

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
2 _____

3 A.J., a 16-year-old foster child,

4 Petitioner,

5 vs.

6 The Eighth Judicial District Court of the
7 State of Nevada, Juvenile Division, in
8 and for the County of Clark, the
 Honorable William O. Voy, District
 Court Judge,

9 Respondent.
10 _____

) S.C. No.

Electronically Filed
Apr 11 2016 09:10 a.m.

) (D.C. No. J-13-3372-K-Din-Deman
) (Department Clerk of Supreme Court)

11 **PETITIONER'S APPENDIX**

12 PHILIP J. KOHN
13 Clark County Public Defender
14 309 South Third Street
 Las Vegas, Nevada 89155-2610

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200 Lewis Avenue, 3rd Floor
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Counsel for Respondent

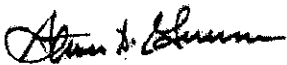
PETITIONER'S APPENDIX

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Exhibit A

DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA


CLERK OF THE COURT

In the Matter of:

AJAH JORDAN

FT ID#: 1248817 JUVI ID: 157926 03

UNITY ID#:

Date of Birth: 06/08/1999

Years of Age: 16

CASE NO. J-15-337227-DI

DEPT. A

Courtroom 18 - Judge Voy

Petition I

Plea: 07/22/2015 at 10:00 a.m.

PETITION - DELINQUENCY

That there is now within the County of Clark, State of Nevada, the above named minor who resides with his/her parent(s) or guardian(s) at: **3627 Victory, Las Vegas, Nevada 89121**

Aunt: ELEASE BELL - Unknown, Las Vegas, Nevada 89121

That your Petitioner, a duly appointed and qualified Deputy District Attorney for the County of Clark, State of Nevada, makes the following declaration:

That Petitioner is informed and believes, and thereon alleges that the facts bringing said minor within the jurisdiction of the Juvenile Court pursuant to NRS 62B.330 are that, in Clark County, Nevada, subject minor:

COUNT 1: OBSTRUCTING AN OFFICER (Misdemeanor)

On or about July 11, 2015, did then and there willfully and unlawfully hinder, delay and obstruct Officer HOPSON with the Las Vegas Metropolitan Police Department, in the discharge of his/her/their official powers or duties, by refusing to identify herself, in violation of NRS 197.190.

LVMPD Event #: 150711-0578

That the subject minor is now in the custody and control of Department of Juvenile Justice Services Detention Facility, and has been since July 15, 2015.

WHEREFORE, Petitioner prays that this matter be set for hearing as it is in the best interest of the public and the subject minor that this proceeding be commenced and that the Court take such further action as is deemed fit and proper under the circumstances and in accordance with the law as the subject minor is in need of treatment and/or rehabilitation.

I declare that I am the Petitioner named in the foregoing Petition and know the contents thereof; that this petition is true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe it to be true. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 15th day of July, 2015.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

BY:


Deputy District Attorney
Petitioner

MW/tw

DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA


CLERK OF THE COURT

In the Matter of:

AJAH JORDAN

FT ID#:1248817 JUVI ID: 157926 03

UNITY ID#:

Date of Birth: 06/08/1999

Years of Age: 16

CASE NO. J-15-337227-D2

DEPT. A

Courtroom 18 - Judge Voy

Petition 2

Plea: 10/07/2015 at 10:00 a.m.

PETITION - DELINQUENCY

That there is now within the County of Clark, State of Nevada, the above named minor who resides with his/her parent(s) or guardian(s) at: **100 St. Judes St., Boulder City, Nevada 89006**

Mother: Information not available

Father: Information not available

That your Petitioner, a duly appointed and qualified Deputy District Attorney for the County of Clark, State of Nevada, makes the following declaration:

That Petitioner is informed and believes, and thereon alleges that the facts bringing said minor within the jurisdiction of the Juvenile Court pursuant to NRS 62B.330 are that, in Clark County, Nevada, subject minor:

COUNT 1: VIOLATION OF PROBATION

On or about September 27, 2015, did willfully and unlawfully violate one or more conditions of his/her probation agreement with the Clark County Juvenile Probation Department, Probation Officer K, KELLE, in the following manner, to-wit: Subject Minor having been placed on formal probation on July 22, 2015 and having violated said probation by violating curfew and/or associating with places involved in prostitution, in violation of NRS 62B.340 and NRS 62E.710.

DJJS

That the subject minor is now in the custody and control of his/her parents, and has been since September 27, 2015.

WHEREFORE, Petitioner prays that this matter be set for hearing as it is in the best interest of the public and the subject minor that this proceeding be commenced and that the Court take such further action as is deemed fit and proper under the circumstances and in accordance with the law as the subject minor is in need of treatment and/or rehabilitation.

I declare that I am the Petitioner named in the foregoing Petition and know the contents thereof: that this petition is true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe it to be true. I declare under penalty of perjury that the foregoing is true and correct.

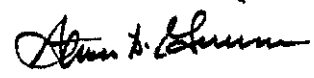
Dated this 30th day of September, 2015.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

BY: /s/ KAREN M. JAMES
Deputy District Attorney
Petitioner

KMJ/tw

DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA


CLERK OF THE COURT

In the Matter of:

AJAH JORDAN

FT ID#:1248817 JUVI ID: 157926 03

UNITY ID#:

Date of Birth: 06/08/1999

Years of Age: 16

CASE NO. J-15-337227-D3

DEPT. A

Courtroom 16 - HM Leeds

Petition 3

Plea: 10/08/2015 at 10:00 a.m.

PETITION - DELINQUENCY

That there is now within the County of Clark, State of Nevada, the above named minor who resides with his/her parent(s) or guardian(s) at: **701 N. Pecos, Las Vegas, Nevada 89101**

Mother: Information not available

Father: Information not available

That your Petitioner, a duly appointed and qualified Deputy District Attorney for the County of Clark, State of Nevada, makes the following declaration:

That Petitioner is informed and believes, and thereon alleges that the facts bringing said minor within the jurisdiction of the Juvenile Court pursuant to NRS 62B.330 are that, in Clark County, Nevada, subject minor:

COUNT 1: VIOLATION OF PROBATION

Subject Minor was adjudicated a delinquent on Petition 1 Count 1 Obstructing an Officer on or about July 22, 2015 and was placed on probation with Suspended Commitment to the State and with a Global Positioning Satellite [GPS] unit and/or Probation Review and Release Program [PRRP] under the supervision of the Department of Juvenile Justice Service, Probation Officer L. RUCKER, and that Subject Minor did willfully and unlawfully violate probation and/or conditions of the GPS and/or PRRP Programs, in the following manner, to-wit: On or about October 3, 2015, Subject Minor was at an unauthorized location and/or On or about October 3, 2015, Subject Minor absconded from her placement, in violation of NRS 62B.340 and NRS 62E.710.

DJJS

That the subject minor is now in the custody and control of Department of Juvenile Justice Services Detention Facility, and has been since October 04, 2015.

WHEREFORE, Petitioner prays that this matter be set for hearing as it is in the best interest of the public and the subject minor that this proceeding be commenced and that the Court take such further action as is deemed fit and proper under the circumstances and in accordance with the law as the subject minor is in need of treatment and/or rehabilitation.

I declare that I am the Petitioner named in the foregoing Petition and know the contents thereof: ~~that this petition is true of my own knowledge, except as to those matters stated on~~ information and belief, and that as to those matters I believe it to be true. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 5th day of October, 2015.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

BY: /s/ KAREN M. JAMES
Deputy District Attorney
Petitioner

KMJ/tw

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION - JUVENILE
CLARK COUNTY, NEVADA

Ann L. Blum
CLERK OF THE COURT

In the Matter of:

AJAH JORDAN

CASE NO. J-15-337227-D4

JUVI ID: 15792603

DEPT NO. A

Date of Birth: June 8, 1999

Petition No. 4

A Minor 16 Years of Age.

WRIT OF ATTACHMENT

PETITION - PROBATION VIOLATION

That there is now within the County of Clark, State of Nevada, the above named minor who resides with her guardian, at: 701 Aspen Peal Loop, Henderson, Nevada 89011.

Father: ---

Mother: ---

Guardian: Waconda Alvarez - Foster Mother

Assigned Probation Officer: Suzanne Arroyo

That your Petitioner, a duly appointed, qualified and acting Probation Officer of Clark County, State of Nevada, makes the following declaration under the penalty of perjury:

That Petitioner is informed and believes, based upon personal information or information provided to me by the assigned Probation Officer, and therefore on information and belief, alleges that the facts bringing said minor within the jurisdiction of the Juvenile Court pursuant to Chapters 62B and 62E of the Nevada Revised Statutes are that on or about October 14, 2015, Subject Minor was adjudicated a delinquent on Petition 2, Count 1 - Violation of Probation, and was placed on Probation under the supervision of the Department of Juvenile Justice Services; that Subject Minor has violated the terms and conditions of probation in the following manner:

///

///


1 **CONDITION:** I will reside at 701 Aspen Peal Loop Henderson, NV
2 89011 during my period of Probation and will be in the physical custody of
3 Waconda Alvarez, Foster Mother. Any stay away from this location must have
4 the prior approval of my Probation Officer

5 **CONDUCT:** Ajah left her residence on November 30, 2015. She has
6 not returned home and her current whereabouts are unknown. Her foster
7 mother Waconda Alvarez filed a runaway report with the Henderson Police
8 Department under event number 15-1969. Her foster mother contacted Basic
9 High School on December 1, 2015 and Ajah was not at school. Ajah has a
10 history of running away and she has not made any attempt to contact or her
11 foster mother.

12 **WHEREFORE,** Petitioner prays that a writ of attachment be issued for the
13 apprehension of Ajah Jordan, as it is in the best interest of the public and the subject minor
14 that she be forthwith brought before the Court and that the Court take such further action as
15 deemed fit and proper under the circumstances and in accordance with law as the Subject
16 Minor is in need of treatment or rehabilitation. Petitioner requests that a writ of attachment
17 issue in lieu of a summons as a summons cannot be served, service of a summons would be
18 ineffective and/or the welfare of the child requires that the child be immediately brought into
19 custody. Petitioner's request for a writ of attachment is based upon the following facts: Ajah
20 has left her residence and her current whereabouts are unknown. She has not completed
21 any of her Court Orders. Petitioner recommends, based upon the information known at the
22 time of the filing of this request Ajah Jordan remain detained pending alternative or
23 correctional placement.

24 Dated this 11th day of December, 2015.

25 **STEVEN B. WOLFSON**
26 **DISTRICT ATTORNEY**

27 BY: 
28 Deputy District Attorney
SCC/mm


Petitioner

Exhibit B

JUVENILE JUSTICE SERVICES
DECLARATION OF ARREST

Page 1 of 3

DR/Event #: 150711-0578

Suspect's Name: JORDAN, AJAH Date of Arrest: 07-11-15 Time of Arrest: 0430

Other Suspects: _____

OFFENSES:

ENGLISH IN PROSTITUTION / LOITERING PROSTITUTION.

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SWAYS. That I am a peace officer with LVMPD (VILE) Department, Clark County, Nevada, being an employee for a period of 6.5 years (months). That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the above offense(s) at the location of TROPICANA / VALLEY VIEW, LV NV and that the offense occurred at approximately 0430 hours on the 11 day of JULY 2015.

DETAILS FOR PROBABLE CAUSE:

ON 07-11-15 AT APPROXIMATELY 0330 HOURS, I DETECTIVE ALIYEV P#1378
ALONG WITH DETECTIVE SANCENTER P#9844 RECEIVED A PHONE
CALL FROM OFFICER B. KOPSON P#8906 IN REFERENCE 2 POSSIBLE
JUVENILES WORKING AS PROSTITUTES IN THE AREA OF TROPICANA
AND VALLEY VIEW. UPON ARRIVAL WE MADE CONTACT WITH
OFFICER KOPSON WHO ADVISED THAT HE OBSERVED TWO
YOUNG FEMALES WHO APPEARED TO BE JUVENILES WORKING
BACK AND FORTH ON TROPICANA. OFFICER KOPSON ADVISED
THAT BOTH JUVENILES WALKED FROM PROXYON TO VALLEY
VIEW ON THE SOUTH SIDE OF THE STREET AND THEN
WALKED BACK TO PROXYON FROM VALLEY VIEW ON THE
NORTH SIDE. OFFICER KOPSON OBSERVED BOTH FEMALES
REPEATEDLY RECALL MOTOR VEHICLES AS THEY STOOD AT
THE CORNER OF PROXYON BY MAKING EYE CONTACT WITH
MOTORIST. OFFICER KOPSON STATED THAT HE OBSERVED BOTH
FEMALES WAVING AT ONCOMING VEHICLES ON TROPICANA.

Wherefore, Declarant prays that a finding be made by a Hearing Master/Judge that probable cause exists to hold said person pending plea and trial.

Declarant must sign second page with original signature.

[Signature]
Declarant's Signature

K. ALIYEV
Print Declarant's Name

13950

P 1

JUVENILE JUSTICE SERVICES
DECLARATION OF ARREST CONTINUATION PAGE

Page 2 of 3

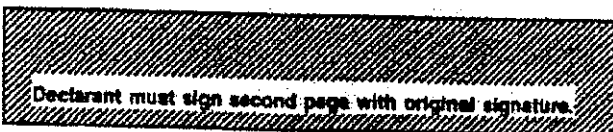
DR/Event #: 150711-0578

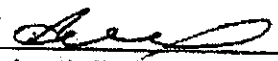
IN ATTEMPTS HAVE THEM STOP AS WELL AS THEY KEPT
LOOKING AROUND AS IF THEY WERE WAITING FOR A
RIDE. OFFICER HOPKINS AND DETECTIVE KNOW TROPIANA
OUR TRAINING AND EXPERIENCE THAT TROPIANA
BLVD IS A KNOWN PROSTITUTION AREA AND IS CURRENTLY
PART OF THE "DE-RAIL" THAT IS DESIGNATED FOR
THE SPECIFIC PURPOSE TO STOP VIOLENT CRIME AND
PROSTITUTION RELATED ACTIVITY.

OFFICER KOPSON AFTER OBSERVING THE FEMALE'S
BEHAVIOR BEGINNING OF PASSER-BY AND MOTOR VEHICLES
FOR A PERIOD OF 10-15 MINUTES HE CONDUCTED
A PERSON STOP ON SOME FEMALES FOR LOITERING
FOR PROSTITUTION AND THE FACT THAT BOTH
FEMALES APPEARED TO BE JUVENILES. OFFICER
KOPSON ADVISED THAT BOTH FEMALES WERE
BEING UNCOOPERATIVE AND REFUSED TO PROVIDE
THEIR NAMES.

I DETECTIVE ALIYEV THEN MADE CONTACT
WITH ONE OF THE FEMALES WHO APPROXIMATELY
30 MINUTES LATER WAS IDENTIFIED AS JORDAN,
AJAH DOB: 06-08-99 (16 YEARS OLD) INITIALLY UPON
MAKING CONTACT WITH JORDAN SHE STATED
THAT SHE DOES NOT LIKE VICE AND REFUSED TO

Wherefore, Declarant prays that a finding be made by a Hearing Master/Judge that probable cause exists to hold said person pending
plea and trial.




Declarant's Signature
K. ALIYEV 13950
Print Declarant's Name P #

JUVENILE JUSTICE SERVICES
DECLARATION OF ARREST CONTINUATION PAGE

Page 3 of 3

DR/Event #: 150711-0578

GIVE ME HER NAME AND DOB. DURING THE
COURSE OF OUR CONVERSATION JORDAN ADMITTED
WORKING AS A PROSTITUTE FOR THE PAST
3 MONTHS. JORDAN STATED THAT SHE USUALLY
POSTS HER ADS ON WWW.CRAIGSLIST.COM AND
WWW.BACKPAGE.COM. JORDAN ALSO STATED THAT
SHE PREFERS CAR DATES BECAUSE THAT'S
THE EASIEST WAY TO MAKE MONEY.
JORDAN STATED THAT TODAY AT APPROXIMATELY
0230 HOURS, SHE ALONG WITH HER FRIEND
WILLIAMSON, QUINNAGE DOB 07-31-2000 (15 YEARS OLD),
ARRIVED ON TROPICANA TO MAKE MONEY.
JORDAN STATED THAT SHE USUALLY CHARGES
\$150 FOR A "BLOWJOB" (FELLATIO) AND \$100
FOR A "HANDJOB" (MANUAL MASTURBATION). JORDAN
ALSO ADMITTED THAT SHE NEVER HAS "SEX" WITH
HER CUSTOMERS BECAUSE IT'S NOT SAFE. JORDAN
ALSO STATED THAT SHE DID NOT HAVE ANY
"DATES" TONIGHT BECAUSE UPON HER ARRIVAL
ON TROPICANA SHE WAS STOPPED BY A POLICE
DUE TO ABOVE FACTS AND CIRCUMSTANCES. JORDAN
WAS ARRESTED FOR ENGAGING IN PROSTITUTION AND
LOITERING FOR PROSTITUTION AND TRANSPORTED TO CCYM.

Wherefore, Declarant prays that a finding be made by a Hearing Master/Judge that probable cause exists to hold said person pending
plea and trial.

Declarant must sign second page with original signature.

Declarant's Signature

Print Declarant's Name

K. ALIVER 13950

P 8

**Clark County Department of Juvenile Justice Services
DECLARATION OF ARREST**

Primary Suspect: AJAH JORDAN

Date of Arrest: 09/27/2015 **Time of Arrest:** 01:01 AM

Offense: MIS / Solicitation of Prostitution / Principal

Offense Location: Tropicana/Valley View

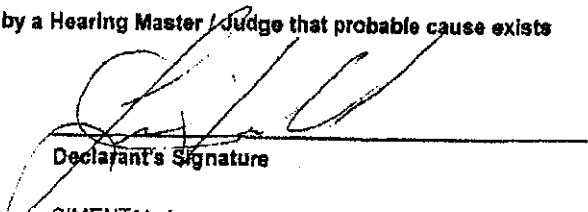
Date of Offense: 09/27/2015 **Time of Offense:** 12:30 AM **DR/Event Number:** 1509270074

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with LVMPD, being so employed for a period of 8 years and 9 months. That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the above offense(s) at the location listed above and that the offense(s) occurred at the above-listed date and time.

Details for Probable Cause:

On 09-27-15 at approximately 0030 hours, I Detective L. Simental P#9844 was working in a covert capacity investigating vice related crimes on the known prostitution street of Tropicana. I then observed a female who was later identified as Jordan, A'Jah who was walking on the sidewalk of Tropicana approaching Valley View. I then honked at Jordan who walked over to the front driver side window and quickly asked, "You're not a Vice cop right". I replied, "No, I am not a cop". Jordan then asked, "So what are you looking for a date" to which I replied, "Yeah, I look for date" (in broken English). I said, "I want 'mamada' (Spanish for oral sex) you know blow job (oral sex)". Jordan said, "Ok, how much money do you have" to which I replied, "I got \$40 dollar". Jordan then asked, "Can you do \$50 dollars?" I said, "Ok, \$50 is good deal, but I want sex how much for sex" and Jordan replied "Sex is going to be \$100 dollars". I then told Jordan that I did want to have sex with her but that I needed to get some money out first at which point Jordan got into the front passenger seat of my vehicle. After we had agreed that I would pay Jordan \$100 dollars for sex Detectives from V3 then assisted me in taking Jordan into custody for soliciting prostitution. A records check revealed that Jordan was reported missing out of Boulder City on 09-19-15 (Nik# M6128194). Jordan was then transported and booked accordingly at CCJH.

Wherefore, Declarant prays that finding be made by a Hearing Master / Judge that probable cause exists to hold said person pending plea and trial.


Declarant's Signature

SIMENTAL, L.

Declarant's Name

09-27-15
Date

Exhibit C

RECEIVE Summary

Booking

Name of Minor JORDAN, AJAH
Family TRACS Arrest # 1028049
Family ID # 426215
Person ID # 1248817
J # 337227

Previous Record Identified
Strip Searched

Date/Time of Booking 09/27/2015 01:01 AM

Person ID	Name	DOB/Age	Ref #	Charge(s)	Date / Time of Offense	Event #
1248817	JORDAN, AJAH	06/08/1999	3	MIS / Solicitation of Prostitution / Principal	09/27/2015 12:30 AM	1509270074
157926	03					

Offense Remarks:
Offense Location: Tropicana/Valley View

CUSTODY INFORMATION

Received By: LAWLER, JOHN V.
Primary Prob/Parole Officer: KELLE, KYLE
Secondary Prob/Parole Officer:

Intake Date:
Assign Date: 09/27/2015
Assign Date:

Intake Time:
Court Status:

Detention Hearing
09/28/2015

Custody Location: Tropicana/Cameron

Date: 09/27/2015

Time: 01:01 AM

Custody Officer: SIMENTAL, L.

Transportation Officer: SIMENTAL, L.

Officer Agency: LVMPD

Admitting Officer: LAWLER, JOHN V.

(V) ☒

ALLEGED OFFENDER INFORMATION

Name: Jordan, Ajah Race: Black/African American Hispanic/Latino Origin: No
DOB: 06/08/1999 Height: 4'11" Weight: 130 Lbs Hair: Brown Eyes: Brown
Age: 16 Yrs 3 Mos Sex: Female

Minor's Address : 100 ST. JUDES ST., BOULDER CITY, Nevada Lives With
89006

Comments
DFS: Ebony Davis

FAMILY INFORMATION

Family Address: 100 ST. JUDES ST., BOULDER CITY, Nevada 89006

Phone Numbers: Home: (702)294-7186

NAME	ROLE	RACE	CARE- TAKER	ADULT RECORD	RESIDENCE
Landers, Jimeshian DOB: Age: 40	Other	Black/African American	N	N	Different
Jordan, Ajah DOB: 06/08/1999 Age: 16	Daughter	Black/African American	N	N	Same
Jell, Elease DOB: Age: 99	Aunt	Black/African American	N	N	Different

Person Contacted:

Date/Time:

Notes:

Exhibit D

4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11611043

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Location : All Courts Images Help

REGISTER OF ACTIONS

CASE NO. J-15-337227-DT

In the Matter of: **Ajah Jordan**§
§
§
§
§
§
§Case Type: **Juvenile Detention Hearing - Initial Case**Date Filed: **07/13/2015**Location: **Family Juvenile**Cross-Reference Case Number: **J337227**

PARTY INFORMATION

Delinquent **Jordan, Ajah**
Subject Minor

DOB: 06/08/1989

Lead Attorneys
Public Defender
Retained
702-455-4685(W)

State of **State of Nevada**
Nevada

Steven B Wolfson
702-455-6320(W)

CHARGE INFORMATION

Charges: **Jordan, Ajah**
1. Detained

Statute
Detained

Level
Unknown

Date
07/13/2015

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS

07/13/2015 **Detention Hearing** (9:00 AM) (Magistrate Leeds, Thomas L.)
Parties Present
Minutes
Result: Delinquency Matter Heard

07/13/2015 **PD/Conflict Attorney Referral and Order**

07/13/2015 **Detention Hearing/Recommendation Order**

07/15/2015 **Detention Review** (10:00 AM) (Judicial Officer Voy, William O.)
New charges (D1)
Parties Present
Minutes
Result: Matter Heard for all Pending Matters

07/15/2015 **Order**
Order

07/22/2015 **CANCELED** Continued Entry of Plea/Consult PD (10:00 AM) (Judicial Officer Voy, William O.)
Vacated
New Charges (D1)

09/28/2015 **Detention Hearing** (9:00 AM) (Magistrate Leeds, Thomas L.)
Parties Present
Minutes
Result: Delinquency Matter Heard

09/28/2015 **PD/Conflict Attorney Referral and Order**

09/29/2015 **Detention Hearing/Recommendation Order**

09/30/2015 **Detention Review** (10:00 AM) (Judicial Officer Voy, William O.)
New Charges D2
Parties Present
Minutes
Result: Matter Heard for all Pending Matters

09/30/2015 **Order**
for PLACEMENT at CHILD HAVEN

10/05/2015 **Detention Hearing** (9:00 AM) (Magistrate Leeds, Thomas L.)
Parties Present
Minutes
Result: Delinquency Matter Heard

10/05/2015 **PD/Conflict Attorney Referral and Order**

10/05/2015 **Detention Hearing/Recommendation Order**

10/07/2015 **CANCELED** Entry of Plea/Consult PD (10:00 AM) (Magistrate Henry, Jennifer)
Vacated
New Charges D2

10/08/2015 **CANCELED** Entry of Plea/Consult PD (10:00 AM) (Magistrate Leeds, Thomas L.)
Vacated
New Charges (D3)

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[Search](#) [Close](#)

Location : All Courts Images Help

REGISTER OF ACTIONS

CASE NO. J-15-337227-DT

In the Matter of: Ajah Jordan

Case Type: **Juvenile Detention Hearing**
- Initial Case

Date Filed: 07/13/2015

Location: **Family Juvenile**

Cross-Reference Case J337227

Number:

PARTY INFORMATION

Delinquent Jordan, Ajah
Subject
Minor

DOB: 06/08/1999

Lead Attorneys
Public Defender
Retained
702-455-4685(W)

State of Nevada

Steven B Wolfson
702-455-5320(W)

CHARGE INFORMATION

Charges: Jordan, Ajah
1. Detained

Statute
Detained

Level
Unknown

Date
07/13/2015

EVENTS & ORDERS OF THE COURT

07/15/2015 Detention Review (10:00 AM) (Judicial Officer Voy, William O.)
New charges (D1)

Minutes

07/15/2015 10:00 AM

CUSTODY. PROBATION represented by Nicole Yohay. CHILD PROTECTIVE SERVICES (CPS) represented by Mrs. Sanders. The Public Defender's office has a conflict with this case. Defense requested release to placement at Child Haven. Minor left placement at Westcare on June 8, 2015. Prior to placement at Westcare, she was placed with her Aunt, minor's infant child is placed with the Aunt. The Aunt is no longer willing to be a placement option for subject minor. Minor has been in the foster care system since the age of six (6), it was reported that minor was abused by her former adoptive father. State feels that subject minor is a run risk. COURT ORDERED, Carol Griffin APPOINTED as Conflict Counsel to represent subject minor. Entry of Plea set for 7-22-15 at 10:00 a.m. in "18" STANDS. PLACEMENT at CHILD HAVEN. CPS to follow up with minor's status on the waiting list at ST. JUDES. Minor RELEASED to PROBATION or CPS for transport to CHILD HAVEN on GPS ELECTRONIC MONITORING CLERK'S NOTE: Carol Griffin, PRESENT in Court and notified of appointment by e-mail on 7-16-15/aw

Parties Present

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4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11611043&HearingID=188717333&SingleViewMode=Minutes

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REGISTER OF ACTIONS**CASE No. J-15-337227-DT**

In the Matter of: Ajah Jordan

Case Type: Juvenile Detention Hearing
- Initial Case

Date Filed: 07/13/2015

Location: Family Juvenile

Cross-Reference Case J337227

Number:

PARTY INFORMATIONDelinquent Subject
Jordan, Ajah
Minor

DOB: 06/08/1999

Lead Attorneys
Public Defender
Retained
702-455-4685(W)State of Nevada
NevadaSteven B Wolfson
702-455-5320(W)**CHARGE INFORMATION**Charges: Jordan, Ajah
1. DetainedStatute
DetainedLevel
UnknownDate
07/13/2015**EVENTS & ORDERS OF THE COURT**09/30/2015 **Detention Review** (10:00 AM) (Judicial Officer Voy, William O.)
New Charges D2**Minutes**

09/30/2015 10:00 AM

- CUSTODY, PROBATION represented by Nicole Yohay for Kyle Kelle, Department of Family Services (DFS) represented by Ebony Davis. Esther Brown, with the Embracing Project, PRESENT. Jamal Moore, previous Foster Parent, also PRESENT. William S. Boyd, School of Law, Clinical Program represented by a Student Attorney under the supervision of Susan Roske from the Public Defender's office. Minor was previously placed at St. Judes and she was doing well; however, when the GPS unit was removed subject minor ran shortly after. Minor was picked up for solicitation of prostitution. Probation reported that the placement at St. Judes is no longer an option, the plan was to have minor reunify with her child. Minor's foster father informed the Court of a potential placement option with Mrs. Alvarez, a licensed DFS Foster Parent, who currently has no children in her care at this time. DFS will follow up with possible placement with Mrs. Alvarez. Defense requested placement at Child Haven to allow subject minor to maintain her scheduled visit with her daughter today. DFS worker informed the Court that minor's adoptive parents relinquished their rights. Subject minor's Aunt has temporary guardianship of subject minor's child. COURT ORDERED, as to NEW CHARGES, Entry of Plea set for 10-7-15 at 10:00 a.m. in Dept. A STANDS. TEMPORARY PLACEMENT at CHILD HAVEN pending appropriate PLACEMENT by DFS, WESTCARE not to be considered as a placement option. Minor RELEASED to DFS or PROBATION on GPS/Electronic Monitoring for transport to PLACEMENT at CHILD HAVEN. CLERK'S NOTE: There is currently an active Writ of Attachment in the dependency case (J312837-P1), parties in the dependency case notified via e-mail on 10-2-15/aw

Parties PresentReturn to Register of Actions

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REGISTER OF ACTIONS

CASE No. J-15-337227-D1

In the Matter of: Ajah Jordan

Case Type: Juvenile Delinquent

Date Filed: 07/15/2015

Location: Family Juvenile

Cross-Reference Case Number: J337227

PARTY INFORMATION

Delinquent Jordan, Ajah
Subject Minor

DOB: 06/08/1999

Lead Attorneys
Mary E Berkholser
Retained
702-895-2080(H)

State of Nevada

Steven B Wolfson
702-455-5320(W)

CHARGE INFORMATION

Charges: Jordan, Ajah
1. Obstructing an Officer

Statute
197.190

Level
Misdemeanor

Date
07/11/2015

EVENTS & ORDERS OF THE COURT

DISPOSITIONS

07/22/2015	Disposition (Judicial Officer: Voy, William O.) 1. Obstructing an Officer Adjudicated a Delinquent Minor
------------	--

07/22/2015 Sentence (Judicial Officer: Voy, William O.)

1. Obstructing an Officer

Condition - Juvenile:

1. Adjudicated Delinquent Minor, 07/22/2015, Active 07/22/2015
2. Suspended Commitment, DCFS 07/22/2015, Active 07/22/2015
3. Coroner's Program, 07/22/2015, Active 07/22/2015
4. Counseling, INDIVIDUAL 07/22/2015, Active 07/22/2015
5. Mandatory School, 07/22/2015, Active 07/22/2015
6. No Contact With Person(s), NO CONTACT with Quinnae Williamson and NO CONTACT with persons and places involved in prostitution 07/22/2015, Active 07/22/2015
7. Random UA, 07/22/2015, Active 07/22/2015
8. Parenting Classes, 07/22/2015, Active 07/22/2015
9. Any Other Conditions Per Probation, 07/22/2015, Active 07/22/2015
10. Alternative Placement, per DFS 07/22/2015, Active 07/22/2015

Comment: minor to comply with DFS CASEPLAN and Aunt to set up a VISITING SCHEDULE to allow minor's child to visit with subject minor while in placement at Child Haven

Monitoring - Juvenile:

Type: Probation - Supervised

Agency: Department of Juvenile Justice

Term of 12 Mo

07/22/2015 - 07/22/2016

Comment: Subject to modification

Status: Active 07/22/2015

OTHER EVENTS AND HEARINGS

07/15/2015 Petition - Delinquent

Plea 7/22 P1 Jordan

07/22/2015 Entry of Plea (10:00 AM) (Judicial Officer Voy, William O.)

Parties Present

Minutes

Result: Adjudicated a Delinquent Minor

08/05/2015 Status Check (10:00 AM) (Judicial Officer Voy, William O.)

DFS placement

Parties Present

Minutes

Result: Matter Heard for all Pending Matters

09/02/2015 **Status Check** (10:00 AM) (Judicial Officer Voy, William O.)

PLACEMENT

Parties Present

Minutes

Result: Off Calendar

4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11612246

02/23/2016

Motion

Motion To Terminate Or Modify Orders

03/11/2016

Opposition

State's Opp: Jordan, A.

03/14/2016

Reply

Subject Minor's Reply To State's Opposition To Motion To Terminate Or Modify Orders

03/15/2016

Motion (3:00 PM) (Judicial Officer Voy, William Q.)

Motion To Terminate Or Modify Orders

Parties Present

Minutes

Result: Motion Denied

03/25/2016

Ex Parte Order

Order On Ex Parte Request To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings

03/25/2016

Ex Parte

Ex Parte Request For Order To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings

REGISTER OF ACTIONS**CASE NO. J-15-337227-D2**

In the Matter of: Ajah Jordan

Case Type: Juvenile Delinquent

Date Filed: 09/30/2015

Location: Family Juvenile

Cross-Reference Case Number: J337227

PARTY INFORMATION

Delinquent Jordan, Ajah
Subject Minor

DOB: 06/08/1999

Lead Attorneys
Public Defender
 Retained
 702-455-6475(W)

State of Nevada
Nevada

Steven B Wolfson
 702-455-5320(W)

CHARGE INFORMATION

Charges: Jordan, Ajah
 1. Violation of Probation

Statute
 62B.340

Level
 Unknown

Date
 09/27/2015

EVENTS & ORDERS OF THE COURT**DISPOSITIONS**

10/14/2015 **Plea** (Judicial Officer: Voy, William O.)
 1. Violation of Probation
 Admit

10/14/2015 **Disposition** (Judicial Officer: Voy, William O.)
 1. Violation of Probation
 Adjudicated a Delinquent Minor

10/14/2015 **Sentence** (Judicial Officer: Voy, William O.)
 1. Violation of Probation
 Condition - Juvenile:
 1. Adjudicated Delinquent Minor, 10/14/2015, Active 10/14/2015
 2. Any Other Conditions Per Probation, 10/14/2015, Active 10/14/2015
 3. Alternative Placement, per DFS 10/14/2015, Active 10/14/2015
 4. Electronic Monitoring/GPS, upon release length of time at the discretion of probation 10/14/2015, Active 10/14/2015
 5. Prior Orders Stand, including SUSPENDED COMMITMENT to CALIENTE 10/14/2015, Active 10/14/2015
 Monitoring - Juvenile:
 Type: Probation - Supervised
 Agency: Department of Juvenile Justice
 Term of 12 Mo
 10/14/2015 - 10/14/2016
 Comment: subject to modification
 Status: Active 10/14/2015

OTHER EVENTS AND HEARINGS

09/30/2015 **Petition - Delinquent**
 Plea 10/07 P2 Jordan

10/07/2015 **Entry of Plea/Consult PD** (10:00 AM) (Magistrate Henry, Jennifer)
Parties Present
Minutes

Result: Matter Continued

10/13/2015 **Notice and Approval to Reschedule or Reset a Court Date**
 Notice and Approval to Reschedule or Reset a Court Date

10/14/2015 **Continued Entry of Plea/Consult PD** (9:00 AM) (Judicial Officer Voy, William O.)
Parties Present
Minutes

Result: Adjudicated a Delinquent Minor

10/21/2015 **Status Check** (10:00 AM) (Judicial Officer Voy, William O.)
 PLACEMENT per DFS
Parties Present
Minutes

Result: Matter Heard for all Pending Matters

10/28/2015 **Status Check** (10:00 AM) (Judicial Officer Voy, William O.)
 PLACEMENT
Parties Present

4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11630739

	<u>Minutes</u> Result: Matter Heard for all Pending Matters
11/02/2015	<u>Status Check</u> (9:30 AM) (Judicial Officer Voy, William O.) <u>PLACEMENT</u> <u>Parties Present</u> <u>Minutes</u> Result: Matter Heard for all Pending Matters
11/03/2015	<u>Notice and Approval to Reschedule or Reset a Court Date</u> (RUSH) Notice And Approval To Reschedule Or Reset A Court Date
11/04/2015	<u>Status Check</u> (11:00 AM) (Judicial Officer Voy, William O.) Per NARC Filed 11/3/15, Re: Placement <u>Parties Present</u> <u>Minutes</u> Result: Matter Continued
11/18/2015	<u>CANCELED Status Check</u> (10:00 AM) (Judicial Officer Voy, William O.) Vacated <u>PLACEMENT</u> <u>Formal Probation Order</u> Formal Probation Order
11/25/2015	<u>Status Check</u> (10:00 AM) (Judicial Officer Voy, William O.) <u>PLACEMENT</u> with Mrs. Alvarez, former Foster Parent <u>Parties Present</u> <u>Minutes</u> 11/18/2015 Reset by Court to 11/25/2015
02/23/2016	Result: Matter Heard for all Pending Matters <u>Motion</u> Motion To Terminate Or Modify Orders
03/11/2016	<u>Opposition</u> State's Opp: Jordan, A.
03/14/2016	<u>Reply</u> Subject Minors Reply To State's Opposition To Terminate Or Modify Orders
03/15/2016	<u>Motion</u> (3:00 PM) (Judicial Officer Voy, William O.) Motion To Terminate Or Modify Orders <u>Parties Present</u> <u>Minutes</u> Result: Motion Denied
03/25/2016	<u>Ex Parte Order</u> Order On Ex Parte Request To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings
03/25/2016	<u>Ex Parte</u> Ex Parte Request For Order To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings
05/25/2016	<u>CANCELED Status Check</u> (10:00 AM) (Judicial Officer Voy, William O.) Vacated <u>PLACEMENT</u>

4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11648291

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REGISTER OF ACTIONS**CASE NO. J-15-337227-D4**

In the Matter of: Ajah Jordan

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Case Type: Juvenile Delinquent

Date Filed: 12/19/2015

Location: Family Juvenile

Cross-Reference Case Number: J337227

PARTY INFORMATION**Delinquent** Jordan, Ajah
Subject-Minor

DOB: 06/08/1989

Lead Attorneys
Public Defender
Retained
702-455-4885(W)**State of** Nevada
Nevada**Steven B Wolfson**
702-455-5320(W)**CHARGE INFORMATION****Charges:** Jordan, Ajah

1. Violation of Probation

Statute
62B.340**Level**
Unknown**Date**
10/14/2015**EVENTS & ORDERS OF THE COURT****DISPOSITIONS**01/13/2016 **Plea** (Judicial Officer: Voy, William O.)
1. Violation of Probation
Admit01/27/2016 **Disposition** (Judicial Officer: Voy, William O.)
1. Violation of Probation
Adjudicated Ward Of Nevada Committed to DCFS01/27/2016 **Sentence** (Judicial Officer: Voy, William O.)
1. Violation of Probation
Condition - Juvenile:
1. Adjudicated Delinquent Minor, 01/27/2016, Active 01/27/2016
2. Committed to Division of Child & Family Services, CALIENTE 01/27/2016, Active 01/27/2016
3. Parental Support Payments, WAIVED 01/27/2016, Active 01/27/2016
Comment: Minor to be seen by Dr. Roitman while at Caliente and DESERT PSYCHOLOGICAL is recommended. Dr. Holland will follow up with therapeutic services upon release. Minor's Aunt, Mrs. Banks and foster mother, Mrs. Alvarez to be added to the visitation list at CALIENTE.**OTHER EVENTS AND HEARINGS**12/18/2015 **Petition - Delinquent**
WOA VOP D4 JORDAN, Ajah01/08/2016 **Detention Hearing** (9:00 AM) (Magistrate Leeds, Thomas L.)
Parties PresentMinutes

Result: Delinquency Matter Heard

01/08/2016 **PD/Conflict Attorney Referral and Order**01/08/2016 **Detention Hearing/Recommendation Order**01/11/2016 **Juvenile Warrant - Writ of Attachment**Writ of Attachment - served01/13/2016 **Entry of Plea/Consult PD** (10:00 AM) (Judicial Officer Voy, William O.)Parties PresentMinutes

Result: Admitted

01/19/2016 **Notice and Approval to Reschedule or Reset a Court Date**

(RUSH) Notice And Approval To Reschedule Or Reset A Court Date

01/20/2016 **Detention Hearing** (10:00 AM) (Judicial Officer Voy, William O.)Parties PresentMinutes

Result: Matter Heard for all Pending Matters

01/22/2016 **Dispositional Report - Delinquency**Dispositional Report01/27/2016 **Report & Disposition** (10:00 AM) (Judicial Officer Voy, William O.)FORMALParties PresentMinutes<http://172.29.28.187/CaseDetail.aspx?CaseID=11648291>

4/1/2016

172.29.28.187/CaseDetail.aspx?CaseID=11648291

	Result: Committed
02/08/2016	<u>State of NV Child and Family Services Dvsn Commitment Order</u> <i>State of NV Child and Family Services Dvsn Commitment Order</i>
02/23/2016	<u>Motion</u> <i>Motion To Terminate Or Modify Orders</i>
03/11/2016	<u>Opposition</u> <i>State's Opp: Jordan, A.</i>
03/14/2016	<u>Reply</u> <i>Subject Minors Reply To State's Opposition To Terminate Or Modify Orders</i>
03/15/2016	<u>Motion</u> (3:00 PM) (Judicial Officer Voy, William O.) <i>Motion To Terminate Or Modify Orders</i> <u>Parties Present</u> <u>Minutes</u>
	Result: Motion Denied
03/25/2016	<u>Ex Parte Order</u> <i>Order On Ex Parte Request To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings</i>
03/25/2016	<u>Ex Parte</u> <i>Ex Parte Request For Order To Release Electronic Recording Or Typewritten Transcript Of Juvenile Proceedings</i>
05/25/2016	<u>CANCELED Status Check</u> (10:00 AM) (Judicial Officer Voy, William O.) <i>Vacated</i> <i>Follow up on services</i>

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REGISTER OF ACTIONS

CASE No. J-15-337227-D4

In the Matter of: Ajah Jordan

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§Case Type: **Juvenile Delinquent**Date Filed: **12/19/2015**Location: **Family Juvenile**Cross-Reference Case **J337227**

Number:

PARTY INFORMATION

Delinquent Subject Jordan, Ajah
Minor

DOB: 06/08/1999

Lead Attorneys
Public Defender
Retained
702-455-4685(W)

State of Nevada
Nevada

Steven B Wolfson
702-455-5320(W)

CHARGE INFORMATION

Charges: Jordan, Ajah
1. Violation of Probation

Statute
62B.340

Level
Unknown

Date
10/14/2015

EVENTS & ORDERS OF THE COURT

01/27/2016 Report & Disposition (10:00 AM) (Judicial Officer Voy, William O.)
FORMAL

Minutes

01/27/2016 10:00 AM

- CUSTODY, PROBATION represented by Suzanne Arroyo. Department of Family Services (DFS) represented by Ebony Davis. Esther Brown, with the Embracing Project, PRESENT. Jeana O'Dell from the Juvenile Justice Clinic at Thomas and Mack, representing subject minor under the supervision of Susan Roske from the Public Defender's office. Children's Attorney Project (CAP) represented by Shannon Wilson. The State and Probation recommended commitment to Caliente. Subject minor continues to run from numerous placements. She does not remain in placement long enough to start services. Defense requested release and stated that subject minor would like to return to the foster mother, Mrs. Alvarez. BENCH CONFERENCE- COURT ORDERED, minor ADJUDICATED on Petition 4, Count 1. COURT FINDS, it is in subject minor's best interest to be COMMITTED to the Department of Child and Family Service (DCFS) with PLACEMENT at CALIENTE. SUPPORT PAYMENTS are WAIVED. Minor to be seen by Dr. Roltman and REFERRED to DESERT PSYCHOLOGICAL SERVICES while at Caliente. Dr. Holland to CONTINUE with SERVICES upon minor's release from Caliente. Ms. Bell, minor's Aunt, AUTHORIZED to VISIT subject minor while at Caliente along with subject minor's daughter, Mrs. Alvarez, previous foster mother, also added to the list to visit subject minor while at Caliente. DFS to contact James Kingera with Nevada Youth Parole, to coordinate transportation for the Aunt and subject minor's child to visit minor at Caliente. Detention Staff to transport minor to APPOINTMENT for a MEDICAL PROCEDURE scheduled for tomorrow 1-28-16. Matter to be placed on calendar PRIOR to release from Caliente to make sure SERVICES are back in place. Status Check on PLACEMENT set for 5-25-16 at 10:00 a.m. is hereby VACATED. DETAINED pending transport to CALIENTE

Parties PresentReturn to Register of Actions

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REGISTER OF ACTIONS

CASE NO. J-15-337227-D1

In the Matter of: Ajah Jordan

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Case Type: Juvenile Delinquent
Date Filed: 09/30/2015
Location: Family Juvenile
Cross-Reference Case Number: J337227

PARTY INFORMATION

Delinquent: Jordan, Ajah
Subject:
Minor

DOB: 06/08/1999

Lead Attorneys
Public Defender
Retained
702-455-5475(W)

State of Nevada

Steven B Wolfson
702-455-5320(W)

CHARGE INFORMATION

Charges: Jordan, Ajah
1. Violation of Probation

Statute
62B.340

Level
Unknown

Date
09/27/2015

EVENTS & ORDERS OF THE COURT

10/07/2015 Entry of Plea/Consult PD (10:00 AM) (Magistrate Henry, Jennifer)

Minutes

10/07/2015 10:00 AM

CUSTODY, PROBATION represented by Nicole Yohay for Kyle Kelle. Department of Family Services (DFS) represented by Ebony Davis. William S. Boyd, School of Law, Clinical Program represented by Student Attorney Jenna Odell under the supervision of Mary Berkhelser. Minor was placed on formal probation on July 22, 2015. Petition 3 was filed on October 5, 2015 for obstructing an officer and leaving placement at Child Haven while on GPS. Minor reported that an incident occurred at Child Haven, probation advised subject minor to cooperate with Vice Detectives and provide them with the passcode to her cell phone as any information contained on her phone will only be used for the purposes of the recent investigation and will not be used against her for the filing of any new SEY related charges. Probation recommended subject minor to remain detained. COURT RECOMMENDED, as to Petition 3, Count 1, Entry of Plea set for 10-08-15 at 10:00 a.m. In "15" is hereby VACATED and RESET. Entry of Plea on Petition 2, Count 1 and Petition 3, Count 1 are hereby CONTINUED. DETAINED.

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Juvenile Delinquent

COURT MINUTES

January 27, 2016

J-15-337227-D4 In the Matter of: Ajah Jordan

January 27, 2016	10:00 AM	Report & Disposition
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HEARD BY: Voy, William O.	COURTROOM: Courtroom 18
---------------------------	-------------------------

INTAKE OFFICER:	
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PARTIES:	
State of Nevada:	Attorney: Watson, Michael J.
Delinquent Subject Minor: Jordan, Ajah	Attorney: Roske, Susan D.
Attorney: Public Defender	

COURT CLERK:	Adria Wallace
--------------	---------------

CHARGES:
1. Violation of Probation October 14, 2015 - December 01, 2015 (Unknown) 62B.340 (62B.340)

PLEAS:
Plea Date: January 13, 2016
1. Violation of Probation
Plea: Admit

DISPOSITION:
Disposition Date: January 27, 2016
1. Violation of Probation
Disposition: Adjudicated Ward Of Nevada Committed to DCFS

SENTENCE:
 Ajah Jordan, June 08, 1999
 Commitment
 Date: January 27, 2016 Judge: Voy, William O.

- 1. Violation of Probation

Condition - Juvenile The following conditions apply to Ajah Jordan:
 Adjudicated Delinquent Minor effective January 27, 2016. As of

January 27, 2016, the status is Active.

Committed to Division of Child & Family Services effective January 27, 2016. As of January 27, 2016, the status is Active.

CALIENTE

Parental Support Payments effective January 27, 2016. As of January 27, 2016, the status is Active. WAIVED

Minor to be seen by Dr. Roitman while at Caliente and DESERT PSYCHOLOGICAL is recommended. Dr. Holland will follow up with therapeutic services upon release. Minor's Aunt, Mrs. Banks and foster mother, Mrs. Alvarez to be added to the visitation list at CALIENTE.

JOURNAL ENTRIES

- CUSTODY. PROBATION represented by Suzanne Arroyo. Department of Family Services (DFS) represented by Ebony Davis. Esther Brown, with the Embracing Project, PRESENT. Jeana O'Dell from the Juvenile Justice Clinic at Thomas and Mack, representing subject minor under the supervision of Susan Roske from the Public Defender's office. Children's Attorney Project (CAP) represented by Shannon Wilson. The State and Probation recommended commitment to Caliente. Subject minor continues to run from numerous placements. She does not remain in placement long enough to start services. Defense requested release and stated that subject minor would like to return to the foster mother, Mrs. Alvarez.

BENCH CONFERENCE-

COURT ORDERED, minor ADJUDICATED on Petition 4, Count 1. COURT FINDS, it is in subject minor's best interest to be COMMITTED to the Department of Child and Family Service (DCFS) with PLACEMENT at CALIENTE. SUPPORT PAYMENTS are WAIVED. Minor to be seen by Dr. Roitman and REFERRED to DESERT PSYCHOLOGICAL SERVICES while at Caliente. Dr. Holland to CONTINUE with SERVICES upon minor's release from Caliente.

Alise Bell, minor's Aunt, AUTHORIZED to VISIT subject minor while at Caliente along with subject minor's daughter. Mrs. Alvarez, previous foster mother, also added to the list to visit subject minor while at Caliente. DFS to contact James Kingera with Nevada Youth Parole, to coordinate transportation for the Aunt and subject minor's child to visit minor at Caliente. Detention Staff to transport minor to APPOINTMENT for a MEDICAL PROCEDURE scheduled for tomorrow 1-28-16. Matter to be placed on calendar PRIOR to release from Caliente to make sure SERVICES are back in place. Status Check on PLACEMENT set for 5-25-16 at 10:00 a.m. is hereby VACATED. DETAINED pending transport to CALIENTE

FUTURE HEARINGS:

Exhibit E

DECLARATION

A'JAH JORDAN makes the following declaration:

1. I am a juvenile born 06/08/1999. I am currently under the jurisdiction of the Juvenile Court and am being held at the Juvenile Detention Center.

2. Around March or April of 2015 I was approached by an adult man who called himself "Spade" on the Charleston bus at the Bonneville Transport Center. Spade asked to exchange phone numbers with me. We began text messaging and eventually Spade invited me to go bowling, and I agreed. The night we went bowling, we left the bowling alley and Spade took me to the Boulevard Mall where he bought me clothes and multiple pairs of shoes.

3. The day after we went bowling and shopping, Spade began texting me and asking for photographs of me wearing the clothes he bought me. He asked me to meet him again, and encouraged me to sneak out with him when I explained that I could not leave. That night Spade asked me if I wanted to earn some money, and told me that I could earn more than \$1,000 in one night. When I began asking Spade questions, he told me that I didn't have to work that night, and instead we can just watch. Spade drove me to Tropicana Ave. to watch girls working as prostitutes. Spade kept me there for hours watching the girls, pointing out what they were doing and how they do it. Later, he took me to meet his friend, another pimp, who had three young girls working for him. The girls and I talked and they told me about how they make money.

4. The following day, Spade started texting me and asked me if I liked what I saw the night before. He asked me if I wanted to make money. Later, in person, I told him no. He said that I owed him money because of the clothes and shoes he bought me at the Boulevard Mall.

5. Spade asked me to meet him after school at the boxing gym, where he works. I told him no, but he insisted and then picked me up from my aunt's house in the evening. He then took me to work near the Orleans casino because he said my face was too young to work on the Strip. I worked that night for a few hours. At the end of the night, Spade refused to take me home. Instead, he took me to his apartment where he lived with a woman. When she questioned

why I was there, he hit her. He forced her to sleep on the couch while I slept in her bed. Eventually, I moved in and lived with Spade, working for him as a prostitute on nearly a nightly basis. He would have sex with me at times and he beat me twice. At times he threatened me, once mentioning to me that he knows where I live and that there is a lot of desert surrounding Las Vegas.

6. I have various pieces of evidence of my involvement with Spade and other men. I kept a journal every day when I was with Spade and frequently wrote about my encounters with Spade and other older men. When the police confiscated my phone when I was first arrested, it contained both video and photographic evidence of my encounters with Spade. Some of these photos and videos are explicit or pornographic in nature, depicting me engaging in sex ^{AJ} ~~and other~~ _{AJ with} ~~with~~ Spade. Also, after one of the instances when Spade beat me, I had to be treated at Summerlin hospital. The hospital has records of my visit that would corroborate this event. Spade was the one to take me to the hospital and checked me in.

7. My legal counsel has advised me regarding the penalty of perjury and the high likelihood of prosecution for perjury if what I have said above is untrue. I understand that perjury is a felony in Nevada, and that felonies carry dire consequences. I understand that, at a minimum, prosecution for perjury could result in this court committing me to a correctional facility again, separate from the present offense. In other words, I know that if anything contained in this document is untrue, and I sign below, I am making my life much worse than it is now.

I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).

EXECUTED this 23rd day of February, 2016.


A'Jah Jordan

Exhibit F

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION - JUVENILE
CLARK COUNTY, NEVADA

Alana L. Schuman
CLERK OF THE COURT

In the Matter of:

AJAH JORDAN,
Date of Birth: June 08, 1999,
Minor, 16 Years of Age.

CASE NO. J337227
DEPT. A

DISPOSITIONAL REPORT

Date of Hearing: January 27, 2016

Time of Hearing: 10:00 AM

Courtroom: 18

Reason For Hearing:

At a Plea Hearing on January 13, 2016, Ajah admitted to the allegations contained in Petition 4 Count 1 - Violation of Probation.

Plea Information:

Charges	Plea	Petition Num	Cnt	Amend / Reduce
OTH / Violation of Probation / Principal	Admit	4	1	

Recommendations:

Community Protection:

- 1) That the Subject Minor be committed to the Division of Child and Family Services for Correctional Placement;
- 2) All prior Orders to be vacated; except any fines, fees, restitution.

Competency Development:

- 1) Accredited Educational Program;
- 2) Counseling.

Accountability:

- 1) Random Drug Testing.

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Prior Record:

Arrest ID	Arrest Date	Charge	Finding Date	Finding	Source	Pet
1031730	01/07/2016	OTH / Arrest Writ Served / Principal	01/08/2016	No Further Action	Intake	
1031259	12/18/2015	OTH / Violation of Probation / Principal	01/14/2016	Continued	Intake	4-1
1028293	10/04/2015	OTH / Violation of Probation / Principal	10/14/2015	Dismissed	Court	3-1
1028049	09/27/2015	MIS / Solicitation of Prostitution / Principal	09/29/2015	Amended	DA	
		OTH / Violation of Probation / Principal	10/14/2015	Suspended Commitment / Formal Probation	Court	2-1
1025992	07/11/2015	MIS / Obstructing an Officer / Principal	07/22/2015	Suspended Commitment / Formal Probation	Court	1-1
		MIS / Prostitution / Principal	07/14/2015	Deny / Lack of Prosecutorial Resources	DA	
1011295	08/10/2014	MIS / Disturbing the Peace / Principal	08/17/2014	Community Service	Intake	

Offense Report:

On November 30, 2015, Ajah left her Foster Placement with Waconda Alvarez. Ms Alvarez filed a runaway report with Henderson PD. A Writ of Attachment was issued by Juvenile Justice Services on December 1, 2015.

On January 7, 2016, Ajah turned herself into Probation Intake. The Writ of Attachment was served on Ajah. She was booked accordingly.

Whereabouts of Minor:

Address:

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2 **Placements:**

Client	Facility	Number of Days In Placement
Ajah Jordan	DET, E-5	20

7 **Statement of Subject Minor:**

8 No statement taken.

9 **Parents Statement Regarding Offense:**

10 Ms. Elease Bell would like to see her niece sent to Caliente. She believes that she
11 is on the wrong path. She loves her niece and wants her to get her life on track.
12 Since Ajah is pregnant with another baby, she is not in a position to take care of a
13 new baby as this point.

14 **Prior Services:**

15 **Treatment Program History:**

Program Treatment	Start Date	End Date	Outcome
Community Services	06/17/2014	08/18/2014	Completed

18 **Placement History:**

Client	Removal / Placement Reason	Start Date	Release Date	Facility
Ajah Jordan	Detained	06/10/2014	06/10/2014	BOOKING, Holding Cell
Ajah Jordan	Detained	07/11/2015	07/11/2015	BOOKING, Holding Cell
Ajah Jordan	Detained	07/11/2015	07/15/2015	DET, E-5
Ajah Jordan	Detained	07/15/2015	07/27/2015	PRRP, Zone 3 - GPS
Ajah Jordan	Detained	07/27/2015	08/02/2015	PRRP, Zone 4 - GPS
Ajah Jordan	Detained	09/27/2015	09/27/2015	BOOKING, Holding Cell
Ajah Jordan	Detained	09/27/2015	09/30/2015	DET, E-5
Ajah Jordan	Detained	09/30/2015	09/30/2015	PRRP, Zone 3 - GPS

Placement History:

	Removal /	Start	Release	
Client	Placement Reason	Date	Date	Facility
Ajah Jordan	Detained	10/04/2015	10/04/2015	BOOKING, Holding Cell
Ajah Jordan	Detained	10/04/2015	10/11/2015	DET, E-5
Ajah Jordan	Detained	10/11/2015	10/11/2015	DET, E-5
Ajah Jordan	Detained	10/11/2015	10/24/2015	DET, E-5
Ajah Jordan	Detained	10/24/2015	10/28/2015	DET, E-5
Ajah Jordan	Detained	10/28/2015	10/28/2015	DET, E-5
Ajah Jordan	Detained	10/28/2015	10/30/2015	DET, E-5
Ajah Jordan	Detained	10/30/2015	11/01/2015	DET, E-5
Ajah Jordan	Detained	11/01/2015	11/03/2015	DET, E-5
Ajah Jordan	Detained	11/03/2015	11/26/2015	ISP, Post - GPS
Ajah Jordan	Detained	11/25/2015	01/07/2016	ISP, Post - HM
Ajah Jordan	Detained	01/07/2016		DET, E-5
Ajah Jordan	Detained	01/07/2016	01/07/2016	BOOKING, Holding Cell

Ajah has been a part of the DFS system since the age of six. She was adopted when she was eight years old. That adoption was short lived due to sexual abuse by the adoptive parent. She was returned to the Foster Care system. Since the return to the Foster Care system, Ajah has been placed into several different homes.

Ajah's most recent she was placement was at St. Judes Ranch in August of 2015. Within a month of being placed, she ran.

On September 27, 2015, Ajah was arrested for a new charge of Solicitation of Prostitution and Violation of Probation. She was released to Child Haven pending a Plea Hearing on October 7, 2015.

On October 3, 2015, ISP Officers were notified that Ajah had left Child Haven taking two other girls with her, one of which was only 12 years old.

On November 3 2015, Ajah was released to an Eagle Quest Group Home, which she was placed at until her most recent placement with Ms. Alaverz was available.

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2 **Placement History:**

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4 Ajah was at the Eagle Quest Group home for approximately three weeks before
5 moving to Ms. Alvarez's home.

6 On November 30, 2015, Ajah left Ms. Alvarez's home and did not return. A Writ of
7 Attachment was issued for Ajah.

8 **Community Based Services:**

9 Ajah has been afforded many opportunities to start services in the Community,
10 however, she absconds from placement before services can be initiated.

11 **Family Social History:**

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13 **Family Composition:**

Client	Client Role	Family Role	Telephone
Ajah Jordan	Alleged Offender/Perpetrator	Daughter	(805) 236-3121 (702) 522-0568
Elease Bell	Other	Aunt	(702) 353-2071
Jimeshian Sanders	Other	Other	(702) 294-7188
Waconda Alvarez	Other	Foster Mother	(805) 238-3121 (702) 522-0568

19
20 **Family Functioning:**

21 Please see Exhibit

22 Ajah has been a part of the Foster Care system since she has been six years old.
23 She was adopted by a relative when she was approximately eight years old. The
24 adoption did not work out as Ajah was sexually abused by her adoptive father, thus
25 returned her to the Foster care system. The adoptive parent's rights have been
26 terminated for about six years. Ajah was temporarily placed with her Cousin, Juanita
27 Jones. The placement with Ms. Jones did not work out because the Ajah would
28 runaway and did not get along with Ms. Jones. Ajah has two siblings that are in the
process of being adopted by Ms. Jones. Ajah's sister, Amaya, is in another
placement because she doesn't wish to be adopted by Ms. Jones and does not get
along with Ms. Jones. Amaya is currently in another foster placement and is doing

1
2 **Family Functioning:**

3 well. Ajah has an older brother, who is nineteen years of age. Ajah has a good
4 relationship with her siblings. She continues to have contact with them when she is
5 placement.

6 Ajah want to live with her Aunt, Elease Banks, when she was pregnant. She gave
7 birth to her daughter, Nala, on January 10, 2015. According to Ms. Banks, when
8 Nala was approximately two months old, Ajah began running away doing her own
9 thing and leaving her baby in the care of her Aunt.

10 Ajah has admitted to seeing her mother while she is on the run. The contact with her
11 mother in not approved by DFS. The other children do not have contact with their
12 biological mother. Ms. Banks feels that Ajah uses her mother as an excuse to run
13 from placements.

14 **Offender Functioning:**

15 According to Ajah, she does not have any mental health diagnosis. She stated that
16 she is enrolled in regular classes at school.

17 Ajah currently has no credit for the first semester of school this year. She continues
18 to run from each placement she has been at. She has amassed several Violations
19 of Probation in a short amount of time. Ajah has not completed any Court Orders.
20 She has been referred to Parenting Classes, Counseling and the Coroner's
21 Visitation Program. As previously stated, she has not completed any of these due to
22 absconding from placement on a regular basis. It appears that she is only interested
23 in running her own program.

24 At the time of this report, Ajah is approximately ten weeks pregnant with her second
25 child.

26 **Peers:**

27 It appears that Ajah associates with negative peers who are involved in criminal
28 activity.

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2 **School:**

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School	Current Grade Level	Education Status
OTHER (OUT OF AREA)	11th Grade	Attending

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6 Ajah was denied any credits for the first semester due to poor attendance. She only
7 attended one day of classes at Basic High School. Probation contacted Basis High
8 School and verified this information. It was requested that Ajah be able to take her
9 final exams, but they would not allow her to do this due her non attendance.

10 **Psychological Evaluations:**

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Evaluation Date	Agency	Evaluation Type	Court Order
01/11/2016		Mental Health Treatment Team	
10/06/2015		Mental Health Treatment Team	

15
16 **Evaluation:**

17 Ajah is a sixteen year old before the Court on her Fourth Petition. She has
18 accumulated several petitions in a short amount of time. Ajah has been given many
19 opportunities to change her life. However, she continues to run the streets and
20 engage in a dangerous life style. She associates with negative influences while on
21 the run. She has not completed any Court orders, nor does it appear that she has
any interest in being cooperative with DFS or Probation.


22 Ajah needs a more structured environment where she can get herself back on track.
23 She needs to work on her education and take care of her one year old daughter.
24 Ajah has had several opportunities to take advantage of the services provided,
25 however, she will run from placement shortly after being placed not allowing any of
26 these services to start. Ajah is a very street savvy young lady who will manipulate
27 every situation attempting to avoid all consequences. Ajah's history has shown
28 Probation that she is not ready or unwilling to abide by the terms that the Court has
set forth.

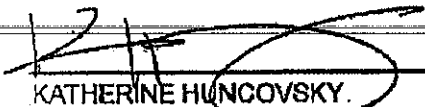
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Evaluation:

Therefore, it is recommended that Ajah be committed to the Division of Family
Services for Correctional Treatment at this time.

Submitted by:


SUZANNE LYNN ARROYO
Juvenile Probation Officer
601 North Pecos Road
Las Vegas, NV 89101


KATHERINE HUNCOVSKY
Juvenile Probation Supervisor

DATE: January 22, 2016

Exhibit G

Assembly Bill No. 153--Assemblymen Araujo, Diaz, Hambrick;
Benitez-Thompson, Flores, O'Neill and Thompson

Joint Sponsor: Senator Denis

CHAPTER.....

AN ACT relating to juveniles; providing that, under certain circumstances, the juvenile court must place a child who is alleged to have engaged in prostitution or the solicitation of prostitution under the supervision of the juvenile court subject to certain terms and conditions; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Under existing law, the juvenile court has exclusive jurisdiction over a juvenile: (1) who is alleged or adjudicated to be in need of supervision; or (2) who is alleged or adjudicated to be delinquent because he or she has committed certain crimes. (NRS 62B.320, 62B.330) Existing law authorizes the juvenile court, under certain circumstances, to place a child under the supervision of the juvenile court pursuant to a supervision and consent decree, without a formal adjudication of delinquency, if the child is alleged to be in need of supervision or to have committed a delinquent act. (NRS 62C.230)

This bill requires the juvenile court to place a child under the supervision of the juvenile court pursuant to a supervision and consent decree if the child is alleged to have engaged in prostitution or the solicitation of prostitution. Under this bill, the juvenile court: (1) must order that the terms and conditions of the supervision and consent decree include, without limitation, services to address the sexual exploitation of the child and any other needs of the child; and (2) may issue certain orders, including, without limitation, any placement of the child that the juvenile court finds to be in the child's best interest. If the child is alleged to have violated the supervision and consent decree or an order of the juvenile court: (1) the allegation must be placed before the court pursuant to a motion or a request for judicial review, except that the district attorney may file a petition alleging that the child committed a delinquent act under certain circumstances; and (2) the court may issue certain orders concerning the child. This bill further requires that the juvenile court, upon successful completion of the terms and conditions of the supervision and consent decree or at the time the child reaches 18 years of age, whichever is earlier, must dismiss the petition alleging that the child engaged in prostitution or the solicitation of prostitution. However, a child who has reached 18 years of age may consent to remain under the supervision of the juvenile court for the purpose of receiving services pursuant to the decree.

EXPLANATION -- Matter in *bolded italics* is new; matter between brackets ~~permitted material~~ is material to be omitted.

THE PEOPLE OF THE STATE OF NEVADA, REPRESENTED IN
SENATE AND ASSEMBLY, DO ENACT AS FOLLOWS:

Secs. 1-6. (Deleted by amendment.)



Sec. 6.5. Chapter 62C of NRS is hereby amended by adding thereto a new section to read as follows:

1. If the district attorney files a petition with the juvenile court alleging that a child who is less than 18 years of age has engaged in prostitution or the solicitation of prostitution, the juvenile court:

(a) Except as otherwise provided in paragraph (b), shall:

(1) Place the child under the supervision of the juvenile court pursuant to a supervision and consent decree, without a formal adjudication of delinquency; and

(2) Order that the terms and conditions of the supervision and consent decree include, without limitation, services to address the sexual exploitation of the child and any other needs of the child, including, without limitation, any counseling and medical treatment for victims of sexual assault in accordance with the provisions of NRS 217.280 to 217.350, inclusive.

(b) If the child originated from a jurisdiction outside this State, may return the child to the jurisdiction from which the child originated.

2. If a child is placed under a supervision and consent decree pursuant to this section, the juvenile court may issue any order authorized by chapter 62E of NRS, including, without limitation, any placement of the child that the juvenile court finds to be in the child's best interest.

3. If a child is alleged to have violated the provisions of a supervision and consent decree under this section or an order issued pursuant to this section:

(a) The district attorney must not file a petition alleging that the child has violated the decree or order and the allegation must be placed before the court pursuant to a motion or a request for judicial review. This paragraph does not prohibit the district attorney from filing a petition alleging that the child has committed a delinquent act.

(b) The juvenile court may issue any order authorized by chapter 62E of NRS, including, without limitation, any placement of the child that the juvenile court finds to be in the child's best interest.

4. Except as otherwise provided in this subsection, if a child is placed under the supervision of the juvenile court pursuant to a supervision and consent decree under this section, the juvenile court shall dismiss the petition upon the successful completion of the terms and conditions of the supervision and consent decree or at the time the child reaches 18 years of age, whichever is earlier.



A child who has reached 18 years of age may consent to remain under the supervision of the juvenile court for the purpose of receiving services provided under the supervision and consent decree.

Sec. 7. This act becomes effective upon passage and approval.



Exhibit H

Safe Harbor: Protecting Child Sex Trafficking Victims in Nevada

Thomas & Mack Juvenile Justice Clinic

**Joyce Mack Professor of Law Mary Berkheiser
& Student Attorney Kerry Kleiman**



1. What is Sex Trafficking of Children?

Sex trafficking of children is rape for sale.

A child who has been sex trafficked is forced or tricked into a life of prostitution, often after a lifetime of abuse. They frequently see their trafficker, or pimp, as a “boyfriend” whom they are trying to please. However, traffickers can also be members of the victim’s family.

Contrary to popular belief, sex trafficking is not just a problem abroad, and it does not require movement across borders. Victims come from middle class and professional families as well as lower income and impoverished neighborhoods.

Nevada is a hub for child sex trafficking. There were 198 reported child sex trafficking victims in Nevada in 2013, and 202 in 2014; however, many cases go unreported. These children can be as young as 12 or 13 years old. They suffer from physical, psychological, emotional, and sexual abuse.

2. What is Nevada’s Current Approach to Combating Sex Trafficking?

In 2013, Nevada enacted a law criminalizing sex trafficking of minors and adults. *See* N.R.S. §201.300. Neither consent nor mistake of age is a defense to a prosecution for child sex trafficking. The law also provides assistance to the trafficking victims, and gives victims the right to sue their traffickers in civil court.

Under federal law, *any* minor under the age of 18 years induced into commercial sex is a victim of sex trafficking—regardless of whether the trafficker used force, fraud, or coercion.

However, Nevada law still criminalizes the solicitation of prostitution as a misdemeanor, even if the person soliciting is a child. This means that child victims of sex trafficking still face criminal charges, and possible commitment to a secure detention facility, for the behavior that they were forced into by their trafficker.

3. Why is Nevada’s Current Approach Ineffective and Harmful?

Sex traffickers prey on vulnerable children, and forge strong bonds with the children through a mixture of love and fear. Traffickers often manipulate these children by establishing a safe and

loving romantic relationship, and then using that relationship as leverage to control the victims. Because many trafficking victims have experienced trauma and abandonment, and have no sense of self-worth, the relationship with their trafficker helps many victims feel less isolated, more worthwhile, and even safe. Accordingly, the trafficker's threats to end that relationship are powerful coercive techniques.

Unfortunately, detention is harmful for sex trafficking victims because it may reinforce the victims' feelings of abandonment and worthlessness. Committing trafficking victims to detention can also reinforce their sense of isolation and distrust of law enforcement, which may unintentionally strengthen the bond between the victim and the trafficker and serve to convince the victim that the trafficker was right, and he is the only person that the victim can truly trust. This makes it more difficult for a victim to feel comfortable assisting law enforcement in an investigation against a trafficker, and thereby hinders effective prosecution.

Nevada's detention facilities are not equipped to delve into the complex trauma experienced by child sex trafficking victims. Many victims suffer from serious physical and psychological problems that require comprehensive, long-term trauma informed services. Therapists in the Department of Juvenile Justice Services (DJJS) facilities do not engage in in-depth counseling or trauma therapy, and Caliente, the only secure long-term correctional facility for girls in Nevada, has limited access to psychologists and one-on-one therapy.

Repeatedly detaining child victims, rather than securing rehabilitative services for them, will often lead to the child developing a self-identity of being a criminal or "bad kid," and will further damage their sense of self-worth. Incarceration of these victims can inadvertently solidify their bond with their trafficker, whereas appropriate rehabilitative services are much more likely to give the victim the tools necessary to leave their trafficker.

It is also important to remember that in the case of a child sex trafficking victim, the child is being sexually exploited under a trafficker's control. The child is not actually "free" to choose to engage in such behavior.

4. How Can a Safe Harbor Law Protect Child Victims of Sex Trafficking?

A "safe harbor" law is a legal protection for minors who have been exploited through prostitution. In some states, a safe harbor law grants immunity from prosecution for prostitution-related offenses for persons under age 18 and mandates the use of safe houses, or residential treatment centers, as an alternative to juvenile detention. In other states, a safe harbor law diverts arrested children from juvenile delinquency proceedings to child protection proceedings where they can access social services.

Nineteen states have passed safe harbor laws: Arkansas, Connecticut, Florida, Illinois, Kansas, Kentucky, Louisiana, Massachusetts, Michigan, Minnesota, Nebraska, New Jersey, New York, North Carolina, Ohio, Tennessee, Texas, Vermont, and Washington. These states have enacted statutes that provide varying forms of protection, but the ideal statute would provide complete protection for a child victim.

5. How Would AB 153, Nevada's Safe Harbor Law, Operate?

Unlike the laws in a number of other states, AB 153 would provide a complete safe harbor for children by requiring child sex trafficking victims to be designated as Children in Need of Supervision ("CHINS").

Although still in the Juvenile Justice system, "CHINS" cases are treated very differently from "Delinquent Child" cases. Most importantly, CHINS cannot be adjudicated delinquent for a crime or be committed to state correctional facilities. Rather, the juvenile court must "refer the child to services available in the community for counseling, behavioral modification and social adjustment." This would help trafficked children move past their victimization, rather than be punished for being victims. Furthermore, CHINS must maintain regular contact with probation officers and can have scheduled visits with law enforcement, which will help enable the prosecution of traffickers.

6. Will the Safe Harbor Law Cost the State a Lot of Money?

The costs currently spent on detention and prosecution of a child sex trafficking victim should instead be allocated toward social services. The cost of detaining a child in the DJJS Detention Center is \$279 per bed per day. Prosecution is also expensive. It includes the time of the judge, prosecutor, defense attorney, court clerk, marshal, and probation officer. Without proper rehabilitative care, a child is likely to commit repeat offenses, require multiple adjudications, and spend more time in detention, thereby incurring additional costs for the county. The proposed safe harbor law would pave the way for community-based services and safe houses, and the money that the state currently spends to prosecute and incarcerate child victims can help provide funding for those services.

Exhibit I

DECLARATION

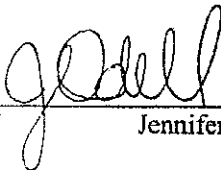
JENNIFER ODELL makes the following declaration:

1. I am a student attorney practicing under Supreme Court Rule 49.5 in the Thomas & Mack Legal Clinic at the William S. Boyd School of Law, University of Nevada, Las Vegas. I am supervised by Professors Mary Berkheiser and Susan Roske. I represented subject minor A'Jah Jordan in her juvenile delinquency proceedings in the Eighth Judicial District Court, Juvenile Division for her petitions 2, 3, and 4 (D.C. No. J-15-337227-D/2/3/4).

2. I submitted a referral for A'Jah Jordan to Stacey Cramer, the Program Director of The Salvation Army SEEDS of HOPE program in Las Vegas, on or about March 25, 2016, in order for SEEDS of HOPE to open a file on A'Jah and provide her services for child sex-trafficking victims when she returns to Clark County.

I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).

EXECUTED this 7 day of April, 2016.



Jennifer Odell

Exhibit J


CLERK OF THE COURT

MOT
MARY E. BERKHEISER
NEVADA BAR NO. 7225C
THOMAS & MACK LEGAL CLINIC
WILLIAM S. BOYD SCHOOL OF LAW
UNIVERSITY OF NEVADA, LAS VEGAS
P.O. BOX 71075
LAS VEGAS, NV 89170-1075
(702) 895-2080

EIGHTH JUDICIAL DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA

IN THE MATTER OF

A'JAH JORDAN
06/08/1999

Subject Minor.

CASE NO. J-15-337227-D/2/3/4

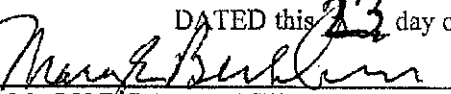
DEPT. NO. 18


DATE:

MOTION TO TERMINATE OR MODIFY ORDERS

Subject minor A'Jah Jordan, by and through her undersigned counsel, requests this Court to invoke its broad authority under NRS 62E.020 to terminate or modify its previous orders adjudicating A'Jah delinquent on petitions 1, 2, 3, and 4. In place of these orders, A'Jah requests this Court to order court supervision pursuant to a consent decree under Nevada's recently passed law, Assembly Bill 153 (2015), as well as the services specified for sexually exploited children provided in that law. Alternatively, A'Jah requests that this Court adjudicate her as a "child in need of supervision" under NRS 62B.320 as a habitual runaway and victim of sex trafficking in need of care or rehabilitation.

DATED this 23 day of February, 2015


MARY E. BERKHEISER
Nevada Bar No. 7225C
Thomas & Mack Legal Clinic
William S. Boyd School Of Law
University Of Nevada, Las Vegas
P.O. Box 71075
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S. ALEX SPELMAN
Student Attorney, SCR 49.5
Thomas & Mack Legal Clinic
William S. Boyd School Of Law
University Of Nevada, Las Vegas
P.O. Box 71075
Las Vegas, NV 89170-1075
(702) 895-2080

1 **NOTICE OF MOTION**

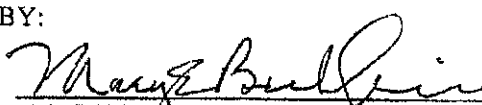
2 TO: THE STATE OF NEVADA; and

3 TO: _____, Deputy District Attorney

4 PLEASE TAKE NOTICE that the Subject Minor herein will bring the foregoing Motion on for
5 hearing on the 15th day of March, 2016, at the hour of 3:00 p.m.
a.m./p.m.

6 DATED this _____ day of _____, 2016

7 BY:

8 

9 MARY E. BERKHEISER
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13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14
15 A'Jah Jordan, a foster child, is before this Court because she is a sexually exploited youth
16 and a habitual runaway. The State petitioned for A'Jah's delinquency because it discovered her—
17 a 16-year-old girl—walking the streets of Las Vegas attempting to solicit prostitution. Local law
18 enforcement has found A'Jah on the street engaged in these activities at least twice.¹ Since
19 A'Jah's first petition, all of her arrests have been for solicitation, prostitution, or for violating the
20 probation that resulted from these activities.²

21
22 As a minor, A'Jah is the victim of sexual exploitation by countless older men and is the
23 victim of sex trafficking by a pimp here in Las Vegas.³ She is thus both factually and legally the
24 victim of sexual assault in this State.⁴

25
26
27 ¹ Exh. B; Exh. D; Exh. E.

28 ² See Exh. C, p. 2.

³ See Exh. B.

⁴ See generally Exh. A (text of 2015 AB 153).

1 However, the State has never listed solicitation or prostitution in its petitions against A'Jah,
2 despite law enforcement citing those activities as the basis for arresting her. Instead, the State has
3 listed only crimes incident to prostitution or solicitation on those petitions.⁵ Had the State filed a
4 petition alleging that A'Jah "engaged in prostitution or the solicitation of prostitution," this Court
5 would have placed her under its supervision pursuant to a consent decree without a formal
6 adjudication of delinquency and ordered her to receive "services to address the sexual exploitation
7 of the child and any other needs of the child," such as "counseling and medical treatment for
8 victims of sexual assault."⁶ But the State avoided this outcome and instead succeeded in having
9 A'Jah adjudicated delinquent and placed on formal probation. This outcome is both sad and
10 contrary to the will of the Nevada legislature.⁷

12 This Court has the authority, under NRS 62E.020, to modify its previous orders and issue
13 new orders that provide A'Jah with appropriate services "at any time."

15 Facts

16 A'Jah Jordan is, by anyone's measure, an empowered and resilient 16-year-old,
17 considering what she has been through in her short life. She appears to everyone to be remarkably
18 intelligent and charismatic, but her confident demeanor, though admirable, belies the dark reality
19 of her life.

20 Since as early as 8-years-old, A'Jah has been the victim of sexual exploitation and has not
21 had a stable family to love her. Her first reported memory of sexual assault was by her adopted
22 father when she was 8, an event that forced her back into the foster care system. Since then, she
23

25 ⁵ *Id.*

26 ⁶ See Exh. A, p. 3, subsection 1(a)(1-2).

27 ⁷ AB 153 is a recent bill that passed unanimously in both houses of the Nevada legislature in the
28 spring of 2015, and the Governor signed it into law on May 25, 2015.
(<https://www.leg.state.nv.us/Session/78th2015/Reports/history.cfm?ID=336>). This bill became the
law of Nevada nearly two months prior to A'Jah's first arrest for prostitution. See Exh. D.

1 has been in and out of foster homes and has lived without any semblance of a consistent family
2 structure, making her a prime target for recruitment into the sex trade.⁸

3 At 15 years of age, A'Jah recalls being approached by an older man on the bus who slowly
4 and methodically recruited her into the sex trade.⁹ As so many other young female victims have
5 experienced in our city, this man bought A'Jah nice things and made her feel special, only to

6 eventually use her as a sexual product, selling her to countless child rapists on a nightly basis.

7 This man beat A'Jah, threatened her, and finally convinced her to leave her home to live with him.

8 After she moved in with him, he repeatedly raped her. But, as is also true with so many other
9 manipulated girls in this situation, A'Jah did not understand that she was a victim (and probably
10 still does not understand this). Before A'Jah was ever arrested, Nevada lawmakers passed AB
11 153, recognizing these girls as "victims of sexual assault" and provided these girls with a program
12 for this Court's supervision and care.¹⁰

13
14 Three months after A'Jah was trafficked, local law enforcement observed A'Jah "working
15 as [a] prostitute[] in the area of Tropicana and Valley View" with another child.¹¹ An officer
16 observed her "walking back and forth on Tropicana," repeatedly beckoning motor vehicles as they
17 stood at the corner of the street "by making eye contact with motorist[s]," and "waving at ongoing
18 vehicles on Tropicana in attempts to have them stop. . . ."¹² When finally approached by law
19 enforcement, A'Jah initially refused to speak with them, telling them that she does not like Vice.¹³
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23 ⁸ See Neha A. Deshpande & Nawal M. Nour, *Sex Trafficking of Women and Girls*, REVIEWS IN
24 OBSTETRICS AND GYNECOLOGY, 6(1), e22–e27 (2013) (available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3651545/>) ("Traffickers and/or pimps commonly recruit potential victims who
25 are either economically or socially vulnerable. These include women and girls who are susceptible
26 to poverty, societal isolation, drug addiction, violence in the family, a history of child sexual
27 abuse, family dysfunction, school failure, or a history of criminal behavior.").

28 ⁹ See Exh. B.

¹⁰ Exh. A, p. 2, §1(a)(1 & 2).

¹¹ Exh. D, p. 1.

¹² *Id.* at 1–2.

¹³ *Id.* at 2.

1 But when she eventually did speak with the officers, she admitted that she had been engaging in
2 prostitution and revealed details to the officers about how she arranged the encounters. The
3 officers arrested her, listing "Engaging in Prostitution / Loitering Prostitution" as the arresting
4 offense.¹⁴ However, the petition filed by the district attorney did not include prostitution as one of
5 her charges.¹⁵ Therefore, A'Jah did not receive the protections and services that AB 153 provides
6 for children exploited by prostitution and solicitation.

7 In accordance with her resulting delinquency adjudication on the first petition, this Court
8 placed A'Jah on formal probation. Not long after, law enforcement found A'Jah back on the
9 street, this time catching her directly in the act of soliciting an undercover officer.¹⁶ A'Jah agreed
10 to perform fellatio on the officer for \$50 and then agreed to sex for \$100.¹⁷ Again, law
11 enforcement discovered A'Jah as she was being sexually exploited in the sex trade and arrested her
12 for "Solicitation of Prostitution."¹⁸ As before, the petition filed by the State did not include the
13 solicitation charge—once again avoiding the consent decree, supervision, and treatment programs
14 prescribed by AB 153 for victimized girls.
15

16 A'Jah admitted to violating probation. As a result, she was permanently kicked out of her
17 placement. She discovered that she was no longer welcome there while she was in custody at the
18 juvenile detention facility. Because the Department of Family Services—A'Jah's only guardian at
19 this time—did not promptly find her a new place to live, this Court placed A'Jah on a GPS
20 monitor and released her to Child Haven.¹⁹ She ran again several days later, reporting that an
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26 ¹⁴ Exh. D, p. 1.

27 ¹⁵ Exh. C., p. 2.

28 ¹⁶ Exh. E.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ See Exh. C, p. 4.

1 employee of Child Haven had sexually abused her in a previous stay.²⁰ After her arrest, A'Jah
2 returned to juvenile detention.

3 The Department of Family Services again failed to promptly find A'Jah a new placement.

4 After accepting a lead from a former foster father about a potential, future placement (Ms.
5 Alvarez), DFS represented to this Court that it was unable to find A'Jah another placement.²¹ The

6 result was that A'Jah remained in the juvenile detention facility for a total of 32 days (36 including
7 the days in detention before Child Haven), most of which was after this Court ordered her to
8 continue on probation.²² Thus, as a result of "violating probation" (by being sexually exploited),
9 A'Jah spent over a month in juvenile detention.
10

11 Finally, this Court intervened and found a temporary placement for A'Jah until Ms.
12 Alvarez's home would become available. A'Jah eventually ran from Ms. Alvarez's home.
13

14 Present Proceedings

15 After being on the run, A'Jah surrendered herself to Probation Intake on January 7, 2016.²³
16 The State again petitioned for A'Jah's delinquency. On January 13, A'Jah admitted to violating
17 the terms of formal probation while she was on the run.²⁴ On January 27, this Court ordered A'Jah
18 to be committed to the State. She will be transported in the next few weeks to Caliente. A'Jah has
19 been at the juvenile detention facility since she turned herself in on January 7 and will remain there
20 until transport.
21
22
23

24 ²⁰ To date, counsel for A'Jah Jordan is unaware of the result of the report and investigation into the
25 possible sexual abuse by this employee. But whatever reason A'Jah had for running, she simply
26 could not have seriously intended to escape law enforcement by running: she is an intelligent girl
27 and she still had her GPS unit on.

28 ²¹ This Court may take notice of the minutes or video recording of the court hearing in which DFS
made these representations.

²² See Exh. C, p. 2-4.

²³ Exh. C, p. 2.

²⁴ *Id.* at 1.

1 To date, A’Jah has served a total of 83 days in the juvenile detention facility since she was
2 arrested for soliciting an undercover officer on September 27, 2015.²⁵ For an initial charge of
3 “obstructing an officer” – when she was actually a victim of child sex trafficking – she has served
4 just under three months in detention. This is more than enough time in custody, especially given
5 that she is there because older men repeatedly sexually exploited and raped her.

6
7 Argument

8 **I. This court has broad authority to modify or terminate its previous orders and decrees**
9 **“at any time.”**

10 A’Jah Jordan respectfully requests this Court to invoke its broad authority to “*at any time*
11 modify or terminate any decree or order that it has made”²⁶ in order to vacate or terminate her
12 previous delinquency adjudications and probation dispositions. This Court’s power under NRS
13 62E.020 is broad and consistent with the problem-solving and informal atmosphere of the juvenile
14 court. The statute does not limit the factors or law upon which this Court may base its decision as
15 to whether to modify or terminate a previous order on behalf of a child. Rather, in deciding
16 whether to modify or terminate its order committing a child to the custody of the Division of Child
17 and Family Services, the statute requires only that this Court: “[g]ive due consideration to the
18 effect that the modification or termination of the order will have upon the child and the programs
19 of the Division of Child and Family Services.”²⁷ With this in mind, the Court may also consider
20 other relevant facts, law, and state policy—such as how the state legislature intends for this Court
21 to handle girls who have been victimized by the child sex trade.
22

23 In deciding how to exercise this Court’s power, the Court may look to other areas of
24 Nevada law that demonstrate the legislature’s intent for these girls. For example, the bipartisan
25 bill passed in 2015 (AB 153) demonstrates the legislative intent for this Court to provide services
26

27 ²⁵ See *id.* at 3–4.

28 ²⁶ NRS 62E.020 (emphasis added).

²⁷ *Id.*, § 2(b).

1 to and supervise sexually victimized girls engaged in prostitution, but to do so “without a formal
2 adjudication of delinquency.”²⁸ The legislative intent is that these victims receive “services to
3 address the sexual exploitation of the child and any other needs of the child,” such as “counseling
4 and medical treatment for victims of sexual assault.”²⁹ This recent and unanimous pronouncement
5 by both houses of the Nevada legislature became the law of Nevada nearly two months before

6 A’Jah was first arrested for prostitution. This law applies to her situation.

7
8 Similarly, another law that the Nevada legislature updated last year – in the same
9 legislative session as AB 153 – demonstrates how the state legislature intends to treat those
10 victimized by sex trafficking in Las Vegas.³⁰ This law, NRS 176.515 § 5, grants courts the
11 authority to vacate previous convictions for solicitation, prostitution, or a long list of crimes
12 incidental to those activities, whenever evidence suggests that the movant was the victim of sex
13 trafficking in the course of committing those crimes. Therefore, Nevada law now recognizes those
14 who are sex trafficked as victims, not criminals, and instructs courts accordingly. This Court may
15 look to the State’s policy, as reflected in these recent enactments, in modifying a previous order
16 under NRS 62E.020.
17

18 Finally, the policies behind AB 153 and NRS 176.515 § 5 together suggest how Nevada
19 lawmakers intend to treat children who have been victimized by the sex trade. AB 153 operates on
20 the presumption that any minor engaged in prostitution is most likely the victim of an adult.
21 Therefore, these children are victims of sex trafficking. AB 153 provides for pre-adjudicatory
22 relief for child sex trafficking victims, and NRS 176.515 § 5 provides post-adjudicatory relief in
23 the form of vacating a prior conviction. This Court’s ability to provide relief for them “at any
24 time” is even broader under NRS 62E.020. Together, these laws give this Court the authority to
25
26

27 ²⁸ Exh. A (emphasis added).

28 ²⁹ Exh. A.

³⁰ NRS 176.515 § 5 (updated in 2015 by Assembly Bill 108 to include unlawful trespass, loitering, and loitering for the purpose of solicitation or prostitution).

1 modify (i.e. vacate) or terminate any of its previous orders "at any time" for the victims of sex
2 trafficking.

3 **II. The Nevada Legislature has recently and unanimously decided that juvenile victims**
4 **of sexual exploitation, including A'Jah Jordan, shall be treated as victims, and, as**
5 **such, offered help through this Court's consent decree program without an**
6 **adjudication of delinquency for activities related to solicitation and prostitution.**

7 ~~In the spring of 2015, the Nevada legislature unanimously passed Assembly Bill 153,~~
8 which was meant to "end[] the practice of prosecuting sexually exploited youth and, instead,
9 place[] them under the supervision of the juvenile court without an adjudication of delinquency."³¹
10 On May 25, 2015, Governor Sandoval signed the bill into law.³² Less than two months later, law
11 enforcement arrested A'Jah for "engaging in prostitution / loitering prostitution."³³

12 AB 153 significantly updated state policy regarding how to handle the issue of child
13 prostitution and child sex trafficking in Nevada. The text and legislative history of AB 153
14 demonstrate that, by passing this bill, the legislature adopted the position that these children are
15 victims for whom the court should provide the services necessary for them to lead productive lives,
16 not criminals or delinquents who should go to correctional facilities.³⁴ Therefore, the bill provides
17 that children who were engaged in solicitation or prostitution shall be placed under court
18 supervision pursuant to a consent decree, without an adjudication of delinquency.³⁵

21
22 ³¹ See Exh. H, p. 1 (letter to the Senate Judiciary Committee chairman by Professor Mary E.
23 Berkheiser, supervising counsel to subject minor here).

24 ³² See <https://www.leg.state.nv.us/Session/78th2015/Reports/history.cfm?ID=336> (legislative
25 history of the statute).

26 ³³ Exh. D, p. 1.

27 ³⁴ *Id.* Exh. H, p. 1; Exh. G, p. 13 ("The Juvenile Division of the Clark County District Attorney
28 fully supports A.B. 153. . . . [The District Attorney is] treating these children as victims, not
delinquents."); Exh. G, p. 11 ("The ultimate goal is to not treat victims as criminals."); Exh. G, p.
10 ("It is not a delinquent act if a juvenile reengages with his or her panderer. . . . The juvenile
would have additional services and conditions provided to prevent him or her from engaging in
that lifestyle."); *Id.* ("Under A.B. 153, a juvenile arrested for solicitation will be given a consent
decree rather than being treated as a juvenile delinquent." (emphasis added)).

³⁵ See Exh. A.

1 This bill reflects the modern understanding that these children have been lured or coerced
2 into these activities by persons who took advantage of their immaturity and special vulnerability.³⁶
3 The legislature, therefore, intended to create a program wholly apart from the juvenile delinquency
4 system in order to address the needs of these child-victims:

5 Under A.B. 153, a juvenile arrested for solicitation will be given a consent decree
6 rather than being treated as a juvenile delinquent. That is similar to a stay of
7 adjudication in the adult system. This puts the juvenile under a county's
8 jurisdiction. It is in the child's best interest to receive help from the county to meet
9 his or her needs. The consent decree has conditions. A juvenile would enter a plea
10 as a consent decree so he or she would not be adjudicated. It is important a juvenile
11 have conditions. If a juvenile violates those conditions, there is a mechanism that
12 would not treat victims as criminals. If conditions are violated, the district attorney
13 will not be able to file a delinquent petition as a result of the violation. The district
14 attorney can file an additional petition if it is an act not relating to the circumstance
15 surrounding the decree. A juvenile under a consent decree who robs a store can be
16 charged for that act.

17 ...
18 If a juvenile is in the process of having a consent decree and reengages in
19 prostitution or pandering, the conditions are not enough to address the issue and
20 need to be expanded. The ultimate goal is to not treat victims as criminals.³⁷

21 The touchstone for interpreting this bill must be common sense. Simply put, the legislature
22 wants to help the victims of sex trafficking and forbid juvenile delinquency adjudication against
23 them for their conduct related to prostitution and solicitation. The legislature certainly did not
24 intend for the district attorney to circumvent the provisions of this law by leaving "prostitution" or
25 "solicitation" off the petition when the arresting officer had cited "prostitution" or "solicitation" as
26 the arresting offense or when the facts make clear that the subject minor was engaged in
27 solicitation when arrested. That loophole would be pointless, as it would completely blunt the
28 effectiveness of this unanimously-passed bill, and would serve no conceivable legislative purpose.
Therefore, the commonsense interpretation of this bill dictates that when the underlying

36 Exh. F, p. 5 (testimony of Susan Roske, Chief Deputy Public Defender, Clark County Public Defender's Office, before the Assembly Committee on Judiciary; discussing an early draft of the Assembly Bill 153).

37 Exh. G, p. 10-11 (testimony of Jason Frierson, Chair of the Legislative Committee on Child Welfare and Juvenile Justice, before the Senate Committee on Judiciary) (emphasis added).

1 circumstances of the arrest demonstrate that the girl was engaging in prostitution or solicitation
2 upon her arrest and her additional offenses are clearly incidental or related to that activity (e.g.
3 obstructing an officer, loitering, trespass, curfew, etc.), the law requires the court to apply the
4 protections of AB 153 and not adjudicate her as a delinquent child for those activities.³⁸ In
5 contrast, obviously, if a child commits a delinquent act not at all relating to solicitation – e.g., she
6 robs a bank – then the district attorney can seek a delinquency adjudication against her for that
7 conduct.³⁹ Again, the touchstone must be common sense.

8
9 AB 153 applies to A’Jah. For petition one, law enforcement had arrested A’Jah for
10 “Engaging in Prostitution / Loitering Prostitution” after observing her walking up and down the
11 street, beckoning motorists, and ultimately admitting that she was prostituting.⁴⁰ However, the
12 State listed only “obstructing an officer” on her petition (she failed to give her name when the
13 officer was questioning her about her prostitution activities). Therefore, A’Jah was adjudicated
14 delinquent and placed on formal probation. This result violates AB 153 – A’Jah should have been
15 placed on court supervision pursuant to a consent decree under AB 153 without a formal
16 adjudication of delinquency because she was arrested for prostitution. It follows, then, that she
17 never should have been on formal probation either.

18
19 Similarly, for petition two, law enforcement had arrested A’Jah for soliciting an undercover
20 officer.⁴¹ But the State did not list this charge on her petition, and instead only petitioned for a
21 violation of formal probation, thus seeming to avoid AB 153 again. Her subsequent two violations
22 of probation were, of course, only possible because she was on formal probation at all – which she
23

24
25 ³⁸ See, e.g., Exh. G, p. 10 (“A juvenile arrested for solicitation will be given a consent decree
rather than being treated as a juvenile delinquent.” (emphasis added)).

26 ³⁹ See *id.* (noting that if a child in the consent decree program under AB 153 commits a delinquent
27 act, “[t]he district attorney can file a petition if it is an act not relating to the circumstances
surrounding the decree. A juvenile under a consent decree who robs a store can be charged for that
act.”).

28 ⁴⁰ Exh. D.

⁴¹ Exh. E.

1 should not have been under AB 153. Indeed, perhaps had A'Jah been treated as a victim and
2 ordered the services specified for the victims of child sex trafficking prescribed by AB 153, her
3 services might have helped prevent her from running.⁴² But even if she were caught returning to
4 the child sex market, the remedy under AB 153 is to modify her services, not adjudicate her
5 delinquent and commit her to the State.⁴³ AB 153's program is consistent with the state's modern
6 understanding that these girls are victims who need supervision and services, not commitment to a
7 correctional facility.
8

9 This Court has the power to get A'Jah on the correct, legally prescribed program under AB
10 153 "at any time."⁴⁴ A'Jah asks the Court to do so and recognize her under AB 153 as a victim of
11 sexual exploitation: she was arrested for prostitution and solicitation, and her other offenses of
12 "obstructing an officer" and violating probation were incidental to her victimization. Had A'Jah
13 been under the consent decree program of AB 153, she would not have had a formal probation to
14 violate.
15

16 Because Ajah was arrested for these activities after the passage of AB 153, she requests the
17 Court to vacate her adjudications of delinquency and formal probation orders from petitions 1-4
18 along with the Court's most recent order to commit her to the State. In place of those orders,
19 A'Jah asks this Court to order court supervision pursuant to a consent decree under AB 153 and
20 the "services to address [her] sexual exploitation . . . and any other needs of the child including,
21 without limitation, any counseling and medical treatment for victims of sexual assault in
22 accordance with the provisions of NRS 217.280 to 217.350, inclusive."⁴⁵
23
24
25

26 ⁴² AB 153 prescribes for these children "counseling and medical treatment for victims of sexual
27 assault in accordance with the provisions of NRS 217.280 to 217.350, inclusive." Exh. A, p. 2, §
28 1(a)(2) (emphasis added).

⁴³ See Exh. G, p. 10-11.

⁴⁴ See NRS 62E.020 (emphasis added).

⁴⁵ Exh. A, § 1(a)(2).

1 **III. In the event that the court does not order A’Jah to participate in the consent decree**
2 **program under 2015 AB 153, A’Jah alternatively requests that this Court still vacate**
3 **or terminate its previous adjudications of delinquency and dispositions for petitions**
4 **1–4 and djudicate A’Jah now as a “child in need of supervision” for her status as a**
5 **habitual runaway and the victim of sex trafficking.**

6 A’Jah’s needs and circumstances are best captured by this Court’s supervision and the
7 services prescribed by AB 153 because she has been sexually exploited and trafficked by older
8 men and the totality of her “delinquent” conduct is incidental to these circumstances. A’Jah’s
9 habitual runaway problem is likely related to her sexual victimization and other psychological
10 traumas that she has no doubt endured as a foster child.⁴⁶ But if, for any reason, this Court rules
11 that the provisions of AB 153 do not apply to A’Jah, there is another program well suited for her.
12 Specifically, NRS 62B.320–330 (“Child in need of supervision”) dictates how this Court can help
13 children who are better described as habitual runaways than true “delinquents.”

14 The Court has jurisdiction over a child, like A’Jah, who is in need of supervision because
15 she deserts, abandons or runs away from the home or her usual place of abode and *is in need of*
16 *care or rehabilitation*.⁴⁷ Children in need of supervision are distinct from delinquent children and
17 are not to be considered delinquent.⁴⁸

18 Knowing what this Court now knows about A’Jah, under NRS 62E.020 this Court may
19 modify its previous orders and place her in the programs that Nevada law dictates are best suited
20 for a girl in her situation. AB 153’s program is the best outcome for her; however, alternatively, if
21 this Court does not order her into that program, it can adjudicate her now as a “child in need of
22 supervision” under NRS 62B.320–330. The “child in need of supervision” program better
23 captures the needs and problems faced by a victim of sex trafficking who is a habitual runaway –
24 like A’Jah – than would an adjudication of delinquency and commitment to a correctional facility.

25
26
27 ⁴⁶ See, e.g., Exh. C, p. 5 (A’Jah was raped by her adopted father at 8 years old).

28 ⁴⁷ NRS 62B.320, § 1(c) (emphasis added); see also *id.* at § 1(b) (“is unmanageable”); § 1(f)
(violates curfew); § 1(g) (loitering).

⁴⁸ NRS 62B.320, § 2.

1 NRS 62B.320–330 allows this Court to address her issues as a habitual runaway and sex
2 trafficking victim and maintain jurisdiction over her for her own health and well-being.

3 Nevada law does not provide for commitment to a correctional facility for a “child in need
4 of supervision.”⁴⁹ Committing A’Jah to the State will not help her now or in the future.

5 Moreover, it may make matters only worse:

6 There is an idea called revictimization, which is what happens when these girls . . .
7 are taken into detention and are threatened with suspended commitments and going
8 up to Caliente. It reinforces their feelings of isolation. There is research by
9 psychologists and sociologists that talks about the isolation that sex traffickers
10 capitalize on. Unfortunately, by punishing these victims and treating them like
criminals, and not as the victims that they truly are, it counterintuitively serves to
strengthen their bond with their trafficker.⁵⁰

11 A’Jah is an extreme example of an isolated girl – a lifelong foster child who has been
12 abused, exploited, and abandoned – who would be most susceptible to predation by sex traffickers.
13 Therefore, she is especially at risk for “revictimization.” Regardless of the state’s ability to bring
14 juvenile delinquency charges against A’Jah and seek her commitment to the State, it is simply the
15 wrong thing to do. She is the victim of sex trafficking and her worst other offense is being a
16 habitual runaway.

17
18 The best solution for a girl in her position is to do everything in this Court’s power to save
19 her, not punish her. Nevada’s policy on how to accomplish this (within the state’s resources) is by
20 court supervision, counseling, and other services specifically tailored to sexually assaulted and
21 exploited children. Under 62E.020, this Court has the power to get A’Jah the help she needs now
22 by vacating her prior delinquency adjudications, probation orders, and her commitment order, and
23 instead either ordering the programs prescribed by AB 153 or now adjudicating her as a “child in
24
25

26 ⁴⁹ NRS 62E.420.

27 ⁵⁰ Exh. F, p. 12 (testimony before the Nevada legislature by a former student attorney at the
28 Thomas & Mack Juvenile Justice Clinic at the Boyd School of Law); *see also id.* at 13
(representative of the Nevada District Attorneys Association testified that “[I]n many respects, we
are revictimizing victims of sex trafficking.”).

1 need of supervision" under NRS 62B.320. Court supervision and treatment for A'Jah is the
2 approach consistent with the state law—not delinquency, probation, and commitment. By treating
3 her like a victim, rather than a delinquent, the State can better address the problems that are
4 thrusting A'Jah into a life as a victim of the sex trafficking market.

5 Conclusion

6 By passing A.B. 153 we are allowing these [child-victims of sex trafficking and
7 sexual exploitation] to reach out to the advocates in the community to pick them up
8 and bring them back. They need to be told that they will not do time because they
9 are not criminals, they are victims. We have these services in place and will be able
10 to help them. I believe A.B. 153 will do that. We already have things in place that
11 we can bring to the table. We need to reinforce the law by arresting the johns and
12 clients who come to this town and solicit sex from our children. We need to hold
13 them accountable. These are children in need of supervision, and once these victims
14 step up to the plate, they can access all of the services that they cannot now because
15 they are adjudicated as a delinquent and not as a child in need of supervision. I
16 work with them every day and see their struggles.⁵¹

17 A'Jah is an isolated foster child with no home and no family. She has been sexually
18 assaulted and exploited since she was 8 years old. She has served nearly three months in the
19 juvenile detention facility, all for an original charge of "obstructing an officer," but really, of
20 course, for being a victim of sex trafficking. A'Jah has been punished enough.

21 This Court has the information and power that it needs to help A'Jah as the Nevada
22 legislature has prescribed. She asks that this Court invoke its broad powers under NRS 62E.020 to
23 "at any time" vacate her previous delinquency adjudications and probation orders. In their place,
24 AB 153 provides for A'Jah to be under this Court's supervision pursuant to a consent decree and
25 for this Court to order her the services prescribed for the victims of sexual assault.⁵² If the AB 153
26 program is for any reason unavailable for A'Jah, she alternatively requests that the court vacate her
27 previous adjudications and orders and now adjudicate her as a "child in need of supervision."

28 ⁵¹ *Id.* at p. 12–13 (testimony of Esther Rodríguez Brown, Founder of the Embracing Project, Las Vegas, Nevada, before the Assembly Committee on Judiciary).

⁵² Exh. A.

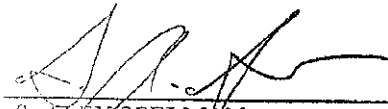
1 Even if the law does not demand this result, A'Jah requests that the Court reconsider its
2 commitment order for purely equitable reasons. A'Jah is a young girl who may have a bright
3 future if responsible adults act now to help her. Commitment will not provide her with the
4 promise of a future. Rather, it will simply risk furthering A'Jah's psychological isolation and
5 despair. Instead, A'Jah needs this Court's care and supervision; she needs counseling, guidance,
6 and a stable home in which to study and raise her daughter.⁵³

7
8 Therefore, for any of the above reasons, A'Jah respectfully requests that this Court vacate
9 her previous adjudications of delinquency and order for her court supervision pursuant to a consent
10 decree under AB 153 or, in the alternative, adjudicate her as a "child in need of supervision" under
11 62B.320-330. Above all, A'Jah requests that this Court order "services to address the sexual
12 exploitation of the child and any other needs of the child, including, without limitation, any
13 counseling and medical treatment for victims of sexual assault in accordance with the provisions of
14 NRS 217.280 to 217.350, inclusive,"⁵⁴ and that A'Jah may seek these services out of custody in
15 Clark County, rather than in a correctional facility.
16

17 RESPECTFULLY SUBMITTED this 23rd day of February, 2016.

18
19 

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26
27
28 ⁵³ See, e.g., Exh. A, § 1(a)(2).

⁵⁴ Exh. A, p. 2, § 1(a)(2).

Exhibit K


CLERK OF THE COURT

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7
8 IN THE EIGHTH JUDICIAL DISTRICT COURT
9 JUVENILE DIVISION
10 CLARK COUNTY, NEVADA

11 In the Matter of:

12 A'JAH JORDAN

13 JUVI ID: 15792603

14 Date of Birth: June 8, 1999

15 A Minor 16 Years of Age.

Case No. J-15-337227-D1,2,3,4
Dept. No. A
Courtroom No. 18

Hearing Date: March 15, 2016
Hearing Time: 3:00 p.m.

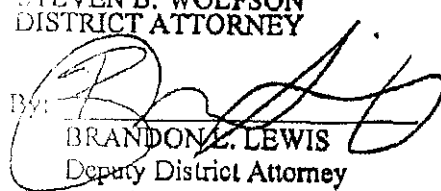
16 STATE'S OPPOSITION TO MOTION TO TERMINATE OR MODIFY
17 ORDERS

18 COMES NOW the State of Nevada, by and through STEVEN B. WOLFSON,
19 District Attorney, through his Deputy, BRANDON L. LEWIS, and hereby submits the
20 attached Points and Authorities in support of Opposition to Subject Minor's Motion to
21 Terminate or Modify Orders.

22 This Opposition is made and based upon all the papers and pleadings on file
23 herein, the attached Points and Authorities in support hereof, and any oral argument at the
24 time of hearing, if deemed necessary by this Honorable Court.

25 DATED this 11th day of March, 2016.

26 STEVEN B. WOLFSON
27 DISTRICT ATTORNEY

28 
BY: BRANDON L. LEWIS
Deputy District Attorney
Nevada State Bar No. 12251

1 **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF**
2 **OPPOSITION TO MOTION TO TERMINATE OR MODIFY ORDERS**

3 I.

4 **STATEMENT OF FACTS**

5 On December 16, 2015, a Writ of Attachment was issued in regards to A'JAH
6 JORDAN, (hereinafter, "A'JAH"). The Writ alleged a Violation of Probation based on
7 reports from A'JAH's foster mother, WACONDA ALVAREZ (hereinafter, "Mrs.
8 Alvarez"), that A'JAH left her residence on November 30, 2015 and had not returned or
9 contacted Ms. Alvarez to inform her about her whereabouts and/or safety.¹ On January 7,
10 2016, A'JAH self-surrendered and appeared in custody for her plea hearing on January
11 13, 2016. At the plea hearing A'JAH appeared with her counsel, JEANA O'DELL
12 (hereinafter, "Ms. O'Dell"), with the Thomas & Mack Legal Clinic, under the supervision
13 of Chief Deputy Public Defender, SUSAN ROSKE (hereinafter, "Ms. Roske"), ESTHER
14 BROWN (hereinafter, "Ms. Brown"), of the Embracing Project, Department of Family
15 Services caseworker EBONY DAVIS (hereinafter, "Ms. Davis"), Children's Attorney
16 Project counsel, SHANNON WILSON (hereinafter, "Ms. Wilson"), and Mrs. Alvarez.
17 At the hearing A'JAH admitted to count one of petition number 4, Violation of Probation.
18 She remained detained pending a Formal Report and Disposition in front of Judge Voy.²

19 On January 27, 2016, A'JAH appeared in front of Judge Voy for Formal Report
20 and Disposition. She was represented by Ms. O'Dell, supervised by Ms. Roske, and all of
21 the parties present at the plea hearing were also present. A'JAH was adjudicated on
22 Violation of Probation and committed to the Department of Child and Family Services,
23 Caliente Youth Center. On February 23, 2016, A'JAH filed the instant Motion to
24 Terminate or Modify Orders. This Opposition follows.

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27 ¹ See a true and correct copy of Writ of Attachment attached hereto as State's Exhibit 1.

28 ² See a true and correct copy of the Dispositional Report attached hereto as State's Exhibit 2.

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II. ARGUMENT

I. THIS COURT SHOULD NOT MODIFY OR TERMINATE ITS PREVIOUS ORDERS AS DOING SO IS NOT IN A'JAH'S BEST INTEREST

A'JAH'S motion request that this Court "vacate or terminate her previous delinquency adjudications and probation dispositions."³ Pursuant to NRS 62E.020, this Court's ability to terminate and/or modify its prior orders is broad and expansive.⁴ However, section 2(b) of the statute provides specific guidance when modifying or terminating an order committing a child to a DCFS facility. Under that section the Court is to give "due consideration" to the impact the termination or modification will have on the child and the DCFS programs. This section requires that the Court make inquiry into, and consider whether or not termination or modification of its orders is in the best interest of the child. Here, terminating the order committing A'JAH to Caliente Youth Center is not in her best interest.

A. A'JAH continually absconded from various placements, making implementation of services to address her needs impossible

Following petition 1 A'JAH was placed at St. Jude's Ranch in August of 2015. Within a month she absconded from placement. She was arrested for the acts underlying petition 2 on September 27, 2015. Following that petition she was placed at Child Haven,

³ See Motion at pg. 7, ln. 10-11

⁴ NRS 62E.020, 1. Except as otherwise provided in this section, the juvenile court may at any time modify or terminate any decree or order that it has made.

2. Except as otherwise provided in NRS 63.480, before the juvenile court may modify or terminate an order committing a child to the custody of the Division of Child and Family Services, the juvenile court shall:

(a) Provide the Administrator of the Division of Child and Family Services with written notice not later than 10 days before modifying or terminating the order, unless the Administrator waives the right to receive such notice; and
(b) Give due consideration to the effect that the modification or termination of the order will have upon the child and the programs of the Division of Child and Family Services.

(Added to NRS by 2003, 1067)

1 but again ran. She was arrested on October 3, 2015, for Violation of Probation, and on
2 November 3, 2015, she was placed at an Eagle Quest Group Home while she awaited
3 placement with Mrs. Alvarez.⁵ A'JAH remained at the Eagle Quest Group home for
4 approximately three (3) weeks prior to placement with Mrs. Alvarez. On November 30,
5 2015, she ran from Mrs. Alvarez's home, resulting in petition 4.

6 Services to address A'JAH'S specific needs have been a part of her court orders
7 since her initial contact with the Juvenile Justice System. These orders include the
8 involvement of Ms. Brown with the Embracing Project, Individual counseling, and
9 Parenting classes. A'JAH'S motion argues that the intent of AB 153 is that victims of sex
10 trafficking are provided with such services⁶ and that is exactly what this Court has
11 attempted to do, however, A'JAH'S inability to remain where she is placed has made
12 providing such services impossible. Commitment to Caliente significantly lowers the
13 possibility that A'JAH will abscond, which in turn significantly increases the likelihood
14 that she will receive the services she desperately needs. Additionally, A'JAH will be
15 provided with the opportunity to complete her high school education and learn a trade.
16 Certainly, completing her education, learning a trade, and receiving therapeutic services
17 will assist her now and in the future.⁷

18 ***B. Detention at Caliente Youth Center is the safest alternative for A'JAH at the***
19 ***moment***

20 As mentioned above, A'JAH absconded from three different placements. Often
21 times when A'JAH ran, she ran back to the lifestyle of sex trafficking, a lifestyle that
22 continually places A'JAH at risk for serious harm.⁸ Commitment to Caliente Youth
23

24 ⁵ See Exhibit 2, Dispositional Report, pg. 4, ln. 20-28.

25 ⁶ See Motion, pg. 8, ln. 2-4.

26 ⁷ See Motion, pg. 14, ln. 4. "Committing A'Jah to the State will not help her now or in the future."

27 ⁸ See A'JAH'S Motion, Ex. B, Declaration, pg. 2, ¶ 6, "Also, after one of the instances when Spade beat me, I had to
28 be treated at Summerlin hospital."

1 Center places A'JAH nearly 200 miles outside of Clark County and away from being
2 victimized by sex trafficking. Several proponents of AB 153 testified regarding detention
3 being the safest alternative in many of these cases.⁹ This Court has attempted four
4 separate placements for A'JAH and the reality is that Calliente is the best place where this
5 Court can maximize its ability to keep A'JAH safe.

6
7 **II. A'JAH HAS BEEN REPRESENTED BY HER CURRENT COUNSEL**
8 **SINCE OCTOBER 7, 2015, BUT WAITED UNTIL FEBRUARY 23, 2016 TO**
9 **FILE A MOTION ARGUING WHAT SHOULD HAVE OCCURRED AT**
10 **THE INCEPTION OF THE CASE**

11 The Thomas & Mack Legal Clinic has represented A'JAH since her entry of plea
12 hearing on petition two on October 7, 2015.¹⁰ Student attorney, Ms. O'Dell appeared at
13 the hearing, under the supervision of MARY BERKHEISER, (hereinafter, Ms.
14 Berkheiser). At that time A'JAH admitted to the Violation of Probation in petition 2,
15 petition 3 was dismissed, and this Court ordered that the prior commitment to Calliente
16 stand.¹¹ Although, NRS 62E.020 does not set forth a time limit upon which this Court
17 may modify or terminate its orders, simple fairness and reasonableness should dictate that
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19 ⁹ See A'JAH'S Motion, Ex. F, pg. 5, testimony of Susan Roske, "Many times, the juvenile court will detain these
20 children because there is no safe alternative... They will run back to where they feel safe, and that is oftentimes with
21 their pimp." See also pg. 12, testimony of Esther Brown, "Unfortunately, the only safe place that we have now is
22 detention." Pg. 13 testimony of John Jones, "You have heard testimony today that, unfortunately, detention is the
23 only safe place we have for some of these children. It is a sad reality that we face right now, and that is why a safe
24 house is an extremely important piece of this conversation."

25 ¹⁰ See a true and correct copy of the court minutes from the October 7, 2015, Entry of Plea hearing, attached hereto as
26 State's Exhibit 3.

27 ¹¹ See a true and correct copy of the court minutes from the October 14, 2015, Continued Entry of Plea hearing,
28 attached hereto as State's Exhibit 4.

1 defense counsel should stand idly by for months, while their client acquires two additional
2 petitions, all the while knowing that she has a suspended commitment and then choose to
3 file a motion requesting this Court to unwind the orders that they silently witnessed.

4
5 III. CONCLUSION

6 ~~This Court should not terminate or modify its current order committing A'JAH to~~
7 Caliente. This Court has done what is in A'JAH'S best interest, to ensure her safety and
8 that she receives the services she needs.

9 Based upon the foregoing, as well as any argument and/or evidence presented at
10 hearing, the state respectfully requests that this Court deny the Motion to Terminate or
11 Modify Orders in its entirety.

12 DATED this 11th day of March, 2016.

13 STEVEN B. WOLFSON
14 Clark County District Attorney
15 Nevada Bar No. 001565

16 By:

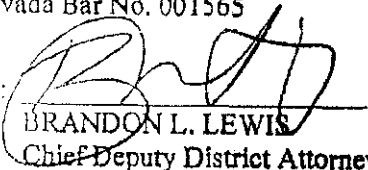
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18 BRANDON L. LEWIS
19 Chief Deputy District Attorney
20 Nevada State Bar No. 12251
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Exhibit L

1 **MOT**
2 **MARY E. BERKHEISER**
3 **NEVADA BAR NO. 7225C**
4 **THOMAS & MACK LEGAL CLINIC**
5 **WILLIAM S. BOYD SCHOOL OF LAW**
6 **UNIVERSITY OF NEVADA, LAS VEGAS**
7 **P.O. BOX 71075**
8 **LAS VEGAS, NV 89170-1075**
9 **(702) 895-2080**


CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA

IN THE MATTER OF)

A'JAH JORDAN
06/08/1999

Subject Minor.

CASE NO. J-15-337227-D/1/2/3/4


DEPT. NO. A, Courtroom 18

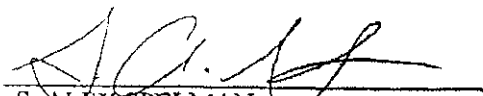
DATE: March 15, 2016
TIME: 3:00 p.m.

SUBJECT MINOR'S REPLY TO STATE'S OPPOSITION TO
MOTION TO TERMINATE OR MODIFY ORDERS

Subject minor A'Jah Jordan, by and through her undersigned counsel, hereby submits this reply to the State's Opposition to Jordan's "Motion to Terminate or Modify Orders." This reply is based upon all of the papers and evidence that have been submitted to the Court regarding this matter to date.

DATED this 14th day of March, 2016.


MARY E. BERKHEISER
Nevada Bar No. 7225C
Thomas & Mack Legal Clinic
William S. Boyd School of Law
University of Nevada, Las Vegas
P.O. Box 71075
Las Vegas, NV 89170-1075
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S. ALEX SPELMAN
Student Attorney, SCR 49.5
Thomas & Mack Legal Clinic
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1 **II. This Court** may do what is in A'Jah's best interest now.

2 Finally, the State argues that this Court should, if for no other reason, continue the
3 confinement of a child sex trafficking victim because the state does not like the timing of A'Jah's
4 motion—while the State admits that this Court's broad powers allow the Court to grant such a
5 motion at any time.¹² This argument should not detain this Court long: the informal, problem-
6 solving nature of this Court is designed to allow the Court to modify its orders "at any time"
7 because the focus of these proceedings is supposed to be on the best interests of the children, not
8 procedural squabbles. This Court's design for what is best for A'Jah should be based on Nevada
9 policy and A'Jah's life circumstances whenever the Court has the power to do so: the Court is not
10 limited by legally unsupported procedural objections. Accordingly, A'Jah pleads for this Court to
11 focus on what really matters—her health, future, and Nevada policy for girls in her situation.
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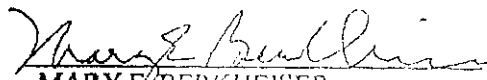
13 And in any event, the Thomas & Mack Legal Clinic never stood "idly by" in the course of
14 these proceedings. This Court may take notice that the Thomas & Mack Legal Clinic—comprised
15 of student attorneys with a ton of time, resources, and passion—has provided tireless,
16 comprehensive advocacy for A'Jah throughout our representation of her. A'Jah raises the present
17 motion now, rather than before, because her counsel had previously concluded that heated
18 litigation with the State was not in A'Jah's best interest while she was facing nothing more than
19 probation consequences. But now that she has been committed, the matter is urgent and
20 unavoidable. Now, we must object and insist that this Court help A'Jah in line with state policy.
21

22 Therefore, A'Jah respectfully renews her request that this Court vacate her previous
23 adjudications of delinquency and order for her court supervision pursuant to a consent decree
24 under AB 153 or, in the alternative, adjudicate her as a "child in need of supervision" under
25 62B.320–330. Above all, A'Jah requests that this Court order "services to address the sexual
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¹² See Opp. at 5, ln. 16–17.

1 exploitation of the child and any other needs of the child, including, without limitation, any
2 counseling and medical treatment for victims of sexual assault in accordance with the provisions of
3 NRS 217.280 to 217.350, inclusive,¹³ and that A'Jah may seek these services out of custody in
4 Clark County, rather than in a correctional facility.

5
6 RESPECTFULLY SUBMITTED this 14th day of March, 2016.

7 

8 MARY E. BERKHEISER
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28 ¹³ Exh. A, p. 2, § 1(a)(2).

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2
3 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
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5 A.J., a 16-year-old foster child,

) S.C. No.

6 Petitioner,

7 vs.

) (D.C. No. J-15-337227-D/1/2/4)
(Department A, Courtroom 18)

8 The Eighth Judicial District Court of the
9 State of Nevada, Juvenile Division, in
and for the County of Clark, the
Honorable William O. Voy, District
Court Judge,

10 Respondent.
11

12 **PETITIONER'S APPENDIX**

13 PHILIP J. KOHN
14 Clark County Public Defender
309 South Third Street
Las Vegas, Nevada 89155-2610

15 Attorney for Petitioner

STEVE WOLFSON
Clark County District Attorney
200 Lewis Avenue, 3rd Floor
Las Vegas, Nevada 89155

16 ADAM LAXALT
17 Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538
18 Counsel for Respondent

19 **CERTIFICATE OF SERVICE**

20 I hereby certify that this document was filed electronically with the Nevada
21 Supreme Court on the 8TH DAY OF April, 2016. Electronic Service of the foregoing
22 document shall be made in accordance with the Master Service List as follows:

23 ADAM LAXALT
24 JONATHAN VANBOSKERCK
STEVEN S. OWENS

SUSAN ROSKE
HOWARD S. BROOKS

25 I further certify that I served a copy of this document by mailing a true and
26 correct copy thereof, postage pre-paid, addressed to: HONORABLE JUDGE WILLIAM
27 VOY, District Court, Juvenile Division, Dept. 18, 601 North Pecos, Las Vegas, NV
28 89101.

BY /s/ Carrie M. Connolly
Employee, Clark County Public Defender's Office