
Las Vegas, NV 89169  
Attorney for Defendant





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**ROC**  
THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada State Bar No. 9469  
3960 Howard Hughes Parkway  
Suite 615  
Las Vegas, Nevada 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
  
Plaintiff,  
  
vs.  
  
VALENTINA KNIGHT & MOUSTAPHA  
DIOUBATE,  
  
Defendants.

Case No: **C-15-309123-1 & C-15-309123-2**  
Dept. No: **19**

**MOTION TO PLACE ON  
CALENDAR FOR RELEASE FROM  
HOUSE ARREST**

**RECEIPT OF COPY**

RECEIPT OF COPY of the **MOTION TO PLACE ON CALENDAR FOR  
RELEASE FROM HOUSE ARREST** is hereby acknowledged this \_\_\_\_ day of  
October, 2015.

DISTRICT ATTORNEY'S OFFICE:

\_\_\_\_\_  
DISTRICT ATTORNEY  
200 Lewis Ave.  
Las Vegas, NV 89101

# 7018909

llc

**BAIL BONDS**

In the District

Court, County of Clark, State of Nevada.

STATE OF NEVADA

Bail Bond No. IS 100K

(Power of attorney with this number must be attached)

FILED  
2015 OCT 27 A 10:52  
Clerk of the Court  
The Court

vs.

Defendant: Knight, Valentina M Case No. C-15-309123-2

Know all men by these presents:

That we, Statewide Bail Bonds as principal and International Fidelity Insurance Company as the Surety, heretofore authorized to transact Bail bonds in the State of Nevada, are held and bound, to the above court, for payment in the sum of: one hundred thousand

Dollars, whereof, we bind ourselves, our heirs, executors, administrators, and successors, and assigns, jointly, severally, and firmly, by these presents. The condition of this obligation is such that the said defendant shall appear from day to day and term to term of said court to answer the charge(s) of: Burglary, (1st), Intent to utter fict bill/note/check (18 cks), Pass ID info for false stat/occup/lic ID, Pass doc/pers ID to commit forge/c-feit and not depart the same without leave, then this obligation to be void, else to remain in full force and effect.

MC

This bond shall be in full force and effect until any of the following events:

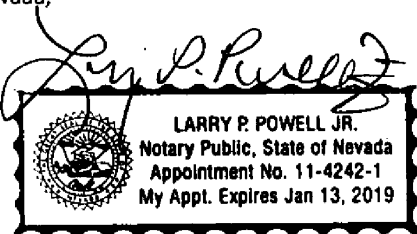
- 1) Exoneration by court order, 2) Termination of this case by dismissal or conviction

Signed and sealed this 16th day of October, 2015

Angelita M. [Signature]  
Attorney in fact (signature)

Subscribed and sworn before me, a notary for the State of Nevada,  
This 16th day of October, 2015

\_\_\_\_\_  
Approved this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_



Bonding Company Stamp  
**STATEWIDE BAIL BONDS**  
17 N. Mojave Rd.  
Las Vegas, NV 89101  
702-731-2245

Insurance Company Stamp  
**INTERNATIONAL FIDELITY INSURANCE COMPANY**  
P.O. BOX 9810  
CALABASAS, CA. 91372-9810

C-15-309123-2  
BAB  
Bail Bond  
4497655



RECEIVED  
OCT 27 2015  
CLERK OF THE COURT

5

VERIFY FIRST - THIS DOCUMENT IS PRINTED IN BLUE, RED & BLACK INKS.

Only the original Power of Attorney will bind this Surety.

**POWER OF ATTORNEY**  
INTERNATIONAL FIDELITY INSURANCE COMPANY  
P.O. BOX 9810, CALABASAS, CA 91372-9810 (800) 935-2245

POWER NUMBER IS100K-48282

THIS POWER VOID IF NOT USED BY:

January 31, 2016

POWER AMOUNT \$

100,000

KNOW ALL MEN BY THESE PRESENTS, that INTERNATIONAL FIDELITY INSURANCE COMPANY, a corporation duly organized and existing under the laws of the State of New Jersey, has constituted and appointed, and does hereby constitute and appoint, its true and lawful Attorney-in-Fact, with full power and authority to sign the company's name and affix its corporate seal to, and deliver on its behalf as surety, any and all obligations as herein provided, and the execution of such obligations in pursuance of these presents shall be as binding upon the company as fully and to all intents and purposes as if done by the regularly elected officers of said company at its home office in their own proper person; and the said company hereby ratifies and confirms all and whatsoever its said Attorney-in-Fact may lawfully do and perform in the premises by virtue of these presents.

**THIS POWER OF ATTORNEY IS VOID IF ALTERED OR ERASED, THE OBLIGATION OF THE COMPANY SHALL NOT EXCEED THE SUM OF ONE HUNDRED THOUSAND DOLLARS\*\*\*\*\*:**

AND MAY BE EXECUTED FOR RECOGNIZANCE ON CRIMINAL BAIL BONDS ONLY.

Authority of such Attorney-in-Fact is limited to the execution of appearance bonds and cannot be construed to guarantee defendant's future lawful conduct, adherence to travel limitation, fines, restitution, payments or penalties, or any other condition imposed by a court not specifically related to court appearances. A separate Power of Attorney must be attached to each bond executed. Powers of Attorney must not be returned to Attorney-in-Fact, but should remain a permanent part of the court records.

Bond Amt \$ 100,000.00 Date Executed 10-16-2015

**NOTICE: Stacking of Powers is strictly prohibited. No more than one power from this Surety may be used to post any one bail amount.**

Defendant Knight, Valentina M DOB \_\_\_\_\_

IN WITNESS WHEREOF, said INTERNATIONAL FIDELITY INSURANCE COMPANY, by virtue of authority conferred by its Board of Directors, has caused these presents to be sealed with its corporate seal, signed by its Chairman of the Board and attested by its Secretary, this 23rd day of March, 1998.

Case # P-15-309123-2 Appearance Date \_\_\_\_\_

Offense Burglary (1st), Intent to utter fals bill/note/check (1st ct), Poss 7D info for false stat/occup/lic/1st, Poss doc/lpers 7D to commit forgery

Court County Clark Court State NV Div./Dept. District

*[Signature]*  
Francis Mitterhoff, Chairman of the Board  
*[Signature]*  
Norman Korvitz, Secretary



If rewrite, give orig. power #  Increase  Decrease

Executing Agent Angelita M Montelargo Signature/If applicable, add your COURT assigned Agent # \_\_\_\_\_

NOT VALID FOR IMMIGRATION



Form# IF1.0100 (9/06)

ORIGINAL



Only the original Power of Attorney will bind this Surety.

**CERTIFICATE OF DISCHARGE**  
INTERNATIONAL FIDELITY INSURANCE COMPANY  
P.O. BOX 9810, CALABASAS, CA 91372-9810 (800) 935-2245

POWER NUMBER IS100K-48282

POWER VOID DATE: January 31, 2013

POWER AMOUNT \$ 100,000

*Handwritten notes:* P/O... 100,000... 7/19/01... 50000

ORIGINAL POWER OF ATTORNEY DID NOT EXCEED THE SUM OF  
ONE HUNDRED THOUSAND DOLLARS\*\*\*\*\*

*Handwritten notes:* Bond Amt \$ 100,000.00 Date Executed 1/10/2013  
Defendant Knight, Valentina M DOB. \_\_\_\_\_  
Case # C-15-314123-2 Appearance Date \_\_\_\_\_  
Offense \_\_\_\_\_  
Court County Alameda  
Court City San Jose Court State CA Div./Dept. District  
If rewrite, give orig. power # \_\_\_\_\_  Increase  Decrease  
Executing Agent: [Signature] Signature/If applicable, add your COURT assigned Agent # \_\_\_\_\_

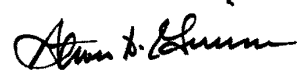
COURT USE ONLY  
Discharge Date: 1/22/13  
Clerk Signature: \_\_\_\_\_



Form# IFI.0100 (9/06)

DISCHARGE COPY

**Statewide Bail Bonds  
17 NORTH MOJAVE ROAD  
LAS VEGAS, NV 89101**

  
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**ACK**  
Michael D. Pariente  
The Pariente Law Firm, P.C.  
3960 Howard Hughes Parkway  
Suite 615  
Las Vegas, NV 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,

vs.

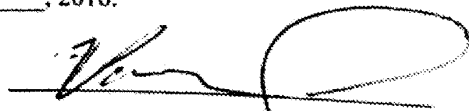
VALENTINA KNIGHT &  
MOUSTAPHA DIOUBATE,  
Defendants.

Case No: C-15-309123-1 & C-15-  
309123-2  
Dept No: 19


**WRITTEN ACKNOWLEDGMENT**

The Defendant, VALENTINA KNIGHT, hereby acknowledges that there will be no trial on April 18, 2016, at 9:00 a.m., in the Eighth Judicial District Court Department No. 19. Ms. Knight acknowledges that she is not required to appear on April 18, 2016.

DATED this 29<sup>th</sup> day of March, 2016.

  
Valentina Knight

Submitted by:

  
Michael D. Pariente, Esq.  
Nevada Bar No.: 9469  
Attorney for Defendant

**PARIENTE LAW FIRM, P.C.**  
3960 Howard Hughes Pkwy., Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 966-2085  
[WWW.PARIENTELAW.COM](http://WWW.PARIENTELAW.COM)





CLERK OF THE COURT

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ACK  
Michael D. Pariente  
The Pariente Law Firm, P.C.  
3960 Howard Hughes Parkway  
Suite 615  
Las Vegas, NV 89169  
(702) 966-5310  
Attorney for Defendant

EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA

STATE OF NEVADA,  
Plaintiff,

Case No: C-15-309123-1 & C-15-  
309123-2  
Dept No: 19


vs.

VALENTINA KNIGHT &  
MOUSTAPHA DIOUBATE,  
Defendants.

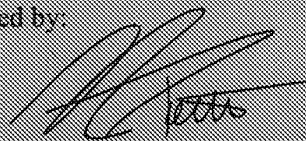
WRITTEN ACKNOWLEDGMENT

The Defendant, VALENTINA KNIGHT, hereby acknowledges that she must appear for  
Calendar Call on February 1, 2017, at 8:30 a.m. and Trial on February 7, 2017 at 10:00 a.m., in the  
Eighth Judicial District Court Department No. 19.

DATED this 01 day of April, 2016.

  
Valentina Knight

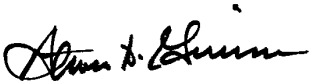
Submitted by:



Michael D. Pariente, Esq.  
Nevada Bar No.: 9469  
Attorney for Defendant

PARIENTE LAW FIRM, P.C.

3960 Howard Hughes Parkway, Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 963-7055  
WWW.PA.RIENTELAW.COM



CLERK OF THE COURT

1 **MOT**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 NOREEN DEMONTE  
6 Chief Deputy District Attorney  
7 Nevada Bar #8213  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,  
10 Plaintiff,

11 -vs-

12 MOUSTAPHA DIOUBATE,  
13 #7018908,  
14 VALENTINIA KNIGHT,  
15 #7018909

Defendants.

CASE NO: C-15-309123-2

DEPT NO: XIX

16 **NOTICE OF MOTION AND MOTION TO REVOKE BAIL AND REMAND**  
17 **DEFENDANTS WITHOUT BAIL**

18 DATE OF HEARING:  
19 TIME OF HEARING: 8:30 AM

20 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County  
21 District Attorney, through NOREEN DEMONTE, Chief Deputy District Attorney, and files  
22 this Notice of Motion and Motion TO REMAND DEFENDANTS WITHOUT BAIL.

23 This Motion is made and based upon all the papers and pleadings on file herein, the  
24 attached points and authorities in support hereof, and oral argument at the time of hearing, if  
25 deemed necessary by this Honorable Court.

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NOTICE OF HEARING

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing motion on for setting before the above entitled Court, in Department 19 thereof, on 5<sup>th</sup>, the day of DEC, 2016, at 8:30 AM, or as soon thereafter as counsel may be heard.

DATED this 23<sup>rd</sup> day of November, 2016.

STEVEN B. WOLFSON  
Clark County District Attorney  
Nevada Bar #001565

BY *N. Demonte*  
NOREEN DEMONTE  
Chief Deputy District Attorney  
Nevada Bar #8213

**POINTS AND AUTHORITIES**

**STATEMENT OF THE CASE**

Moustapha Dioubate and Valentina Knight were arrested and charged with Conspiracy, Burglary, Forgery of a Credit or Debit Card, Fraudulent Use of a Credit Card and Possession of Document or Personal Identifying Information on May 4, 2015 after they attempted to check into a room at the Bellagio using fraudulent credit card and identifications. Upon arrest, Defendants were found to be in possession of numerous credit cards and identifying information.

Defendants were released to house arrest by Las Vegas Justice of the Peace on May 11, 2015.

After numerous continuances of preliminary hearing, defendants ultimately unconditionally waived preliminary hearing on August 31, 2015 to accept negotiations.

On September 29, 2015, Defendants rejected negotiations and plead not guilty to all charges.

On October 12, 2015, this Honorable Court granted Defendants' requests to be removed from house arrest in exchange for higher bail. Defendants cited the desire to return to Texas

1 to be with their children as the reason for the request.

2 On October 27, 2015, both defendants posted bail in the amount of \$100,000.00. Trial  
3 is currently scheduled for February 6, 2017.

4 On November 18, 2016, Defendants were arrested in Glendale, WI after Knight  
5 attempted to fraudulently obtain a credit card using the name and identifying information of  
6 another. When contacted by police, Defendants were in possession of numerous credit cards,  
7 identifying information belonging to other individuals, and a credit card making machine. A  
8 copy of the arrest reports are attached hereto as Exhibit 1. Defendants have been formally  
9 charged with Unauthorized Use of Personal Information, Credit Card Forgery, and Obstructing  
10 a Police Officer. A copy of the Criminal Complaint is attached hereto as Exhibit 2.

#### 11 ARGUMENT

12 NRS 178.488(4) provides that:

13 "Any court or any judge or justice authorized to grant bail may at any time revoke the  
14 order admitting the defendant to bail."

15 NRS 178.499 provides that:

16 "Bail may be increased at any time for good cause shown. This may be done upon the  
17 court's own motion or upon motion of the district attorney's office."

18 NRS 178.487 provides that:

19 Every release on bail with or without security is unconditioned  
20 upon the defendant's good behavior while so released, and upon a  
21 showing that proof is evident or the presumption great, the  
22 defendant has committed a felony during the period of release, the  
23 defendant's bail may be revoked, after a hearing by the magistrate  
who allowed it or by any judge of the court in which the original  
charge is pending. Pending such revocation, the defendant may  
be held without bail by order of the magistrate before whom he is  
brought after arrest upon the second charge.

24 It is obvious the intent of the bail statutes is to ensure that the Defendant engage in  
25 good behavior while on his own recognizance.

26 While on bond, Defendants have clearly been engaging in the same criminal activity  
27 in the Midwest that they committed here in Nevada. Their continued criminal activity and  
28 victimization of honest citizens should not be rewarded with the privilege of remaining out


1 of custody.

2 **CONCLUSION**

3 For the foregoing reasons, the State respectfully requests this Honorable Court remand  
4 Defendants without bail pending trial. In the event that Defendants are still in custody in the  
5 State of Wisconsin, the State recommends that bail be revoked and no bail bench warrants be  
6 issued for Defendants so that they may be returned to Nevada after disposition of Wisconsin's  
7 charges.

8  
9 DATED this 23<sup>rd</sup> day of November, 2016.

10 STEVEN B. WOLFSON  
11 Clark County District Attorney  
12 Nevada Bar #001565

13 BY   
14 NOREEN DEMONTE  
15 Chief Deputy District Attorney  
16 Nevada Bar #8213


17 **CERTIFICATE OF ELECTRONIC FILING**

18 I hereby certify that service of NOTICE OF MOTION AND MOTION TO REVOKE  
19 BAIL AND REMAND DEFENDANTS WITHOUT BAIL, was made this 23<sup>rd</sup> day of  
20 November, 2016, by Electronic Filing to:

21 MICHAEL PARIENTE, ESQ.  
22 EMAIL: michael@parientelaw.com

23   
24 Secretary for the District Attorney's Office

25  
26  
27 15F06822A/mlb/L-2

	<b>Glendale Police Department</b>			<b>Incident Report</b>		
	Incident: <b>Fraud - Impersonate/Identity Theft</b>					
	Incident Report Number: <b>16-013206</b>		Between: Date - Time		And/At: Date-Time <b>11/18/16 15:24</b>	
	Incident Location: <b>7139 N Port Washington Rd, BLDG, Glendale, WI, 53217</b>					
	CFS Code-1: <b>2604</b>		CFS Code-2: <b>4899</b>		CFS Code-3:	
CFS Code-5:		CFS Code-6:		CFS Code-7:		
CFS Code-8:		CFS Code-9:		CFS Code-10:		
<b>RP</b>	Name (Last, First, Middle) <b>Langdon, Angela M</b>			DOB: <b>08/27/1979</b>	Race/Sex <b>W/F</b>	
Address: (Address, City, State, Zip) <b>1400 N Newman Rd, Racine, WI, 53406</b>				Home Phone Number		
Employer				Work Phone Number <b>(262) 619-2322</b>		
Employer Address				Cell Phone Number		
<b>V</b>	Name (Last, First, Middle) <b>Lowe, Jazmin Kenny</b>			DOB: <b>04/20/1977</b>	Race/Sex <b>W/F</b>	
Address: (Address, City, State, Zip) <b>5110 Spring Dr, Killeen, TX, 76542</b>				Home Phone Number		
Employer				Work Phone Number		
Employer Address				Cell Phone Number <b>(254) 371-0918</b>		
<p><b>SUMMARY</b></p> <p>Adult female and male arrested at Educator's Credit Union regarding an identity theft. Subjects TOT GLPD, booked, and transported to Milw. Co. CJF on charges.</p>						
<b>Suspect</b>		Vehicle Information: (Year, Make, Model, Style, Color) <b>2017, Cadillac, Sedan</b>				
License Number: <b>957YZY</b>	State: <b>WI</b>	Expiration Year:	Vin: <b>1G5AR53X8HD129810</b>	Insurance Company:		
Other Vehicle Information:				NCIC#		
Reporting Officer(s): <b>Doss, Carrie</b>			Payroll Number: <b>748</b>	Payroll Number:	Report Date: <b>11/19/2016</b>	
Time Received: <b>15:24:15</b>	Time Cleared: <b>16:19:28</b>	Unit(s) Assigned: <b>748, 762, 788, 724</b>		Pages: <b>1 OF 5</b>		
Reviewed by: <b>7wbutl</b>			Payroll Number: <b>710</b>	Copy To		

Date: 11/19/2016

CFS Code-1: 2604

Incident Report Number:

16-013206

**EXHIBIT "1"**

**Glendale Police Department**

**Continuation**

Incident Report Number <b>16-013206</b>	Incident Location: <b>7139 N Port Washington Rd, BLDG, Glendale, WI, 5321</b>	Incident Date: <b>11/18/2016</b>
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**NAMES**

**Witness-1**

Liberacki, Matthew A W/M of 2125 S. 97th St., West Allis, WI, 53227  
Cell Phone: (414) 588-7198

**Arrested-1**

Dioubate, Moustapha B/M-28 of 10964 143rd St, Jaimaca, NY, 11435  
DOB: 03/12/1988  
Cell Phone: (414) 312-2339

**Booking#: 16-001295**

Case#	Charge	Description	Ct
16-013206	943.201(2)	Unuth Use of Individual's ID	1
16-013206	946.41(1)	Resisting/Obstruct an Officer	2

**Witness-2**

Pierquet, Terra L W/F-28 of 321 E Oklahoma Ave, Milwaukee, WI, 53207  
DOB: 08/23/1988  
Cell Phone: (920) 680-6226

**Mentioned in Report**

Kuczynski, Christine E W/F-28 of 3449 S Kansas Ave, Milwaukee, WI, 53207  
DOB: 03/22/1988  
Cell Phone: (414) 322-5534

**Business-1**

Educators Credit Union - Glendale of 7139 N Port Washington Rd; GL,  
Glendale, WI, 53217  
Business Phone: (414) 325-2500

**Business-2**

Enterprise Rent-A-Car-Glendale of 5932 N Green Bay Ave, BLDG; GL,  
Glendale, WI, 53209  
Home Phone: (414) 540-7100

Reporting Officer(s): <b>Doss, Carrie</b>	ID Number <b>748</b>	ID Number	Pages: <b>2 Of 5</b>
--	-------------------------	-----------	-------------------------

**Glendale Police Department**

**Continuation**

<b>Incident Report Number</b> 16-013206	<b>Incident Location:</b> 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	<b>Incident Date:</b> 11/18/2016
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**Arrested-2**

**Knight, Valentina Monee** E/F-29 of 1563A S 3rd St, Milwaukee, WI, 53204  
 DOB: 06/13/1987  
 HT: 503 WT: 142 Hair: Black  
 Eyes: Brown  
 Cell Phone: (414) 807-1225

**Booking#:** 16-001294

Case#	Charge	Description	Ct
16-013206	943.201(2)	Unuth Use of Individual's ID	1

**Booking#:** 16-001297

Case#	Charge	Description	Ct
16-013206	943.201(2)	Unuth Use of Individual's ID	1

<b>Reporting Officer(s):</b> DOSS, Carrie	<b>ID Number</b> 748	<b>ID Number</b>	<b>Pages:</b> 3 OF 5
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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PROPERTY LIST

Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
16-003268				
1	STO		Identity of victim	1.000 \$0.00

Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 4 Of 5
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<b>Glendale Police Department</b>		<b>Continuation</b>	
<small>Incident Report Number</small> 16-013206	<small>Incident Location:</small> 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	<small>Incident Date:</small> 11/18/2016	
<p><b>NARRATIVE</b></p> <p>***** See attached reports *****</p>			
<small>Reporting Officer(s):</small> Doss, Carrie	<small>ID Number</small> 748	<small>ID Number</small>	<small>Pages:</small> 5 OF 5

Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016		
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:	
<p><b>NARRATIVE</b></p> <p>On Friday, November 18, 2016, at approximately 3:24PM, PO Doss and I were dispatched to Educator's Credit Union, 7139 N. Port Washington Rd., for a fraud complaint. Dispatch advised that there was a female subject wearing black leggings with green hair attempting to make a transaction using the name of Jazmin Lowe. Dispatch further advised that the suspect arrived in a black Cadillac (WI/957-YZY). Detective Purtell had advised earlier in the day that the credit union might be calling a identity theft complaint with a suspect using the name Jazmin Lowe.</p> <p>When I arrived, I observed the Cadillac parked facing west and it was occupied by one black male subject. When PO Doss arrived, I began to approach the Cadillac to make contact with the male subject when the female suspect exited the building. I approached the female suspect who was wearing a black body suit, a tan baseball hat, and had green hair. I asked her what she was doing and she told me that she was making a deposit. I asked her what name she used to make a deposit and she said Valentina. She was later identified as Valentina M. KNIGHT (f/b 06/13/87). I informed her that she was being detained for an identity theft investigation and I handcuffed (dl) her. I searched KNIGHT and she did not have any identification on her person. KNIGHT was carrying a brown Louis Vuitton backpack type purse. I took the purse off of KNIGHT and opened it. I immediately located a residential rental agreement with the name Jazmin Lowe on it. I informed KNIGHT she was under arrest for identity theft and placed her in the rear of PO Doss' squad.</p> <p>PO Doss and I had the male subject in the car step out. The subject would not provide his name or anything to me. PO Doss handcuffed the subject as he kept attempting to reach in his pocket. I asked the male subject numerous times what his name was, but he refused to identify himself. I informed him that he was under arrest for obstructing and placed him in the rear of PO Galbraith's squad for transport to GLPD.</p> <p>Leader Towing was called to tow the vehicle to GLPD. Leader arrived and took custody of the vehicle. I followed the tow truck back to GLPD and secured the Cadillac in GLPD garage #6.</p> <p>Submitted By,</p> <p>PO Eric F. Guse 788/Early</p>				
Reporting Officer(s): Guse, Eric		Payroll Number: 788	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 7wbutl	Payroll Number: 710	Copy To:	Page: 1 Of 1	

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:
<p><b>NAMES</b></p> <p><b>Employee</b> Liberacki, Matthew A W/M of 2125 S. 97th St., West Allis, WI, 53227 Cell Phone: (414) 588-7198</p> <p><b>Business</b> Enterprise Rent-A-Car-Glendale of 5932 N Green Bay Ave, BLDG; GL, Glendale, WI, 53209 Home Phone: (414) 540-7100</p> <hr/>			
Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 7ghaff	Payroll Number: 705	Copy To:	Page: 1 OF 4

Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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VEHICLE

Tow

Year: 2017 Make: Cadillac  
Style: Sedan  
Plate#: 957YZY-WI Vin#: 1G6AR5SX9H0129810

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Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 2 OF 4
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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**NARRATIVE**

16-013206  
Day Shift  
Detective Wall  
Supplement Report

On Friday, 11/18/16, at about 3:24 P.M., GLPD squads were advised of a fraud complaint at Educator's Credit Union, 7139 N. Port Washington Rd. See Detective Costigan's report for incident details.

I was advised that the suspects involved, later identified as Valentina M. KNIGHT, F/B 06/13/87, and Moustapha DIOUBATE, M/B 03/12/88, were arrested for their involvement in the fraud. KNIGHT and DIOUBATE arrived at the business in a black 2017 Cadillac CTS (Bearing WI reg. #957YZY). The Cadillac was towed to the GLPD shortly after their arrest. I was asked to contact the owner of the Cadillac, EAN Holdings LLC, to help determine whose name was on the rental agreement.

At about 5:00 P.M., I made telephone contact with Enterprise Branch Manager Matthew A. LIBERACKI, M/W 10/17/89. I advised LIBERACKI of my request and he advised that the Cadillac was rented from the Milwaukee Airport Enterprise, on 11/12/16, by Valentina M. KNIGHT. According to LIBERACKI, KNIGHT was to return the Cadillac on 12/03/16. LIBERACKI stated that KNIGHT presented identification and used a credit card as payment for the rental. LIBERACKI advised that he did not have access to any further information regarding the rental agreement.

At about 5:45 P.M., I removed KNIGHT from her temporary holding cell. I presented to KNIGHT a GLPD Consent to Search form, completed for consent to search the 2017 Cadillac. KNIGHT advised that she understood the form, and stated that she would not be consenting to a search of the Cadillac. I then used the Morpho identification unit to confirm KNIGHT's identity. KNIGHT initially refused to follow my instructions on providing her right, and left, index fingers. KNIGHT stated that she wanted a lawyer. I advised her that the unit was only used to confirm her identity. KNIGHT then provided her index fingers and the Morpho unit confirmed KNIGHT's identity. I then returned KNIGHT to the temporary holding cell. I advised Detectives Purtell and Costigan that KNIGHT did not consent to the search of the Cadillac. A search warrant will be requested on Saturday, 11/19/16.

At about 6:00 P.M., I removed DIOUBATE from his temporary holding cell. I then obtained DIOUBATE's fingerprints, to later transmit them to the FBI for identification purposes. DIOUBATE possessed no valid identification, which included a false IL Picture ID of a Michael L. RICHARDSON, M/B 03/08/90. The IL Picture ID included DIOUBATE's photograph. Using the Morpho unit, I obtained

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 3 Of 4
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**Glendale Police Department****Continuation**

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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DIOUBATE's index fingerprints, however I was advised that DIOUBATE's fingerprints had never been obtained by a WI agency and did not receive a positive identification. At about 6:26 P.M., I faxed DIOUBATE's 10 print card to the FBI Identification Department, to assist with positively identifying DIOUBATE. I was later advised that the FBI did not receive a full copy of DIOUBATE's fingerprint card. On Saturday, 11/19/16, at about 7:56 A.M., I re-faxed DIOUBATE's fingerprint card to the FBI.

Submitted By:

Detective Adam R. Wall

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 4 OF 4
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Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5327	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:
<p><b>NAMES</b></p> <p><b>Employee</b>  Langdon, Angela M W/F-37 of 1400 N Newman Rd, Racine, WI, 53406  DOB: 08/27/1979  Work Phone: (262) 619-2322</p> <p><b>Victim</b>  Lowe, Jazmin Kenny W/F-39 of 5110 Spring Dr, Killeen, TX, 76542  DOB: 04/20/1977  Cell Phone: (254) 371-0918</p> <p>-----</p>			
Reporting Officer(s): Purtell, Scott	Payroll Number: 722	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 7wbut1	Payroll Number: 710	Copy To:	Page: 1 Of 3



Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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**NARRATIVE**

16-013206  
Victim Complaint  
Detective Purtell #722

On Friday, 11/18/16 at approx. 1PM, I was contacted by Angela Langdon, a security director at Educators Credit Union. Angela informed me that they had a suspect trying to obtain an unsecured loan using a false identity. Angela said that a person identifying herself as 'Jazmin Lowe' had come to an Educators CU branch and presented a Maryland ID and the social security number of the true Jazmin Lowe to obtain a loan. Angela had contacted the true Jazmin Lowe, who resides in Texas and whose social security number begins with '606', the same social security number provided by the suspect. Jazmin Lowe informed Angela that she did not consent to anyone using her personal information to obtain anything from Educators Credit Union or any other financial institution. Angela informed me that Educators Credit Union was attempting to get this suspect to come to their Glendale Branch so the suspect could be arrested. I advised Angela to have the branch manager call for Police if this suspect returned to their branch.

At approx. 3:24PM, Educator's Credit Union called North Shore Dispatch requesting police for the fraud suspect having returned to their location. I confirmed with dispatch that they were reporting the suspect using the name Jazmin Lowe is the suspect at the CU. Dispatch confirmed with the branch manager that it was that suspect. I then called Angela Langdon and confirmed with Angela that Educators CU wanted the suspect arrested for fraud and she stated that they did. I then advised the responding officers that the suspect should be arrested for Fraud. PO Guse and PO Doss arrived on scene and placed Valentina M. KNIGHT (F/B, 06/13/87) and Moustapha DIOUBATE (M/B, 03/12/88) into custody for Fraud-PTAC/Obstructing, see their narrative for details.

At approx. 3:45PM, I received a phone call from Jazmin M. LOWE (F/H, 04/20/77) at 254-371-0918. I had left a message for LOWE to call me regarding her being the victim of ID Theft. LOWE informed me she resides in Texas and did not consent to anyone using her personal information to obtain money or credit. LOWE informed me that earlier that day, at approx. 11AM, she received a phone call from an investigator from a 'Summit bank or credit union'. She was advised that someone was at one of their locations attempting to secure a loan in LOWE's name. The woman had presented a Maryland ID with Jazmin LOWE information and had presented LOWE's social security number. Summit employees became suspicious and when the investigator reviewed the credit report information for LOWE, he learned that LOWE resided in Texas, not Maryland. LOWE was also told that the suspect was a black female and that she exited the Summit branch before police could be notified. LOWE was informed that the suspect had presented 'DynCorp' pay stubs for LOWE, which is the business that LOWE currently works for. LOWE had no

Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 2 Of 3
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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idea how someone could have obtained that information about her. After learning about his attempted identity theft, LOWE began checking her credit through 'Credit Karma' and learned numerous credit inquires had been made on her credit that day. LOWE began to call the businesses, banks and credit unions that had been reported on her credit history. That is when LOWE was put in contact with Angela Langdon at Educators Credit Union. Angela was advised by LOWE that whoever was trying to obtain money or credit in her name were providing fraudulent information and it was done without LOWE's consent.

LOWE again informed me that she did not consent to anyone using her personal information and LOWE wanted to pursue criminal charges against anyone involved in this activity.

Submitted by,  
Detective Purtell #722

Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 3 OF 3
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Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016		
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:	
<p><b>NARRATIVE</b></p> <p>16-013206 PO C. DOSS Supplement</p> <p>On Fri., 11-18-16 at approx. 3:24 p.m., PO Guse and I were dispatched to Educator's Credit Union, 7139 N. Port Washington Rd., for a fraud complaint. Dispatch advised that a f/b suspect in the credit union was attempting to commit a fraud. A m/b suspect was waiting in the east parking lot in a black Cadillac, license #957YZY/WI. A check of the license plate showed that the vehicle was a rental vehicle from Enterprise Rent-a-Car.</p> <p>Upon our arrival, the f/b suspect was exiting the credit union. The suspect matched the description given by employees to dispatch of a f/b with green colored hair, wearing a tan hat, and a blue jacket. I pulled up in my fully marked GLPD squad car, behind the suspect vehicle, and activated my emergency lights. PO Guse made contact with the female suspect and I approached the suspect vehicle.</p> <p>I could see a m/b subject seated in the passenger seat of the vehicle and he was holding onto a brown leather-like wallet and a cellphone. I asked the subject to put down the items, several times, and to put his hands on the dashboard of the vehicle. The male subject did not do as he was told and continued to hold onto the items, asking why he was being stopped and why we had stopped his "girlfriend." I asked him his girlfriend's name and he said he didn't know her name and then asked me what name she gave to me. I asked the subject as to how he didn't know his girlfriend's name, but he just kept asking why they were being stopped. I continued to monitor the subject while PO Guse took the female suspect into custody and placed her in the rear of my squad. I then had Guse approach the passenger side of the suspect vehicle and have the male suspect exit the vehicle.</p> <p>The male subject continued to be uncooperative, not putting down his phone or wallet, and continued to ask why we were questioning him. I advised the subject that he was currently being detained regarding a fraud investigation and handcuffed him (dl). The subject refused to cooperate with officers as we asked him to let go of his phone and wallet, to identify himself and the female subject, and answer as to their business at the credit union.</p> <p>Based upon the information from the credit union, I advised the male subject that he was under arrest for fraud. I searched the suspect,</p>				
Reporting Officer(s): Doss, Carrie	Payroll Number: 748	Payroll Number:	Report Date: 11/18/2016	
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 4	

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subsequent to his arrest, and located numerous credit cards in several names, both male and female, in the subject's pants pockets and the wallet that he had refused to put down. I also located what came out to be \$1260.00 in cash from the subject's pants pockets and his wallet, as well as a State of IL driver's license, in yet another name, in his front right pants pocket.

Upon going through the cards later, at the PD, I found the names and cards were as follows:

Bank of America VISA debit 4117 7339 7481 7221 in the name of Moustapha Dioubate

Bank of America MasterCard debit 5312 6600 0430 8246 in the name of Moustapha Dioubate

Capitol One MasterCard 5178 0575 0459 2853 in the name of Moustapha Dioubate

Western Union MasterCard debit 5292 6365 2750 2279 in the name of Moustapha Dioubate

Bank of America MasterCard 5524 3301 6025 9054 in the name of Moustapha Dioubate

Citibank MasterCard 5262 1960 8108 7105 in the name of Moustapha Dioubate

Bank of America VISA Business debit card 4135 7445 0691 6587 in the name of M&V Fast Efficient with a sub-name of Moustapha Dioubate

Citibank CitiBusiness MasterCard 5571 2711 0721 0499 in the name of M&V Fast Efficient Truck with a sub-name of Moustapha Dioubate

Fleet-Tech Transportation Services (Control) card 999011 180083 776100 in the name of M&V Fast Efficient Tru, Milwaukee WI, Customer Control ID Card  
Fleet-Tech Transportation Services (Purchase card) 180083 776100 001004 in the name of M&V Fast Efficient Trucking LLC, Milwaukee, WI

Bank of America VISA debit 4744 7801 3843 8924 in the name of Mohamed Conde

Bank of America VISA debit 4744 7801 3904 0596 in the name of Laura Banks

Bank of America VISA debit 4744 8900 8489 6528 in the name of Valentina Monee Knight

State of Illinois photo ID card in the name of Michael L. Richardson, m/b 03-08-90, DL#2635-5290-070R

An HSBC card with no name or number on it, but with the magnetic strip across the front of the card and what appeared to be a security chip affixed to the back of the card

A Bank of America VISA card with no name or number on the front of the card, but what appeared to be one magnetic strip over another on the back of the card. The information on the back of the card was not "centered" and some

Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 2 Of 4
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Continuation

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of the wording appeared to be cut off or not printed on the card properly.

It appeared that these last two cards were "blanks" that were poorly made.

I turned over the male subject to PO Galbraith for transport to the GLPD, but kept possession of the credit cards, ID's, and money, as possible evidence.

I advised Det. Costigan of the investigation up to that point. He advised he was going to investigate the fraud and requested I contact Leader Towing to tow the suspect vehicle to the GLPD as evidence. PO Galbraith and I transported the male and female suspects, respectively, to the GLPD, while PO Guse stood by with the vehicle as it was towed back to the GLPD.

While I was transporting the female suspect to the GLPD, she asked why we had arrested "Moustapha". I recognized the name from several of the credit cards found on the male subject. One of the credit cards found on the male suspect was in the name of Valentina Knight. PO Guse later advised me that the female subject had given that as her name when he first approached her at the bank.

At the GLPD PO Galbraith placed the male suspect in a secure holding cell and I placed the female suspect in a secure holding cell, as well. The female suspect verbally identified herself, to me, as Valentina M. KNIGHT, f/b 06-13-1987, but refused to provide any more information.

I ran a check of KNIGHT and found she has a valid State of WI driver's license. The photo on file for KNIGHT appeared to be the suspect in custody. A check of KNIGHT'S CIBR record showed previous arrests in WI, including Glendale, however, her last WI arrest was in 2009. Based upon the crime KNIGHT was allegedly committing, I ran a III record for KNIGHT and found additional arrests for her in the State of Nevada. I turned over this information to the Detective Bureau.

I then checked the recovered credit cards that "Moustapha" had in his possession and found he listed a last name of DIOUBATE. I ran an Accurint.com check for "Moustapha Dioubate" and found what appeared to be only one listed throughout the US, but using several different Social Security numbers, and with addresses in Glendale, WI at 2870 W. Mill Rd., #E, as well as in New York and Nevada. When officers first approached DIOUBATE, he kept stating that he didn't know what was happening and that he had just gotten here from New York. This subject showed a date of birth of 03-12-88.

I ran a check of DIOUBATE through WI with negative results, however, he came back with a driver's license in New York, as well as a III record from

Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 3 OF 4
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New York and Nevada. I turned over this information to the Det. Bureau, as well.

Upon doing a further search on KNIGHT through our local database, I found that KNIGHT had a previous contact through Brown Deer PD in 2013 and she showed an address of 2870 W. Mill Rd., #E; one of the same addresses on file for DIOUBATE.

I turned over all of the recovered money, credit cards, and ID's found on DIOUBATE to Det. Furtell.

All of these cards were later scanned and the copy attached, electronically, to this case file.

Submitted by,  
PO Carrie J. Doss

Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 4 Of 4
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New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:	
<b>PROPERTY LIST</b>				
Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
=====				
16-003266				
1	EVI		Louie Vuitton brown purse	1.000 \$0.00 [Recovered]
2	EVI		\$734.35	1.000 \$734.35 [Recovered]
3	EVI		Maryland DL LOWE info, KNIGHT's photo	1.000 \$0.00 [Recovered]
4	EVI		Educators CU Visa Debit card- LOWE	1.000 \$0.00 [Recovered]
5	EVI		Chase Freedom Visa CC LOWE	1.000 \$0.00 [Recovered]
6	EVI		Educators CU business cards and Account # card	1.000 \$0.00 [Recovered]
7	EVI		Visa Debit Card Laura Banks	1.000 \$0.00 [Recovered]
8	EVI		Target Receipt Nikita Parsons for \$500 REDcard CC	1.000 \$0.00 [Recovered]
9	EVI		Educators CU Transaction ticket LOWE name signed	1.000 \$0.00 [Recovered]
10	EVI		Rental Agreement- Residential- LOWE at 7705 Glenbrook Dr	1.000 \$0.00 [Recovered]
Reporting Officer(s): Purtell, Scott		Payroll Number: 722	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 7dhaff	Payroll Number: 705	Copy To:	Page: 1 Of 3	

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			[Recovered]
11	EVI	Apple	IPhone 6s, A1634,
		A1634	BCG-E2944A, 579C-E2944A
			579C-E2944A
			1.000
			\$0.00
			[Recovered]
12	EVI	Apple	IPhone 5s, broken, A1688,
		A1688	BCG-E2946A, 579C-E2946A
			579C-E2946A
			1.000
			\$0.00
			[Recovered]

Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Page: 2 OF 3
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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NARRATIVE

16-013206  
Evidence Recovery  
Detective Purtell #722

On Friday, 11/18/16 at approx. 4PM, PO Guse informed me he recovered a brown purse from Valentine M. KNIGHT (F/B, 06/13/87) when he placed her into custody. During a search of the purse incident to KNIGHT arrest, PO Guse located documents with the name 'Jazmin Lowe' on them. I am aware that Jazmin Lowe is the victim in this identity theft investigation and I know that documents with Jazmin Lowe's personal information on them would be evidence of the crime of Identity Theft. The purse was transported to GPD with the recovered vehicle, a 2017 black Cadillac 4DR CTS, with WI plate 957YZY. The vehicle was determined to be a rental car from Enterprise which had been rented by KNIGHT.

At the station, I conducted a search of the brown Louis Vuitton purse and recovered the items in the attached property record. Recovered from the purse of note:

- Maryland Driver's License in the name of Jazmin Lowe with KNIGHT's photo
- An Educators Credit Union Visa Debt card #4535 9800 0690 8684 in the name of Jazmin M Lowe
- Chase Freedom Unlimited Visa card #4266 8414 8708 1265 in the name of Jazmin Lowe
- A Visa Debit Card #4744 7801 4085 4357 in the name of 'Laura Banks'.
- Target store receipt for the purchase of a Redcard credit Card in the name of Nikita Parsons
- Educators Credit Union documents with the name 'Jazmin Lowe' on them
- A Rental Agreement with the name 'Jazmin Lowe' on it
- \$734.35 in cash

All of the above items were inventoried as evidence, see attached property sheet for a more detailed list.

Submitted by,  
Detective Purtell #722

Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 3 Of 3
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New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:	
<p><b>NAMES</b></p> <p><b>Employee-1</b>  Pierquet, Terra L W/F-28 of 321 E Oklahoma Ave, Milwaukee, WI, 53207  DOB: 08/23/1988  Cell Phone: (920) 680-6226</p> <p><b>Employee-2</b>  Kuczynski, Christine E W/F-28 of 3449 S Kansas Ave, Milwaukee, WI, 53207  DOB: 03/22/1988  Cell Phone: (414) 322-5534</p> <p>-----</p>				
Reporting Officer(s): Costigan, Patrick	Payroll Number: 724	Payroll Number:	Report Date: 11/18/2016	
Reviewed by: 7wbutl	Payroll Number: 710	Copy To:	Page: 1 Of 6	

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PROPERTY LIST

Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
=====				
16-003263				
1	EVI		Documents from Educators credit union were VALENTINA KNIGHT opened accounts and attempted to obtain a credit card in the name of JAZMIN LOWE.	1.000 \$0.00 [Recovered]
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Reporting Officer(s): Costigan, Patrick	ID Number 724	ID Number	Pages: 2 OF 6
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Glendale Police Department

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Incident Report Number 16-013206	Incident Location 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date 11/18/2016
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NARRATIVE

16-013206  
Employee Statement  
Detective Costigan #724

On Friday 11/18/16 at approximately 3:24pm, Glendale squads were being dispatched to Educators credit union located at 7139 N. Port Washington Rd. regarding an identity theft complaint.

Minutes earlier, I was advised by Det. Purtell that he was in contact with security director Angela Langdon at Educators as well as a victim by the name of JAZMIN LOWE who currently resides in the State of Texas. Langdon states that an unknown subject purporting to be LOWE, entered the Glendale CU earlier in the day and opened a bank account as well as applied for a Visa credit card in LOWES name.

I responded to the Glendale Educators where I observed P.O.'s Doss and Guse affecting the arrests of 2 subjects.

I entered the CU and met with Member Finance Representative TERRA L. PIERQUET, F/W 08/23/88. PIERQUET observed the female subject being detained by the Glendale Police and confirmed her as being the same subject who entered the CU earlier in the day and opened a bank account in the name of JAZMIN LOWE. She states that the female arrived in the black Cadillac that the police were standing in front of.

PIERQUET states that this incident actually began earlier in the day around 11:30am. She states that the female suspect entered the CU and asked a teller that she would like to close on the credit card application that she previously filled out online. PIERQUET states that the suspect was referred to her and that they sat in her office. She states that before the suspect could close on the Visa Platinum credit card, she would first need to open an Educators account. PIERQUET states that there was some hostility from the suspect at first, because she wanted her credit limit on the card to be \$20,000 instead of the \$10,000 that was authorized. PIERQUET states that the suspect was not pleased and seemed to really want the \$20,000 limit. The suspect eventually relented and accepted the \$10,000 limit and accepted the requirement of opening an Educators account.

To open the savings and checking account, the suspect was required to present photo identification, she did so by displaying a Maryland DL in the name of JAZMIN M. LOWE 04/07/77 bearing an address of 1023 Savanna Dr. La Plata, MD 20646. PIERQUET states that she verified the picture of the suspect and states they were one in the same. Because the DL was out of state, the suspect was required to present proof of WI residency, she did so by presenting a Residential Rental Agreement contract showing an address of 7705 W. Glenbrook Dr. Milwaukee, WI

Reporting Officer(s) Costigan, Patrick	ID Number 724	ID Number	Pages 3 OF 6
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date 11/18/2016
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53224. The suspect was then required to show proof of employment, she did so by providing a pay stub bearing the company name Dynocorp International LLC out of Fort Worth Texas. The employee name on the pay stub was JAZMIN LOWE 7705 W. Glenbrook Dr. Milwaukee, WI. After receiving all of this verification, PIERQUET states that she physically provided the suspect an Educators Debit card in the name of JAZMIN M. LOWE. As a conditional requirement, the suspect was required to carry a \$5 balance on the accounts, she did so by depositing \$5 into each. At the end of the account opening process, the suspect was required to sign verifying all of the information was accurate. The suspect signed in the electronic box verifying she was in fact JAZMIN LOWE and that all the information was correct.

Next, PIERQUET states that she and the suspect began to review the credit card application. PIERQUET explained that the suspect filled out the credit card application online on 11/15/16, and was only now coming in to obtain the actual card. While looking over the application, PIERQUET states that she became suspicious for the following reasons:

- PIERQUET reviewed the suspects credit history and learned that she has about 40 lines of open credit through various credit card companies and businesses.
- She added that the available balance the suspect had was just over \$90,000.
- There were many instances where the suspects credit history was run, an indicator of suspicious activity.
- Its seemed suspicious to PIERQUET that LOWE insisted on receiving a \$20,000 balance when she had over \$90,000 of available balance.

Due to these irregularities, PIERQUET felt this may be an identity theft circumstance and wanted to check with a supervisor before processing the credit card application. PIERQUET told the suspect to provide her with a telephone number and she would call when the credit approval was finished and she could come in and obtain her credit card. The suspect provided a number of #312-956-5356.

PIERQUET states that she provided this information to her supervisor, CHRISTINE E. KUCZYNSKI, F/W 03/22/88 who in turn contacted Security Director ANGELA LANGDON.

PIERQUET states that at LANGDON'S request, she called the suspect and told her the credit card application was finished and approved and she could come in to retrieve her card. The suspect came in and was arrested by Glendale officers.

PIERQUET provided me with numerous documents involving this identity theft incident which I later scanned into this case and inventoried:

- The Dynacorp payroll stub in the name of JAZMIN LOWE
- The credit report that was run by Educators in the name of JAZMIN LOWE bearing a SS beginning in #606.
- Verification of account information that the suspect signed JAZMIN LOWE.

Reporting Officer(s): Costigan, Patrick	ID Number 724	ID Number	Pages: 4 OF 6
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Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
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<p>-Membership application filled out by the suspect bearing the name JAZMIN M. LOWE providing a telephone number of #312-956-5356. (This being the same number the suspect gave as her own when being called back into the CU)</p> <p>-On line loan application that the suspect admitted filling out bearing the name JAZMINE LOWE.</p> <p>At the GLPD, using the morpho fingerprint unit, I positively identified the female suspect in this case to be VALENTINA MONEE KNIGHT, F/B 06/13/87. The male did not register on the morpho unit and verbally identified himself as MOUSTAPHA DIOUBATE, M/B 03/12/88. DIOUBATE has an extensive criminal record in both New York and Nevada. Due to him not having a WI driving record, criminal history or identification, his fingerprint card was faxed to the FBI for possible identification. (This name was later confirmed by the F.B.I.)</p> <p>When asked, both subject denied my request for an interview.</p> <p>Upon checking GLPD records, I learned that VALENTINA KNIGHT is associated with a prior Glendale fraud case #16-007824. On 07/11/16 at 7:40pm, KNIGHT and MOUSTAPHA DIOUBATE were registered to room #118 at the Holiday Inn located at 4700 N. Port Washington Rd. Glendale. During that incident, a subject called the police and hotel and stated that the occupants of that room purchased their stay through an internet site using their identity. The subjects were identified and removed from the property. It was determined that a police agency in Texas was investigating the identity theft for the booking of the room.</p> <p>At about 6pm, I made telephone contact with the guest services employee at the Holiday Inn, she confirmed that DIOUBATE and KNIGHT were registered to that room on 07/10/16 and 07/11/16. Due to a report not being generated, the case notes were printed and scanned to this case.</p> <p>Upon reviewing some of DIOUBATE'S belongings, I observed an Ill ID card bearing his picture but in the name, MICHAEL L. RICHARDSON, 03/08/90 with an address of 730 W. Lake St. Apt 174 Chicago, IL 60661. Upon checking Accurant, an investigative website, I learned that there is a subject by the name of MICHAEL RICHARDSON that was born in 1990 that holds an address of 7236 S. Paxton Ave #1 Chicago. There is no telephone number associated with this entry.</p> <p>DIOUBATE and KNIGHT were transported to the CJF. On Monday 11/21/16, the following charges will be sought:</p> <p><b>KNIGHT-</b>  Unauthorized use of personal identifying information  Forgery of Financial Transaction Card</p> <p><b>DIOUBATE-</b>  Unauthorized use of personal identifying information</p>			
Reporting Officer(s): Costigan, Patrick	ID Number 724	ID Number	Page(s) 5 Of 6

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Forgery of Financial Transaction card  
Obstructing an Officer

Submitted by,

Det. Patrick Costigan #724

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Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53233	Incident Date: 11/18/2016	
Now Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:
<p><b>NARRATIVE</b></p> <p>16-013206 Vehicle Warrant Detective Purtell #722</p> <p>ON Saturday, 11/19/16, I generated a search warrant for the recovered black 2017 Cadillac vin#1G6AR5SX9H0129810. I presented the affidavit to Milwaukee County ADA Katherine Halopka-Ivory, who reviewed and approved the affidavit and warrant. I then presented the warrant to Milwaukee County Court Commissioner Barry Phillips. At 9:34AM, Commissioner Phillips signed the search warrant.</p> <p>I scanned the warrant documents and attached them to this report. A copy of the search warrant will be left with the vehicle when the search is executed.</p> <p>Submitted by, Detective Purtell #722</p>			
Reporting Officer(s): Purtell, Scott	Payroll Number: 722	Payroll Number:	Report Date: 11/19/2016
Reviewed by: 7dhaff	Payroll Number: 705	Copy To:	Page: 1 Of 1



**Glendale Police Department**

**Supplementary Report**

Incident Report Number: <b>16-013206</b>	Incident Location: <b>7139 N Port Washington Rd, BLDG, Glendale, WI, 5323</b>	Incident Date: <b>11/18/2016</b>
New Incident:	Original CFS Code - 1:	New CFS Code - 1:
		New CFS Code - 2:

**PROPERTY LIST**

Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
=====				
16-003269				
1	EVI		6 credit cards in the name of Moustapha Dioubate	6.000 \$0.00 [Recovered]
2	EVI		Two M&V Fast Efficient cards	2.000 \$0.00 [Recovered]
3	EVI		Bank of America CC Laura Banks	1.000 \$0.00 [Recovered]
4	EVI		Bank of America KNIGHT Visa CC	1.000 \$0.00 [Recovered]
5	EVI		2 blank Credit cards	2.000 \$0.00 [Recovered]
16-003270				
1	EVI		\$1268 Cash	1.000 \$1268.00 [Recovered]
2	EVI	Alcaltel	Alcatal black Cell phone, A571VL 2ACCJB027	1.000 \$0.00 [Recovered]
16-003272				
1	EVI		IL Drivers License Michael L. Richardson w/ Dioubate's photo	1.000 \$0.00 [Recovered]
2	EVI		1 Visa Debit, 1 MasterCard Debit Dioubate	1.000 \$0.00 [Recovered]
3	EVI		Visa Debit card Mohamed Conde	1.000 \$0.00 [Recovered]
-----				

Reporting Officer(s): <b>Purtell, Scott</b>	Payroll Number: <b>722</b>	Payroll Number:	Report Date: <b>11/19/2016</b>
Reviewed by: <b>7wbut1</b>	Payroll Number: <b>710</b>	Copy To:	Page: <b>1 OF 2</b>

Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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NARRATIVE

16-013206  
DIOUBATE Evidence  
Detective Purtell #722

On 11/18/16 at approx. 4:30PM, the following items were turned over to me by PO Doss at GPD as evidence recovered from the suspect later identified as Mustopha DIOUBATE (M/B, 03/12/88) which were recovered incident to his arrest. I photographed these items and inventoried them as evidence:

- \$1268 Cash
- Alcatel 'one touch' black cell phone, model A571VL, FCC ID 2ACCJB027
- Western Union MasterCard, Moustapha Dioubate, #5292 6365 2750 2279
- Bank of America MasterCard Moustapha Dioubate, #5524 3301 6025 9054
- CitiPhone Bank MasterCard, Moustapha Dioubate, #5262 1960 8108 70 15
- CitiBusiness MasterCard, Moustapha Dioubate, #5571 2711 0721 0499
- Capitol One MasterCard, Moustapha Dioubate, #5178 0575 0459 2853
- Bank of America Visa, Moustapha Dioubate- N&Y Fast Efficient, #4135 7445 0691 6587
- FTS Purchase Card, M&V Fast Efficient Trucking LLC, #180083 776100 001004
- FTS Control, M&V Fast Efficient Tru, #999011 180083 776100
- HSBC credit card blank, no information
- Bank of America Visa Blank- no information
- Bank of America Visa Debit card, Valentina Monee Knight, #4744 8900 8489 6528
- Bank of America Visa Debit card, Laura Banks, #4744 7801 3904 0596
- Bank of America Visa Debit card, Mohamed Conde #4744 7801 3843 8924
- Bank of America Visa Debit card, Moustapha Dioubate, #4117 7339 7481 7221
- Bank of America MasterCard, Moustapha Dioubate, #5312 6600 0430 8246
- IL ID Card for Michael Richardson, 730 W. Lake St in Chicago, with DIOUBATE's photo

The above items were placed in a secure evidence locker, see attached property sheet for details.

Submitted by,  
Detective Purtell #722

Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 2 Of 2
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Glendale Police Department

Supplementary Report

Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd,BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1: New CFS Code - 2:

OTHER NAMES

Knight, Valentina Monee B/F-29 of 1563A S 3rd St, Milwaukee,WI,53204  
DOB: 06/13/1987  
HT: 504 WT: 142 Hair: Black  
Eyes: Brown  
Cell Phone: (414) 807-1225

Enterprise Rent-A-Car-Glendale of 5932 N Green Bay Ave, B  
LDG;GL  
Glendale, WI, 53209  
Home Phone: (414) 540-7100

Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/19/2016
Reviewed by:	Payroll Number:	Copy To:	Page: 1 OF 11

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Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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PROPERTY LIST

Seq#	Reason	Make/Model	Description/Serial#	QTY/Value
=====				
16-003273				
1	EVI		Piece of Wells Fargo mail addressed to Valentina Knight	1.000 \$0.00 [Recovered]
2	EVI		Piece of Bank of America mail addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
3	EVI		Piece of mail from Stop Mart addressed to Laura Banks	1.000 \$0.00 [Recovered]
4	EVI		Piece of mail from Bank of America addressed to Nikita	1.000 \$0.00 [Recovered]
5	EVI		Sales receipt for JB's addressed to Nikita	1.000 \$0.00 [Recovered]
6	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
7	EVI		Mail from Bank of America	1.000 \$0.00 [Recovered]
8	EVI		Mail from Citi addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
9	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
10			Walmart Sales receipt from Brown Deer 11/02/16	1.000 \$0.00 [Recovered]

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Continuation

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11	EVI	Educators Credit Union Withdrawal Receipt for Nikita Parsons	1.000 \$0.00 [Recovered]
12	EVI	Parking placard for Milwaukee College Prep Loh Rowe North Campus #565	1.000 \$0.00 [Recovered]
13	EVI	2.98 in US Currency	1.000 \$0.00 [Recovered]
14	EVI	Mail from Bank of America addressed to Laura M. Banks	1.000 \$0.00 [Recovered]
15	EVI	WI paper I.D. for Valentia M. Knight F/B Laura M. Banks	1.000 \$0.00 [Recovered]
16	EVI	Wyndham Rewards Visa card assigned to Nikita Parsons 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
17	EVI	Chase Freedom Visa card assigned to Laura M. Banks 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
18	EVI	Chase Freedom Visa assigned to Nikita Parsons 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
19	EVI	Chase Freedom Visa assigned to Valentia Knight 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
20	EVI	Chase Freedom Visa assigned to Adam Lowe 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
21	EVI	South Carolina DL with the name of Laura M. Banks f/b 03/12/89, with Knight's photo. 185967942	1.000 \$0.00 [Recovered]
22	EVI	New York State DL for a Nikita Parsons F/B 04/24/91, with Knight's	1.000 \$0.00 [Recovered]

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Page: 3 Of 11
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- photo.  
612 715 834
- 23 EVI Bank of America Visa Debit Card 1.000  
4744 8100 7046 2515 \$0.00  
[Recovered]
- 24 EVI Bank of America Visa Debit Card 1.000  
4744 8100 7046 2523 \$0.00  
[Recovered]
- 25 EVI Chase Sapphire Visa card assigned to Vanessa M Knight 1.000  
4147 2022 8330 4582 \$0.00  
[Recovered]
- 26 EVI Capital One Visa card 1.000  
5178 0592 1043 \$0.00  
[Recovered]
- 27 EVI Educators Credit Union debit card with account 1.000  
\$0.00  
[Recovered]
- 28 EVI Gucci Brown and black leather purse 1.000  
\$0.00  
[Recovered]
- 29 EVI HP Silver laptop 1.000  
8CG63404 \$0.00  
[Recovered]
- 30 EVI Alcatel One Touch cell phone 1.000  
\$0.00  
[Recovered]
- 31 EVI Misc. power cords and chargers 1.000  
\$0.00  
[Recovered]
- 32 EVI 3 blank checks for M&V Fast Efficient Trucking LLC. 3.000  
#s 1010, 1011, 1012 \$0.00  
[Recovered]
- 33 EVI 4 UPS shipping receipts to various New York City 4.000  
\$0.00

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34	EVI	Sandisk	locations. Sandisk 16gb thumbdrive	[Recovered] 1.000 \$0.00 [Recovered]
35	EVI		2 keys for unknown lock mechanism	2.000 \$0.00 [Recovered]
36	EVI		Gold cell phone backing	1.000 \$0.00 [Recovered]
37	EVI		Pink sticky note with Lowe 606014 211 N Bay Ave Glendale WI 53039 414-540-1422 for it	1.000 \$0.00 [Recovered]
38	EVI		Transaction from 11/11/16 at Wells Store #0001311 for withdrawal	1.000 \$0.00 [Recovered]
39	EVI	Logitech	Logitech computer	1.000 \$0.00 [Recovered]
40	SAF		1 Excluded cards card	1.000 \$0.00 [Recovered]
41	SAF	2017 Cadillac CTS	2017 Cadillac CTS 4dr black 1G6AR5SK1M119810	1.000 \$30000.00 [Recovered]
42	EVI	Sharper Image	Sharper Image w/ misc. amount of men's clothing/shoes. Baggage claim ticket shows Michael L. Richardson	1.000 \$0.00 [Recovered]
43	EVI		A blue binder that contained a large amount of misc. paperwork, related to M&V Fast Efficient Trucking.	1.000 \$0.00 [Recovered]
44			Credit Card magnetic strip encoder	1.000 \$0.00 [Recovered]

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Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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45	EVI	HP	Damaged Black HP laptop CND6162WMG	1.000 \$0.00 [Recovered]
46	EVI		Certified mail addressed Midwest Conde Pain Management Dr. Mohamed Conde MD	1.000 \$0.00 [Recovered]
47	EVI		Receipt from Akira Bayshore from 10/22/16 purchase made by Knight using MC ending 3210	1.000 \$0.00 [Recovered]
48	EVI	Swiss Alps	Grey Swiss Alps suitcase w/ misc. clothing paperwork for Fast Efficient New York	1.000 \$0.00 [Recovered]
49	EVI		Permit Commere for Moustapha Di #813 712 977	1.000 \$0.00 [Recovered]
50	EVI		Parking permit for 6th St	1.000 \$0.00 [Recovered]
51	EVI		Lease Agreement paperwork for rental Entertainment	1.000 \$0.00 [Recovered]
52	EVI		Confirmation form for Moustapha Di 10/18/16 - 11/14/16 purchased with a MC ending	1.000 \$0.00 [Recovered]
53	EVI		Vehicle Agreement/Bill for a 2006 BMW 330i for \$3000	1.000 \$0.00 [Recovered]
54	EVI		10 pages of false employment pay stubs for Jazmin Lowe and Nikita Parsons	10.000 \$0.00 [Recovered]
55	EVI		Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]
56	EVI	Apple	Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]

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|----|-----|--------------------------|---|--------------------------------|
| 57 | EVI | Samsung<br>SM-J100VPP UD | Blue Samsung Galaxy J1<br>A3LSMJ100VPP FCC ID #   | 1.000<br>\$0.00<br>[Recovered] |
| 58 | EVI | Motorola                 | White Motorola cell phone   | 1.000<br>\$0.00<br>[Recovered] |
| 59 | EVI | LG<br>LG-VS425PP         | Black LG cell phone<br>607VTNV0684567   | 1.000<br>\$0.00<br>[Recovered] |
| 60 | EVI | Apple                    | Apple Laptop  | 1.000<br>\$0.00<br>[Recovered] |
| 61 | EVI |                          | Numerous charging cables,<br>cords, wifi puck   | 1.000<br>\$0.00<br>[Recovered] |
| 62 | EVI |                          | Items found in<br>center  | 2.000<br>\$0.00<br>[Recovered] |
| 63 | EVI |                          | Residential Rental Agreement<br>with forwarding banks   | 1.000<br>\$0.00<br>[Recovered] |
| 64 | EVI |                          | Residential Rental Agreement<br>started on Jazmin Lowe  | 1.000<br>\$0.00<br>[Recovered] |
| 65 | EVI |                          | Residential Rental Agreement<br>on Jazmin Lowe on   | 1.000<br>\$0.00<br>[Recovered] |
| 66 | EVI |                          | 4 pages of fake employee pay<br>stubs for Nikita Parsons<br>and Jazmin Lowe                                   | 4.000<br>\$0.00<br>[Recovered] |
| 67 | EVI |                          | Unused packet of residential<br>rental forms  | 1.000<br>\$0.00<br>[Recovered] |
| 68 | EVI |                          | Multi colored suit case with<br>baggage claim tag for<br>Michael L. Richardson,<br>containing women and men's | 1.000<br>\$0.00<br>[Recovered] |

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69 EVI Brother clothing.  
Brother personal fax machine 1.000  
\$0.00  
[recovered]

70 EVI Large amount of misc. 1.000  
paperwork, most pertaining \$0.00  
to M&V Fast Efficient [recovered]  
Trucking

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**DRAFT**

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Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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NARRATIVE

16-013206  
 Early Shift  
 Detective Wall  
 Supplement Report

On Sunday, 11/19/16, at about 10:00 A.M., I conducted a search of the back 2017 Cadillac CTS (bearing WI registration #957YZY) after Det. Purtell had obtained a search warrant for the vehicle. The vehicle was used in the commission of a Fraud-Identity Theft.

The Cadillac was parked in the secure GLPD garage floor bay #6. I placed a copy of the search warrant onto the Cadillac's dashboard. Using the GLPD digital evidence camera, I first photographed the exterior of the Cadillac. The photographs were later printed and copies placed in the officer's folders. After photographing the vehicle, I proceeded to systematically search the Cadillac, and conducted an inventory search of the items within. The following items were placed into GLPD property:

- The front driver's door (pocket)
  - Mail from Wells Fargo. Addressed to Valerie Knight of 2025 Dr. Martin Luther King Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
  - Mail from Storage Mart. Addressed to Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
  - Sales Invoice for JB's Furniture purchase made by Nikita Parsons on 11/17/16. Addressed for 332 W. Donna Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. ML King Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
  - Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
  - Receipt for purchase made at Walmart, in Brown Deer, WI, on 11/09/16 for two separate money orders, \$1000 (serial number #20683866939) and \$675 (serial number #20683866939).
  - Withdrawal slip from Educators Credit Union, Park Place Office, on

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 9 Of 11
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11/17/16, for \$5.00. The account listed to a Nikita Parsons.  
 -Parking placard (#565) for Milwaukee College Prep Lola Rowe North Campus.  
 -\$2.98 in U.S. Currency, coins.

Center console compartment (underneath radio):

- Mail from Bank of America. Addressed to Laura Banks of 10000 MLK Dr. Milwaukee, WI 53212.
- WI Paper ID of Valentina M. Knight, F/B 06/13/87. ID #K523-8738-7713-09. ID contains Knight's photograph.
- Wyndham Rewards Visa card (#48689513 3269 8494) issued to Nikita Parsons.
- Wyndham Rewards Visa card (#4868 9513 3269 8486) issued to Laura M. Parsons.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Nikita P. Parsons.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Valentina Knight.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Jazmin Lowe. (All three Chase Freedom Visa cards share the same account number).
- South Carolina D.L. of Laura M. Banks, F/B 06/13/87. The D.L. contained Knight's photograph. DL #185967942.
- New York State D.L. of Nikita Parsons, F/B 06/13/87. The D.L. contained Knight's photograph. D.L. #612 715 834.
- Bank of America Visa Debit Card (#4744 8100 7046 2524) issued to Nikita Parsons.
- Bank of America Visa Debit Card (#4744 8100 7046 2524) issued to Nikita Parsons.
- Chase Sapphire Visa Card (#4142 8100 7046 2524) issued to Valentina M. Knight.
- Capital One MasterCard (#5178 8100 7046 2524) issued to Valentina Knight.
- Educators Credit Union pamphlet - account number.

Front passenger seat floor:

- Brown and Tan Gucci purse.
- Silver HP laptop (#9CG63404B).
- Black Alcatel One Touch cell phone.
- Misc. power cords and chargers.
- Three (3) blank checks for M&V Fast Efficient Trucking LLC (check #'s 1010, 1011 & 1012).
- Four (4) keys to various New York City locations.
- Sandisk 16GB USB drive.
- Two (2) keys to a lawn locking mechanism.
- The back of a silver flip cell phone.
- A pink sticky note with address: Lowe 606014733 6811 N Green Bay Ave Glendale, WI 53209 4142 8100 7046 2524 written on it.
- Transfer of \$400 from 11/17/16 at Wells Fargo Store (#0001311) for \$400 withdrawal.
- A black Logitech computer mouse.
- A key chain with Akira Exclusive rewards card.

Front passenger seat:

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Page: 10 Of 11
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Blue Samsung Galaxy J1 (S/N #A3LSMJ100VPP) cell phone.
- White Motorola cell phone.
- Black Verizon LG 4GLTE cell phone (S/N #507VTINV0684567).
- Gold Apple Laptop
- Numerous chargers, power cords, WiFi puck.

DRAFT

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 11 Of 11
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Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016		
New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:	
<p><b>NARRATIVE</b></p> <p>16-013206 Day Shift Detective Wall Supplement Report</p> <p>On Saturday, 11/19/16, at about 11:39 A.M., I received a fax from the FBI in regards to my identification request on Moustapha DIOUBATE, M/B 03/12/88. I had earlier faxed, to the FBI's CJIS Division, DIOUBATE's 10 print card. According to the FBI's report, the fingerprints on the 10 print card had been identified as belonging to Moustapha DIOUBATE, M/B 03/12/88. I attached a copy of the FBI report to this report.</p> <p>Submitted By:  Detective Adam R. Wall</p>				
Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/19/2016	
Reviewed by: 7wbut1	Payroll Number: 710	Copy To:	Page: 1 Of 1	

Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016		
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:	
<p><b>NARRATIVE</b></p> <p>16-013206 Follow up Det. Costigan #724</p> <p>Based on KNIGHT being in possession of a New York State DL in the name NIKITA PARSONS 04/24/91, I used Accurint, a Law Enforcement search data base to attempt to identify PARSONS.</p> <p>I located a NIKITA P. PARSONS with the same date of birth of 04/24/91 residing at 2025 N. Dr. Martin Luther King Dr. Milwaukee, WI 53212. There was no phone listing. This address is familiar to me as numerous mailings from the searched Cadillac showed an address of 2025 N. Dr. Martin Luther King Dr. associated with various names.</p> <p>At approximately 10pm, P.O. Hoffmann and I responded to the address and learned that it was a commercial building and not a private residence. The business name is East Bank Storage, a self storage facility that appears to also be a mailing center. The business was closed due to the late hour, but appeared to still be operational.</p> <p>Submitted by,  Det. Patrick Costigan #724</p>				
Reporting Officer(s): Costigan, Patrick		Payroll Number: 724	Payroll Number:	Report Date: 11/19/2016
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 1	

Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5323	Incident Date: 11/18/2016		
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1 :	New CFS Code - 2:	
<p><b>NARRATIVE</b></p> <p>16-013206 Follow up Det. Costigan</p> <p>Upon checking Accurant, a Law Enforcement investigative website, I searched for the name, MOHAMED CONDE.</p> <p>I learned that there is a MOHAMED CONDE 06/21/86, that resides at 2025 N. Dr. Martin Luther King JR. Dr. This is the same address that is listed for another potential victim in this case. Once again, this is a commercial self storage building and not a private residence.</p> <p>A search was conducted on one other potential victim in this case; LAURA M. BANKS. This search provided no results as the parameters are too vague.</p> <p>Submitted by, Det. Patrick Costigan #724</p>				
Reporting Officer(s): Costigan, Patrick	Payroll Number: 724	Payroll Number:	Report Date: 11/19/2016	
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 1	



Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:
<p><b>NARRATIVE</b></p> <p>16-013206 Follow up-NIKITA PARSONS Det. Costigan #724</p> <p>On Monday 11/21/16 at approximately 10am, I made phone contact with Educators Security Director Angela Langdon. Langdon states that the suspect in this case, VALENTINA M. KNIGHT, attempted to procure credit at different Educators Credit Unions in southeastern WI in the name of NIKITA PARSONS. The attempt was started at a Racine branch and continued at the branch at the Park Place location in Milwaukee.</p> <p>During this attempt, KNIGHT presented a pay stub in the name of: NIKITA PARSONS with an address of: 3164 N. 39th St. Milwaukee, WI 53206.</p> <p>The employer is listed as:</p> <p>Silver Spring Neighborhood Center School 5460 N. 64th St. Milwaukee, WI 53255.</p> <p>The two pay periods listed on the stub are 10/06/16 to 11/11/16 and 10/23/16 to 10/28/16. I made phone contact with Silver Spring Neighborhood Center School HR employee ROWANDA NUNN. NUNN states that NIKITA PARKS is not a current or past employee of the Silver Spring Center.</p> <p>An email was sent to LANGDON for specifics regarding the attempts to open the account in Racine and Milwaukee.</p> <p>This pay stub was scanned and attached to this case.</p> <p>Submitted by, Det. Costigan #724</p>			
Reporting Officer(s): Costigan, Patrick	Payroll Number: 724	Payroll Number:	Report Date: 11/21/2016
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 1

Glendale Police Department

Supplementary Report

Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 2:

OTHER NAMES

Knight, Valentina Monee    B/F-29    of 1563A S 3rd St, Milwaukee, WI, 53204  
 DOB: 06/13/1987  
 HT: 504    WT: 142    Hair: Black  
 Eyes: Brown  
 Cell Phone: (414) 807-1225

Enterprise Rent-A-Car-Glendale    of 5932 N Green Bay Ave, B  
 LDG; GL  
 Glendale, WI, 53209  
 Home Phone: (414) 540-7100

DRAFT

Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/19/2016
Reviewed by:	Payroll Number:	Copy To:	Page: 1 Of 13

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**Continuation**

Incident Report Number: **16-013206** Incident Location: **7139 N Port Washington Rd, BLDG, Glendale, WI, 5321** Incident Date: **11/18/2016**

**PROPERTY LIST**

Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
16-003273				
1	EVI		Piece of Wells Fargo mail addressed to Valentina M Knight	1.000 \$0.00 [Recovered]
2	EVI		Piece of Bank of America mail addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
3	EVI		Piece of mail from Stovage Mart addressed to Laura Banks	1.000 \$0.00 [Recovered]
4	EVI		Piece of mail from Bank of America addressed to Laura Banks	1.000 \$0.00 [Recovered]
5	EVI		State invoice for JB's	1.000 \$0.00 [Recovered]
6	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
7	EVI		Mail from Bank of America	1.000 \$0.00 [Recovered]
8	EVI		Mail from Citi addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
9	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
10			Walmart Sales receipt from Brown Deer 11/02/16	1.000 \$0.00 [Recovered]

Reporting Officer(s): **Wall, Adam** ID Number: **726** ID Number: [ ] Page(s): **2 Of 13**

Glendale Police Department

Continuation

Incident Report Number: 16-013206 Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321 Incident Date: 11/18/2016

11	EVI	Educators Credit Union Withdrawal Receipt for Nikita Parsons	1.000 \$0.00 [Recovered]
12	EVI	Parking placard for Milwaukee College Prep Loba- Rowe North Campus #565	1.000 \$0.00 [Recovered]
13	EVI	2.98 in US Currency	1.000 \$0.00 [Recovered]
14	EVI	Mail from Bank of America addressed to Laura Banks	1.000 \$0.00 [Recovered]
15	EVI	WI paper ID for Valentia M. Knight F/B 03/12/89, with Knight's photo	1.000 \$0.00 [Recovered]
16	EVI	Wyndham Rewards Visa card assigned to Nikita Parsons 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
17	EVI	Wyndham Rewards Visa card assigned to Laura M. Banks 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
18	EVI	Chase Freedom Visa assigned to Nikita Parsons 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
19	EVI	Chase Freedom Visa assigned to Valentia Knight 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
20	EVI	Chase Freedom Visa assigned to Mazan Lowe 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
21	EVI	South Carolina DL with the name of Laura M. Banks f/b 03/12/89, with Knight's photo. 185967942	1.000 \$0.00 [Recovered]
22	EVI	New York State DL for a Nikita Parsons F/B 04/24/91, with Knight's	1.000 \$0.00 [Recovered]

Reporting Officer(s): Wall, Adam ID Number: 726 ID Number: Pages: 3 OF 13

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Incident Report Number  
16-013206

Incident Location:  
7139 N Port Washington Rd, BLDG, Glendale, WI, 5321

Incident Date:  
11/18/2016

		photo. 612 715 834	
23	EVI	Bank of America Visa Debit Card 4744 8100 7046 2515	1.000 \$0.00 [Recovered]
24	EVI	Bank of America Visa Debit card 4744 8100 7046 2523	1.000 \$0.00 [Recovered]
25	EVI	Chase Sapphire Visa card assigned to Vanessa M Knight 4147 2022 8000 0682	1.000 \$0.00 [Recovered]
26	EVI	Capital One Visa credit card 5178 0592 1049 5000	1.000 \$0.00 [Recovered]
27	EVI	Bankers Credit Union Bankers Web account	1.000 \$0.00 [Recovered]
28	EVI	Gucci Brown and Tan Gucci purse	1.000 \$0.00 [Recovered]
29	EVI	HP Silver HP Laptop 8CG63404BV	1.000 \$0.00 [Recovered]
30	EVI	Alcatel Black Alcatel One Touch cell phone	1.000 \$0.00 [Recovered]
31	EVI	Misc. power cords and chargers	1.000 \$0.00 [Recovered]
32	EVI	3 blank checks for M&V Fast Efficient Trucking LLC. #'s 1010, 1011, 1012	3.000 \$0.00 [Recovered]
33	EVI	4 UPS shipping receipts to various New York City	4.000 \$0.00

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Incident Report Number: 16-013206  
 Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321  
 Incident Date: 11/18/2016

34	EVI	Sandisk	locations. Sandisk 16gb thumbdrive	[Recovered] 1.000 \$0.00
35	EVI		.2 keys for unknown lock mechanism	[Recovered] 2.000 \$0.00
36	EVI		Gold cell phone back	[Recovered] 1.000 \$0.00
37	EVI		Pink sticky note with 9-5 min Lowe 606014746 3811 N Green Bay Ave Glendale, WI 53209 414-540-1424	[Recovered] 1.000 \$0.00
38	EVI		Transaction receipt from 11/11/16 at Wells Fargo Store #0001311 for \$100 with withdrawal	[Recovered] 1.000 \$0.00
39	EVI	Logitech	Logitech computer mouse	[Recovered] 1.000 \$0.00
40	SAF		1 key on chain with Akira Exclusive Rewards card	[Recovered] 1.000 \$0.00
41	SAF	2017 Cadillac CTS	2017 Cadillac CTS 4dr black 1G6AR5SX8H0129810	[Recovered] 1.000 \$30000.00
42	EVI	Sharper Image	Sharper Image bags w/ misc. amount of men's clothing/shoes. Baggage claim ticket shows Michael L. Richardson	[Recovered] 1.000 \$0.00
43	EVI		blue binder that contained a large amount of misc. paperwork, related to M&V Fast Efficient Trucking.	[Recovered] 1.000 \$0.00
44			Credit Card magnetic strip encoder	[Recovered] 1.000 \$0.00

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Incident Report Number: 16-013206 Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321 Incident Date: 11/18/2016

45	EVI	HP	Damaged Black HP laptop CND6162WMG	1.000 \$0.00 [Recovered]
46	EVI		Certified mail addressed to Midwest Conde Pain Management Dr. Mohamed Conde MD	1.000 \$0.00 [Recovered]
47	EVI		Receipt from Akira Bayshore from 10/23/16 purchase made by Valentina Knight using MC ending 3210	1.000 \$0.00 [Recovered]
48	EVI	Swiss Alps	Grey Swiss Alps suitcase w/ misc. clothing and paperwork for Fast Efficient	1.000 \$0.00 [Recovered]
49	EVI		New York State New York Permit Commercial Driver for Moustapha Diabate #813 712 977	1.000 \$0.00 [Recovered]
50	EVI		Permitting permit for David 6615 S 20th St	1.000 \$0.00 [Recovered]
51	EVI		Enterprise Rental agreement paperwork for vehicle rented by Valentina Knight	1.000 \$0.00 [Recovered]
52	EVI		Enterprise Rental confirmation form for Moustapha Diabate for 10/18/16 to 11/14/16 purchased with a MC ending 2054	1.000 \$0.00 [Recovered]
53	EVI		Used Vehicle Agreement/Bill of Sale for a 2006 BMW 330i for \$3000	1.000 \$0.00 [Recovered]
54	EVI		9 pages of false employment pay stubs for Jazmin Lowe and Nikita Parsons	10.000 \$0.00 [Recovered]
55	EVI		Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]
56	EVI	Apple	Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]

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- 57 EVI Samsung Blue Samsung Galaxy J1 1.000  
 SM-J100VPP UD A3LSMJ100VPP FCC ID # \$0.00  
 [Recovered]
- 58 EVI Motorola White Motorola cell phone 1.000  
 \$0.00  
 [Recovered]
- 59 EVI LG Black LG cell phone 1.000  
 LG-VS425PP 607VTNV0684567 \$0.00  
 [Recovered]
- 60 EVI Apple Apple Laptop 1.000  
 \$0.00  
 [Recovered]
- 61 EVI Numerous chargers, power 1.000  
 cords, wifi puck \$0.00  
 [Recovered]
- 62 EVI Two receipts found in case 2.000  
 one headed for the center \$0.00  
 console [Recovered]
- 63 EVI Residential Rental Agreement 1.000  
 written for Jazmin Banks \$0.00  
 [Recovered]
- 64 EVI Residential Rental Agreement 1.000  
 started for Jazmin Lowe \$0.00  
 [Recovered]
- 65 EVI Residential Rental Agreement 1.000  
 signed Jazmin Lowe on \$0.00  
 12/07/15 [Recovered]
- 66 EVI 4 pages of fake employee pay 4.000  
 stubs for Nikita Parsons \$0.00  
 and Jazmin Lowe [Recovered]
- 67 EVI Unused packet of residential 1.000  
 rental forms \$0.00  
 [Recovered]
- 68 Multi colored suit case with 1.000  
 baggage claim tag for \$0.00  
 Michael L. Richardson, [Recovered]  
 containing women and men's

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69 EVI Brother clothing.  
Brother personal fax machine 1.000  
50.00  
[Recovered]

70 EVI Large amount of misc. 1.000  
paperwork, most pertaining to M&V Fast Efficient 50.00  
Trucking [Recovered]

**DRAFT**

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16-013206

Incident Location:  
7139 N Port Washington Rd, BLDG, Glendale, WI, 5321

Incident Date:  
11/18/2016

NARRATIVE

16-013206  
Early Shift  
Detective Wall  
Supplement Report

On Sunday, 11/19/16, at about 10:00 A.M., I conducted a search of the black 2017 Cadillac CTS (bearing WI registration #957YZY) after Det. Purtell had obtained a search warrant for the vehicle. The occupants of the vehicle, KNIGHT and DIOUBATE, were arrested for Fraud-Identity Theft.

The Cadillac was parked in the secure GLPD garage, in door bay #6. I placed a copy of the search warrant onto the Cadillac's dash. Using the GLPD digital evidence camera, I first photographed the exterior/perimeter of the Cadillac. The photographs were later printed and copies placed into the E.A.'s folders. After photographing the vehicle, I proceeded to systematically search the Cadillac, and conducted an inventory search of the items therein. The following items were placed into GLPD property:

The Front Driver's Door (pocket):

- Mail from Wells Fargo. Addressed to Valenenna M. Knight of 2025 Dr. Martin Luther King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Storage Mart. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Sales Invoice from JB's Furniture. Purchase made by Nikita Parsons on 11/17/16. Address shown for Parsons was 2039 W. Donna Dr. Milwaukee, WI 53212. A Chase Visa card, ending in 265 was used.
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. ML King Dr. Milwaukee, WI 53212
- Mail from Citi MasterCard. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212

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Incident Report Number  
16-013206

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7139 N Port Washington Rd, BLDG, Glendale, WI, 5321

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11/18/2016

- Sales Receipt for a purchase made at Walmart, in Brown Deer, WI, on 11/02/16. The purchase was for two separate money orders, \$1000 (serial number #20683866938) and \$675.00 (serial number #20683866939). Purchased with cash.
- Withdrawal receipt from Educators Credit Union, Park Place Office, on 11/17/16, for \$5.00. The account listed to a Nikita Parsons.
- Parking placard (#565) for Milwaukee College Prep Lola Rowe North Campus.
- \$2.98 in U.S. Currency, coins.

Center Console Compartment (underneath radio):

- Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr., Milwaukee, WI 53212.
- WI Paper ID of Valentina M. Knight, F/B 06/13/87. The ID contained Knight's photograph. ID #K523-8738-7713-09.
- Wyndham Rewards Visa card (#48689513 3269 8494) issued to Nikita P. Parsons. Security code #901.
- Wyndham Rewards Visa card (#4868 9513 3269 8485) issued to Laura M. Banks. Security code #579.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Nikita P. Parsons. Security code #542.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Valentina Knight. Security code #542.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Jarmin Lowe. Security Code #542. (All three Chase Freedom Visa cards share the same account number).
- South Carolina D.L. of Laura M. Banks, F/B 03/17/89. The D.L. contained Knight's photograph. DL #185967942.
- New York State D.L. of Nikita Parsons, F/B 03/04/91. The D.L. contained Knight's photograph. D.L. #612 715 834.
- Bank of America Visa Debit Card (#4744 8100 7046 2515). Security code #118.
- Bank of America Visa Debit Card (#4744 8100 7046 2523). Security code #660.
- Chase Sapphire Visa Card (#4047 2022 8113 4682) issued to Valentina M. Knight. Security code #033.
- Capital One MasterCard (#5178 0592 4043 5146) issued to Valentina Knight. Security code #770.
- Educators Credit Union Savings account #340804.

Front Passenger Seat Storage

- Brown and Tan Gucci purse
- Silver Hampton (S/N 408540 SV).
- Black Apple One Touch cell phone.
- Misc power cords and chargers.
- Three (3) blank checks for M&V Fast Efficient Trucking LLC (check #'s 1010, 1011 & 1012).
- Four (4) UPS shipping receipts to various New York City locations. Shipped 11/15/16, 11/16/16, and 11/17/16 (x2).
- Sandisk USB thumb drive.

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Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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- Two (2) keys for unknown locking mechanism.
- The backing (case) of a gold colored cell phone.
- A pink sticky note with Jasmin Lowe 606014733 6811 N Green Bay Ave Glendale, WI 53209 414-540-1424 written on it.
- Transaction receipt from 11/11/16 at Wells Fargo Store (#00061314) for \$400 withdrawal.
- A red/black Logitech computer mouse.
- 1 key on key chain, with Akira Exclusive rewards card.

Front Passenger Seat:

- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Blue Samsung Galaxy J1 (S/N #A3LSMJ100VFP) cell phone.
- White Motorola cell phone.
- Black Verizon LG 4GLTE cell phone (S/N #607VTMVW0E4567)
- Gold Apple Laptop
- Numerous chargers, power cords, WiFi puck.

Glove Compartment:

- Nine (9) pages of doctored employment pay stubs. Eight (8) pay stub copies for a Nikita Parsons of 3164 N. 39th St. in Milwaukee, WI 53206. Pay stubs from Silver Spring Neighborhood Center School of 5460 N. 64th St. in Milwaukee, WI 53255. Ten (10) pay stub copies for Jasmin Lowe of 7705 W. Glen Brook Dr. in Milwaukee, WI 53224. Pay stubs from Vantage International, LLC of 13500 Heritage Pkwy. in Fort Worth, TX 76177. (Company is the victim's, LOWE, actual employer).
- Enterprise Rental Agreement Summary for 09/26/16 to 10/19/16 for a Black Cadillac CTS (License #957YZY). Rented from the Enterprise at 5300 S. Howell Ave. in Milwaukee, by Valentina Knight.
- Enterprise Rental Confirmation for Moustapha Habate for 10/18/16 to 11/14/16. Rented from the Enterprise at 5300 S. Howell Ave. in Milwaukee. Paid by MasterCard, last four 3054.
- A Bill of Sale from Credit Cash, LLC of 607 Cornell Dr. in Wilmington, DE 19807. The sale is dated 10/09/16 and was for the sale of a 2006 BMW 330i (Vin#WBAVB33546PS1019682006).
- A parking permit for one day Inn of 6331 S. 13th St. in Milwaukee, for 10/17/16 to 10/18/16. Reservation # 191987362.

Center Console (cup holder)

- Sales Receipt from Wisconsin Seal Blank Co, Inc. for a sale of \$6.91 on 11/17/16. Purchased with a Visa ending #1265.
- Sales receipt from unknown vender, for a sale of \$50.00. Purchased with a MasterCard ending #0499.

Rear Passenger Seat Floor:

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Page: 11 Of 13
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Glendale Police Department

Continuation

Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016
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- Four (4) pages of doctored employment pay stubs. Six (6) pay stub copies for a Nikita Parsons of 3164 N. 39th St. in Milwaukee, WI 53206. Pay stubs from Silver Spring Neighborhood Center School of 5460 N. 64th St. in Milwaukee, WI 53255. Two (2) pay stub copies for a Jazmin Lowe of 7705 W. Glen Brook Dr. in Milwaukee, WI 53224. Pay stubs from DynCorp International, LLC. 13500 Heritage Pkwy in Fort Worth, TX 76177.
- Residential Rental Agreement form with a signature of Jazmin Lowe on the bottom. Purportedly signed on 12/02/15 for a property on 7705 W. Glenbrook Dr. in Milwaukee, WI 53224.
- Residential Rental Agreement form partially filled out, with the name Jazmin Lowe written as the tenant. The rest of the form is blank.
- Residential Rental Agreement form with Laura Banke as the landlord of 3164 N. 39th St. in Milwaukee, WI 53206. Form purportedly signed on 02/01/16.
- Opened package of blank Residential Rental Agreement forms. The forms were made by Wisconsin Legal Blank Co., LLC. (Related to the receipt located in the cup holder, for a purchase made at Wisconsin Legal Blank Co., LLC).

Rear Driver's Side Seat:

- Multi-colored suit case, with baggage claim tag for Michael L. Richardson.
- Misc. women's and men's clothing. Most of the items still had the sales tags attached.
- Brother personal fax machine.
- Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.

Trunk:

- Unopened certified mail addressed to Robert Wade Pain Management Dr. Mohamed Conde MD of 2025 N. MLK Dr. Milwaukee, WI 53212.
  - Sales Receipt from Akira Gift Bayshore, on 10/23/16, for a \$162.74 sale. The purchase was made with a Mastercard, ending #3210, identifying the purchaser as Valentina Knight.
  - Gray Swiss Alps suitcase.
  - Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.
  - Misc. clothing. Most of the items still had the sales tags attached.
  - New York State Learning Permit Commercial #813 712 977 for Moustapha Dioubate. The permit has Dioubate's photo attached.
  - Silver Sharper Image suitcase with baggage claim tag for Michael L. Richardson.
  - Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.
  - Large amount of clothing and shoes. Most of the items still had the sales tags attached.
  - Black Credit Card Magnetic Strip Encoder (#MSR605).
  - Panasonic Black HP 11300 (S/N#CND616WMG).
- After recovering the above items from the Cadillac, when appropriate, I scanned a copy of the items into this report. The Cadillac was then placed into the GLPD impound lot and secured. Enterprise was contacted and advised that the

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 12 Of 13
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Glendale Police Department

Continuation

Incident Report Number  
16-013206

Incident Location  
7139 N Fort Washington Rd, BLDG, Glendale, WI, 5321

Incident Date:  
11/18/2016

Cadillac was available for pickup, after payment of the tow bill. The tow bill was scanned to this report.

Submitted By:  
Detective Adam R. Wall

**DRAFT**

Reporting Officer(s):  
Wall, Adam

ID Number  
726

ID Number

Pages:  
13 OF 13

Glendale Police Department

Supplementary Report

Incident Report Number: 16-013206.	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1: New CFS Code - 2:

NARRATIVE

16-013206  
Det Bryan C Bichler

On Monday, 11-21-2016 I notified Enterprise Manager Matthew Liberson that the 2017 Cadillac was available for release upon payment of the tow bill. He advised he would make arrangements for the vehicle to be retrieved by N & S Towing.

At 2:15pm I spoke with Enterprise Risk Coordinator Corey Wesell (262 544 8330 ext 212) regarding the rental contract for the 2017 Cadillac involved in this incident. Wesell confirmed that the vehicle was rented on 11/12/2016 at 7:05pm at the Airport location of Enterprise, 5300 S Howell Ave under the name Valentina Knight. Knight has four rental profiles with Enterprise. Two are flagged as Do Not Rent, two are not. The profile Knight used to rent this vehicle was not flagged. It showed the correct date of birth, 06-13-87 and driver's license number (K523-8738-7713-08). The address on this particular profile was 2870 W Mill Rd apt B, Milwaukee (acutally a Glendale address). Payment was made with a VISA card (#4147 2022 8113 4682) that was swiped at the Enterprise location. The card was in the name Valentina Knight.

Original documents are available if a court order is produced.  
BCB-728

Reporting Officer(s): Bichler, Bryan	Payroll Number: 728	Payroll Number:	Report Date: 11/21/2016
Reviewed by:	Payroll Number:	Copy To:	Page: 1 OF 1

**STATE OF WISCONSIN      CIRCUIT COURT      MILWAUKEE COUNTY**

**STATE OF WISCONSIN**

**Plaintiff,**

**DA Case No.: 2016ML027672**

**Court Case No.:**

vs.

**CRIMINAL COMPLAINT**

**DIOUBATE, MOUSTAPHA**  
10964 143<sup>RD</sup> STREET  
JAMAICA, NY 11435  
DOB: 03/12/1988

**KNIGHT, VALENTINA MONEE**  
1563-A SOUTH 3<sup>RD</sup> STREET  
MILWAUKEE, WI 53204  
DOB: 06/13/1987

**Defendants,**

*For Official Use*

**DETECTIVE PATRICK COSTIGAN BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:**

**Count 1: UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION OR DOCUMENTS (OBTAIN THING OF VALUE) - PTAC, AS A PARTY TO A CRIME (As to defendants Moustapha Dioubate and Valentina Monee Knight)**

The above-named defendants on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, as a party to a crime, did intentionally attempt to use personal identifying information of Jazmin Lowe to obtain credit without the authorization or consent of that person, and by representing that they or she was that person, contrary to sec. 943.201(2)(a), 939.50(3)(h), 939.05 Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Count 2: CREDIT CARD-FORGERY (ALTERATION, ETC.) - PTAC, AS A PARTY TO A CRIME (As to defendant Valentina Monee Knight)**

The above-named defendant on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, as a party to a crime, did with intent to defraud a purported issuer or organization providing money, goods, services or anything of value, possess a financial transaction card with knowledge that it is counterfeit; ie a debit card issued by Educators Credit Union under the name of Jazmin Lowe, contrary to sec. 943.41(4)(a), 939.50(3)(i), 939.05 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**EXHIBIT "2"**



**Count 3: CREDIT CARD-FORGERY (ALTERATION, ETC.) - PTAC, AS A PARTY TO A CRIME (As to defendants Moustapha Dioubate and Valentina Monee Knight)**

The above-named defendants on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, as a party to a crime, did with intent to defraud a purported issuer or organization providing money, goods, services or anything of value, possess a financial transaction card with knowledge that it is counterfeit; ie a financial transaction card issued under the name of Laura Banks, contrary to sec. 943.41(4)(a), 939.50(3)(i), 939.05 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 4: CREDIT CARD-FORGERY (ALTERATION, ETC.) - PTAC, AS A PARTY TO A CRIME (As to defendant Moustapha Dioubate)**

The above-named defendant on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, as a party to a crime, did with intent to defraud a purported issuer or organization providing money, goods, services or anything of value, possess a financial transaction card with knowledge that it is counterfeit; ie a financial transaction card issued under the name of Mohamed Condé, contrary to sec. 943.41(4)(a), 939.50(3)(i), 939.05 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 5: CREDIT CARD-FORGERY (ALTERATION, ETC.) (As to defendant Moustapha Dioubate)**

The above-named defendant on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, did with intent to defraud a purported issuer or organization providing money, goods, services or anything of value, possess a financial transaction card with knowledge that it is counterfeit; ie a financial transaction card issued under HSBC Bank, contrary to sec. 943.41(4)(a), 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 6: CREDIT CARD-FORGERY (ALTERATION, ETC.) (As to defendant Valentina Monee Knight)**

The above-named defendant on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, did with intent to defraud a purported issuer or organization providing money, goods, services or anything of value, possess a financial transaction card with knowledge that it is counterfeit; ie a financial transaction card issued under the Bank of America, contrary to sec. 943.41(4)(a), 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 7: OBSTRUCTING AN OFFICER (As to defendant Moustapha Dioubate)**

The above-named defendant on or about Friday, November 18, 2016, at 7139 North Port Washington Road, in the City of Glendale, Milwaukee County, Wisconsin, did knowingly obstruct an officer, while such officer was doing an act in an official capacity and with lawful authority,, contrary to sec. 946.41(1), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Probable Cause:**

1. Your complainant states that he has been a law enforcement officer with the City of Glendale Police Department for 17 years and is presently a detective for one year. Complainant bases this complaint upon a review of official City of Glendale Police Department reports, kept and maintained in the ordinary and normal course of business at the City of Glendale Police Department, information from citizen witnesses, personal knowledge, as well as other information he believes to be reliable.
2. Upon the report of Detective Patrick Costigan that reflects on Friday, November 18, 2016 at approximately 3:24 p.m., Glendale squads were dispatched to Educators Credit Union located at 7139 N. Port Washington Rd., City of Glendale, Wisconsin regarding an identity theft complaint. Said reports reflect that a female, later identified as defendant Valentina M. Knight, had been to the credit union earlier on that date and represented herself to be JAZMIN LOWE, and opened a bank account and applied for a Visa credit card in the name of LOWE. The true Jazmine Lowe, who resides in Texas, was contacted and confirmed the unauthorized use of her identity. Said reports reflect that defendant Valentina M. Knight (D.O.B. 6/13/1987) and defendant Moustapha Dioubate (D.O.B. 3/12/1988) were arrested when defendant Knight returned to the Educators Credit Union to pick up the Visa credit card in the name of Jazmine Lowe.
3. Det. Patrick Costigan further related that he spoke with Educators Credit Union Finance Representative Terra L. Pierquet, who said that defendant Valentina M. Knight had entered the above credit union located at 7139 N. Port Washington Rd., City of Glendale, Wisconsin earlier on November 18, 2016.
4. Pierquet related that defendant Knight had arrived in a black Cadillac at the above location at about 11:30 a.m. Pierquet said defendant Knight told a teller that Knight wished to close on the credit card application that she previously filled out online. Defendant Knight was then referred to Pierquet, defendant Knight identifying herself as JAZMIN LOWE. Defendant Knight was told that before she could close on the Visa Platinum credit card, she would first need to open an Educators account. Pierquet said that there was some hostility from defendant Knight at first because Knight wanted her credit limit on the card to be \$20,000 instead of the \$10,000 that was authorized. PIERQUET states that that Knight was not pleased and seemed to really want the \$20,000 limit, but finally relented and accepted the \$10,000 limit and requirement of opening an Educators Credit Union account.
5. Pierquet said that in order to open the savings and checking account, defendant Knight was required to present photo identification, and did so by displaying a Maryland driver's license in the name of JAZMIN M. LOWE (D.O.B. 4/07/1977 bearing an address of 1023 Savanna Dr., La Plata, MD 20646. Pierquet said she verified the picture on the license was that of defendant Knight. Because it was an out-of-state driver's license, defendant Knight was required to present proof of Wisconsin residency. Defendant Knight did so by presenting a Residential Rental Agreement contract showing an address of 7705 W. Glenbrook Dr., Milwaukee, WI 53224. Defendant Knight also was required to show proof of employment – she did so by providing a pay stub bearing the company name Dyncorp International LLC out of Fort Worth, Texas. The employee name on the pay stub was JAZMIN LOWE of 7705 W. Glenbrook Dr. Milwaukee, WI. After receiving all of this verification, Pierquet said that she physically provided the suspect an Educators Debit card in the name of JAZMIN M. LOWE. As a conditional

requirement, the suspect was required to carry a \$5 balance on the accounts -- she did so by depositing \$5 into each account. At the end of the account opening process, defendant Knight was required to sign verifying all of the information was accurate. Pierquet said that defendant Knight signed in the electronic box verifying she was in fact JAZMIN LOWE and that all the information was correct.

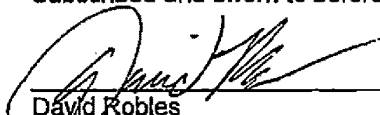
6. Pierquet said she became suspicious of the credit card application and sought a supervisor's approval before processing the application. Pierquet advised defendant Knight would be contacted by phone when the approval was completed -- defendant Knight provided a cell phone number. Later, defendant Knight was called and advised that the credit card was ready. Defendant Knight returned to the above Educators Credit Union on November 18, 2016 in the afternoon in a black Cadillac in which defendant Moustapha Dioubate was located. Both were arrested at that time.
7. Detective Costigan reported that among the documents that Pierquet identified as signed by defendant Knight included a verification of account information. Defendant Knight also filled out an Educators Credit Union membership application and credit card application in the name of JAZMIN LOWE.
8. Detective Costigan reported that in the belongings of defendant DIOUBATE was an Illinois identification card with the picture of defendant Dioubate, but in the name of MICHAEL L. RICHARDSON, with a date of birth of 03/08/90, and address of 730 W. Lake St., Apt 174, Chicago, IL 60661.
9. Said reports reflect that Detective Scott Purtell spoke with Jazmin M. Lowe, who resides in Texas. Jazmin M. Lowe related that she did not consent to anyone using her personal information to obtain money or credit. Detective Purtell verified that the social security number of Lowe had been used without her consent in conjunction with the above described application for account and credit at Educators Credit Union by defendant Knight. Additionally Jazmine M. Lowe confirmed she worked for Dyncorp and her paystub information had been used without her consent by defendant Knight.
10. Said reports further reflect P.O. Carrie Doss and P.O. Guse of the Glendale Police Department were dispatched to the above Educators Credit Union at about 3:24 p.m. on November 18, 2016. As P.O. Guse made contact with defendant Knight, P.O. Doss approached the Black Cadillac that was at the above location in which an individual later identified as defendant Moustapha Dioubate was the passenger, holding onto a cell phone and wallet. P.O. Doss directed defendant Dioubate to put the above items down and place his hand on the dashboard -- defendant Dioubate did not do so and asked why his "girlfriend" [defendant Knight] had been stopped. P.O. Doss asked for the "girlfriends" name, and the defendant said he did not know her name. Defendant Dioubate refused to let go of the wallet and phone, and also refused to identify himself.
11. Said reports reflect that a search of defendant Dioubate revealed that he had numerous credit cards in his possession in the name of Moustapha Dioubate. Defendant Dioubate also had a Visa credit card in the name of Mohamed Conde; a Visa credit card in the name of Laura Banks; a HSBC financial transaction card with chip and magnetic stripe but no name or number on the card; a Bank of America Visa card with no name or number on the front and a magnetic stripe on the back with the information not centered.
12. Recovered from defendant Knight was a Maryland driver's license in the name of Jazmin Lowe with the photo of Knight; the Educators Credit Union Visa debit card issued in the name of

Lowe; a Chase Freedom Visa card issued in the name of Jazmine Lowe; a Visa debit card issued in the name Laura Banks.

13. Your complainant has further reviewed arrest reports related to defendants Knight and Dioubate from the Las Vegas Metropolitan Police department from May 5, 2015. Said reports reflect that both defendants Knight and Dioubate were arrested after Dioubate and Knight had rented a room at the Bellagio Hotel and Casino at 3600 S. Las Vegas Blvd, Nevada with the name "Mohamed Conde" and "Laura Banks" under a credit card in that name that was determined to be fraudulent. Said reports reflect that access to the room was changed that required the individuals to contact the front desk to enter. Defendants Dioubate and Knight then appeared at the front desk. A request was made for the credit card that the room was booked under and defendant Knight retrieved a credit card from her purse that was later determined to be fraudulent. Said reports reflect that both defendants were then detained and a security officer located a large quantity of credit cards and identifications in the bag that defendant Knight was carrying. P.O. Pandullo reported that he observed multiple credit cards with the name "Mohamed Conde" embossed on them as well as others in the name of "Moustapha Dioubate." Said officer also observed additional cards in the name of "Laura Banks" and Valentina Knight.
14. P.O. Pandullo indicated that he used a card reader on the Citibank card with credit card numbers ending 2122 in the name of Mohamed Conde – the number encoded on the back of the card ended in numbers 8620 and was identified as the fraudulent card used to book the room and was number on the card provided by defendants Knight and Dioubate when they went to the front desk.
15. Your complainant states for this reason it is reasonable to believe that the above described credit cards recovered on November 18, 2016 from defendants Knight and Dioubate respectively in the name of "Laura Banks" and "Mohamed Conde" are counterfeit.
16. Your complainant states that a review of a NCIC (National Crime Information Computer) report for defendant KNIGHT and DIOUBATE (after their respective identities were confirmed via fingerprints) reflect that they are presently co-defendants in Clark County Nevada case number 15-309123. The amended information filed on September 29, 2015 in the above entitled case reflects that defendants DIOUBATE and KNIGHT are charged with Conspiracy to Commit Burglary, Burglary, FORGERY OF CREDIT OR DEBIT CARD, Fraudulent Use of Credit or Debit Card, Possession of Document or Personal Identifying Information. A copy of that information is attached. The case is scheduled for a jury trial in February, 2017.
17. Your complainant states this information does not exhaust his knowledge in support of this complaint.

\*\*\*\*End of Complaint\*\*\*\*

Subscribed and sworn to before me and approved for filing this 23<sup>rd</sup> day of November, 2016.

  
\_\_\_\_\_  
David Robles  
Assistant District Attorney  
1009608

  
\_\_\_\_\_  
Complaining Witness

ORIGINAL

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

SEP 29 2015

BY *Kristen Brown*  
KRISTEN BROWN DEPUTY

1 AINF  
STEVEN B. WOLFSON  
2 Clark County District Attorney  
Nevada Bar #001565  
3 NOREEN DEMONTE  
Chief Deputy District Attorney  
4 Nevada Bar #08213  
200 Lewis Avenue  
5 Las Vegas, Nevada 89155-2212  
(702) 671-2500  
6 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

C-15-309123-1  
AINF  
Amended Information  
4491400



9 THE STATE OF NEVADA,  
10 Plaintiff,

CASE NO: C-15-309123-1

11 -vs-

DEPT NO: XIX

12 MOUSTAPHA DIOUBATE, #7018908,  
VALENTINA MONEE KNIGHT,  
13 #7018909

AMENDED  
INFORMATION

14 Defendant.

15 STATE OF NEVADA }  
16 COUNTY OF CLARK } ss.

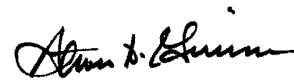
17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State  
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That MOUSTAPHA DIOUBATE and VALENTINA MONEE KNIGHT, the  
20 Defendant(s) above named, having committed the crime of CONSPIRACY TO COMMIT  
21 BURGLARY (Gross Misdemeanor - NRS 205.060, 199.480 - NOC 50445); BURGLARY  
22 (Category B Felony - NRS 205.060 - NOC 50424); FORGERY OF CREDIT OR DEBIT  
23 CARD (Category D Felony - NRS 205.110, 205.090, 205.740 - NOC 50462);  
24 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS  
25 205.760(1) - NOC 50796) and POSSESSION OF DOCUMENT OR PERSONAL  
26 IDENTIFYING INFORMATION (Category E Felony - NRS 205.465 - NOC 50697), on  
27 or about the 4th day of May, 2015, within the County of Clark, State of Nevada

28 ///

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WA2015F06822115F06822-AINF-(DIOUBATE\_MOUSTAPHA)-001.DOCX

  
CLERK OF THE COURT

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**MOT**  
THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No. 9469  
3960 Howard Hughes Parkway, Suite 615  
Las Vegas, Nevada 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,

Case No: C-15-309123-1 &  
C-15-309123-2  
Dept No: 19

vs.

MOUSTAPHA DIOUBATE &  
VALENTINA KNIGHT,  
Defendants.

Date of Hearing: \_\_\_\_\_  
Time of Hearing: \_\_\_\_\_

**DEFENDANT'S MOTION TO COMPEL PERSONNEL FILES PURSUANT TO  
MILKE V. RYAN**

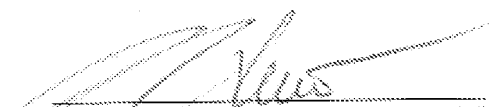
COMES NOW Defendant, MOUSTAPHA DIOUBATE and VALENTINA  
KNIGHT, by and through their attorney of record, MICHAEL D. PARIENTE, ESQ.,  
and files this Motion to Compel the State to review the Las Vegas Metropolitan Police  
Department personnel files of Detective T. Pandullo P#7884, Detective T. Cunningham  
P#13798 and Officer Timothy Guynn P#14891 who are expected to testify against Mr.  
Dioubate and Ms. Knight.

DATED this 14 day of December, 2016.

**PARIENTE LAW FIRM, P.C.**  
3960 Howard Hughes Pkwy, Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 963-7035  
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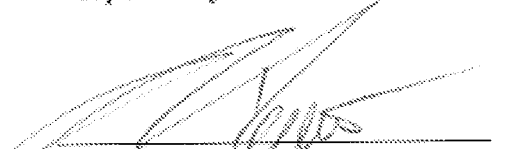
  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes, Suite 615  
Las Vegas, Nevada 89169

**NOTICE OF MOTION**

TO: STATE OF NEVADA, Plaintiff  
TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the 11 day of JANUARY, 2018, at 8:30 A<sup>XIX</sup>m. of said day, in Department        of said Court.

Respectfully submitted,

  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes, Suite 615  
Las Vegas, Nevada 89169

**MEMORANDUM OF POINTS AND AUTHORITIES**

Mr. Moustapha Dioubate and Ms. Valentina Knight have been charged in the above referenced case numbers. In this case, Detective T. Pandullo P#7884, Detective T. Cunningham P#13798 and Officer Timothy Guynn P#14891 allege that Mr. Dioubate and Ms. Knight committed acts of Burglary (1 count), Conspiracy to commit burglary (1 count), Fraudulent use of a credit or debit card (1 count), Possession of a document of personal identifying information (1 count) and Forgery of a credit or debit

1 card (23 counts). If believed, Mr. Dioubate and Ms. Knight face fines of up to \$10,000  
 2 and up to 20 years of incarceration together with the loss of Mr. Dioubate's resident  
 3 alien status. Mr. Dioubate and Ms. Knight assert that the police report contains  
 4 material misstatements and material omissions.

5  
 6 The U.S. Ninth Circuit Court of Appeals decided the case of *Milke v. Ryan*, 711  
 7 F.3d 998 (9<sup>th</sup> Cir. 2013). In that decision, the Court held that the District Attorney or  
 8 any prosecuting agency *must* review the personnel files of any of its testifying officers  
 9 or detectives for evidence of dishonesty or disciplinary history and turn that  
 10 information over to the defendant. This is essential to ensure a fair trial because "the  
 11 Constitution requires a fair trial, and one essential element of fairness is the  
 12 prosecution's obligation to turn over exculpatory evidence." *See United States v.*  
 13 *Bagley*, 473 U.S. 667, 674-75, 105 S.Ct. 3375, 87 L.Ed.2d 481 (1985); *Giglio*, 405 U.S.  
 14 at 153-55, 92 S.Ct. 763; *Brady*, 373 U.S. at 87, 83 S.Ct. 1194. *Milke v. Ryan*, 711  
 15 F.3d 998, 1002-03 (9th Cir. 2013).  
 16  
 17

18 **I. ISSUE**

19 Does the prosecutor have a duty to review the personnel files of its testifying  
 20 officers and disclose any evidence of dishonesty or disciplinary history?  
 21

22 **II. RULE OF LAW**

23 "Information in the [officer's] personnel file fit within the broad sweep of *Giglio*,  
 24 and it [is] the prosecutor's 'duty to learn of any favorable evidence known to the  
 25 others acting on the government's behalf in the case, including the police.'" *Kyles v.*  
 26 *Whitley*, 514 U.S. 419, 437-38, 115 S.Ct. 1555, 131 L.Ed.2d 490 (1995). *Milke v.*  
 27 *Ryan*, 711 F.3d 998, 1006 (9th Cir. 2013).  
 28



1            “[R]eliable evidence of a law enforcement officer’s misconduct in unrelated cases  
2 is admissible to impeach that officer’s credibility, particularly ‘where credibility is the  
3 central issue in the case and the evidence presented at trial consists of opposing  
4 stories presented by the defendant and government agents.’” *United States v.*  
5 *Kiszevski*, 877 F.2d 210, 216 (2nd Cir. 1989). *Milke v. Ryan*, 711 F.3d 998, 1011 (9th  
6 Cir. 2013).

7  
8            Due process imposes an “inescapable” duty on the prosecutor “to disclose known,  
9 favorable evidence rising to a material level of importance.” *Kyles*, 514 U.S. at 438,  
10 115 S.Ct. 1555. Favorable evidence includes both exculpatory and impeachment  
11 material that is relevant either to guilt or punishment. *See Bagley*, 473 U.S. at 674–  
12 76, 105 S.Ct. 3375; *Giglio*, 405 U.S. at 154, 92 S.Ct. 763. The prosecutor is charged  
13 with knowledge of any *Brady* material of which the prosecutor’s office or the  
14 investigating police agency is aware. *See Youngblood v. West Virginia*, 547 U.S. 867,  
15 869–70, 126 S.Ct. 2188, 165 L.Ed.2d 269 (2006) (per curiam). *Id.* at 1012.

16  
17            The Ninth Circuit Court of Appeals in *Milke* reaffirmed established precedent  
18 that a prosecutor must turn over any evidence helpful to the defense:

19  
20            The second element of a *Brady* violation is the willful or inadvertent failure of  
21 the prosecutor to disclose evidence favorable to the defendant. *See Strickler*,  
22 527 U.S. at 281–82, 119 S.Ct. 1936; *see, e.g., Giglio*, 405 U.S. at 154, 92 S.Ct.  
23 763 (“[W]hether the nondisclosure was a result of negligence or design, it is  
24 the responsibility of the prosecutor.”). We have long held that the government  
25 has a *Brady* obligation “to produce any favorable evidence in the personnel  
26 records” of an officer. *United States v. Cadet*, 727 F.2d 1453, 1467 (9th  
27 Cir. 1984). A defendant doesn’t have to make a request for exculpatory or  
28 impeachment evidence: “[T]he duty to disclose [exculpatory] evidence is  
applicable even though there has been no request by the accused, and ... the  
duty encompasses impeachment evidence as well as exculpatory evidence.”  
*Strickler*, 527 U.S. at 280, 119 S.Ct. 1936 (internal citation omitted). We’ve  
also held that “the government has a duty to examine personnel files upon a  
defendant’s request for their production.” *United States v. Henthorn*, 931 F.2d

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29, 31 (9th Cir.1991). If the prosecution isn't sure whether material in a personnel file rises to the *Brady* threshold, "it may submit the information to the trial court for an *in camera* inspection." *Cadet*, 727 F.2d at 1467-68 (internal quotation marks omitted) (quoting *United States v. Gardner*, 611 F.2d 770, 775 (9th Cir.1980)). As the Supreme Court held in *Kyles v. Whitley*, "a prosecutor anxious about tacking too close to the wind will disclose a favorable piece of evidence." 514 U.S. at 439, 115 S.Ct. 1555.

*Milke v. Ryan*, 711 F.3d 998, 1016 (9th Cir. 2013).

Mr. Dioubate and Ms. Knight alleges the police reports contain material omissions and material misstatements. They anticipate the State will rely on prior Nevada Supreme Court decisions, which were decided previous to *Milke*, and argue that the personnel files are private and raise privacy concerns. Fortunately, the *Milke* opinion addresses these concerns and outlines a procedure that will help the State to sleep better at night knowing that the law enforcement officers' personnel files do not fall into the wrong hands and violate the officers' privacy interests.

[T]he district court shall order the state to provide [defense] counsel with [the officer's] police personnel records covering all of his years of service, including records pertaining to any disciplinary or Internal Affairs investigations and records pertaining to performance evaluations. If the state believes that any of the materials it is ordered to provide are not relevant to *Brady* or *Giglio*, it may present them to the district court in camera, and the district court shall review them to determine whether they are relevant to *Brady* or *Giglio*, as explicated in our opinion. Defense counsel shall be allowed to see the documents and to argue why each might be *Brady* or *Giglio* material. The district court may, in its discretion, enter a protective order requiring all contested documents to be filed under seal and to be designated "For Attorneys' Eyes Only," and setting such other conditions as the district court finds necessary and proper, while the district court decides whether the contested materials are relevant to *Brady* or *Giglio*.

*Milke* at 1019.

Once the State has complied with the above referenced and suggested order, the *Milke* case provides guidance on the final steps the State must take in ensuring that the defendant has all the impeachment material from the personnel files he or she

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needs to cross-examine the law enforcement personnel.

After the State has turned over these records, [the State] shall provide a statement under oath from a relevant police official certifying that all of the records have been disclosed and none has been omitted, lost or destroyed. If a relevant police official is unable or unwilling to provide such a certification, the district court shall hold an evidentiary hearing to determine whether any records have not been produced, and, if so, why. [Defendant's] counsel shall be given a reasonable period of discovery prior to the hearing.

*Milke v. Ryan*, 711 F.3d 998, 1019 (9th Cir. 2013)

### III. APPLICATION OF LAW TO FACTS

In this case, the credibility of Detective T. Pandullo P#7884, Detective T. Cunningham P#13798 and Officer Timothy Guynn P#14891 is at issue. If, upon reviewing their personnel files, it becomes apparent that they have not been truthful in the past, the fact finder may well believe that they were not truthful in their reports and therefore doubt their credibility when they testify at trial.

Indeed, the entirety of the truthfulness and objectivity of the investigation could be in doubt if the personnel files show a history of deception. But without access to these files, Mr. Dioubate and Ms. Knight are deprived of their Sixth Amendment right to confront them as witnesses against them. Fortunately for Mr. Dioubate and Ms. Knight, the *Milke* decision demands that this information, if it does exist, be made available to them to allow them to impeach Detective T. Pandullo P#7884, Detective T. Cunningham P#13798 and Officer Timothy Guynn P#14891.

### IV. CONCLUSION

This Honorable Court should comply with the recent *Milke* decision, *supra*, and grant an order directing the State to review these officers' personal files. If the District Attorney has privacy concerns or believes that some of the information

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contained therein is not relevant, the prosecutor may request this Honorable Court to conduct an *in camera* of the personnel files to determine if the information is relevant under *Brady* or *Giglio*. Subsequently, the Court should order the State to provide a statement under oath from Las Vegas Metropolitan Police Department certifying that all of the records have been disclosed and none has been omitted, lost or destroyed. If the Las Vegas Metropolitan Police Department is unable or unwilling to provide such a certification, the Court should hold an evidentiary hearing to determine whether any records have not been produced, and, if so, why they have not been produced.

DATED this 19 day of December, 2016.

Respectfully submitted,



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DECLARATION OF COUNSEL

STATE OF NEVADA     )  
                                  )  
COUNTY OF CLARK    )

I, MICHAEL D. PARIENTE, ESQ., being first duly sworn according to law, upon oath, deposes and says:

1. Your affiant is an Attorney at Law duly licensed to practice in all courts in the State of Nevada;
2. Your affiant is the Attorney of record for the Defendant herein;

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
MICHAEL D. PARIENTE, ESQ.

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ROC  
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Attorney for Defendant

EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA

STATE OF NEVADA,  
Plaintiff,  
vs.  
MOUSTAPHA DIOUBATE &  
VALENTINA KNIGHT,  
Defendants.

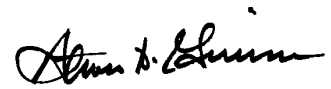
Case No: C-15-309123-1 &  
C-15-309123-2  
Dept No: 19

RECEIPT OF COPY

RECEIPT OF COPY of the DEFENDANT'S MOTION TO COMPEL  
PERSONNEL FILES PURSUANT TO MILKE V. RYAN is hereby acknowledged  
this \_\_\_ day of \_\_\_\_\_, 2016.

DISTRICT ATTORNEY'S OFFICE:

\_\_\_\_\_  
DISTRICT ATTORNEY  
200 Lewis Ave.  
Las Vegas, NV 89101



CLERK OF THE COURT

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**MOT**  
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Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
  
Plaintiff,  
  
vs.  
  
VALENTINA KNIGHT &  
MOUSTAPHA DIOUBATE,  
  
Defendants.

Case: **C-15-309123-1 & C-15-309123-2**  
Dept: **19**

**JOINT MOTION TO SUPPRESS**

COME NOW Defendants, VALENTINA KNIGHT & MOUSTAPHA DIOUBATE,  
by and through their attorney of record, MICHAEL D. PARIENTE, ESQ., and files this  
Joint Motion to Suppress evidence seized in violation of the Fourth Amendment of the  
United States Constitution and the Constitution of the State of Nevada.

DATED this 22<sup>nd</sup> day of December, 2016.

Respectfully submitted,



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**NOTICE OF MOTION**

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the 11 day of January, 2017, at 8:30am 2016, at \_\_\_\_\_m. of said day, in Department \_\_\_\_\_ of said Court.



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Las Vegas, Nevada 89169



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**MEMORANDUM**

On May 5, 2015, Ms. Valentina Knight and Mr. Moustapha Dioubate were detained and searched by Bellagio Hotel and Casino security guards. These security guards searched a brown leather bag belonging to Ms. Knight. They discovered it allegedly contained various credit cards they suspected were fraudulent.

These security guards subsequently after seizing the brown leather bag contacted the LVMPD. LVMPD detectives arrived and began running the card BIN numbers through the United States Secret Service website and through a handheld card reader to confirm the cards were not valid. LVMPD detectives exceeded the scope of the Bellagio security guards' search by seizing the credit cards without a warrant, examining the cards, running the cards through the magnetic strip handheld reader and through the United States Secret Service Website. Because LVMPD detectives did not seek a warrant prior to these acts, Ms. Knight and Mr. Dioubate move to suppress the evidence and information seized because the illegal search violated their Fourth Amendment rights.

**I. ISSUE**

Do law enforcement agents need a search warrant when the scope of their search exceeds the search by private persons?

**II. APPLICABLE LAW**

It is clear that a law enforcement search is permissible, and constitutional, to the extent that it mimics the private search conducted private actors. *U.S. v. Bowman*, 215 F.3d 951, 963 (C.A.9 (Wash.), 2000) (Italics added.)

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In *Walter v. U. S.*, 100 S.Ct. 2395, 447 U.S. 649 (1980), an interstate shipment of several securely sealed packages containing 8-millimeter films depicting illegal pornographic activities was opened by an employee of the business where the films were inadvertently sent to. The employee opened one or two of the boxes and attempted without success to view portions of the film by holding it up to the light. After the Federal Bureau of Investigation was notified and picked up the packages, agents viewed the films with a projector without first making any effort to obtain a warrant or to communicate with the consignor or the consignee of the shipment.

The Court “concluded that even though the nature of the contents of the films was indicated by descriptive material on their individual containers, the Government’s unauthorized screening of the films constituted an unreasonable invasion of their owner’s constitutionally protected interest in privacy. It was a search; there was no warrant; the owner had not consented; and there were no exigent circumstances. The fact that FBI agents were lawfully in possession of the boxes of film did not give them authority to search their contents.

*Id.* at 2398, 649.

In *Walter*, the private party opened one or more of the packages and turned the packages over to the FBI. However, the Court held:

“the fact that the packages and one or more of the boxes had been opened by a private party before they were acquired by the FBI excuse the failure to obtain a search warrant. It has, of course, been settled since *Burdeau v. McDowell*, 256 U.S. 465, 41 S.Ct. 574, 65 L.Ed. 1048, that a wrongful search or seizure conducted by a private party does not violate the Fourth Amendment and that such private wrongdoing does not deprive the government of the right to use evidence that it has acquired lawfully. See *Coolidge v. New Hampshire*, 403 U.S. 443, 487–490, 91 S.Ct. 2022, 2048–2050, 29 L.Ed.2d 564. In these cases there was nothing wrongful about the Government’s acquisition of the packages or its examination of their contents to the extent that they had already been examined by third parties. Since that examination had uncovered the labels, and since the labels established probable cause to believe the films were obscene, the Government argues that the limited private search justified an unlimited official

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search. That argument must fail, whether we view the official search as an expansion of the private search or as an independent search supported by its own probable cause.

*Id.* at 2401, 656.

The case of *U.S. v. Mulder*, 808 F.2d 1346 (C.A.9 (Cal.),1987) supports Ms. Knight and Mr. Dioubate’s position. In *Mulder*, hotel security guards seized from the defendant’s room a bag belonging to him. Upon opening the bag, hotel security guards discovered various pills with labels on them suggesting they were contraband. Hotel security guards summoned the local police who came to the hotel, seized the property without a warrant, and had the drugs examined by a lab which confirmed that the pills were indeed contraband. The *Mulder* court found the search was illegal and that police officers could not perform warrantless chemical tests on tablets found in defendant's hotel room during private search conducted by hotel employees because this search exceeded the scope of what the hotel security guards found.

### III. APPLICATION OF LAW TO FACTS

In this case, LVMPD detectives exceeded the scope of the permissible search previously conducted by the Bellagio Hotel and Casino security guards. It was a search; there was no warrant; Ms. Knight or Mr. Dioubate had not consented; and there were no exigent circumstances. None of these exceptions existed to justify the search by LVMPD detectives wherein the detectives, just like the FBI Agents in *Walter* and the law enforcement officers in *Mulder* exceeded the permissible scope of the private search by the security guards. Because the search by LVMPD detectives did

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not mimic that done by the Bellagio Hotel and Casino security guards -- and in fact proceeded to use the United States Secret Service website and the handheld scanner after they developed probable cause -- the credit cards seized without a warrant must be suppressed.

**IV. CONCLUSION**

The Court must suppress the seized credit cards and derivative evidence obtained in violation of the Fourth Amendment of the United States Constitution and in violation of the Constitution of the State of Nevada.

Respectfully submitted,



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**DECLARATION OF COUNSEL**

STATE OF NEVADA     )  
  )  
COUNTY OF CLARK    )

I, MICHAEL D. PARIENTE, ESQ., being first duly sworn according to law, upon oath, deposes and says:

1. Your declarant represents both Ms. Knight and Mr. Dioubate;
2. Your declarant is an Attorney at Law duly licensed to practice in all courts in the State of Nevada;
3. Your declarant is the Attorney of record for the Defendants herein;

FURTHER YOUR DECLARANT SAYETH NAUGHT.



\_\_\_\_\_  
MICHAEL D. PARIENTE, ESQ.

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**ROC**  
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Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

STATE OF NEVADA,

Plaintiff,

vs.

VALENTINA KNIGHT &  
MOUSTAPHA DIOUBATE,

Defendants.

Case: C-15-309123-1 & C-15-309123-2  
Dept: 19

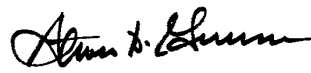
**JOINT MOTION TO SUPPRESS**

**RECEIPT OF COPY**

RECEIPT OF COPY of the **JOINT MOTION TO SUPPRESS** is hereby  
acknowledged this \_\_\_\_ day of December, 2016.

DISTRICT ATTORNEY'S OFFICE:

\_\_\_\_\_  
DISTRICT ATTORNEY  
200 Lewis Ave.  
Las Vegas, NV 89101



CLERK OF THE COURT

1 **RSPN**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 NOREEN DEMONTE  
6 Chief Deputy District Attorney  
7 Nevada Bar #8213  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,  
10  
11 Plaintiff,

11 -vs-

CASE NO: C-15-309123-2

12 MOUSTAPHA DIOUBATE,  
13 #7018908;  
14 VANELTINA KNIGHT,  
15 #7018909

DEPT NO: XIX

15 Defendants.

16 **STATE'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL PERSONNEL**  
17 **FILES PURSUANT TO MILKE V. RYAN**

18 DATE OF HEARING: 1/11/2017  
19 TIME OF HEARING: 8:00 AM

20 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County  
21 District Attorney, through NOREEN DEMONTE, Chief Deputy District Attorney, and hereby  
22 submits the attached Points and Authorities in Opposition to Defendant's Motion for  
23 Discovery.

24 This response is made and based upon all the papers and pleadings on file herein, the  
25 attached points and authorities in support hereof, and oral argument at the time of hearing, if  
26 deemed necessary by this Honorable Court.

27 //

28 //

1 POINTS AND AUTHORITIES

2 Defendant is not entitled to what he seeks. In support of his motion, the Defendant  
3 cites Milke v. Ryan, 711 F.3d. 998, in which the Ninth Circuit United States Court of Appeals  
4 held that the prosecutor's failure to disclose impeachment evidence violated Brady. In Milke,  
5 the prosecutor failed to disclose evidence that the interrogating officer had been investigated  
6 and suspended for taking sexual liberties with a female motorist, as well as several court orders  
7 finding that the officer had lied under oath in order to secure a conviction or further a  
8 prosecution. The Court found that such evidence was relevant to issue of officer's willingness  
9 to lie under oath and abuse of authority. The Court further found that there was a reasonable  
10 probability that, had the jury had evidence of the officer's pattern of misconduct there would  
11 have been a different result as to either guilt or penalty, since the officer's testimony regarding  
12 defendant's alleged confession was the only direct evidence linking defendant to the murder.  
13 Id.

14 Ninth Circuit decisions are NOT controlling in this jurisdiction. See, e.g., Blanton v.  
15 North Las Vegas Municipal Court, 103 Nev. 623, 633, 638, 748 P.2d 494 (1987) (declining to  
16 find the crime of driving while under the influence a serious crime requiring a jury trial and  
17 specifically noting that the decisions of the federal district court and circuit courts are not  
18 binding upon Nevada courts). This decision does not give him permission to go digging  
19 through an officer's personnel files; nor does it place any burden upon this Court to conduct  
20 an in camera inspection of personnel files.

21 The controlling decision for this Nevada case is Sonner v. State , 112 Nev. 1328, 930  
22 P.2d 707 (1996). In Sonner, the Supreme Court of Nevada held that a district court did not  
23 abuse its discretion in denying the defendant's motion to discover a victim's personnel records  
24 (State Trooper Carlos Borland). The Court held, "Although the State may not withhold  
25 evidence favorable to the accused and material to either guilt or sentence, the State is under  
26 no obligation to accommodate a defendant's desire to flail about in a fishing expedition to try  
27 to find a basis for discrediting a victim." 112 Nev. at 1340, 930 P.2d at 715. The court  
28 explained that this request was "based on nothing more than the assertion of a general right to



1 search for whatever mitigating evidence might be found in Borland's records." 112 Nev. at  
2 1341, 930 P.2d at 716. Likewise in the instant case, Defendants are basing this request upon  
3 nothing more than a naked allegation that the police report contains "material omissions and  
4 material misstatements" without even informing this Court what said omissions or  
5 misrepresentations could possibly be. Defendants have not the right to the access they seek,  
6 nor is the State required to personally root through personnel files "for all the years of service"  
7 of its testifying officers on the hunt for potential impeachment evidence and report back to the  
8 Court in a sworn statement.

9 However, in accordance with the years-long practice of the District Attorney's Office,  
10 the State will (as it does in every case set for trial) inquire immediately after calendar call with  
11 the Las Vegas Metropolitan Police Department if any of its testifying officers have been  
12 disciplined for matters of truthfulness. If so, the State will disclose that information to defense  
13 prior to trial. That is the extent of the State's responsibility.

14 **CONCLUSION**

15 For the forgoing reasons, the State respectfully requests this Honorable Court deny  
16 Defendant's motion.

17 DATED this 29<sup>th</sup> day of December, 2016.

18 Respectfully submitted,

19 STEVEN B. WOLFSON  
20 Clark County District Attorney  
21 Nevada Bar #001565

22 BY N. Demonte  
23 NOREEN DEMONTE  
24 Chief Deputy District Attorney  
25 Nevada Bar #8213

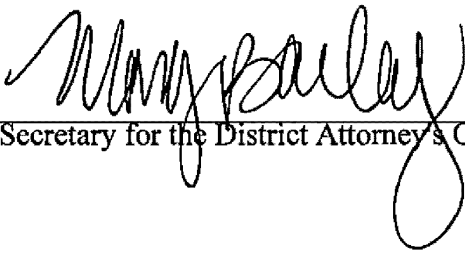
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**CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that service of STATE'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL PERSONNEL FILES PURSUANT TO MILKE V. RYAN, was made this 29<sup>th</sup> day of December, 2016, by Electronic Filing to:

MICHAEL PARIENTE, ESQ.  
EMAIL: mike@parientelaw.com

  
Secretary for the District Attorney's Office

15F06822B/ND/mlb/L-2

1 **GPA**  
2 **STEVEN B. WOLFSON**  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 **NOREEN DEMONTE**  
6 Chief Deputy District Attorney  
7 Nevada Bar #08213  
8 200 Lewis Avenue  
9 Las Vegas, NV 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

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

JAN 04 2017  
BY: *Sia Everett*  
TIA EVERETT, DEPUTY

DISTRICT COURT  
CLARK COUNTY, NEVADA

C-15-309123-2  
GPA  
Guilty Plea Agreement  
4613340



9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

CASE NO: C-15-309123-2

12 VALENTINA MONEE KNIGHT  
13 #7018909

DEPT NO: XIX

14 Defendant.

15 **GUILTY PLEA AGREEMENT**

16 I hereby agree to plead guilty to: **BURGLARY (Category B Felony - NRS 205.060 -**  
17 **NOC 50424)**, as more fully alleged in the charging document attached hereto as Exhibit "1".

18 My decision to plead guilty is based upon the plea agreement in this case which is as  
19 follows:

20 The State will make no recommendation at sentencing. The plea is contingent upon  
21 both the Defendant's accepting negotiations.

22 I agree to the forfeiture of any and all weapons or any interest in any weapons seized  
23 and/or impounded in connection with the instant case and/or any other case negotiated in  
24 whole or in part in conjunction with this plea agreement.

25 I understand and agree that, if I fail to interview with the Department of Parole and  
26 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,  
27 by affidavit review, confirms probable cause against me for new criminal charges including  
28 reckless driving or DUI, but excluding minor traffic violations, the State will have the

1 unqualified right to argue for any legal sentence and term of confinement allowable for the  
2 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have  
3 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without  
4 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite  
5 twenty-five (25) year term with the possibility of parole after ten (10) years.

6 Otherwise I am entitled to receive the benefits of these negotiations as stated in this  
7 plea agreement.

### 8 CONSEQUENCES OF THE PLEA

9 I understand that by pleading guilty I admit the facts which support all the elements of  
10 the offense(s) to which I now plead as set forth in Exhibit "1".

11 I understand that as a consequence of my plea of guilty the Court must sentence me to  
12 imprisonment in the Nevada Department of Corrections for a minimum term of not less than  
13 ONE (1) year and a maximum term of not more than TEN (10) years. The minimum term of  
14 imprisonment may not exceed forty percent (40%) of the maximum term of imprisonment. I  
15 understand that I may also be fined up to \$10,000.00. I understand that the law requires me to  
16 pay an Administrative Assessment Fee.

17 I understand that, if appropriate, I will be ordered to make restitution to the victim of  
18 the offense(s) to which I am pleading guilty and to the victim of any related offense which is  
19 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to  
20 reimburse the State of Nevada for any expenses related to my extradition, if any.

21 I understand that I am eligible for probation for the offense to which I am pleading  
22 guilty. I understand that, except as otherwise provided by statute, the question of whether I  
23 receive probation is in the discretion of the sentencing judge.

24 I understand that I must submit to blood and/or saliva tests under the Direction of the  
25 Division of Parole and Probation to determine genetic markers and/or secretor status.

26 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,  
27 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or  
28 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation

1 and may receive a higher sentencing range.

2 I understand that if more than one sentence of imprisonment is imposed and I am  
3 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order  
4 the sentences served concurrently or consecutively.

5 I understand that information regarding charges not filed, dismissed charges, or charges  
6 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

7 I have not been promised or guaranteed any particular sentence by anyone. I know that  
8 my sentence is to be determined by the Court within the limits prescribed by statute.

9 I understand that if my attorney or the State of Nevada or both recommend any specific  
10 punishment to the Court, the Court is not obligated to accept the recommendation.

11 I understand that if the offense(s) to which I am pleading guilty was committed while I  
12 was incarcerated on another charge or while I was on probation or parole that I am not eligible  
13 for credit for time served toward the instant offense(s).

14 I understand that if I am not a United States citizen, any criminal conviction will likely  
15 result in serious negative immigration consequences including but not limited to:

- 16 1. The removal from the United States through deportation;
- 17 2. An inability to reenter the United States;
- 18 3. The inability to gain United States citizenship or legal residency;
- 19 4. An inability to renew and/or retain any legal residency status; and/or
- 20 5. An indeterminate term of confinement, with the United States Federal  
21 Government based on my conviction and immigration status.

22 Regardless of what I have been told by any attorney, no one can promise me that this  
23 conviction will not result in negative immigration consequences and/or impact my ability to  
24 become a United States citizen and/or a legal resident.

25 I understand that the Division of Parole and Probation will prepare a report for the  
26 sentencing judge prior to sentencing. This report will include matters relevant to the issue of  
27 sentencing, including my criminal history. This report may contain hearsay information  
28 regarding my background and criminal history. My attorney and I will each have the

1 opportunity to comment on the information contained in the report at the time of sentencing.  
2 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also  
3 comment on this report.

4 WAIVER OF RIGHTS

5 By entering my plea of guilty, I understand that I am waiving and forever giving up the  
6 following rights and privileges:

- 7 1. The constitutional privilege against self-incrimination, including the right  
8 to refuse to testify at trial, in which event the prosecution would not be  
allowed to comment to the jury about my refusal to testify.
- 9 2. The constitutional right to a speedy and public trial by an impartial jury,  
10 free of excessive pretrial publicity prejudicial to the defense, at which  
11 trial I would be entitled to the assistance of an attorney, either appointed  
or retained. At trial the State would bear the burden of proving beyond  
a reasonable doubt each element of the offense(s) charged.
- 12 3. The constitutional right to confront and cross-examine any witnesses who  
13 would testify against me.
- 14 4. The constitutional right to subpoena witnesses to testify on my behalf.
- 15 5. The constitutional right to testify in my own defense.
- 16 6. The right to appeal the conviction with the assistance of an attorney,  
17 either appointed or retained, unless specifically reserved in writing and  
18 agreed upon as provided in NRS 174.035(3). I understand this means I  
19 am unconditionally waiving my right to a direct appeal of this conviction,  
20 including any challenge based upon reasonable constitutional,  
jurisdictional or other grounds that challenge the legality of the  
proceedings as stated in NRS 177.015(4). However, I remain free to  
challenge my conviction through other post-conviction remedies  
including a habeas corpus petition pursuant to NRS Chapter 34.

21 VOLUNTARINESS OF PLEA

22 I have discussed the elements of all of the original charge(s) against me with my  
23 attorney and I understand the nature of the charge(s) against me.

24 I understand that the State would have to prove each element of the charge(s) against  
25 me at trial.

26 I have discussed with my attorney any possible defenses, defense strategies and  
27 circumstances which might be in my favor.

28 All of the foregoing elements, consequences, rights, and waiver of rights have been

1 thoroughly explained to me by my attorney.

2 I believe that pleading guilty and accepting this plea bargain is in my best interest, and  
3 that a trial would be contrary to my best interest.

4 I am signing this agreement voluntarily, after consultation with my attorney, and I am  
5 not acting under duress or coercion or by virtue of any promises of leniency, except for those  
6 set forth in this agreement.

7 I am not now under the influence of any intoxicating liquor, a controlled substance or  
8 other drug which would in any manner impair my ability to comprehend or understand this  
9 agreement or the proceedings surrounding my entry of this plea.


10 My attorney has answered all my questions regarding this guilty plea agreement and its  
11 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

12 DATED this 3rd day of ~~December, 2016.~~

*January 2017*  


14 \_\_\_\_\_  
15 VALENTINA MONEE KNIGHT  
16 Defendant

16 AGREED TO BY:

17  
18   
19 \_\_\_\_\_  
20 NOREEN DEMONTE  
21 Chief Deputy District Attorney  
22 Nevada Bar #08213

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CERTIFICATE OF COUNSEL:

I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court hereby certify that:

1. I have fully explained to the Defendant the allegations contained in the charge(s) to which guilty pleas are being entered.
2. I have advised the Defendant of the penalties for each charge and the restitution that the Defendant may be ordered to pay.
3. I have inquired of Defendant facts concerning Defendant's immigration status and explained to Defendant that if Defendant is not a United States citizen any criminal conviction will most likely result in serious negative immigration consequences including but not limited to:
  - a. The removal from the United States through deportation;
  - b. An inability to reenter the United States;
  - c. The inability to gain United States citizenship or legal residency;
  - d. An inability to renew and/or retain any legal residency status; and/or
  - e. An indeterminate term of confinement, by with United States Federal Government based on the conviction and immigration status.

Moreover, I have explained that regardless of what Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

4. All pleas of guilty offered by the Defendant pursuant to this agreement are consistent with the facts known to me and are made with my advice to the Defendant.
5. To the best of my knowledge and belief, the Defendant:
  - a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement,
  - b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily, and
  - c. Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

Dated: This 3rd day of ~~December~~, 2016.

*January 2017*  
  
\_\_\_\_\_  
ATTORNEY FOR DEFENDANT



*Steven B. Wolfson*  
CLERK OF THE COURT

1 **INFM**  
2 **STEVEN B. WOLFSON**  
3 **Clark County District Attorney**  
4 **Nevada Bar #001565**  
5 **NOREEN DEMONTE**  
6 **Chief Deputy District Attorney**  
7 **Nevada Bar #08213**  
8 **200 Lewis Avenue**  
9 **Las Vegas, Nevada 89155-2212**  
10 **(702) 671-2500**  
11 **Attorney for Plaintiff**

7 **I.A. 9/9/15**  
8 **10:00 AM**  
9 **TURCO**

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

9 **THE STATE OF NEVADA,**  
10 **Plaintiff,**

**CASE NO: C-15-309123-2**

11 **-vs-**

**DEPT NO: XIX**

12 **MOUSTAPHA DIOUBATE, #7018908,**  
13 **VALENTINA MONEE KNIGHT,**  
14 **#7018909**

**INFORMATION**

14 **Defendant.**

16 **STATE OF NEVADA** }  
17 **COUNTY OF CLARK** } **ss.**

18 **STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State**  
19 **of Nevada, in the name and by the authority of the State of Nevada, informs the Court:**

20 **That MOUSTAPHA DIOUBATE, and VALENTINA MONEE KNIGHT, the**  
21 **Defendant(s) above named, having committed the crime of BURGLARY (Category B**  
22 **Felony - NRS 205.060 - NOC 50424), on or about the 4th day of May, 2015, within the**  
23 **County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such**  
24 **cases made and provided, and against the peace and dignity of the State of Nevada, did**  
25 **willfully, unlawfully, and feloniously enter, with intent to commit larceny, that certain building**

26 **///**

27 **///**

28 **///**


**EXHIBIT " + "**

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occupied by BELLAGIO HOTEL & CASINO, located at 3600 Las Vegas Boulevard, Las Vegas, Clark County, Nevada.

STEVEN B. WOLFSON  
Clark County District Attorney  
Nevada Bar #001565

BY   
NOREEN DEMONTE  
Chief Deputy District Attorney  
Nevada Bar #08213

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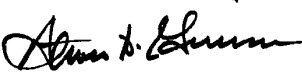
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PARIENTE LAW FIRM. P.C.  
3960 Howard Hughes Prwy., Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 953-7055  
WWW.PARIENTELAW.COM

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**MOT**  
THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No. 9469  
3960 Howard Hughes Parkway, Suite 615  
Las Vegas, Nevada 89169  
(702) 966-5310  
Attorney for Defendant

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CLERK OF THE COURT

**EIGHTH JUDICIAL DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,

Case No.: C-15-309123-2  
Dept No.: 19

vs.


VALENTINA KNIGHT,  
Defendant.

**SENTENCING MEMORANDUM**

COMES NOW Defendant, VALENTINA KNIGHT, by and through her attorney of record, MICHAEL D. PARIENTE, ESQ., and submits Defendant's SENTENCING MEMORANDUM with accompanying exhibits.

This memorandum is made and based upon the pleadings and papers on file herein, and any argument presented at the time of hearing in this matter.

DATED this 10<sup>th</sup> day of March, 2017.

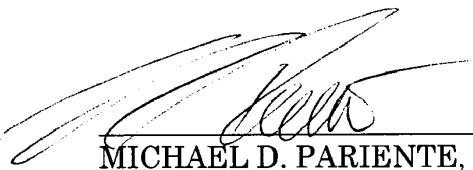
  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.: 9469  
3960 Howard Hughes, Suite 615  
Las Vegas, Nevada 89169

**NOTICE OF MEMORANDUM**

1  
2 TO: STATE OF NEVADA, Plaintiff

3 TO: DISTRICT ATTORNEY, Attorney for Plaintiff

4 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the  
5 undersigned will bring the above and foregoing Motion on for hearing before the Court  
6 at the Courtroom of the above-entitled Court on the 15<sup>th</sup> day of March, 2017, at  
7 \_\_\_\_\_  
8 m. of said day, in Department 19 of said Court.

9  
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11   
12 MICHAEL D. PARIENTE, ESQ.  
13 Nevada Bar No.: 9469  
14 3960 Howard Hughes, Suite 615  
15 Las Vegas, Nevada 89169

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I.

**FACTS**

Ms. Valentina Knight submits this sentencing memorandum for the Court's consideration. She respectfully asks this Honorable Court to follow the Nevada Parole & Probation's recommendation per the PSI and sentence her to a term of probation with a condition of Drug Court.

Enclosed for the Court's consideration are 6 letters from Valentina's friends and family in the Appendix.

The first letter is from her oldest sister. In it, she describes her sister Valentina as a caring person always putting the needs of others before her own. She chronicles how Valentina started the "Single Mother's Network" in Wisconsin, which is an organization that helps single mothers with children. Her charitable acts of feeding

1 the homeless and those in need on Thanksgiving Day attracted the attention of  
2 television station WISN in Wisconsin which interviewed her and featured her good  
3 deeds in their broadcast.

4           The second letter is from Sharita Stewart, a friend of Valentina's of 7 years.  
5 Sharita describes Valentina as a kind person who comforted her when her  
6 grandmother died. She attests to Valentina's good character and lists her kindness as  
7 one of her laudable traits.  
8

9           The third letter is from her brother, David Macklin. He explains how Valentina  
10 has overcome many obstacles that would have crippled most in her situation. Yet, as  
11 he explains, she exhibits kindness and love to her friends, family and those around her.  
12

13           The fourth letter is from her brother-in-law who explains the positive impact  
14 Valentina has had in his life by opening her home to him and his family in their time of  
15 need. He credits her for helping him become a better person and as a tremendous help  
16 to him and his family.  
17

18           The fifth letter is from Michela Connors, who is a friend of Valentina for  
19 approximately 6 years. She describes Valentina as a caring person who's always  
20 shown loyalty, forgiveness and eagerness to help her family. She adds that Valentina  
21 has an amazing personality who has always sought to inspire other people.  
22

23           The sixth letter submitted is from Sharell Knight, who is Valentina's sister and  
24 an architect. Sharell details how Valentina has endured so much including the fact  
25 that her parents battled drug addictions, that Valentina had to live in shelters, foster  
26 care, and suffered sexual abuse. Yet, despite this painful childhood, she demonstrates  
27 kindness towards others and is greatly missed by her 10-year old son, Carter.  
28

1 The common thread through all these letters is that Valentina is a caring, loving  
2 and loyal sister and friend to those closest to her. These letters detail her strength  
3 despite the years in foster care, her parents' drug addiction, and the devastating sexual  
4 abuse she endured as a child.

5  
6 Drug addition is a serious problem in our country. It is a problem which takes  
7 its toll on not only those who abuse drugs, but on their families, on their friends, and  
8 on society. Valentina is no different than any other person who is suffering from drug  
9 addiction and is in need of help.

10  
11 There is no doubt that Valentina has developed a serious drug problem for which  
12 she needs help in beating. Valentina submits that Drug Court would be the one hope  
13 she has to equip her with the tools to battle the methamphetamine and pain pill  
14 addiction for which she admits she has a problem and needs help.


15  
16 **II.**

17 **CONCLUSION**

18 Ms. Knight respectfully requests this Honorable Court sentence her to a term of  
19 probation with Drug Court completion as a condition.

20 DATED this 10<sup>th</sup> day of March, 2017.

21  
22 Respectfully submitted,

23  
24   
25 MICHAEL D. PARIENTE, ESQ.  
26 Nevada Bar No.: 9469  
27 3960 Howard Hughes, Suite 615  
28 Las Vegas, Nevada 89169

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**DECLARATION OF COUNSEL**

STATE OF NEVADA     )  
  )  
COUNTY OF CLARK    )

I, MICHAEL D. PARIENTE, ESQ., being first duly sworn according to law, upon oath, deposes and says:

1. Your affiant is an Attorney at Law duly licensed to practice in all courts in the State of Nevada;
2. Your affiant is the Attorney of record for the Defendant herein;

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
MICHAEL D. PARIENTE, ESQ.



**PARIENTE LAW FIRM, P.C.**

3960 Howard Hughes Pkwy, Suite 615  
Las Vegas, NV 89169

PHONE: (702) 966-5310 | FAX: (702) 953-7055  
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# APPENDIX

Good day your Honor.

Today I'm writing a letter on behalf of my sister Valentina Knight. I am the oldest of our mother's children, so I've known Valentina all her life, and I wish to convey to you the type of person she is.

My sister is the type of person who would go out of her way to help others in need. Four years ago Valentina started "Single Mothers Network" which is an organization that provides support to single mothers with children. Valentina was also featured on WISN news here in Milwaukee WI, where she and others served meals to the homeless and those in need on Thanksgiving day. My sister has an 11 year old son named Carter who she adores and strives to be a role model to him.

I believe the time that Valentina has spent in Clark County Jail has taught her a valuable lesson. We all have made mistakes and I believe we can learn and grow from those mistakes.

I'm asking the Court to grant  
Valentina leniency, and another  
opportunity to prove to herself and  
Society that we all can be  
productive citizens working  
together for a common goal.

Sincerely,

Glenn M. Gamm

2/5/17

To whom it may concern,  
I am writing you on the behalf of  
Valentina Knight. I have known this  
lovely young lady for 7 years now  
Valentina has been nothing but  
loving, kind, and such a ray of  
sunlight in my life. She has helped  
me in my most vulnerable time of  
need. My granny had just died  
I was at my lowest point in my  
life at the time. She was a comforting  
shoulder for me to cry on and and  
unbelievable ear to listen to me. I am  
truly happy and blessed to have gotten  
the opportunity to have gotten to know  
this young lady in my lifetime. I truly  
thank you for taking the time out of  
your truly busy day to take the time  
to read my letter on Mrs Valentina Knight  
I am a good friend and associate  
of this young lady.

Yours truly, Sharita  
Stewart.

On Behalf of Ms. Valentina M. Knight

My name is David Macklin In the youngest of the older three siblings. My intentions of this letter is to solely show the character of her because no know relationship prior to these proceedings exist. Let me start by saying her kindness and love for others is unmeasurable.

Valentina is my youngest sister to my mother Linda. She has overcome many obstacles from a very young age that will "cripple most" but she has maintained a positive outlook on her life and the obstacle put in front of her and for that my family is proud. She has done an outstanding duty as a mother, friend, counselor and any aspect of trouble our family has encountered she has seen us through it. She has never given up on anyone or anything. She is unreplaceable and her love for others is more than the love for her self and that take someone who is willing to sacrifice and maintain humbleness. I ask that the courts ~~and~~ show mercy on behalf of my sister Valentina Knight. Thank you for your time.

Sincerely, David Macklin  
D. Macklin

Valentina has been a tremendous help to me and my family for the last 8 years. When I was homeless and didn't have a place to stay, Valentina opened up her home to me and took me in and treated me like family and made me feel cared for in my time of need. Valentina has always been the type of person that puts other people's needs in front of her own no matter how bad the situation is. She is always willing to help when no one else is. Her compassion, strength, courage, patience and support has played a key role in my life for becoming a better person. I am Valentina's brother-in-law and she ~~has~~ really has been a tremendous help to me and my family.

Edward

To Whom This May Concern:

My name is Michela Connors. I have known Valentina Knight for about 6 years. Let me start off by saying knowing Valentina is like knowing a real life Angel. Her heart is so big it's unreal. She's always helping people when they need it. She's always there whenever anybody needs her or her ears. I have had personal witness to her love, her loyalty, her forgiveness, her eagerness for her family her friends to be great. Her vision, her dreams on how she wants to help people better their lives are so inspiring. Everytime I talk to Valentina she's always telling me about a new view of life she learned. Or some books where I could learn about it also. She is an amazing person with an amazing personality. I hope with this letter you get a look into the real Valentina.

Thank-You for taking the  
time to read my letter.

Michela Connors



To: Your Honor,

I am writing this letter in regards to my younger sister Valentina Knight. We are the youngest of our mother's 5 children. We have 3 older brothers, then theres myself, then Valentina.

The purpose of this letter is to tell you about her, our relationship, what she means to me, and about how many people love and believe in her. I hope to describe how valuable and strong she has been in so many peoples lives.

As the youngest of five you would think she is spoiled or people take it easy on her. Its quite the opposite. She has been through so much hardship, from our parents battling drug addictions, shelters, foster care, sexual assault to name a few. Through it all she survived and prevailed. Her demeanor shows success, beauty, determination, and kind heartedness. She doesn't lash out in hate or bitterness. Everything that sets out to harm her she uses it to her advantage in the form of helping others.

She has started a group called "Single Mothers Network" for moms struggling to take care of their kids. From work shops to meals to just having someone, another mother to talk to in confidence. She makes it her business to visit her family, especially her nieces and nephews, who are 16 and younger. She buys school clothes, helps with behavioral issues, and teaches the kids how to start working

for themselves and being independent. Her nieces and nephews love and adore her. They ask for her often, but I can't tell them where she is because I know they will worry.

My sister has organized Thanksgiving Dinners from her own pocket to feed the hungry. We were shown on TV doing so a few years back. There are countless friends who call her "sister" who she has been there for. She sometimes takes on projects she really doesn't have time for just to be a helping hand. Not more than 3 days ago did she give me permission to take out \$1400 of her money to help get one of our older brothers released from jail, just so he wouldn't lose his job, even when she knows he has owed her money in the past and hadn't paid her back, and when she know she has lawyers to pay for and no one helping her financially. She is just a giving understanding and loyal person.

I love my sister more than I can put into words on this letter. She is seriously like my big sister. She has always been protective of me. She never lets anyone get too close to me so that they may have the chance to hurt me. She sees danger where I never knew it existed. She takes care of my feelings, she has always been there for me, I can be myself around her, she is my best and most needed friend. She is one of the 3 most important people in my life next to my mother and husband. I need her in my life, she

is a part of me. All and a good for her and

When I was struggling to find confidence in my school work or jobs, I could always count on her to lift me up and feel special. I rarely broke down in tears but when I did, I felt like a big baby crying to my big sister who could fix everything. She brags about me to everyone making me feel like everything I've done has been worth it. She says "My sisters an architect", "she is beautiful", "she can figure that out, she is so smart". I can't explain ~~at~~ how that has always made me feel. I love how she makes me feel about myself.

I've always felt bad that I could never seem to make her feel as good as she makes me feel. I think she thinks that I deep down don't love or like her. It brings me to tears often because she feels like her whole entire family doesn't care for her. I do everything I know how to change her mind, but I think her feelings are deeply rooted in past events that hurt her tremendously as we were growing up.

During the time she's been there so many people notice and feel her absence. Her son misses her so much. We get him more often than before to help fill the space of her in his life. He doesn't know what's going on, he is only 11 years old. She more than likely feels empty without

him and not being in his life like she normally is.

I'm asking that you have mercy on my sister. I know she can excel and show progress on probation. Everyone makes mistakes and everyone has the opportunity to learn from there mistakes... and I know she can. I know she will and she has a loving and supportive family to help and encourage her.

Thank you for reading my letter. I appreciate you taking the time.

Thanks,  
Sharell Knight

P.S.

She has taught me so much... About business, life, relationships, all the way down to the best way to research subjects. She is a mother, sister, friend, teacher, helping hand, listening ear, and loyal sweet sister that I can't imagine living without.



- \* I love you TT Tina, when can we hang out? \*
- \* Can I spend the weekend by you? \*
- \* I miss you, why can't I come by you and Carter? \*
- \* Love you TT \* \* She always nice too me and take me places \* \* Can we call her, I want to talk to her \* \* We miss you TT \*

**PARIENTE LAW FIRM. P.C.**  
3960 Howard Hughes Prwy, Suite 615  
Las Vegas, NV 89169  
PHONE: (702) 966-5310 | FAX: (702) 953-7055  
WWW.PARENTELAW.COM

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**ROC**  
THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No. 9469  
3960 Howard Hughes Parkway, Suite 615  
Las Vegas, Nevada 89169  
(702) 966-5310  
Attorney for Defendant

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

STATE OF NEVADA,  
Plaintiff,

vs.

VALENTINA KNIGHT,  
Defendant.

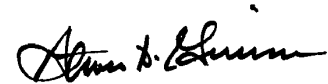
Case No.: C-15-309123-2  
Dept No.: 19

**RECEIPT OF COPY**

RECEIPT OF COPY of the Defendant's SENTENCING MEMORANDUM is  
hereby acknowledged this \_\_\_\_ day of \_\_\_\_\_, 2017.

DISTRICT ATTORNEY'S OFFICE:

\_\_\_\_\_  
DISTRICT ATTORNEY  
200 Lewis Ave.  
Las Vegas, NV 89101



CLERK OF THE COURT

1 JAMES C. GALLO, JR., ESQ.  
Nevada Bar No. 5959  
2 818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
3 (702) 385-3131  
(702) 385-3130 - *Facsimile*  
4 Attorney for Defendant  
VALENTINA KNIGHT  
5

6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA  
8

9 STATE OF NEVADA,

10 Plaintiff,

11 vs.

12 VALENTINA KNIGHT,

13 Defendant.  
14

CASE NO.: C-15-309123-2

DEPT NO.: XIX

DATE OF HEARING:  
TIME OF HEARING:

15 MOTION TO PLACE ON CALENDAR TO REQUEST RECONSIDERATION  
16 OF REVOCATION OF PROBATION

17 COMES NOW, James C. Gallo Jr., Esq., on behalf of the Defendant, VALENTINA  
18 KNIGHT, and hereby moves this Honorable Court for an Order to place on calendar to request  
19 reconsideration of revocation of probation.  
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Gallo Law Office  
818 S. Casino Center Blvd.  
Las Vegas, NV 89101

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**NOTICE OF MOTION**

TO: DISTRICT ATTORNEY, Attorneys for Plaintiff

YOU, will please take notice that the foregoing MOTION TO PLACE ON CALENDAR TO REQUEST RECONSIDERATION OF REVOCATION OF PROBATION has been set for a Hearing on the 8 day of MAY, 2017 at the hour of 8 :30 AM, m., Department of the Clark County District Court, Las Vegas, Nevada.

DATED this 24 day of April, 2017.

Respectfully Submitted:



**JAMES C. GALLO, JR., ESQ.**  
Nevada Bar No. 5959  
818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Defendant  
VALENTINA KNIGHT

**Gallo Law Office**  
818 S. Casino Center Blvd.  
Las Vegas, NV 89101

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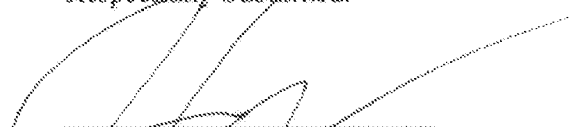
ARGUMENT

When Ms. Knight was sentenced, it was Counsel and the Court's understanding that she had no holds. However, Ms. Knight is still in custody with holds out of the State of Wisconsin. Counsel has serious concerns regarding the ability of Ms. Knight to complete the terms and conditions of probation placed upon her by this Honorable Court based upon the continued holds out of Wisconsin. It is possible that Ms. Knight may never be released from custody and forced to do time in Wisconsin. This is particularly serious in the light of the 4 to 10 year suspended sentence placed upon her by this Honorable Court.

It is important to note that Ms. Knight had no prior criminal history before being charged in the instant case. Moreover, she had a minor role in the instant offense. None of the forged cards seized in this case were in Ms. Knight's name. Instead, half were blank gift cards and the other half were in the Co-Defendant's name. The only card referenced in the criminal complaint with Ms. Knight's name on it was her legitimate card. Mrs. Knight admittedly bears criminal liability for the instant offense, however, Counsel asserts that a 4 to 10 year prison sentence is extreme considering Ms. Knight's lack of criminal history and the facts of this case. Counsel respectfully requests that this Honorable Court sentence Ms. Knight to a minimum 12 to 30 month sentence on this Category B commercial Burglary.

DATED this 24 day of April, 2017.

Respectfully Submitted:

  
JAMES C. GALLO, JR., ESQ.  
Nevada Bar No. 5959  
818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Defendant,  
VALENTINA KNIGHT



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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of JAMES C. GALLO, JR., ESQ., and that on the  
24 day of April, 2017, I served a true and correct copy of the **MOTION TO PLACE  
TO REQUEST RECONSIDERATION OF REVOCATION OF PROBATION** by:

- Mail on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below.
- Personal delivery by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.
- Courtesy copy by facsimile on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.
- E-filing through Wiznet at pdmotions@clarkcountyda.com.

Deputy District Attorney  
200 Lewis Avenue  
Las Vegas, Nevada 89155  
Facsimile: 702-868-2446  
*Attorney for Plaintiff*

Cynthia Capps  
*Employee of Gallo Law Office*

Gallo Law Office  
818 S. Casino Center Blvd.  
Las Vegas, NV 89101



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**JOC**  
STEVEN B. WOLFSON  
Clark County District Attorney  
Nevada Bar #001565  
200 Lewis Avenue  
Las Vegas, Nevada 89155-2212  
(702) 671-2500  
Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,  
  
Plaintiff,

-vs-

CASE NO: C-15-309123-2

VALENTINA MONEE KNIGHT,  
#7018909  
  
Defendant.

DEPT NO: XIX

JUDGMENT OF CONVICTION  
(PLEA OF GUILTY)

The Defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime(s) of BURGLARY (Category B Felony), in violation of NRS 205.060; thereafter, on the 12th day of April, 2017, the Defendant was present in court for sentencing with his counsel, JAMES GALLO, ESQ., and good cause appearing.

THE DEFENDANT IS HEREBY ADJUDGED guilty of said offense(s) and, in addition to the \$25.00 Administrative Assessment Fee, a \$150.00 DNA Analysis fee including testing to determine genetic markers, a \$3.00 DNA Collection fee, a \$5,000.00 fine and restitution in the amount of \$557.76 to be paid jointly and severally with Co-Defendant Moustapha Dioubate, the Defendant is sentenced as follows: to a MINIMUM of FORTY-EIGHT (48) MONTHS and a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS in the Nevada Department of Corrections (NDC); with TWO HUNDRED SEVENTY (270)

///

<input type="checkbox"/> Nolle Prosequi (before trial)	<input type="checkbox"/> Bench (Non-Jury) Trial
<input type="checkbox"/> Dismissed (after diversion)	<input type="checkbox"/> Dismissed (during trial)
<input type="checkbox"/> Dismissed (before trial)	<input type="checkbox"/> Acquittal
<input checked="" type="checkbox"/> Guilty Plea with Sent. (before trial)	<input type="checkbox"/> Guilty Plea with Sent. (during trial)
<input type="checkbox"/> Transferred (before/during trial)	<input type="checkbox"/> Conviction
<input type="checkbox"/> Other Manner of Disposition	

015\2015F\068\22\15F06822-JOC-(KNIGHT\_VALENTINA)-001.DOCX

1 DAYS credit for time served; SUSPENDED. The Defendant is placed on PROBATION for  
2 an indeterminate period not to exceed FIVE (5) YEARS with the following CONDITIONS:

3 Comply with standard probation conditions as follows;

4 1. Reporting: You are to report in person to the Division of Parole and Probation as instructed  
5 by the Division or its agent. You are required to submit a written report each month on forms  
6 supplied by the Division. This report shall be true and correct in all respects.

7 2. Residence: You shall not change your place of residence without first obtaining permission  
8 from the Division of Parole and Probation, in each instance.

9 3. Intoxicants: You shall not consume any alcoholic beverages (whatsoever) (to excess). Upon  
10 order of the Division of Parole and Probation or its agent, you shall submit to a medically  
11 recognized test for blood/breath alcohol content. Test results of .08 blood alcohol content or  
12 higher shall be sufficient proof of excess.

13 4. Controlled Substances: You shall not use, purchase or possess any illegal drugs, or any  
14 prescription drugs, unless first prescribed by a licensed medical professional. You shall  
15 immediately notify the Division of Parole and Probation of any prescription received. You  
16 shall submit to drug testing as required by the Division or its agent.

17 5. Weapons: You shall not possess, have access to, or have under your control, any type of  
18 weapon.

19 6. Search: You shall submit your person, property, place of residence, vehicle or areas under  
20 your control to search including electronic surveillance or monitoring of your location, at any  
21 time, with or without a search warrant or warrant of arrest, for evidence of a crime or violation  
22 of probation by the Division of Parole and Probation or its agent.

23 7. Associates: You must have prior approval by the Division of Parole and Probation to  
24 associate with any person convicted of a felony, or any person on probation or parole  
25 supervision. You shall not have any contact with persons confined in a correctional institution  
26 unless specific written permission has been granted by the Division and the correctional  
27 institution.

28 ///

1 8. Directives and Conduct: You shall follow the directives of the Division of Parole and  
2 Probation and your conduct shall justify the opportunity granted to you by this community  
3 supervision.

4 9. Laws: You shall comply with all municipal, county, state, and federal laws and ordinances.

5 10. Out-of-State Travel: You shall not leave the state without first obtaining written permission  
6 from the Division of Parole and Probation.

7 11. Employment/Program: You shall seek and maintain legal employment, or maintain a  
8 program approved by the Division of Parole and Probation and not change such employment  
9 or program without first obtaining permission. All terminations of employment or program  
10 shall be immediately reported to the Division.

11 12. Financial Obligation: You shall pay fees, fines, and restitution on a schedule approved by  
12 the Division of Parole and Probation. Any excess monies paid will be applied to any other  
13 outstanding fees, fines, and/or restitution, even if it is discovered after your discharge.

14 SPECIAL CONDITIONS:

15 1. Abide by any curfew imposed by probation officer.

16 2. Complete a substance abuse evaluation and any recommended case plan.

17 3. Complete an impulse control evaluation and any recommended case plan.

18 4. Satisfy any/all outstanding warrants within the first sixty (60) days of probation.

19 5. Pay \$557.76 restitution in monthly installments to be determined by P & P based on income  
20 verification; to be paid joint/severally with co-defendant.

21 6. No gambling or entry into any gaming establishment unless employed therein.

22 7. Provide P & P with a full and complete financial disclosure.

23 8. Pay \$5,000.00 Fine.

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9. Comply with all directives and/or requirements of interstate compact; remain in the State of Nevada pending approval for interstate compact and/or at the approval of P & P

DATED this 25<sup>th</sup> day of April, 2017.

  
\_\_\_\_\_  
DISTRICT JUDGE  
*R*

15F06822B/mlb/L-2

State of Nevada  
DEPARTMENT OF PUBLIC SAFETY  
Division of Parole and Probation  
Carson City, NV 89706  
**PROBATION AGREEMENT AND RULES**

File # 17-3092 Filed  
6/1/2017 12:46 PM  
Steven D. Grierson

Required to pay the Assessment Fee  
and all other Court ordered Fees to the County Clerk's  
Office, 200 Lewis Ave., Las Vegas, NV, 89101.

Criminal Case No. C-15-309123-2

THE STATE OF NEVADA Plaintiff,

vs.

KNIGHT, Valentina Monee

Defendant

**ORDER ADMITTING DEFENDANT TO PROBATION  
AND FIXING THE TERMS THEREOF**

**DEFENDANT** is guilty of the Crime of **Burglary, a Category B Felony.**

**DEFENDANT** is sentenced to a term of imprisonment in the Nevada Department of Corrections for **48-120 months with 270 days credit for time served and \$557.76 in restitution.** Execution of that sentence is suspended and the **DEFENDANT** is hereby admitted to probation for an indeterminate period not to exceed **5 years** under the following conditions:

1. **Reporting:** You are to report in person to the Division of Parole and Probation as instructed by the Division or its agent. You are required to submit a written report each month on forms supplied by the Division. This report shall be true and correct in all respects.
2. **Residence:** You shall not change your place of residence without first obtaining permission from the Division of Parole and Probation, in each instance.
3. **Intoxicants:** You shall not consume any alcoholic beverages to excess. Upon order of the Division of Parole and Probation or its agent, you shall submit to a medically recognized test for blood/breath alcohol content. Test results of .08 blood alcohol content or higher shall be sufficient proof of excess.
4. **Controlled Substances:** You shall not use, purchase or possess any illegal drugs, or any prescription drugs, unless first prescribed by a licensed medical professional. You shall immediately notify the Division of Parole and Probation of any prescription received. You shall submit to drug testing as required by the Division or its agent.
5. **Weapons:** You shall not possess, have access to, or have under your control, any type of weapon.
6. **Search:** You shall submit your person, property, place of residence, vehicle or areas under your control to search including electronic surveillance or monitoring of your location, at any time, with or without a search warrant or warrant of arrest, for evidence of a crime or violation of probation by the Division of Parole and Probation or its agent.
7. **Associates:** You must have prior approval by the Division of Parole and Probation to associate with any person convicted of a felony, or any person on probation or parole supervision. You shall not have any contact with persons confined in a correctional institution unless specific written permission has been granted by the Division and the correctional institution.
8. **Directives and Conduct:** You shall follow the directives of the Division of Parole and Probation and your conduct shall justify the opportunity granted to you by this community supervision.
9. **Laws:** You shall comply with all municipal, county, state, and federal laws and ordinances.
10. **Out-of-State Travel:** You shall not leave the state without first obtaining written permission from the Division of Parole and Probation.
11. **Employment/Program:** You shall seek and maintain legal employment, or maintain a program approved by the Division of Parole and Probation and not change such employment or program without first obtaining permission. All terminations of employment or program shall be immediately reported to the Division.
12. **Financial Obligation:** You shall pay fees, fines, and restitution on a schedule approved by the Division of Parole and Probation. Any excess monies paid will be applied to any other outstanding fees, fines, and/or restitution, even if it is discovered after your discharge.
13. **Special Conditions:** SEE ATTACHED

The Court reserves the right to modify these terms of Probation at any time and as permitted by law. DATED this 31<sup>st</sup> day of May, 2017, in the Eighth Judicial District Court of the State of Nevada, in and for the County of Clark.

William D. Kephart  
District Judge **William D. Kephart**

**AGREEMENT BY PROBATIONER**

I do hereby waive extradition to the State of Nevada from any State in the United States, and from any territory or country outside the continental United States, and I also agree that I will not contest any effort to return me to the United States or the State of Nevada. I have read, or have had read to me, the conditions of my probation, and fully understand them and I agree to abide by and strictly follow them. I fully understand the penalties involved should I in any manner violate the foregoing conditions. I have received a copy of this document and NRS 176A.850.

Valentina Monee Knight 5-18-17  
Probationer **Valentina Monee Knight**/Date

Pursuant to NRS 239B.030, the undersigned hereby affirms this document does not contain the social security number of any person.

APPROVED: C. Pollack 5/18/17

**PROBATION AGREEMENT SPECIAL CONDITIONS ADDENDUM**

File # V17-3052

Criminal Case No. C-15-309123-2

KNIGHT, Valentina Monee

Defendant

**Standard Conditions: Refer to attached Probation Agreement and Rules**

**Special Conditions of your probation:**

1. Abide by any curfew imposed by probation officer.
2. Complete a substance abuse evaluation and any recommended case plan.
3. Complete an impulse control evaluation and any recommended case plan.
4. Satisfy any/all outstanding warrants within the first sixty (60) days of probation.
5. Pay \$557.76 restitution in monthly installments to be determined by P & P based on income verification; to be paid joint/severally with co-defendant.
6. No gambling or entry into any gaming establishment unless employed therein.
7. Provide P & P with a full and complete financial disclosure.
8. Pay \$5,000.00 Fine.
9. Comply with all directives and/or requirements of interstate compact; remain in the State of Nevada pending approval for interstate compact and/or at the approval of P & P.

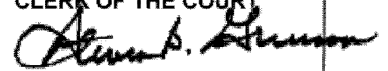
**AGREEMENT BY PROBATIONER**

I do hereby waive extradition to the State of Nevada from any State in the Union and I also agree that I will not contest any effort to return me to the State of Nevada. I have read, or have had read to me, the foregoing conditions of my probation, and fully understand them and I agree to abide by and strictly follow them and I fully understand the penalties involved should I in any manner violate the foregoing conditions. I have received a copy of this document and NRS 176A.850.

  
\_\_\_\_\_  
Probationer Valentina Monee Knight/Date

APPROVED:   
\_\_\_\_\_

ah



IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
AND FOR THE COUNTY OF CLARK

THE STATE OF NEVADA,  
Plaintiff

vs.

KNIGHT, VALENTINA MONEE  
Defendant

Case No. C-15-309123-2  
Department No. XIX

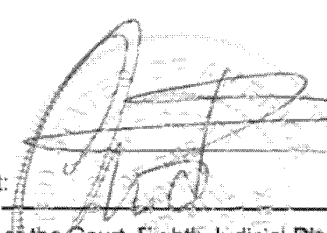
**BENCH WARRANT**

TO ANY LAW ENFORCEMENT OFFICERS:


It appearing to the undersigned District Judge of the Eighth Judicial District Court of the State of Nevada, in and for the County of Clark, that the defendant above-named has violated the terms of probation imposed upon the defendant by this Court on the 12<sup>th</sup> day of April, 2017.

NOW, THEREFORE, by virtue of this Bench Warrant you are hereby commanded forthwith to arrest the above-named defendant, and deliver the defendant to the Chief Parole and Probation Officer of the State of Nevada in order that the defendant may be brought before me forthwith at my courtroom in Las Vegas, Clark County, State of Nevada.

DATED at Las Vegas, Clark County, State of Nevada, this 22<sup>nd</sup> day of Jan., 20 18.

Attest:  , Deputy Clerk  
Clerk of the Court, Eighth Judicial District Court  
Court of the State of Nevada, in and for the County of Clark

JAN 26 2018  
ONDINA AMOS

  
William D. Kephart, District Judge

Proof of Service

Date Served \_\_\_\_\_

By \_\_\_\_\_

Agency \_\_\_\_\_





1 JAMES C. GALLO, JR., ESQ.  
2 Nevada Bar No. 005959  
3 818 S. Casino Center Blvd.  
4 Las Vegas, Nevada 89101  
5 (702) 385-3131  
6 (702) 385-3130 - *Facsimile*  
7 Attorney for Defendant  
8 VALENTINA MONEE KNIGHT

9 DISTRICT COURT  
10 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,  
12  
13 Plaintiff,  
14 vs.  
15 VALENTINA MONEE KNIGHT,  
16  
17 Defendant.

18 CASE NO.: C-15-309123-2  
19 DEPT. NO.: XIX

20 MOTION TO PLACE ON CALENDAR TO WITHDRAW AS ATTORNEY OF RECORD

21 COMES NOW, JAMES C. GALLO, JR., ESQ., attorney for Defendant, VALENTINA  
22 MONEE KNIGHT, and hereby moves this Honorable Court for an Order allowing him leave to  
23 withdraw as attorney of record for the Defendant in the above-captioned case.

24 Respectfully Submitted:

25 /s/ James C. Gallo  
26 JAMES C. GALLO, JR., ESQ.  
27 Nevada Bar No. 005959  
28 818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Defendant  
VALENTINA MONEE KNIGHT

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I.

NOTICE OF MOTION

TO: DISTRICT ATTORNEY, Attorney for Plaintiff:

YOU, will please take notice that foregoing MOTION TO PLACE ON CALENDAR TO WITHDRAW AS ATTORNEY OF RECORD has been set for Hearing on the \_\_\_\_ day of December, 2019, at the hour of \_\_\_\_ : \_\_\_\_ .m., Department XIX, of the Clark County District Court, Las Vegas, Nevada.

Respectfully Submitted:

/s/ James C. Gallo  
JAMES C. GALLO, JR., ESQ.  
Nevada Bar No. 005959  
818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Defendant  
VALENTINA MONEE KNIGHT

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II.

POINTS AND AUTHORITIES

Counsel has not been contacted nor retained on the case. Further, counsel’s attorney/client relationship has broken down with VALENTINA MONEE KNIGHT. Counsel has notified VALENTINA MONEE KNIGHT at his last known address of this Motion.

III.

CONCLUSION

Based upon the above and foregoing, defense counsel, James C. Gallo, Jr., Esq., respectfully request that this Honorable Court grant Defendant's Motion to Withdraw as Attorney of Record.

Respectfully Submitted:

/S/James C. Gallo  
JAMES C. GALLO, JR., ESQ.  
Nevada Bar No. 005959  
818 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Defendant  
VALENTINA MONEE KNIGHT

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DECLARATION OF JAMES C. GALLO, JR., ESQ., IN SUPPORT OF MOTION  
TO PLACE ON CALENDAR TO WITHDRAW AS COUNSEL OF RECORD

COUNTY OF CLARK        )  
  ) ss:  
CITY OF LAS VEGAS     )

I, JAMES C. GALLO, JR., ESQ., being first duly sworn upon oath, declares and says:

- 1) That I am an attorney duly licensed to practice in the State of Nevada;
- 2) That Affiant is presently Counsel of record for VALENTINA MONEE KNIGHT in the above-entitled action;
- 3) That the attorney/client relationship has broken down between Counsel and VALENTINA MONEE KNIGHT.
- 4) Counsel mailed a copy of this Motion to VALENTINA MONEE KNIGHT, at his last known address and at her current location: VALENTINA MONEE KNIGHT, I.D. # 07018909, C/O CCDC, 330 S. Casino Center Blvd., Las Vegas, NV 89101.

/S/ James C. Gallo  
JAMES C. GALLO, JR., ESQ.

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of JAMES C. GALLO, JR., ESQ., and that on the 5<sup>th</sup> day of December, 2019, I served a true and correct copy of the MOTION TO PLACE ON CALENDAR TO WITHDRAW AS COUNSEL OF RECORD by:

- Mail on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below.
- Personal delivery by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.
- Courtesy copy by facsimile on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.
- E-filing through Odyssey File and Serve at motions@clarkcountyda.com.

District Attorney  
200 Lewis Avenue  
Las Vegas, Nevada 89155  
*Attorney for Plaintiff*

Division of Parole and Probation  
215 E. Bonanza Road  
Las Vegas, Nevada 89101  
*Probation Officer*

/s/ Cynthia Capps  
*Employee of Gallo Law Office*

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DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\*

Electronically Filed  
12/6/2019 3:39 PM  
Steven D. Grierson  
CLERK OF THE COURT



State of Nevada  
vs  
Valentina Knight

Case No.: C-15-309123-2  
Department 19

**NOTICE OF HEARING**

Please be advised that the Defendant's Motion to Place on Calendar to Withdraw as Attorney of Record in the above-entitled matter is set for hearing as follows:

**Date:** January 06, 2020  
**Time:** 8:30 AM  
**Location:** RJC Courtroom 16B  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Joshua Raak  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Joshua Raak  
Deputy Clerk of the Court



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DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

VALENTINA MONEE KNIGHT  
#7018909

Defendant.

CASE NO. C-15-309123-2

DEPT. NO. XIX

ORDER FOR REVOCATION OF PROBATION AND  
AMENDED JUDGMENT OF CONVICTION

The Defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime of BURGLARY (Category B Felony) in violation of NRS 205.060; thereafter, on the 12<sup>th</sup> day of April, 2017, the Defendant was present in court for sentencing with counsel, wherein the Court did adjudge the Defendant guilty thereof by reason of the plea of guilty, suspended the execution of the sentence imposed and granted probation to the Defendant.

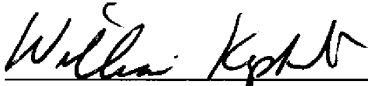
THEREAFTER, a parole and probation officer provided the Court with a written statement setting forth that the Defendant has, in the judgment of the parole and probation officer, violated the conditions of probation; and on the 15<sup>th</sup> day of January, 2020, the

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Defendant appeared in court with counsel MICHAEL W. SANFT, ESQ., and pursuant to a probation violation hearing/proceeding and good cause appearing to amend the Judgment of Conviction,

IT IS HEREBY ORDERED that the probation previously granted to the Defendant is REVOKED; in addition to the original fees, fines and assessments COURT orders \$148.51 Extradition Fees, IT IS FURTHER ORDERED that the original sentence is imposed as follows: a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS with a MINIMUM parole eligibility of FORTY-EIGHT (48) MONTHS in the Nevada Department of Corrections (NDC); with TWO HUNDRED NINETY-SIX (296) DAYS credit for time served.

DATED this 16<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
WILLIAM D. KEPHART  
DISTRICT COURT JUDGE 