

IN THE SUPREME COURT OF THE STATE OF NEVADA

ANDRE GRANT SNIPES,)	SUPREME COURT NO. 82384
)	
Appellant,)	
)	
vs.)	APPEAL
)	
STATE OF NEVADA,)	
)	
Respondent.)	
)	DISTRICT COURT NO. C-19-344461-2
)	
)	

APPELLANT'S APPENDIX

(VOLUME 1 OF 5)

SANDRA L. STEWART
Attorney at Law
Nevada Bar No.: 6834
1361 Babbling Brook Court
Mesquite, Nevada 89034
(702) 363-4656
Attorneys for Appellant

TABLE OF CONTENTS

(APPELLANT'S APPENDIX)

NAME OF DOCUMENT	DATE	PAGE	VOLUME
BAD ACTS-RT	03-03-2020	0317	0002
BAD ACTS-RT	03-05-2020	0337	0002
BAD ACTS-STATE MOTION	02-19-2020	0261	0002
CALENDAR CALL-RT	11-04-2020	0500	0003
COMPETENCY-RT	11-07-2019	0100	0001
COMPETENCY-RT	12-06-2019	0155	0001
COMPETENCY-RT	12-12-2019	0159	0001
CONTINUE TRIAL-RT	01-14-2020	0235	0001
COUNSEL-ORDER APPOINTING APPELLATE	01-12-2021	1194	0005
COUNSEL-RT	01-12-2021	1196	0005
EXHIBIT LIST	11-10-2020	0930	0004
EXHIBITS-JUROR QUESTIONS	11-10-2020	0984	0004
EXHIBITS-PHOTOS	11-10-2020	0976	0004
EXHIBITS-RECEIPTS	11-10-2020	0946	0004
EXPERT LIST (STATE)	12-24-2019	0165	0001
EXPERT LIST (STATE)-2ND	02-24-2020	0313	0002
EXPERT LIST (STATE)-3RD	11-02-2020	0483	0002
GRAND JURY EXHIBITS	10-31-2019	0062	0001
GRAND JURY EXHIBITS	11-14-2019	0143	0001
GRAND JURY EXHIBITS	01-09-2020	0204	0001
GRAND JURY INSTRUCTIONS	10-31-2019	0058	0001
GRAND JURY-RT	10-31-2019	0001	0001
INDICTMENT	11-01-2019	0086	0001
INDICTMENT (PROPOSED)	10-31-2019	0052	0001
INDICTMENT (SUPERSEDING)	11-14-2019	0135	0001
INDICTMENT (SUPERSEDING)	01-10-2020	0211	0001
INDICTMENT (SUPERSEDING)-3RD AMENDED	11-09-2020	0524	0003
INDICTMENT (SUPERSEDING)-AMENDED	01-14-2020	0226	0001
INDICTMENT (SUPERSEDING)-RT	11-14-2019	0106	0001
INDICTMENT (SUPERSEDING)-RT	01-09-2020	0168	0001
INDICTMENT (SUPERSEDING)-RT	01-10-2020	0220	0001
INDICTMENT-RT	11-01-2019	0095	0001
JUDGMENT OF CONVICTION	12-30-2020	1183	0005
JUDGMENT OF CONVICTIONN (AMENDED)	01-07-2021	1189	0005
JURY INSTRUCTIONS	11-13-2020	1111	0005
JURY TRIAL (DAY FOUR)-RT	11-13-2020	1155	0005
JURY TRIAL (DAY ONE)-RT	11-09-2020	0534	0003
JURY TRIAL (DAY THREE)-RT	11-12-2020	0993	0005

TABLE OF CONTENTS

(APPELLANT'S APPENDIX)

NAME OF DOCUMENT	DATE	PAGE	VOLUME
JURY TRIAL (DAY TWO) -RT	11-10-2020	0686	0003
JURY VERDICT	11-13-2020	1151	0005
METRO-TEMPORARY CUSTODY RECORD	11-20-2019	0084	0001
NEGOTIATIONS-RT	01-30-2020	0252	0002
NEGOTIATIONS-RT	10-21-2020	0427	0002
NOTICE OF APPEAL	01-17-2021	1203	0005
OR RELEASE-RT	05-05-2020	0392	0002
OR RELEASE-RT	05-07-2020	0399	0002
OR RELEASE-RT	05-21-2020	0405	0002
OR RELEASE-SNIPES MOTION	04-14-2020	0377	0002
OR RELEASE-STATE OPPOSITION	04-30-2020	0384	0002
PHOTO LINE-UP (ALBREGO)	09-25-2019	0072	0001
PHOTO LINE-UP (ALBREGO)	09-30-2019	0075	0001
PHOTO LINE-UP (ALBREGO)	09-25-2019	0933	0004
PHOTO LINE-UP (ALBREGO)	09-30-2019	0943	0004
PHOTO LINE-UP (LAWS)	09-30-2019	0078	0001
PHOTO LINE-UP (LAWS)	09-30-2019	0081	0001
PHOTO LINE-UP (LAWS)	09-30-2019	0936	0004
PHOTO LINE-UP (LAWS)	09-30-2019	0940	0004
SENTENCING-RT	12-29-2020	1167	0005
SEVER-RT	10-29-2020	0466	0002
SEVER-RT	11-03-2020	0487	0002
SEVER-RT	11-05-2020	0518	0003
SEVER-SNIPES MOTION	10-22-2020	0441	0002
SEVER-STATE OPPOSITION	10-26-2020	0447	0002
TRIAL SETTING-MINUTE ORDER	03-17-2020	0376	0002
TRIAL SETTING-RT	06-23-2020	0415	0002
TRIAL SETTING-RT	07-30-2020	0419	0002
WITNESS LIST (STATE)	12-24-2019	0165	0001
WITNESS LIST (STATE) -2ND	02-24-2020	0313	0002
WITNESS LIST (STATE) -3RD	11-02-2020	0483	0002

TABLE OF CONTENTS

(APPELLANT'S APPENDIX)

NAME OF DOCUMENT	DATE	PAGE	VOLUME
PHOTO LINE-UP (ALBREGO)	09-25-2019	0072	0001
PHOTO LINE-UP (ALBREGO)	09-25-2019	0933	0004
PHOTO LINE-UP (ALBREGO)	09-30-2019	0075	0001
PHOTO LINE-UP (LAWS)	09-30-2019	0078	0001
PHOTO LINE-UP (LAWS)	09-30-2019	0081	0001
PHOTO LINE-UP (LAWS)	09-30-2019	0936	0004
PHOTO LINE-UP (LAWS)	09-30-2019	0940	0004
PHOTO LINE-UP (ALBREGO)	09-30-2019	0943	0004
GRAND JURY-RT	10-31-2019	0001	0001
INDICTMENT (PROPOSED)	10-31-2019	0052	0001
GRAND JURY INSTRUCTIONS	10-31-2019	0058	0001
GRAND JURY EXHIBITS	10-31-2019	0062	0001
INDICTMENT	11-01-2019	0086	0001
INDICTMENT-RT	11-01-2019	0095	0001
COMPETENCY-RT	11-07-2019	0100	0001
INDICTMENT (SUPERSEDING) -RT	11-14-2019	0106	0001
INDICTMENT (SUPERSEDING)	11-14-2019	0135	0001
GRAND JURY EXHIBITS	11-14-2019	0143	0001
METRO-TEMPORARY CUSTODY RECORD	11-20-2019	0084	0001
COMPETENCY-RT	12-06-2019	0155	0001
COMPETENCY-RT	12-12-2019	0159	0001
WITNESS LIST (STATE)	12-24-2019	0165	0001
EXPERT LIST (STATE)	12-24-2019	0165	0001
INDICTMENT (SUPERSEDING) -RT	01-09-2020	0168	0001
GRAND JURY EXHIBITS	01-09-2020	0204	0001
INDICTMENT (SUPERSEDING)	01-10-2020	0211	0001
INDICTMENT (SUPERSEDING) -RT	01-10-2020	0220	0001
INDICTMENT (SUPERSEDING) -AMENDED	01-14-2020	0226	0001
CONTINUE TRIAL-RT	01-14-2020	0235	0001
NEGOTIATIONS-RT	01-30-2020	0252	0002
BAD ACTS-STATE MOTION	02-19-2020	0261	0002
WITNESS LIST (STATE) -2ND	02-24-2020	0313	0002
EXPERT LIST (STATE) -2ND	02-24-2020	0313	0002
BAD ACTS-RT	03-03-2020	0317	0002
BAD ACTS-RT	03-05-2020	0337	0002
TRIAL SETTING-MINUTE ORDER	03-17-2020	0376	0002
OR RELEASE-SNIPES MOTION	04-14-2020	0377	0002
OR RELEASE-STATE OPPOSITION	04-30-2020	0384	0002

TABLE OF CONTENTS

(APPELLANT'S APPENDIX)

NAME OF DOCUMENT	DATE	PAGE	VOLUME
OR RELEASE-RT	05-05-2020	0392	0002
OR RELEASE-RT	05-07-2020	0399	0002
OR RELEASE-RT	05-21-2020	0405	0002
TRIAL SETTING-RT	06-23-2020	0415	0002
TRIAL SETTING-RT	07-30-2020	0419	0002
NEGOTIATIONS-RT	10-21-2020	0427	0002
SEVER-SNIPES MOTION	10-22-2020	0441	0002
SEVER-STATE OPPOSITION	10-26-2020	0447	0002
SEVER-RT	10-29-2020	0466	0002
WITNESS LIST (STATE)-3RD	11-02-2020	0483	0002
EXPERT LIST (STATE)-3RD	11-02-2020	0483	0002
SEVER-RT	11-03-2020	0487	0002
CALENDAR CALL-RT	11-04-2020	0500	0003
SEVER-RT	11-05-2020	0518	0003
INDICTMENT (SUPERSEDING)-3RD AMENDED	11-09-2020	0524	0003
JURY TRIAL (DAY ONE)-RT	11-09-2020	0534	0003
JURY TRIAL (DAY TWO)-RT	11-10-2020	0686	0003
EXHIBIT LIST	11-10-2020	0930	0004
EXHIBITS-RECEIPTS	11-10-2020	0946	0004
EXHIBITS-PHOTOS	11-10-2020	0976	0004
EXHIBITS-JUROR QUESTIONS	11-10-2020	0984	0004
JURY TRIAL (DAY THREE)-RT	11-12-2020	0993	0005
JURY INSTRUCTIONS	11-13-2020	1111	0005
JURY VERDICT	11-13-2020	1151	0005
JURY TRIAL (DAY FOUR)-RT	11-13-2020	1155	0005
SENTENCING-RT	12-29-2020	1167	0005
JUDGMENT OF CONVICTION	12-30-2020	1183	0005
JUDGMENT OF CONVICTIONN (AMENDED)	01-07-2021	1189	0005
COUNSEL-ORDER APPOINTING APPELLATE	01-12-2021	1194	0005
COUNSEL-RT	01-12-2021	1196	0005
NOTICE OF APPEAL	01-17-2021	1203	0005

Steven D. Grierson

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

12:00

1

2

3

4

12:00

5

THE STATE OF NEVADA,)

6

Plaintiff,)

7

vs.)

GJ No. 18CGJ163AB

8

GREGORY DELLO MORGAN, ANDRE GRANT)

9

SNIPES,)

10

Defendants.)

DC No. C344461

12:00

11

12

13

Taken at Las Vegas, Nevada

14

Thursday, October 31, 2019

12:00

15

2:46 p.m.

16

17

18

19

REPORTER'S TRANSCRIPT OF PROCEEDINGS

12:00

20

21

22

23

24

12:00

25

Reported by: Danette L. Antonacci, C.C.R. No. 222

Steven D. Grierson

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,)
)
Plaintiff,)
)
vs.)
)
GREGORY DELLO MORGAN, ANDRE GRANT)
SNIPES,)
)
Defendants.)

GJ No. 18CGJ163AB
DC No. C344461

Taken at Las Vegas, Nevada

Thursday, October 31, 2019

2:46 p.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Reported by: Danette L. Antonacci, C.C.R. No. 222

12:00

1 GRAND JURORS PRESENT ON OCTOBER 31, 2019

2

3 LAWRENCE HOLMES, Foreperson

4 ROBERT KINNIBURGH, Deputy Foreperson

12:00

5 CLAUDIA HUNT, Secretary

6 LINDA MCARTHUR, Assistant Secretary

7 TONI ANDERSON

8 GARLAND BAILEY

9 ANNAMARIE CONKLIN

12:00

10 REGINA CRUNDEN

11 MELISSA HILL

12 MARY KISHMARTON

13 JEANETTE LOMANDO

14 DAVID MILLER

12:00

15 JOHN OLIVE

16 MARY PERKINS

17 ANTHONY SHOR

18

19 Also present at the request of the Grand Jury:

12:00

20 Ashley Lacher, Deputy District Attorney

21 Quanisha Holloway, Deputy District Attorney

22

23

24

25

12:00

1

INDEX OF WITNESSES

2

Examined

3

4

BRYAN LAWS

7

12:00

5

ALDEN ABREGO

16

6

SAMANTHA ALVAREZ

25

7

ELVIN CASTILLO

31

8

GEORGE LASTER

38

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

INDEX OF EXHIBITS

<u>Grand Jury Exhibits</u>	<u>Identified</u>
1 - PROPOSED INDICTMENT	5
2 - INSTRUCTIONS	5
3 - SURVEILLANCE VIDEO	20
4 - RECEIPT	35
5 - RECEIPT	33
6 - PHOTOGRAPH	29
7 - PHOTOGRAPH	29
8 - PHOTO LINE-UP	22
9 - PHOTO LINE-UP	21
10 - PHOTO LINE-UP	12
11 - PHOTO LINE-UP	13

12:00

1

LAS VEGAS, NEVADA, OCTOBER 31, 2019

2

* * * * *

3

4

DANETTE L. ANTONACCI,

12:00

5

having been first duly sworn to faithfully

6

and accurately transcribe the following

7

proceedings to the best of her ability.

8

9

MS. LACHER: Good afternoon ladies and

02:46

10

gentlemen of the Grand Jury. My name is Ashley Lacher.

11

With me for today is Quanisha Holloway. We're both

12

deputy district attorney with the Clark County District

13

Attorney's Office.

14

Today we'll be presenting to you Grand Jury

02:46

15

case number 18CGJ163A&B. The defendants Gregory Morgan

16

and Andre Snipes are charged with multiple counts; grand

17

larceny, robbery with use of a deadly weapon, burglary

18

while in use of a deadly weapon, and then burglary as

19

well. There will be marked as a Grand Jury exhibit a

02:47

20

copy of the proposed Indictment and that's going to be

21

marked as Exhibit Number 1 and the record will reflect

22

that all the grand jurors have a copy of it. In

23

addition I have marked as Grand Jury Exhibit Number 2 a

24

copy of the instructions related to each and every one

02:47

25

of those counts. Have all the grand jurors been

02:47 1 previously instructed on robbery with deadly weapon,
2 burglary with use of a deadly weapon, grand larceny?
3 Everybody is indicating that they've been previously
4 instructed. If you need to refresh your recollection as
02:47 5 to any of those instructions or have any questions about
6 those, I'm happy to answer those once I end my
7 presentation.

8 With that being said, with the permission
9 of the foreperson I'd like to call my first witness.

02:48 10 THE FOREPERSON: Please.

11 MS. LACHER: The State's first witness is
12 Bryan Laws, Jr. His testimony will relate to Counts 1,
13 2 and 3 and I'll probably be adding one count of
14 conspiracy robbery with that that's not in your current
02:48 15 Indictment.

16 THE FOREPERSON: Please raise your right
17 hand.

18 Please stand and raise your right hand.

19 You do solemnly swear the testimony you are
02:48 20 about to give upon the investigation now pending before
21 this Grand Jury shall be the truth, the whole truth, and
22 nothing but the truth, so help you God?

23 THE WITNESS: Yes, sir.

24 THE FOREPERSON: Now be seated please.

02:49 25 THE WITNESS: Thank you.

02:49 1 THE FOREPERSON: You are advised that you
2 are here today to give testimony in the investigation
3 pertaining to the offenses of grand larceny, robbery
4 with use of a deadly weapon, burglary while in
02:49 5 possession of a deadly weapon, and burglary, involving
6 Gregory Morgan and Andre Snipes.

7 Do you understand this advisement?

8 THE WITNESS: Yes, sir.

9 THE FOREPERSON: Please state your first
02:49 10 and last name and spell both slowly for the record.

11 THE WITNESS: Bryan Laws. B-R-Y-A-N,
12 L-A-W-S.

13 THE FOREPERSON: Thank you.

14 MS. LACHER: May I proceed?

02:49 15 THE FOREPERSON: Please.

16 MS. LACHER: Thank you.

17 BRYAN LAWS,
18 having been first duly sworn by the Foreperson of the
19 Grand Jury to testify to the truth, the whole truth,
02:49 20 and nothing but the truth, testified as follows:

21

22 EXAMINATION

23

24 BY MS. LACHER:

02:49 25 Q. Mr. Laws, are you employed as the manager

02:49 1 at the Foot Locker located at 3200 South Las Vegas
2 Boulevard here in Clark County, Nevada?

3 A. Yes, ma'am.

4 Q. I want to direct your attention to
02:49 5 September 24, 2019 at approximately 4:00 p.m. that day.
6 Were you working that day?

7 A. Yes, ma'am.

8 Q. And while you were working at that time did
9 two individuals enter the Foot Locker that caught your
02:49 10 attention?

11 A. Yes, ma'am.

12 Q. What did those individuals look like when
13 they entered?

14 A. Two black middle age men walked in normal,
02:50 15 came to return clothes.

16 Q. What happened after they tried to return
17 clothes?

18 A. I warned my team, we basically say pink
19 laces for that. Pink laces is our code for theft in our
02:50 20 store. So I called out pink laces on my mic and I told
21 my team, I had a part timer in the back in HOH where I
22 keep all my jerseys, he was standing there, he was very
23 confused, all of a sudden I looked to my right and I see
24 two gentlemen walking out with at threes 15 of my
02:50 25 jerseys.

02:50

1 Q. What were they doing though in the store
2 that caught your attention that made you put out that
3 call to the rest of your team?

02:50

4 A. They returned items from two different
5 stores. One store -- one item had a receipt, the other
6 item didn't, and when I scanned it in my system as all
7 retail stores, it will tell you that it's not from your
8 store and that's a red flag right there. So just giving
9 the best customer service, hey, I can't take this but if
10 you find anything else let me know, my name's Bryan.

02:51

11 Q. Did you end up giving store credits on that
12 or were you not, did not complete those returns?

13 A. No, I did not complete those.

14 Q. The return transactions were not completed?

02:51

15 A. Yes, ma'am.

16 Q. Is that a yes?

17 A. Yes, ma'am.

18 Q. So you said that multiple jerseys were
19 taken by the two individuals who entered your store.

02:51

20 How many jerseys were taken from your store on that day?

21 A. At least 15.

22 Q. And what's the approximate value of those
23 jerseys?

24 A. A hundred and ten each.

02:51

25 Q. And does that matter what type of jersey or

02:51

1 are they all 110?

2 A. It doesn't matter. It's an NBA official
3 jersey so.

02:51

4 Q. Did both of the men take jerseys or just
5 one?

6 A. Both of them.

7 Q. Do you recall what type of jerseys you
8 recall the two men taking?

02:52

9 A. Anthony Davis, which he plays for Los
10 Angeles Lakers. LeBron James, which he plays for the
11 Los Angeles Lakers. And the new rookie in the NBA
12 league, Zion Williamson, and he plays for the New
13 Orleans Pelicans.

02:52

14 Q. Did you try to confront them to stop them
15 from taking the items from the store?

16 A. No, ma'am. There was another key holder,
17 Sui Yow (phonetic), he's been working there for years, I
18 ordered him to stop him, give him customer service, he
19 didn't want to, he's a very old man, so he backed off,
20 as soon as I seen that I got on the phone with Metro.

02:52

21 Q. When the two men were leaving did either
22 one of the men show something to you?

23 A. Yes, ma'am.

02:52

24 Q. What did they show, what did that
25 individual show you?

02:52 1 A. He had his gun tucked in his, it was a gun,
2 but he had it tucked in his pants, so when he lifted his
3 shirt all I seen was a handle. I'm a carrier so I know
4 what a gun looks like.

02:53 5 Q. Did either of them say anything to you
6 while the gun was being shown?

7 A. No, ma'am. He turned around, flashed it, I
8 backed up, and they kept on running wherever they were
9 running to.

02:53 10 Q. Which of the two men was the man who showed
11 you the gun?

12 A. The heavier set gentleman, he had an Afro.

13 Q. And then backtracking a little bit. The
14 value of the jerseys taken is well over \$650; correct?

02:53 15 A. Oh, of course.

16 Q. When the individual flashed the gun at you,
17 was it because you were trying to stop?

18 A. No. I was actually on the phone with Metro
19 helping them out, giving them descriptions of what they
02:53 20 looked like, what they were wearing, where they were
21 going, and once he flashed it in the parking garage, I
22 want to say it's the south parking garage closest to the
23 freeway, I turned around and I went back to my store.

24 Q. Because you were afraid of --

02:54 25 A. Yeah.

02:54

1 Q. -- what they were flashing at you?

2 A. Oh yeah, of course.

3 Q. And those two men entered the store

4 together and left the store together; correct?

02:54

5 A. Yes, ma'am.

6 Q. After you got off the phone with Metro, did
7 you meet with detectives to do a line-up?

8 A. Yes, ma'am.

9 Q. I'm showing you Grand Jury Exhibit

02:54

10 Number 10. Do you recognize that?

11 A. Yes, ma'am.

12 Q. Do you recognize the first page as your
13 handwriting?

14 A. Yes, ma'am.

02:54

15 Q. And it's photo line-up 48535?

16 A. Yes, ma'am.

17 Q. Okay. And then were you shown a six pack
18 of different individuals?

19 A. Yes.

02:54

20 Q. And you circled and initialed the person in
21 position number 5; correct?

22 A. Yes, ma'am.

23 Q. There was a second photo line-up done with
24 detectives; correct?

02:55

25 A. Yes.

02:55

1 Q. I'm showing you Grand Jury Exhibit

2 Number 11. Do you recognize that?

3 A. Yes, ma'am.

4 Q. Based upon your handwriting and signature;

02:55

5 correct?

6 A. Yes, ma'am.

7 Q. And that's photo line-up 48580; correct?

8 A. Yes.

9 Q. You were given the six pack photo line-up

02:55

10 of different individuals; correct?

11 A. Yes, ma'am.

12 Q. And you circled and initialed the

13 individual in position number 2?

14 A. Yes.

02:55

15 Q. And was the person in position number 2 the

16 individual who flashed the gun?

17 A. Yes, ma'am.

18 MS. LACHER: I don't have anymore questions

19 for this witness. Do any of the grand jurors?

02:55

20 BY A JUROR:

21 Q. Mr. Laws, I just need a clarification.

22 When you asked your other key holder to I guess

23 intervene, he decided not to, so you left the store and

24 followed these two individuals?

02:56

25 A. Yes, sir.

02:56

1 Q. As far as the parking structure?

2 A. Yes, sir.

3 Q. Okay. And then returned to your store?

4 A. Yes, sir.

02:56

5 Q. Thank you.

6 THE FOREPERSON: Any other questions?

7 BY A JUROR:

8 Q. Mr. Law --

9 A. Yes, sir.

02:56

10 Q. -- you said you know guns.

11 A. Yes.

12 Q. Was that a semi-automatic or a revolver?

13 A. Semi-automatic.

14 Q. Thank you.

02:56

15 A. Yes, sir.

16 THE FOREPERSON: Any other questions?

17 Seeing no further questions.

18 By law, these proceedings are secret and

19 you are prohibited from disclosing to anyone anything

02:56

20 that has transpired before us, including evidence and

21 statements presented to the Grand Jury, any event

22 occurring or statement made in the presence of the Grand

23 Jury, and information obtained by the Grand Jury.

24 Failure to comply with this admonition is a

02:56

25 gross misdemeanor punishable by up to 364 days in the

02:56 1 Clark County Detention Center and a \$2,000 fine. In
2 addition, you may be held in contempt of court
3 punishable by an additional \$500 fine and 25 days in the
4 Clark County Detention Center.

02:56 5 Do you understand this admonition?

6 THE WITNESS: Yes, sir.

7 THE FOREPERSON: Thank you. You're
8 excused.

9 THE WITNESS: Thank you.

02:57 10 MS. LACHER: The State's next witness will
11 be Alden Abrego and his testimony will relate to the
12 Champs Sports, those being Count 5, Count 6, Count 7,
13 and I do anticipate adding one count of conspiracy to
14 commit robbery which is not contained in the Indictment.

02:58 15 THE FOREPERSON: Please stand and raise
16 your right hand.

17 You do solemnly swear the testimony you are
18 about to give upon the investigation now pending before
19 this Grand Jury shall be the truth, the whole truth, and
02:58 20 nothing but the truth, so help you God?

21 THE WITNESS: Yes, sir.

22 THE FOREPERSON: Please be seated.

23 You are advised that you are here today to
24 give testimony in the investigation pertaining to the
02:58 25 offenses of grand larceny, robbery with use of a deadly

02:58 1 weapon, burglary while in possession of a deadly weapon,
2 and burglary, involving Gregory Morgan and Andre Snipes.

3 Do you understand this advisement?

4 THE WITNESS: Yes, sir.

02:58 5 THE FOREPERSON: Please state your first
6 and last name and spell both slowly for the record.

7 THE WITNESS: My name is Alden, A-L-D-E-N,
8 Abrego, A-B-R-E-G-O.

9 MS. LACHER: May I proceed?

02:58 10 THE FOREPERSON: Please.

11 MS. LACHER: Thank you.

12 ALDEN ABREGO,

13 having been first duly sworn by the Foreperson of the
14 Grand Jury to testify to the truth, the whole truth,
02:58 15 and nothing but the truth, testified as follows:

16

17 EXAMINATION

18

19 BY MS. LACHER:

02:58 20 Q. Alden, are you employed at the Champs store
21 at 3200 South Las Vegas Boulevard in the Fashion Show
22 Mall?

23 A. Yes, ma'am.

24 Q. Are you the manager of that store?

02:58 25 A. Yes, ma'am.

02:58 1 Q. That store is here in Clark County, Nevada;
2 correct.

3 A. Yes, ma'am.

4 Q. I want to direct your attention to the date
02:59 5 of September 24, 2019. Were you working in your
6 capacity as a manager at the store on that day?

7 A. Yes, ma'am.

8 Q. Specifically around the time frame of 12:15
9 in the afternoon, did two individuals enter your store
02:59 10 that caught your attention?

11 A. Yes, ma'am.

12 Q. What did they look like?

13 A. They were two African American men, about
14 like 5'9" or so, one was wearing a brown T-shirt, the
02:59 15 other one was wearing a white wife beater.

16 Q. What did they do when they entered the
17 store?

18 A. As soon as they walked in, the gentleman
19 with the, the skinnier gentleman with the brown T-shirt
02:59 20 approached the front, one of our front tables that we
21 have with a couple of Jordan merchandise, as the other
22 guy with the white tank top headed towards the jerseys.

23 Q. Did you interact with either of them?

24 A. I did. I interacted with the guy with the
03:00 25 brown T-shirt as he walked in and headed straight to the

03:00 1 table in the front. I asked him how he was doing and he
2 said oh, I'm just looking, everything's too expensive.

3 Q. Do you continue to watch the two
4 individuals?

03:00 5 A. Yes, ma'am. As I was talking to him I was
6 also keeping my eye on the other gentleman with the
7 white tank top.

8 Q. And what did the other gentleman with the
9 white tank top, what was he doing?

03:00 10 A. As I was talking briefly for about 30
11 seconds with the gentleman with the brown T-shirt, he
12 was just scoping the jerseys, then he started putting
13 them around his hand and was about to, or was making his
14 way towards the door, and that's when the guy with the
03:00 15 brown also went and got the shirts or jerseys.

16 Q. How many jerseys were taken from the store?

17 A. A total of 14.

18 Q. And how much are those jerseys worth?

19 A. About 1700.

03:00 20 Q. And do you know that based upon being a
21 manager at the store?

22 A. Yes, ma'am.

23 Q. Do you recall the types of jerseys that
24 were taken and their color?

03:01 25 A. There was a couple, there was, it was three

03:01 1 different type of LeBron James jerseys, a purple and
2 yellow one, a white and purple, and a black and purple.

3 And then there was a Kobe Bryant jersey which was
4 yellow. There was two Curry jerseys, I believe those
03:01 5 were gray, and a Mike Bibby jersey, that's like a teal
6 color, and a Kyle Kuzma jersey in the purple.

7 Q. And it's fair to say that the total value
8 of those jerseys exceeded \$650?

9 A. Yes, ma'am.

03:01 10 Q. While you're confronting the two
11 individuals as they're leaving the store with the
12 jerseys, what do you see happen?

13 A. As they're walking out, cause as soon as
14 they walked in I called security, and as they're walking
03:02 15 out, the gentleman with the brown T-shirt says "oh trust
16 me, you don't want to do this," and walks out. And as
17 the second guy is walking out, the guy with the tank
18 top, kind of tugs his shirt and lifts it up a little and
19 you could see the back end of a gun.

03:02 20 Q. What color was it?

21 A. Black. Black, rigid black, so you could
22 only see the handle.

23 Q. Did that put you in fear, in a fearful
24 position?

03:02 25 A. At the moment cause everything happened

03:02 1 just so fast, it was like oh, I don't know what's going
2 on.

3 Q. Did either of those men -- I'll rephrase
4 that. Both of those men left the store without paying
03:02 5 for any of those items?

6 A. Correct.

7 Q. Without any permission to take those items
8 from the store; correct?

9 A. Yes, ma'am.

03:02 10 Q. The store has surveillance video; correct?

11 A. Correct.

12 Q. And it's kept in the ordinary course and
13 scope of business for security purposes?

14 A. Correct.

03:03 15 Q. I'm showing you what's been marked as Grand
16 Jury Exhibit Number 3. Do you recognize this?

17 A. Yes, ma'am.

18 Q. And how do you recognize it?

19 A. It has my initials.

03:03 20 Q. And is this the surveillance video from the
21 front exit/entrance area of the Champs store that you
22 work at?

23 A. Yes, ma'am.

24 Q. And you have access to this kind of

03:03 25 surveillance video as manager of the store; correct?

03:03

1 A. Yes, ma'am.

2 Q. Is that date and time stamped for the
3 incident of September 24, 2019 about 12:15 p.m.?

4 A. Yes, ma'am.

03:03

5 Q. And it shows the individual that you
6 described in the tan shirt as well as the individual in
7 the white shirt and you trying to stop them; correct?

8 A. Yes, ma'am.

9 Q. Also after you called police do they

03:04

10 respond?

11 A. Yes, ma'am.

12 Q. And when they respond do you later meet
13 with detectives?

14 A. Yes, ma'am.

03:04

15 Q. I'm showing you what's been marked as Grand
16 Jury Exhibit Number 9. Do you recognize this?

17 A. Yes, ma'am.

18 Q. And do you recognize it based upon your
19 handwriting and signature?

03:04

20 A. Yes, ma'am.

21 Q. Did you review the instructions indicated
22 on that and indicate a person on the second page?

23 A. Yes, ma'am.

24 Q. And this is photo line-up 48580; correct?

03:04

25 A. Yes, ma'am.

03:04

1 Q. And you indicated the person in position
2 number 2 and initialed by that person; correct?

3 A. Yes, ma'am.

4 Q. I'm showing you Grand Jury Exhibit

03:04

5 Number 8. Do you recognize this as one of the other
6 photo line-ups that you did with detectives?

7 A. Yes, ma'am.

8 Q. And that's photo line-up 48535; correct?

9 A. Yes, ma'am.

03:05

10 Q. And you initialed that and that's your
11 handwriting?

12 A. Yes, ma'am.

13 Q. On the second page you selected the person
14 in position number 5 by indicating your initials A.A. as

03:05

15 the other individual that entered your store and stole
16 items; correct?

17 A. Yes, ma'am.

18 MS. LACHER: I don't have anymore questions
19 for this witness. Do any of the grand jurors?

03:05

20 THE FOREPERSON: Seeing -- we've got one
21 hand.

22 BY A JUROR:

23 Q. Just so that I'm clear, all of the jerseys
24 were MBA jerseys?

03:05

25 A. Yes, sir.

03:05

1 Q. Thank you.

2 THE FOREPERSON: Any other questions?

3 Seeing no additional questions.

4 By law, these proceedings are secret and

03:05

5 you are prohibited from disclosing to anyone anything

6 that has transpired before us, including evidence and

7 statements presented to the Grand Jury, any event

8 occurring or statement made in the presence of the Grand

9 Jury, and information obtained by the Grand Jury.

03:05

10 Failure to comply with this admonition is a

11 gross misdemeanor punishable by up to 364 days in the

12 Clark County Detention Center and a \$2,000 fine. In

13 addition, you may be held in contempt of court

14 punishable by an additional \$500 fine and 25 days in the

03:05

15 Clark County Detention Center.

16 Do you understand this admonition?

17 THE WITNESS: Yes, sir.

18 THE FOREPERSON: Thank you. You're

19 excused.

03:06

20 THE WITNESS: Thank you.

21 MS. LACHER: Our next witness will be

22 Samantha Alvarez. Her testimony will relate to Count

23 10, burglary, and the State also anticipates adding a

24 grand larceny to that count that's not currently in the

03:06

25 Indictment.

03:07

1 THE FOREPERSON: Please raise your right
2 hand.

03:07

3 You do solemnly swear the testimony you are
4 about to give upon the investigation now pending before
5 this Grand Jury shall be the truth, the whole truth, and
6 nothing but the truth, so help you God?

7 THE WITNESS: Yes.

8 THE FOREPERSON: Please be seated.

03:07

9 You are advised that you are here today to
10 give testimony in the investigation pertaining to the
11 offenses of grand larceny, robbery with use of a deadly
12 weapon, burglary while in possession of a deadly weapon,
13 and burglary, involving Gregory Morgan and Andre Snipes.

14 Do you understand this advisement?

03:07

15 THE WITNESS: Yes.

16 THE FOREPERSON: Please state your first
17 and last name and spell both for the record.

18 THE WITNESS: Samantha Alvarez.

19 S-A-M-A-N-T-H-A, Alvarez is A-L-V-A-R-E-Z.

03:07

20 MS. LACHER: Ladies and gentlemen, her
21 testimony will relate to Counts 9 and 10. I did have a
22 grand larceny already in there that I didn't catch
23 earlier.

24 May I proceed?

03:08

25 THE FOREPERSON: Please.

03:08 1 MS. LACHER: Thank you.

2 SAMANTHA ALVAREZ,

3 having been first duly sworn by the Foreperson of the

4 Grand Jury to testify to the truth, the whole truth,

03:08 5 and nothing but the truth, testified as follows:

6

7 EXAMINATION

8

9 BY MS. LACHER:

03:08 10 Q. Ma'am, are you employed as the manager at

11 the Downtown Summerlin Foot Locker at 2120 Festival

12 Plaza here in Clark County, Nevada?

13 A. Yes, I am.

14 Q. Directing your attention to September 27th.

03:08 15 Were you working that day?

16 A. Yes, I was.

17 Q. At approximately 2:20 p.m. did two
18 individuals enter the store that caught your attention?

19 A. Yes.

03:08 20 Q. Why did they catch your attention?

21 A. They fit the description of the two males
22 that were, the two males that had robbed the Fashion
23 Show Foot Locker.

03:08 24 Q. And I'm going to instruct the ladies and
25 gentlemen of the Grand Jury to disregard that statement

03:08 1 as it is hearsay. Does everybody understand that
2 admonition?

3 Everyone is indicating that they understand
4 and can comply with that admonition.

03:09 5 So is it fair to say that you were in
6 communications with other Foot Locker managers?

7 A. Yes.

8 Q. And you had kind of like a group text;
9 correct?

03:09 10 A. Yes.

11 Q. And so without saying what anybody said,
12 were you aware of, to be on the lookout for, as always,
13 for certain thefts related to stores?

14 A. Yes.

03:09 15 Q. So when these two individuals entered into
16 the store, what did they look like to you?

17 A. One was a dark male wearing glasses with a
18 short Afro, and the other one was, he was a little
19 lighter complexion than the dark male but he had like a
03:09 20 low fade, like bald head.

21 Q. And what were they doing when they entered
22 the store?

23 A. So they both walked, came right in, they
24 went straight to the jersey area, they were looking at
03:10 25 the jerseys, and then they just grabbed them. One of

03:10 1 the defendants, I mean one of the guys went, the one
2 with the bald head went towards the exit of Foot Locker
3 and the one with the Afro was heading towards our other
4 exit through HOH and then he had told him hey, this
03:10 5 door's open over here, and then he ran right back with
6 him on the other side.

7 Q. And so the two black males that you
8 described being together were communicating with each
9 other?

03:10 10 A. Yes.

11 Q. About where to go and leave?

12 A. Yes.

13 Q. Were they taking anything in the store?

14 A. They had jerseys, they both had jerseys in
03:10 15 their hands.

16 Q. How many jerseys were taken on
17 September 27th?

18 A. Twenty-one jerseys.

19 Q. And what's the value of those jerseys?

03:10 20 A. \$110.

21 Q. And do you know that based upon being the
22 manager at Foot Locker?

23 A. Yes.

24 Q. And do you recall the types of jerseys that
03:10 25 were taken?

03:11 1 A. Yes. It was two different jerseys that had
2 two different colors in them. It was about ten LeBron
3 jerseys, white and yellow and the other one was purple
4 and black, and then there was another one and it was a
03:11 5 Wilson jersey, it was navy blue and gold.

6 Q. Did either of those men make any attempts
7 to pay for the items, those jerseys that were taken?

8 A. No.

9 Q. And they didn't have any permission to do
03:11 10 that; correct?

11 A. No.

12 Q. Did they say anything else during taking
13 the items other than what you already said?

14 A. There was another associate, he was a
03:11 15 little bit closer to them, and he just, the one with the
16 low Afro had told him "you better not touch me."

17 Q. Was that during the process of the store
18 personnel trying to confront him to prevent them from
19 leaving?

03:12 20 A. Yes.

21 Q. And you personally witnessed them, the two
22 individuals taking jerseys; correct?

23 A. Yes.

24 Q. And leaving without paying for them?

03:12 25 A. Yes.

03:12

1 Q. I'm going to show you Grand Jury Exhibit
2 Number 7. Do you recognize this person?

3 A. Yes.

4 Q. And how do you recognize him?

03:12

5 A. He was the one that was running the
6 opposite way before he was told to go through the second
7 exit.

8 Q. I'm going to show you Grand Jury Exhibit
9 Number 6. Do you recognize that person?

03:12

10 A. Yes.

11 Q. And how do you recognize that person?

12 A. He was the one that was basically talking
13 back to the other gentleman telling him which way to go.

14 Q. The other gentleman in Grand Jury Exhibit
15 Number 7; correct?

03:12

16 A. Yes.

17 MS. LACHER: I don't have anymore questions
18 for this witness. Do any of the grand jurors?

19 THE FOREPERSON: Seeing no additional
20 questions.

03:13

21 By law, these proceedings are secret and
22 you are prohibited from disclosing to anyone anything
23 that has transpired before us, including evidence and
24 statements presented to the Grand Jury, any event
25 occurring or statement made in the presence of the Grand

03:13

03:13 1 Jury, and information obtained by the Grand Jury.

2 Failure to comply with this admonition is a
3 gross misdemeanor punishable by up to 364 days in the
4 Clark County Detention Center and a \$2,000 fine. In
03:13 5 addition, you may be held in contempt of court
6 punishable by an additional \$500 fine and 25 days in the
7 Clark County Detention Center.

8 Do you understand this admonition?

9 THE WITNESS: Yes.

03:13 10 THE FOREPERSON: Thank you. You're
11 excused.

12 THE WITNESS: Thank you.

13 MS. LACHER: The State's next witness is
14 going to be Elvin Castillo. His testimony will relate
03:13 15 to Count 4, Count 8 -- and that is all at this point.

16 THE FOREPERSON: Please stand and raise
17 your right hand.

18 You do solemnly swear the testimony you are
19 about to give upon the investigation now pending before
03:14 20 this Grand Jury shall be the truth, the whole truth, and
21 nothing but the truth, so help you God?

22 THE WITNESS: Yes, sir.

23 THE FOREPERSON: Please be seated.

24 You are advised that you are here today to
03:14 25 give testimony in the investigation pertaining to the

03:14 1 offenses of grand larceny, robbery with use of a deadly
2 weapon, burglary while in possession of a deadly weapon,
3 and burglary, involving Gregory Morgan and Andre Snipes.

4 Do you understand this advisement?

03:15 5 THE WITNESS: Yes, sir.

6 THE FOREPERSON: Please state your first
7 and last name and spell both slowly for the record.

8 THE WITNESS: Elvin Castillo. E-L-V-I-N,
9 C-A-S-T-I-L-L-O.

03:15 10 THE FOREPERSON: Thank you.

11 MS. LACHER: May I proceed?

12 THE FOREPERSON: Please.

13 ELVIN CASTILLO,

14 having been first duly sworn by the Foreperson of the
03:15 15 Grand Jury to testify to the truth, the whole truth,
16 and nothing but the truth, testified as follows:

17

18 EXAMINATION

19

03:15 20 BY MS. LACHER:

21 Q. Sir, where do you work?

22 A. I work at Foot Locker inside the Meadows
23 Mall, 4300 Meadows Lane.

24 Q. Is that here in Clark County, Nevada?

03:15 25 A. Yes.

03:15

1 Q. And are you the manager of that location?

2 A. Yes.

3 Q. I want to direct your attention

4 specifically to September 20, 2019. Were you working as

03:15

5 the manager that day?

6 A. Yes.

7 Q. And did an individual enter the store that

8 kind of caught your attention as a manager?

9 A. Yes.

03:15

10 Q. Who was that individual?

11 A. After I got his information from, cause I
12 signed him up for the membership program, his name was
13 Andre Snipes.

14 Q. And why were you signing him up for the

03:16

15 membership program?

16 A. Because the individual wanted to make a
17 return. It was a pretty heavy return, about four or
18 \$500, and it was just kind of a shady situation for me
19 so I got his ID and I signed him up for the program and
03:16 20 I ended up giving him like store credit cards. Like
21 store credit, so merchandise return card.

22 Q. And is that the store policy when somebody
23 tries to return something and they don't have a receipt?

24 A. Yes. So the individual knew the policy, he
03:16 25 ended up bringing it up during the conversation, told us

03:16 1 we needed to take care of him, so we did, and we split
2 up the gift cards cause the gift cards have like a 200
3 cap. So he brought in four jerseys with no receipt, he
4 knew the policy, we took care of him.

03:17 5 Q. I want to show you Grand Jury Exhibit
6 Number 7. Do you recognize that person?

7 A. Yes.

8 Q. And who is that?

9 A. That's Andre Snipes.

03:17 10 Q. And that's the person who on September 20th
11 you interacted with and tried to make a return?

12 A. That's correct.

13 Q. I'm showing you now Grand Jury Exhibit
14 Number 5. Do you recognize that?

03:17 15 A. Yes.

16 Q. Is that the receipt from September 20, 2019
17 that you made the transaction on?

18 A. Yes.

19 Q. And does that indicate that the defendant

03:17 20 Andre Snipes was returning a A. Davis jersey, two of
21 them, both of them being yellow and white?

22 A. That is correct.

23 Q. As well the defendant was returning a gold,
24 two Williamson jerseys; correct?

03:18 25 A. Yes.

03:18 1 Q. And so you gave him a store credit card in
2 the amount of \$476.32?

3 A. Yes.

03:18 4 Q. Did you later learn about an investigation
5 of other Foot Locker stores and some thefts related to
6 that?

7 A. Yes, I had got a call earlier --

8 Q. Wait. That question -- I'm not trying to
9 ask you what other people told you.

03:18 10 A. Uh-huh.

11 Q. But just that you learned that other stores
12 had been hit and that when you looked back at this event
13 that urged you to kind of let law enforcement know.

14 A. Yes, that's correct.

03:18 15 Q. Okay. And this wasn't later until after
16 sometime in October; correct?

17 A. Yes.

18 Q. So when this first September 20th event
19 occurred, you weren't aware of that?

03:18 20 A. That is correct.

21 Q. There was another event where, on
22 September 24th, were you working at the store that day
23 at Meadows Mall?

24 A. Yes.

03:18 25 Q. And did the same individual enter that

03:19

1 store?

2 A. Yes.

3 Q. And what happened when he entered the store
4 on September 24th?

03:19

5 A. He had some jerseys as well and we ended up
6 just giving him credit for one jersey I believe, even
7 though he had like three jerseys. Two of the jerseys
8 wasn't scanning in our system meaning they could have
9 been like a cross divisional merchandise, so we just

03:19

10 took care of him for the one jersey that scanned in our
11 system.

12 Q. What does cross divisional mean?

13 A. It could have perhaps been like a Nike unit
14 or maybe like a Champs unit.

03:19

15 Q. From another store?

16 A. Yep, the SKU wasn't recognizable, it wasn't
17 scanning.18 Q. And this was just Andre Snipes coming in by
19 himself?

03:19

20 A. That is correct.

21 Q. I want to show you Grand Jury Exhibit

22 Number 4. Do you recognize that?

23 A. Yes.

24 Q. Is that a receipt from the transaction that
25 you were explaining about on being only one item that

03:19

03:19 1 you were doing the store credit return for?

2 A. Yes.

3 Q. And was that store credit return for a

4 yellow Kobe Bryant jersey?

03:20 5 A. Yes.

6 Q. And similar thing, did you later learn that

7 other stores may have had losses for that particular

8 jersey?

9 A. Yes.

03:20 10 Q. And that store credit that you gave him on

11 September 24th before you knew about the other events

12 was for 100, almost \$100, specifically \$97.41?

13 A. Yes.

14 Q. And so he left the store with a store

03:20 15 credit for that amount?

16 A. Yes.

17 Q. And you were not present for any other

18 exchanges; correct?

19 A. That is correct.

03:20 20 MS. LACHER: I don't have anymore questions

21 for this witness. Do any of the grand jurors?

22 THE FOREPERSON: Seeing no further

23 questions.

24 By law, these proceedings are secret and

03:21 25 you are prohibited from disclosing to anyone anything

03:21 1 that has transpired before us, including evidence and
2 statements presented to the Grand Jury, any event
3 occurring or statement made in the presence of the Grand
4 Jury, and information obtained by the Grand Jury. .

03:21 5 Failure to comply with this admonition is a
6 gross misdemeanor punishable by up to 364 days in the
7 Clark County Detention Center and a \$2,000 fine. In
8 addition, you may be held in contempt of court
9 punishable by an additional \$500 fine and 25 days in the
03:21 10 Clark County Detention Center.

11 Do you understand this admonition?

12 THE WITNESS: Yes, sir.

13 THE FOREPERSON: Thank you. You're
14 excused.

03:21 15 THE WITNESS: Thank you.

16 MS. LACHER: The State's next witness and
17 the last witness is Detective George Laster.

18 THE FOREPERSON: Please stand in front
19 there and raise your right hand please.

03:22 20 You do solemnly swear the testimony you are
21 about to give upon the investigation now pending before
22 this Grand Jury shall be the truth, the whole truth, and
23 nothing but the truth, so help you God?

24 THE WITNESS: I do.

03:22 25 THE FOREPERSON: Please be seated.

03:22 1 You are advised that you are here today to
2 give testimony in the investigation pertaining to the
3 offenses of grand larceny, robbery with use of a deadly
4 weapon, burglary while in possession of a deadly weapon,
03:22 5 and burglary, involving Gregory Morgan and Andre Snipes.

6 Do you understand this advisement?

7 THE WITNESS: Yes, sir.

8 THE FOREPERSON: Please state your first
9 and last name and spell both slowly for the record.

03:22 10 THE WITNESS: George Laster. G-E-O-R-G-E,
11 L-A-S-T-E-R.

12 MS. LACHER: May I proceed?

13 THE FOREPERSON: Please.

14 GEORGE LASTER,
03:22 15 having been first duly sworn by the Foreperson of the
16 Grand Jury to testify to the truth, the whole truth,
17 and nothing but the truth, testified as follows:

18
19 EXAMINATION

03:22 20
21 BY MS. LACHER:

22 Q. Sir, where do you work?

23 A. I work for Las Vegas Metro Police
24 Department.

03:22 25 Q. And what's your current assignment?

03:23

1 A. I'm currently assigned to Convention Area
2 Command as a patrol detective.

3 Q. I want to direct your attention to a series
4 of events in September and October at the Foot Locker

03:23

5 Champs and also a Nike. Were you assigned to
6 investigate a series of thefts in those areas?

7 A. Yes, ma'am.

8 Q. And in the course of your investigation did
9 you develop two potential suspects?

03:23

10 A. Yes, ma'am.

11 Q. Did you develop those suspects based upon
12 reviewing surveillance video in addition to interviewing
13 witnesses?

14 A. Yes, ma'am.

03:23

15 Q. And in the course of doing that, who were
16 the two suspects that you determined to be involved in
17 those events?

18 A. It would be Andre Snipes and Morgan --
19 actually what's his first name? I forget his first
20 name, but his last name is Morgan.

03:24

21 Q. Did you meet with one of the witnesses from
22 a Foot Locker event by the name of Alden Abrego as one
23 of the potential witnesses in this case?

24 A. Yes, ma'am.

03:24

25 Q. I'm showing you what has been marked as

03:24

1 Grand Jury Exhibit Number 8. Do you recognize that as
2 the photo line-up that you did with Alden Abrego?

3 A. Yes, ma'am.

03:24

4 Q. And you recognize that based upon your name
5 and P number being indicated on the first page?

6 A. Yes, ma'am.

7 Q. Did you read that witness the instructions
8 before giving him the photo line-up?

9 A. Yes, ma'am, I did.

03:24

10 Q. And did he indicate to you that he
11 understood that?

12 A. Yes, ma'am.

13 Q. Did Alden Abrego select an individual
14 within the six pack photo line-up that you created?

03:24

15 A. Yes, he did.

16 Q. And he selected the individual in position
17 number 5; correct?

18 A. Yes, ma'am.

19 Q. And who is the person in position number 5?

03:24

20 A. That person is Andre Snipes.

21 Q. You also did another photo line-up with him
22 regarding the second suspect; correct?

23 A. Yes, ma'am.

24 Q. I'm showing you Grand Jury Exhibit 9. Do
25 you recognize that?

03:25

03:25

1 A. Yes, ma'am.

2 Q. Did you follow the same procedure of
3 reading that witness the instructions?

4 A. Yes, I did.

03:25

5 Q. And he indicated that he could follow those
6 instructions; correct?

7 A. Yes, ma'am.

8 Q. And Alden Abrego did identify a person,
9 correct, in this line-up on page 2 of that exhibit?

03:25

10 A. Yes, ma'am.

11 Q. He circled the individual in position
12 number 2; correct?

13 A. Yes, ma'am.

14 Q. And the person in position number 2 is

03:25

15 Gregory Morgan; correct?

16 A. That's right, Gregory Morgan.

17 Q. As well you did a photo line-up with
18 another witness Bryan Laws; correct?

19 A. Yes, ma'am.

03:25

20 Q. Showing you Grand Jury Exhibit Number 11.

21 Do you recognize this photo line-up on sheet one?

22 A. Yes, ma'am.

23 Q. Recognize it based upon your P number and
24 initials on the page?

03:26

25 A. Yes, ma'am.

03:26

1 Q. Same process as described earlier to the
2 witness; correct?

3 A. Yes, ma'am.

03:26

4 Q. And that witness did indicate a person
5 located in position number 2; correct?

6 A. Yes, ma'am.

7 Q. And within Grand Jury Exhibit Number 11
8 that witness indicated Gregory Morgan as one of your
9 potential suspects; correct?

03:26

10 A. Yes, ma'am.

11 Q. You did the same for the other suspect.
12 I'm showing you Grand Jury Exhibit Number 10. Do you
13 recognize that?

14 A. Yes, ma'am.

03:26

15 Q. Same policies and procedures as followed
16 before; correct?

17 A. Yes, ma'am.

18 Q. And the witness Bryan Laws found or circled
19 and initialed the person in position number 5 as one of
20 the other potential suspects in your case; correct?

03:26

21 A. Yes, ma'am.

22 Q. And that person is Andre Snipes; correct?

23 A. Yes, ma'am.

24 Q. And those were the only photo line-ups

03:26

25 you've done in this case so far; correct?

03:27

1 A. Yes, ma'am.

2 Q. I'm going to show you Grand Jury Exhibit
3 Number 6. Who is that?

4 A. That is Gregory Morgan.

03:27

5 Q. Okay. And you recognize this photo;
6 correct?

7 A. Yes, ma'am.

8 Q. Within the investigations of all the
9 events, did you work on compiling and still are

03:27

10 compiling surveillance video; correct?

11 A. Yes, ma'am.

12 Q. And you work with another detective on a
13 Nike event to work on formulating the suspects in this
14 case?

03:27

15 A. Yes, ma'am.

16 Q. Ultimately as part of your investigation
17 did you set, did you work with other detectives in
18 setting up a controlled, or a buy for shoes online?

19 A. It was actually, it was another detective

03:28

20 but it was police officers on a different squad.

21 Q. You worked on coordinating --

22 A. Yes.

23 Q. -- that to happen?

24 A. Yes, ma'am.

03:28

25 Q. And once that happened both of those

03:28 1 suspects, Andre Morgan and Gregory, I'm sorry, Andre
2 Snipes and Gregory Morgan were apprehended together at
3 that buy?

4 A. Yes, ma'am.

03:28 5 MS. LACHER: Okay. I don't have anymore
6 questions for this witness. Do any of the grand jurors?

7 THE FOREPERSON: Seeing no additional
8 questions.

9 By law, these proceedings are secret and
03:28 10 you are prohibited from disclosing to anyone anything
11 that has transpired before us, including evidence and
12 statements presented to the Grand Jury, any event
13 occurring or statement made in the presence of the Grand
14 Jury, and information obtained by the Grand Jury.

03:28 15 Failure to comply with this admonition is a
16 gross misdemeanor punishable by up to 364 days in the
17 Clark County Detention Center and a \$2,000 fine. In
18 addition, you may be held in contempt of court
19 punishable by an additional \$500 fine and 25 days in the
03:28 20 Clark County Detention Center.

21 Do you understand this admonition?

22 THE WITNESS: Yes, sir, I do.

23 THE FOREPERSON: Thank you. You're
24 excused.

03:29 25 THE WITNESS: Thank you.

03:29 1 MS. LACHER: Okay. That's going to
2 conclude our testimony for today. I am going to be
3 making some changes. I'm going to add one count of
4 conspiracy robbery for the events at September 20, 2019
03:29 5 at the Foot Locker, as well as a conspiracy robbery at
6 the Champs Sports on September 24th.

7 I do need to make a correction to the date
8 on Counts 9 and 10 for the Summerlin Foot Locker. That
9 date should be September 24th.

03:30 10 I do not want you to deliberate on page 5,
11 count 11, or page 6, Count 12 or 13, do not deliberate.

12 A JUROR: We don't have those on the
13 Indictment.

14 A JUROR: We don't have them in here.

03:30 15 MS. LACHER: Oh, then she didn't include
16 those for me for a reason. Okay. I'll be coming back
17 for additional counts later then. So I will be asking
18 you to deliberate on Count 1, grand larceny; Count 2,
19 robbery with use of a deadly weapon; Count 3, burglary
03:31 20 while in possession of firearm; Count 4, burglary; Count
21 5, burglary while in possession of a firearm; Count 6,
22 grand larceny; Count 7, robbery with use of a deadly
23 weapon; Count 8, burglary; Count 9, grand larceny; Count
24 10, burglary, and then adding the two conspiracy
03:31 25 robberies.

03:31

1 THE FOREPERSON: So where are we going to
2 add those?

3 MS. LACHER: We'll add them at the end. So
4 Counts 11 and 12.

03:31

5 THE FOREPERSON: Can you give me the
6 appropriate wording for those?

7 MS. LACHER: Yes. It will be conspiracy
8 robbery for the September 20th at the Foot Locker for
9 Count 11, and then Count 12, conspiracy robbery,

03:32

10 September 24th at Champs.

11 THE FOREPERSON: What was the date on the
12 second one please?

13 MS. LACHER: September 24th.

14 THE FOREPERSON: Champs.

03:32

15 MS. LACHER: And with that being said,
16 we'll be outside for any questions that you have. And
17 also I left a laptop. If any of you would like or need
18 help with that we'll be outside and can help you. Are
19 there any questions?

03:33

20 Seeing no questions, we'll be right
21 outside. Thank you.

22 (At this time, all persons, other than
23 members of the Grand Jury, exit the room at 3:33 p.m.
24 and return at 3:39 p.m.)

03:39

25 THE FOREPERSON: Madame District Attorney,

03:39

1 by a vote of 12 or more grand jurors a true bill has
2 been returned against defendants Gregory Morgan and
3 Andre Snipes charging the crimes of grand larceny,
4 robbery with use of a deadly weapon, burglary while in
5 possession of a deadly weapon, burglary, and conspiracy
6 robbery, in Grand Jury case number 18CGJ163AB. We
7 instruct you to prepare an Indictment in conformance
8 with the amended Indictment previously submitted to us.

9 MS. LACHER: Thank you.

03:40

10 THE FOREPERSON: Adding the two additional
11 charges.

12 (Proceedings concluded.)

13 --oo0oo--

14

15

16

17

18

19

20

21

22

23

24

25

REPORTER'S CERTIFICATE

STATE OF NEVADA)
 : ss
COUNTY OF CLARK)

I, Danette L. Antonacci, C.C.R. 222, do
hereby certify that I took down in Shorthand (Stenotype)
all of the proceedings had in the before-entitled matter
at the time and place indicated and thereafter said
shorthand notes were transcribed at and under my
direction and supervision and that the foregoing
transcript constitutes a full, true, and accurate record
of the proceedings had.

Dated at Las Vegas, Nevada,
November 12, 2019.

/s/ Danette L. Antonacci

Danette L. Antonacci, C.C.R. 222

AFFIRMATION

Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER 18CGJ163AB:

X Does not contain the social security number of any person,

-OR-

___ Contains the social security number of a person as required by:

A. A specific state or federal law, to-wit: NRS 656.250.

-OR-

B. For the administration of a public program or for an application for a federal or state grant.

/s/ Danette L. Antonacci

Signature

11-12-19
DateDanette L. Antonacci
Print NameOfficial Court Reporter
Title

CASE NO. C-19-344461-1, -2
DEPT. NO. XX
DDA ASHLEY LACHER (L-4)

Defendant(s): GREGORY DELLO MORGAN, #2752270
ANDRE GRANT SNIPES, #7088448

Case No(s): 18CGJ163A-B (RANDOMLY TRACKS TO DC XX & XXV)

Charge(s): As to Deft Morgan:
(3) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004);
(2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147);
(2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138);
(2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and
(1) CT - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424)

As to Deft Snipes:
(3) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004);
(2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147);
(2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138);
(2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and
(3) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424)

Def. Counsel(s): MORGAN - PD
SNIPES - JAMES RUGGEROLI

WARRANTS (1 WEEK):
MORGAN -
SNIPES -

DEFTS ARE IN CUSTODY @CCDC (19F21141A-B - PH 11/12 IN JC9)

LVJC CASES TO BE DISM'D: 19F21141A-B

Exhibits:

- WA 1. Proposed Indictment
- WA 2. Grand Jury Instructions
- WA 3. DVD
- WA 4. Receipt
- WA 5. Receipt
- WA 6. Photo

- WA 7. Photo
- WA 8. Photo Lineup
- WA 9. Photo Lineup
- WA 10. Photo Lineup
- WA 11. Photo Lineup

Exhibits 1 - 11 to be lodged with the Clerk of the Court.

1 IND
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

CASE NO:

11 -vs-

DEPT NO:

12 GREGORY DELLO MORGAN, #2752270
13 ANDRE GRANT SNIPES, #7088448

14 Defendant(s).

INDICTMENT

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

17 The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT
18 SNIPES, accused by the Clark County Grand Jury of the crime(s) of GRAND LARCENY
19 (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); ROBBERY WITH USE OF
20 A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138);
21 BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony -
22 NRS 205.060 - NOC 50426) and BURGLARY (Category B Felony - NRS 205.060 - NOC
23 50424), committed at and within the County of Clark, State of Nevada, on or between
24 September 20, 2019 and October 2, 2019, as follows:

25 COUNT 1 - GRAND LARCENY

26 did on or about September 20, 2019, then and there willfully, unlawfully, and
27 feloniously with intent to deprive the owner permanently thereof, steal, take and carry away,
28 lead away or drive away property owned by FOOTLOCKER, having a value of \$650.00 or

more, to wit: merchandise, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

did on or about September 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise, from the person of BRYAN LAWS, or in his presence, without the consent and against the will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future, to his person, the person of a member of his family, or of anyone in his company at the time of the robbery, defendant using force or fear to obtain or retain possession of the property, to prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another and/or by Defendant GREGORY MORGAN actually possessing and displaying a firearm and Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or larceny.

did on or about September 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a firearm, a deadly weapon, during the commission of the crime and/or before leaving the structure, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the

1 intent to commit this crime by providing counsel and/or encouragement to one another and/or
2 by Defendant GREGORY MORGAN actually possessing a firearm and Defendant ANDRE
3 SNIPES having knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the
4 crime of burglary.

5 COUNT 4 - BURGLARY

6 Defendant ANDRE SNIPES did on or about September 20, 2019, willfully,
7 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
8 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
9 with intent to commit a larceny and/or obtain money or property by false pretenses.

10 COUNT 5 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

11 did on or about September 24, 2019, willfully, unlawfully, and feloniously enter a retail
12 establishment, owned or occupied by CHAMP'S SPORTS, located at 3200 South Las Vegas
13 Boulevard, Las Vegas, Clark County, Nevada, with intent to commit larceny, while in
14 possession of and/or gaining possession of a firearm, a deadly weapon, during the commission
15 of the crime and/or before leaving the structure, Defendants being criminally liable under one
16 or more of the following principles of criminal liability, to-wit: (1) by directly committing said
17 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
18 intent to commit this crime by providing counsel and/or encouragement to one another and/or
19 by Defendant GREGORY MORGAN actually possessing a firearm and Defendant ANDRE
20 SNIPES having knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the
21 crime of burglary.

22 COUNT 6- GRAND LARCENY

23 did on or about September 24, 2019, then and there willfully, unlawfully, feloniously,
24 and intentionally, with intent to deprive the owner permanently thereof, steal, take and carry
25 away, lead away or drive away property owned by CHAAMP'S SPORTS, having a value of
26 \$650.00 or more, to wit: merchandise, Defendants being criminally liable under one or more
27 of the following principles of criminal liability, to-wit: (1) by directly committing said crime;
28 and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to

1 commit this crime by providing counsel and/or encouragement to one another; and/or, (3)
2 pursuant to a conspiracy to commit larceny.

3 COUNT 7 - ROBBERY WITH USE OF A DEADLY WEAPON

4 did on or about September 24, 2019, willfully, unlawfully, and feloniously take
5 personal property, to wit: merchandise, from the person of ABREGO ALDEN, or in his
6 presence, without the consent and against the will of ABREGO ALDEN, by means of force or
7 violence or fear of injury, immediate or future, to his person, the person of a member of his
8 family, or of anyone in his company at the time of the robbery, defendant using force or fear
9 to obtain or retain possession of the property, to prevent or overcome resistance to the taking
10 of the property, and/or to facilitate escape, with use of a deadly weapon, to wit: a firearm,
11 Defendants being criminally liable under one or more of the following principles of criminal
12 liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one
13 another in the commission of this crime with the intent to commit this crime by providing
14 counsel and/or encouragement to one another and/or by Defendant GREORY MORGAN
15 actually possessing and displaying a firearm and Defendant ANDRE SNIPES having
16 knowledge of that fact and both defendants escaping with the merchandise; and/or (3) pursuant
17 to a conspiracy to commit the crimes of burglary and/or larceny.

18 COUNT 8 - BURGLARY

19 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
20 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
21 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
22 with intent to commit a larceny and/or obtain money or property by false pretenses.

23 COUNT 9 - GRAND LARCENY

24 did on or about September 29, 2019, then and there willfully, unlawfully, feloniously,
25 and intentionally, with intent to deprive the owner permanently thereof, steal, take and carry
26 away, lead away or drive away property owned by FOOTLOCKER, located at 2120 Festival
27 Plaza Drive, having a value of \$650.00 or more, to wit: basketball jerseys and/or other
28 merchandise, Defendants being criminally liable under one or more of the following principles

of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

COUNT 10 - BURGLARY

did on or about September 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada, with intent to commit larceny, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another and/or by Defendant GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

DATED this _____ day of October, 2019.

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

BY

ASHLEY LACHER
Deputy District Attorney
Nevada Bar #014560

ENDORSEMENT: A True Bill

Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2
3 Additional Witnesses known to the District Attorney at time of filing the Indictment:

4 ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

5 CUSTODIAN OF RECORDS - CCDC

6 CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV
7 NV

8 CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

9 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

10 CUSTODIAN OF RECORDS - LVMPD RECORDS

11 CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD,
12 LV NV

13 LASTER, GEORGE – LVMPD #5658

14 MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

15 PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

16 SUMMERS, KASHIF – LVMPD #14109

17
18
19
20
21
22
23
24
25
26 18CGJ163A-B/19F21141A-B/ed-GJ
27 LVMPD EV# 190900115154;
28 190900095652; 191099999927
(TK9)

Grand Jury Case # 18CGJ163A-B

Exhibit # 1

Date 10/31/19

GRAND JURY INSTRUCTIONS

Robbery

Robbery is the unlawful taking of personal property from the person of another, or in his presence, against his will, by means of force or violence or fear of injury, immediate or future, to his person or property, or the person or property of a member of his family, or of anyone in his company at the time of the robbery. Such force or fear must be used to obtain or retain possession of the property, to prevent or overcome resistance to the taking, or to facilitate escape, in either of which cases the degree of force is immaterial if used to compel acquiescence to the taking of or escaping with the property.

Deadly Weapon

"Deadly weapon" means any instrument which, if used in the ordinary manner contemplated by its design and construction, will or is likely to cause substantial bodily harm or death; any weapon, device, instrument, material or substance which, under the circumstances in which it is used, attempted to be used or threatened to be used, is readily capable of causing substantial bodily harm or death.

Co-Conspirator/Aider and Abettor Liability for the Use of a Firearm/Deadly Weapon

If more than one person commits a crime, and one of them uses a deadly weapon in the commission of that crime, each may be convicted of using the deadly weapon even though he did not personally himself use the weapon.

An unarmed offender "uses" a deadly weapon when the unarmed offender is liable for the offense, another person liable for the offense is armed with and uses a deadly weapon in the commission of the offense, and the unarmed offender had knowledge of the use of the deadly weapon.

Firearm

You are instructed that “firearm” includes any firearm that is loaded or unloaded and operable or inoperable. “Firearm” includes any device designed to be used as a weapon from which a projectile may be expelled through the barrel by the force of any explosion or other form of combustion.

Burglary

Every person who, by day or night, enters any house, room, apartment, tenement, shop, warehouse, store, mill, barn, stable, outhouse or other building, tent, vessel, vehicle, vehicle trailer, semitrailer or house trailer, airplane, glider, boat or railroad car, with the intent to commit grand or petit larceny, assault or battery on any person or any felony, or to obtain money or property by false pretenses, is guilty of burglary

Every person who commits the crime of burglary, who has in his possession or gains possession of any deadly weapon at any time during the commission of the crime, at any time before leaving the structure, or upon leaving the structure, is guilty of burglary while in possession of a deadly weapon.

Grand Larceny

Intentionally stealing, taking and carrying away, leading away or driving away: Personal goods or property, with a value of \$650 or more, owned by another person.

Conspiracy

Conspiracy is an agreement or mutual understanding between two or more persons to commit a crime. To be guilty of conspiracy, a defendant must intend to commit, or to aid in the commission of, the specific crime agreed to. The crime is the agreement to do something unlawful; it does not matter whether it was successful or not.

Conspiracy is an agreement or mutual understanding between two or more persons to commit a crime. To be guilty of conspiracy, a defendant must intend to commit, or to

aid in the commission of, the specific crime agreed to. The crime is the agreement to do something unlawful; it does not matter whether it was successful or not.

It is not necessary in proving a conspiracy to show a meeting of the alleged conspirators or the making of an express or formal agreement. The formation and existence of a conspiracy may be inferred from all circumstances tending to show the common intent and may be proved in the same way as any other fact may be proved, either by direct testimony of the fact or by circumstantial evidence, or by both direct and circumstantial evidence.

Evidence of the commission of an act which furthered the purpose of an alleged conspiracy is not, in itself, sufficient to prove that the person committing the act was a member of such a conspiracy.

If a number of persons enter into an agreement to commit an illegal act then that agreement is known in law as a conspiracy. If a conspiracy is established, and the purpose thereof is to commit a dangerous felony, then each member of the conspiracy is responsible and liable for the acts of the other member or members.

Each member of a criminal conspiracy is liable for each act and bound by each declaration of every other member of the conspiracy if the act or the declaration is in furtherance of the object of the conspiracy.

A person who knowingly does any act to further the object of a conspiracy, or otherwise participates therein, is criminally liable as a conspirator. However, mere knowledge or approval of, or acquiescence in, the object and purpose of a conspiracy without an agreement to cooperate in achieving such object or purpose does not make one a party to conspiracy.

The act of one conspirator pursuant to or in furtherance of the common design of the conspiracy is the act of all conspirators. Every conspirator is legally responsible for an act of a co-conspirator that follows as one of the probable and natural consequences of the

object of the conspiracy even if it was not intended as part of the original plan and even if he was not present at the time of the commission of such act.

Aiding and Abetting

- Anyone who knowingly & with criminal intent aids and abets in the commission of the crime with the intent that the crime be committed is regarded as a principal in the crime.

- A person aids and abets the commission of a crime if he knowingly & with criminal intent aids, promotes, encourages or instigates by act and/or advice, the commission of such crime with the intention that the crime be committed.

Co-Conspirator/Aider and Abettor Liability

Where two or more persons are accused of committing a crime together, their guilt may be established without proof that each personally did every act constituting the offense charged.

All persons concerned in the commission of a crime who either directly and actively commit the act constituting the offense or who knowingly and with criminal intent aid and abet in its commission or, whether present or not, who advise and encourage its commission, with the intent that the crime be committed, are regarded by the law as principals in the crime thus committed and are equally guilty thereof.

A person aids and abets the commission of a crime if he knowingly and with criminal intent aids, promotes, encourages or instigates by act or advice, or by act and advice, the commission of such crime with the intention that the crime be committed.

The State is not required to prove precisely which defendant actually committed the crime and which defendant aided and abetted.

Grand Jury Case # 18CGJ 163 A-B

Exhibit # 2

Date 10/31/19



THE MEADOWS MALL 4300 MEADOWS LANE SUITE
115
LAS VEGAS, NV 89107
702-878-8226

Visit Us At www.footlocker.com

Store: 307142 Register: 2
Date: 9/24/19 Time: 2:54 PM
Trans: 40037
Cashier: Elvin C.

Customer: Andre Snipes

Loyalty Information

Loyalty #: *****8207
Program Name: Lockers Loyalty
Program Level: Lockers Platinum
Points Earned Today: 0
Total Earned Points: 0

Reprint - Reprint - Reprint - Reprint

Item	Qty	Price	Amount	Tax%
08/24 NK LAL YEL BRYANT #8 JSY				
037100203100950				
	1	-\$120.00	-\$89.99	8.25%

999-SALEABLE
Return without Receipt
Promotion \$30.01
Sales Associate: Elvin C.

0062

Subtotal
Tax

-\$7.42 10-31-19

GJ-21

Total	-\$97.41
--------------	-----------------

Issue Gift Card	\$97.41
*****5981	
Entry Method: Keyed	
Auth #: 178433	
Balance: \$97.41	
Transaction Type: Refund	
Change	\$0.00

Today Foot Locker VIPS get member-only savings and benefits. Visit www.footlocker.com/VIP or the Footlocker Mobile App to check your status.

SHARE YOUR FEEDBACK

You are eligible to receive an incentive for use on your next purchase in Store or Online.

Go to www.flpulse.com within 14 days and tell us about your visit.
Enter Code: 4M78-1P3V-F2NV-7CZ8-QBE1-0056

Can not be used with any other discount offer. Select merchandise excluded. See site for complete details.

Thanks for Shopping Foot Locker!

Returned Item Count = 1

****Reprint - Reprint - Reprint - Reprint****



VIP #:



Customer Copy

****Reprint - Reprint - Reprint - Reprint****

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise

/

18CGJ163 A-B
 Grand Jury Case # _____
 Exhibit # 4
 Date 10.31.19

For questions or comments, call 1-800-991-6682.

and/or multiple offers.

- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

0066

18CGJ163A-B
Grand Jury Case # _____

return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.

- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days **WITH** a receipt.
- Returns **WITHOUT** a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days **WITH** a receipt.
- Returns **WITHOUT** a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days **WITH** a receipt.
- Returns **WITHOUT** a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days **WITH** a receipt.
- Returns **WITHOUT** a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days **WITH** a receipt.
- Returns **WITHOUT** a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.

Issue Gift Card \$250.00
*****4494
Entry Method: Keyed
Auth #: 767555
Balance: \$250.00
Transaction Type: Refund
Issue Gift Card \$226.32
*****2557
Entry Method: Keyed
Auth #: 710800
Balance: \$226.32
Transaction Type: Refund
Change \$0.00

Today Foot Locker VIPS get member-only
savings and benefits. Visit
www.footlocker.com/VIP or the Footlocker
Mobile App to check your status.

SHARE YOUR FEEDBACK

You are eligible to receive an incentive
for use on your next purchase
in Store or Online.

Go to www.flpulse.com
within 14 days

and tell us about your visit.

Enter Code: 4KXC-HMSJ-GBW7-ZAW4-A8DZ-GR4V

Can not be used with any other discount
offer. Select merchandise excluded.
See site for complete details

Thanks for Shopping Foot Locker!

Returned Item Count = 4

Reprint - Reprint - Reprint - Reprint



131MHE711414AK64ARJWQ

VIP #:



70300057818204

Customer Copy

Reprint - Reprint - Reprint - Reprint

return card in the amount of the lowest selling price for



THE MEADOWS MALL 4300 MEADOWS LANE SUITE
115
LAS VEGAS, NV 89107
702-878-8226

Visit Us At www.footlocker.com

Store: 307142 Register: 2
Date: 9/20/19 Time: 8:00 PM
Trans: 39835
Cashier: Elvin C.

Customer: Andre Snipes

Loyalty Information

Loyalty #: *****8204
Program Name: Lockers Loyalty
Program Level: Lockers VIP
Points Earned Today: 0
Total Earned Points: 0

Reprint - Reprint - Reprint - Reprint

Item	Qty	Price	Amount	Tax%
NK LAL YL WT A DAVIS SM JSY				
037101213900930	1	-\$110.00	-\$110.00	8.25%

999-SALEABLE
Return without Receipt
Sales Associate: Elvin C.

NK LAL YL WT A DAVIS SM JSY				
037101213900930	1	-\$110.00	-\$110.00	8.25%

999-SALEABLE
Return without Receipt
Sales Associate: Elvin C.



0070

10-21-19

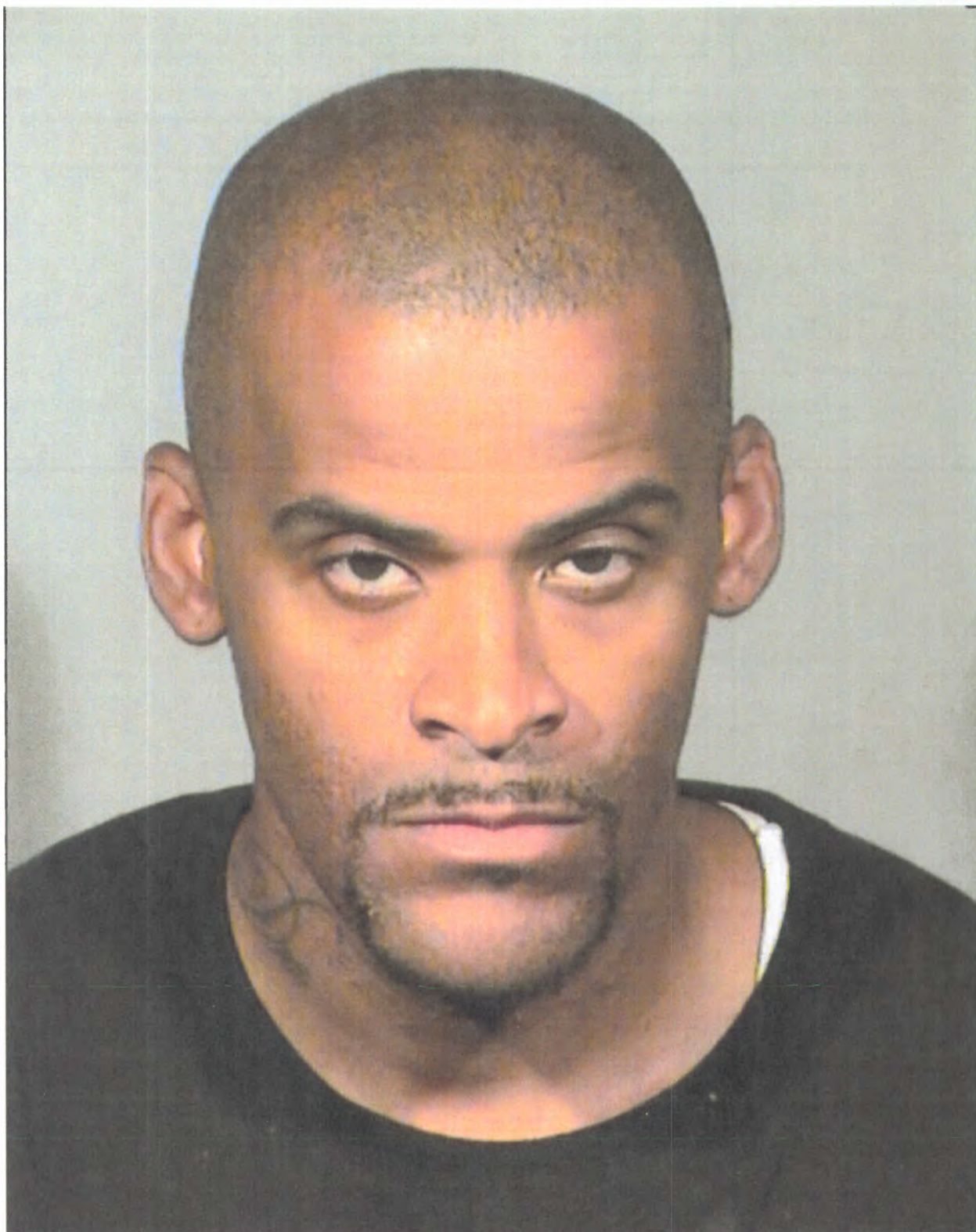
6-1-10

18C GJ 163 A-B

Grand Jury Case # _____

Exhibit # 6

Date 10.31.19



0071

10-21-19

6-1-7

18CGJ163 A-B

Grand Jury Case # _____

Exhibit # 7

Date 10-31-19

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
PHOTO LINE-UP WITNESS INSTRUCTIONS

NAME: ALBREGO, ALDEN
ADDRESS: _____
PHONE NUMBER: 702-541-0119

EVENT #: LLV190900115134
INTERVIEWED BY: DET. G. LASTER
LOCATION: 3200 S. LVB
DATE & TIME: 09-26-19/1525

"In a moment I am going to show you a group of photographs. This group of photographs may or may not contain a picture of the person who committed the crime now being investigated. The fact that the photos are being shown to you should not cause you to believe or guess that the guilty person has been caught. You do not have to identify anyone. It is just as important to free innocent persons from suspicion as it is to identify those who are guilty. Please keep in mind that hair styles, beards, and mustaches are easily changed. Also, photographs do not always depict the true complexion of a person - it may be lighter or darker than shown in the photo. You should pay no attention to any markings or numbers that may appear on the photos. Also, pay no attention to whether the photos are in color or black and white, or any other difference in the type or style of the photographs. You should study only the person shown in each photograph. Please do not talk to anyone other than Police Officers while viewing the photos. You must make up your own mind and not be influenced by other witnesses, if any. When you have completed viewing all the photos, please tell me whether or not you can make an identification. If you can, tell me in your own words how sure you are of your identification. Please do not indicate in any way to other witnesses that you have or have not made an identification. Thank you."

SIGNED: _____

DATE & TIME: 9.25.19 3:28 pm

STATEMENT:

The reason suspect #5 is the same guy that committed the
crime at fashion show mall is he had the same facial hair and the
same ~~eyes~~ eye features. He also had hair is the same skin tone
as the same guy that came in.

SIGNED: _____

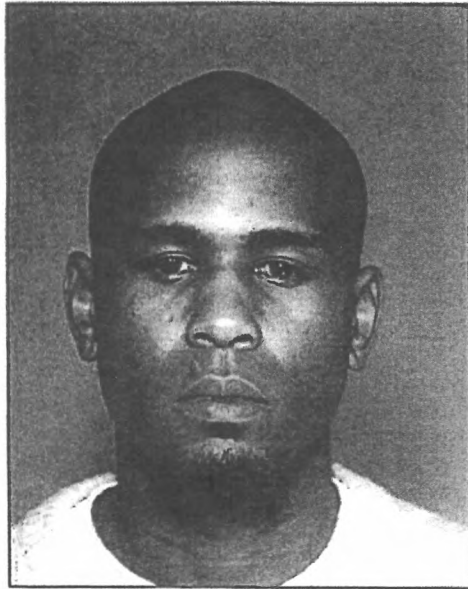
DATE & TIME: 9.25.19 3:32 pm

OFFICER'S NAME & P#: G. LASTER #5658

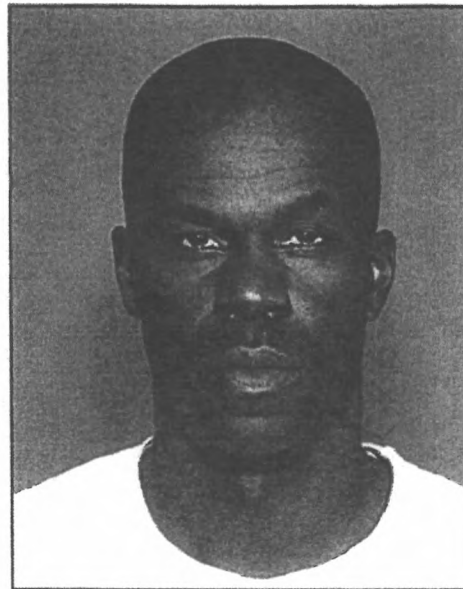
PHOTO LINE ID#: 48535

LLV190900115154

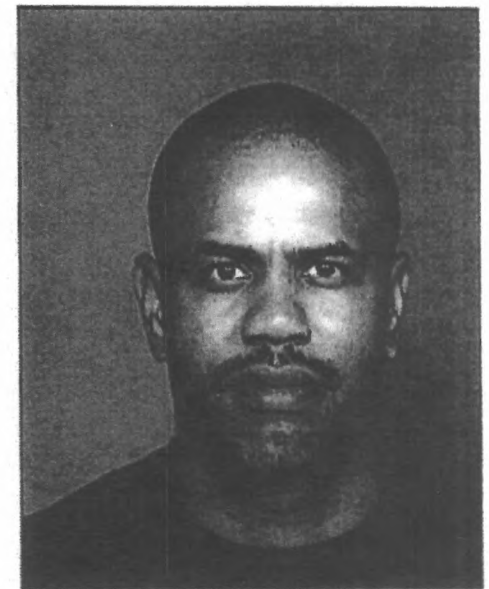
0073



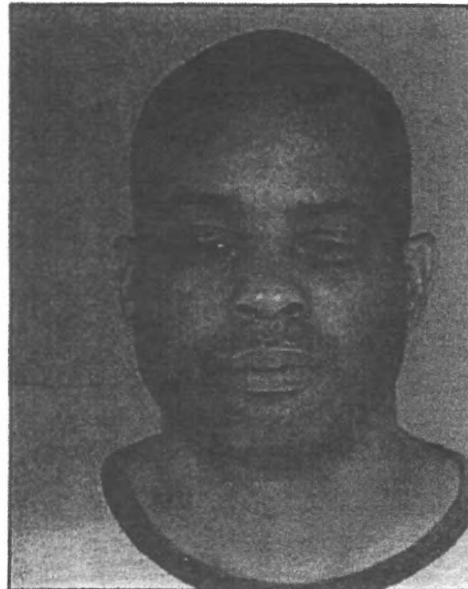
1



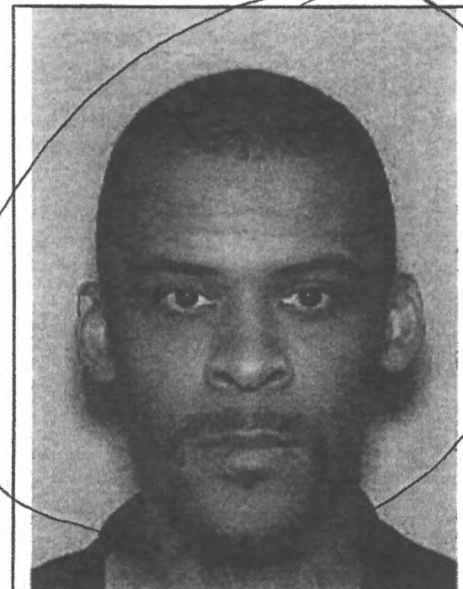
2



3

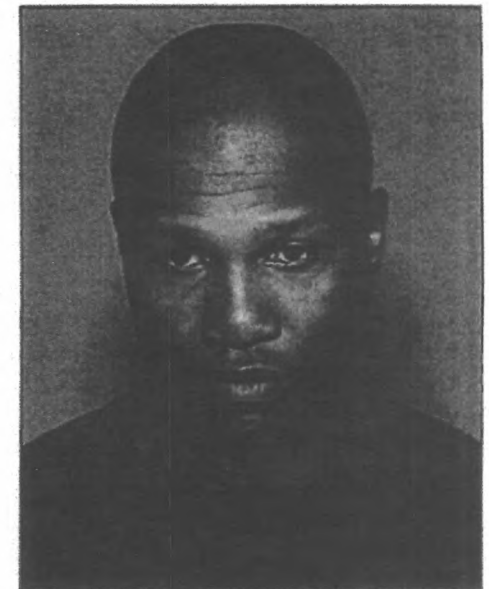


4



5

A.A



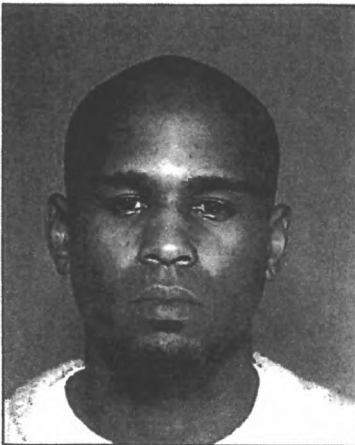
6

LLV190900115154

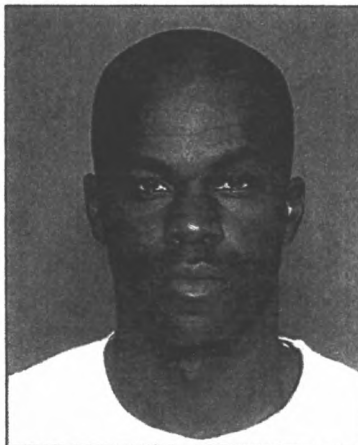
Police Department

Lineup ID: 48535

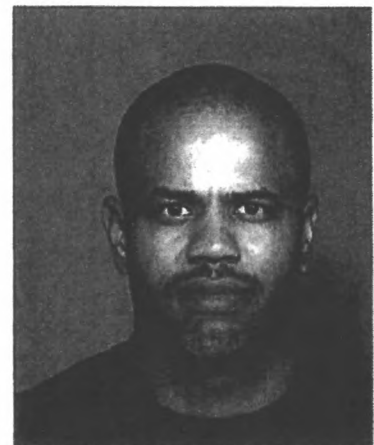
25 Sep 2019



1933440
1 SIMMONS, JASON



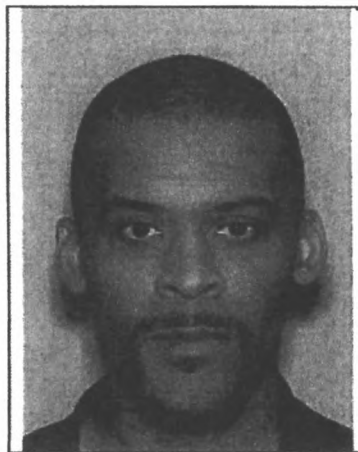
1333355
2 COLLINS, JEFFREY



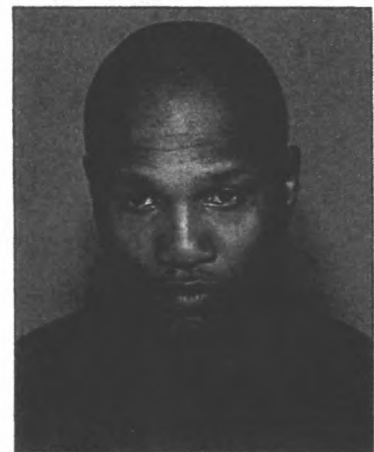
1863215
3 DELVALLE, MIGUEL



2582986
4 HARPER, TEVYE



5 SNIPES, ANDRE



1503026
6 BELL, FABIAN

FOR OFFICIAL USE ONLY

Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

0074

Grand Jury Case # 18CGJ163A-B

Exhibit # 8

Date 10/31/19

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
PHOTO LINE-UP WITNESS INSTRUCTIONS

NAME: ALBREGO, ALDEN
ADDRESS: _____
PHONE NUMBER: 702-541-0119

EVENT #: LLV190920115154
INTERVIEWED BY: DET. G. LASTER
LOCATION: 3200 S. LWS
DATE & TIME: 09-30-19 / 1520HRS

"In a moment I am going to show you a group of photographs. This group of photographs may or may not contain a picture of the person who committed the crime now being investigated. The fact that the photos are being shown to you should not cause you to believe or guess that the guilty person has been caught. You do not have to identify anyone. It is just as important to free innocent persons from suspicion as it is to identify those who are guilty. Please keep in mind that hair styles, beards, and mustaches are easily changed. Also, photographs do not always depict the true complexion of a person - it may be lighter or darker than shown in the photo. You should pay no attention to any markings or numbers that may appear on the photos. Also, pay no attention to whether the photos are in color or black and white, or any other difference in the type or style of the photographs. You should study only the person shown in each photograph. Please do not talk to anyone other than Police Officers while viewing the photos. You must make up your own mind and not be influenced by other witnesses, if any. When you have completed viewing all the photos, please tell me whether or not you can make an identification. If you can, tell me in your own words how sure you are of your identification. Please do not indicate in any way to other witnesses that you have or have not made an identification. Thank you."

SIGNED: 

DATE & TIME: 9.30.19 3:23pm

STATEMENT:

The reason why I am 100% sure it was the man in the
second slot is because he had the same eye structure, had the
same nose, and the same facial hair.

SIGNED: 

DATE & TIME: 9.30.19 3:29pm

OFFICER'S NAME & P#: G. LASTER P#5658

PHOTO LINE ID#: 48580

LLY190900115154

Police Department

Lineup ID: 48580

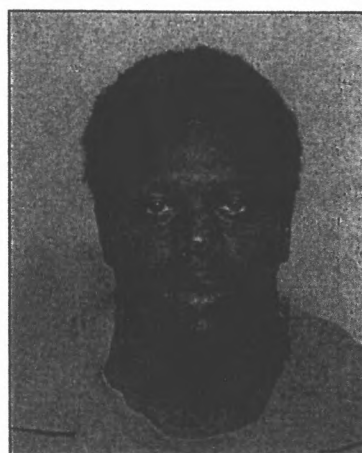
30 Sep 2019



1



2



3



4



5



6

FOR OFFICIAL USE ONLY

Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

0076

LLV1909 cc/15154

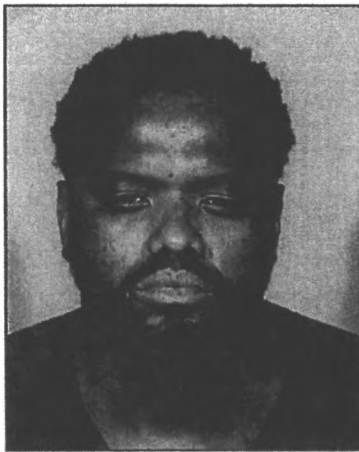
Police Department

Lineup ID: 48580

30 Sep 2019



1 1635846
JACKSON, ROOSEVELT



2 2752270
MORGAN, GREGORY



3 2644386
HALL, JESSIE



4 2632055
CONYERS, LENNIE



5 1102424
GREEN, MARVIN



6 0923419
COLLINS, BORIS

FOR OFFICIAL USE ONLY

Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

0077

Grand Jury Case # 18 CGJ 163A-B
Exhibit # 9
Date 10/31/19

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
PHOTO LINE-UP WITNESS INSTRUCTIONS

LLV19090093652

NAME: LAW, BRYAN

ADDRESS: _____

PHONE NUMBER: 702-369-0401

EVENT #: LLV190900113154

INTERVIEWED BY: DET. G. LASTER

LOCATION: 3200 S. LV6

DATE & TIME: 09-30-19 / 1550 HRS

"In a moment I am going to show you a group of photographs. This group of photographs may or may not contain a picture of the person who committed the crime now being investigated. The fact that the photos are being shown to you should not cause you to believe or guess that the guilty person has been caught. You do not have to identify anyone. It is just as important to free innocent persons from suspicion as it is to identify those who are guilty. Please keep in mind that hair styles, beards, and mustaches are easily changed. Also, photographs do not always depict the true complexion of a person - it may be lighter or darker than shown in the photo. You should pay no attention to any markings or numbers that may appear on the photos. Also, pay no attention to whether the photos are in color or black and white, or any other difference in the type or style of the photographs. You should study only the person shown in each photograph. Please do not talk to anyone other than Police Officers while viewing the photos. You must make up your own mind and not be influenced by other witnesses, if any. When you have completed viewing all the photos, please tell me whether or not you can make an identification. If you can, tell me in your own words how sure you are of your identification. Please do not indicate in any way to other witnesses that you have or have not made an identification. Thank you."

SIGNED: _____

DATE & TIME: 09/30/2019 3:55pm

STATEMENT:

his hair was a bit shorter
Facial hair match
GA

SIGNED: _____

DATE & TIME: 09/30/2019 3:57pm

PHOTO LINE ID#: 48535

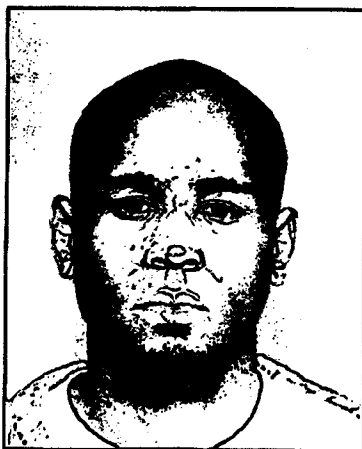
OFFICER'S NAME & P#: _____

G. LASTER #5658

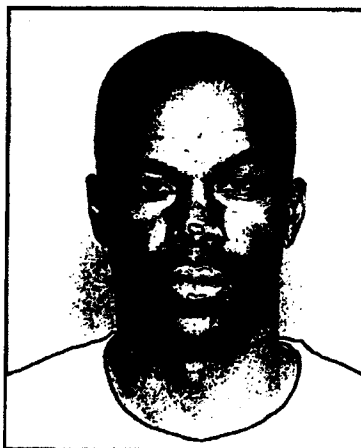
Police Department

Lineup ID: 48535

25 Sep 2019



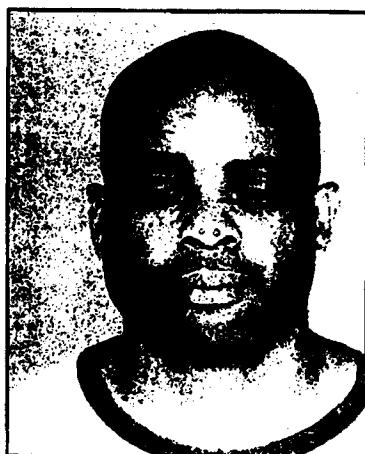
1



2



3



4



5



6

FOR OFFICIAL USE ONLY

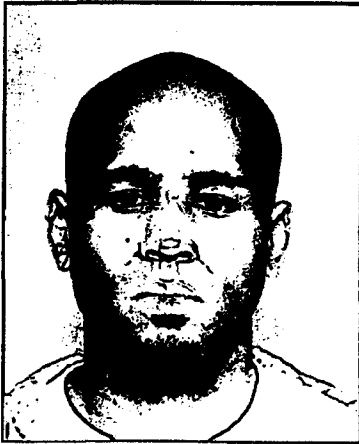
Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

0079

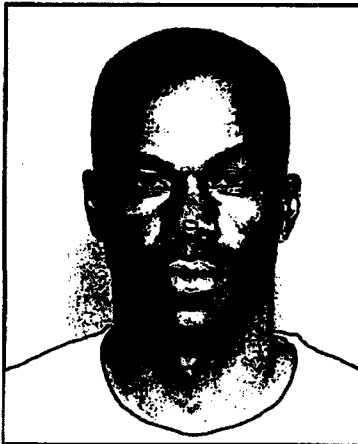
Police Department

Lineup ID: 48535

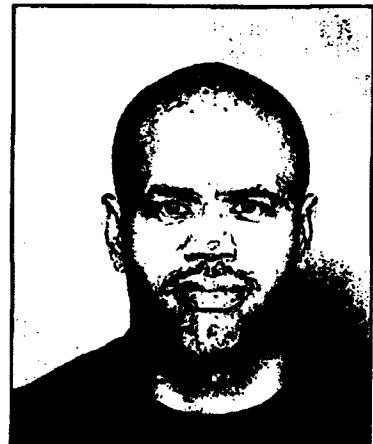
25 Sep 2019



1



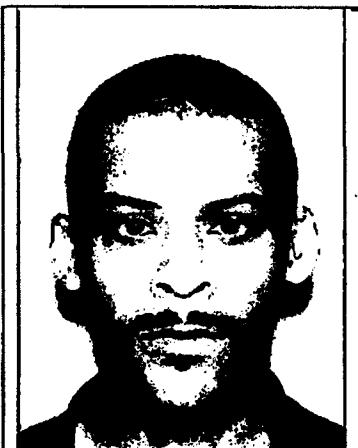
2



3



4



5



6

FOR OFFICIAL USE ONLY

Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

0080

Grand Jury Case # 18CGJ 163A-B
Exhibit # 10
Date 10/31/19

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
PHOTO LINE-UP WITNESS INSTRUCTIONS

LLV19090095652

NAME: LAWS, BRYAN
ADDRESS: _____
PHONE NUMBER: 702-369-0401

EVENT #: LLV190900115154
INTERVIEWED BY: DET. G. LASTER
LOCATION: 3200 S. LVB
DATE & TIME: 09-30-19 1555HRS

"In a moment I am going to show you a group of photographs. This group of photographs may or may not contain a picture of the person who committed the crime now being investigated. The fact that the photos are being shown to you should not cause you to believe or guess that the guilty person has been caught. You do not have to identify anyone. It is just as important to free innocent persons from suspicion as it is to identify those who are guilty. Please keep in mind that hair styles, beards, and mustaches are easily changed. Also, photographs do not always depict the true complexion of a person - it may be lighter or darker than shown in the photo. You should pay no attention to any markings or numbers that may appear on the photos. Also, pay no attention to whether the photos are in color or black and white, or any other difference in the type or style of the photographs. You should study only the person shown in each photograph. Please do not talk to anyone other than Police Officers while viewing the photos. You must make up your own mind and not be influenced by other witnesses, if any. When you have completed viewing all the photos, please tell me whether or not you can make an identification. If you can, tell me in your own words how sure you are of your identification. Please do not indicate in any way to other witnesses that you have or have not made an identification. Thank you."

SIGNED: [Signature]

DATE & TIME: 09/30/2019 3:58pm

STATEMENT:

Same guy No Glasses

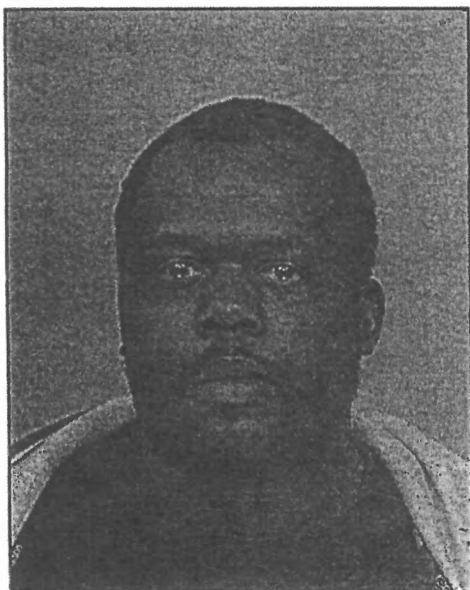
SIGNED: [Signature]

DATE & TIME: 09/30/2019 3:59p

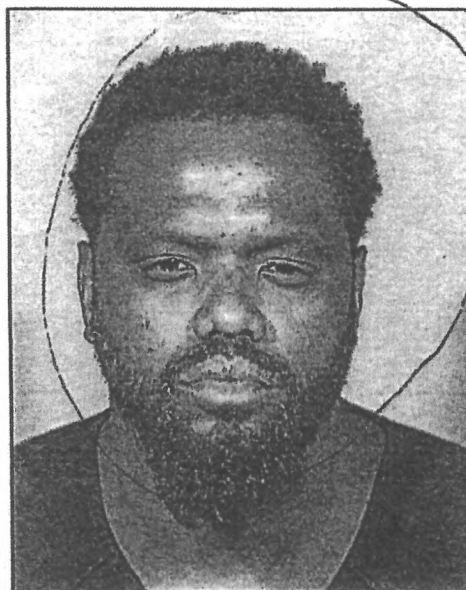
PHOTO LINE ID#: 48580

OFFICER'S NAME & P#: G. LASTER P# 5658

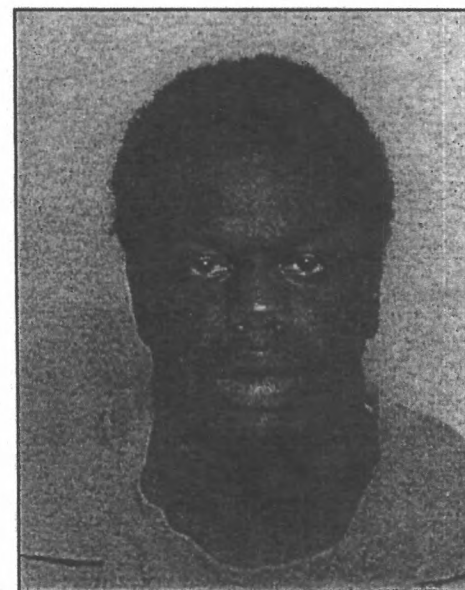
h515110061117



1 _____



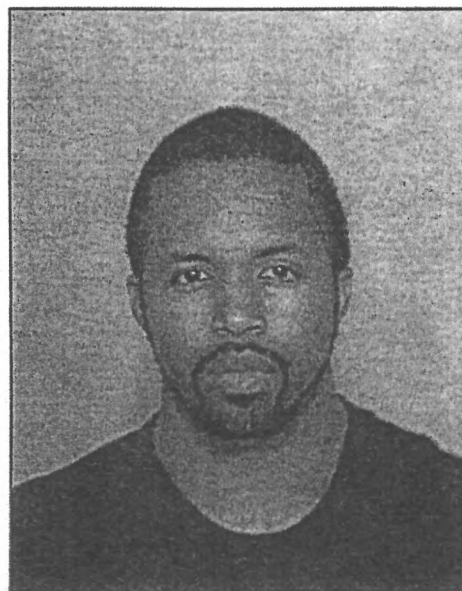
2 _____



3 _____



4 _____



5 _____

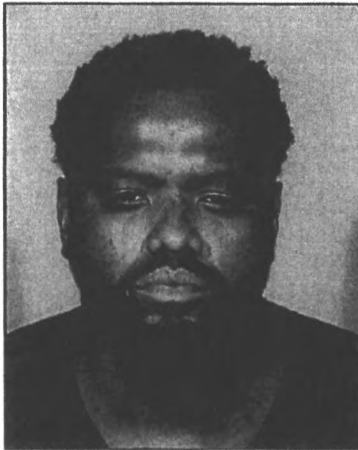


6 _____

LLV190900 115154



1 1635846
JACKSON, ROOSEVELT



2 2752270
MORGAN, GREGORY



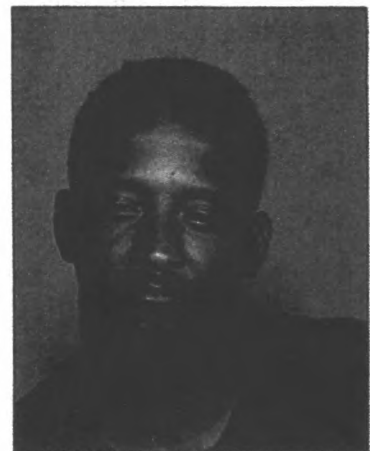
3 2644386
HALL, JESSIE



4 2632055
CONYERS, LENNIE



5 1102424
GREEN, MARVIN



6 0923419
COLLINS, BORIS

FOR OFFICIAL USE ONLY

Copyright © 2004 All rights reserved. ImageWare Systems, Inc.

Grand Jury Case # 18CG5163A-B
Exhibit # 11
Date 10/31/19

*PAGE 1 OF 2 ☐ UOF ☐ BODY CAM

*ID/CS# 7088448

☐ NEW ID

☐ JUVENILE ☐ DNA SAMPLE TAKEN ☒ DNA NOT REQ'D

CO. SGT APPROVAL

☒ REBOOK ☐ ABSENTIA ☐ FORM 6 ☐ NDOC ☐ EXT TO LAS VEGAS ☐ LVC ☐ HND ☐ NLV ☐ COURTESY HOLD ☐ DETAINER

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
TEMPORARY CUSTODY RECORD
(* DENOTES OFFICER REQUIRED FIELD)

*ARREST DATE: 11/1/2019 *ARREST TIME: 1255

*EVENT #: 190900115154

*CO-DEF:

*INTAKE NAME (AKA, ALIAS, ETC.) LAST SNIPES				FIRST ANDRE				MIDDLE GRANT				TRUE NAME LAST SNIPES				FIRST ANDRE				MIDDLE GRANT					
*HOME ADDRESS (STREET # AND STREET NAME) 480 W BONANZA RD								BLDG/APT.#		*CITY LAS VEGAS		*STATE NV		*ZIP 89106		*PLACE OF BIRTH KANSAS CITY, KANSAS									
*DATE OF BIRTH 04/21/1982		*RACE B		*HISP ETHN NH		*SEX M		*HEIGHT 5'10"		*WEIGHT 180		*HAIR BLK		*EYES BRO		*SOCIAL SECURITY # 513-84-0089		*CITIZENSHIP USA		*ALIEN REGISTRATION #		<input type="checkbox"/> US VETERAN <input type="checkbox"/> ACTIVE MILITARY			
*LOCATION OF CRIME (STREET ADDRESS, CITY, STATE, ZIP) <input checked="" type="checkbox"/> CC <input type="checkbox"/> LV WARRANT LAS VEGAS, NV 89101												*LOCATION OF ARREST (STREET ADDRESS, CITY, STATE, ZIP) CCDC LAS VEGAS, NV 89101 > ST-4N-36-S												<input type="checkbox"/> CITIZEN'S ARREST <input checked="" type="checkbox"/> SPEAKS ENGLISH	
*ARR ** TYPE		*COURT JURIS		*WARRANT # / CASE #		*# CNTS		*NOC CODE		* M GM F		*CHARGE LITERAL						*ORD / NRS		*BAIL		*EVENT# / NIC#			
IN		DC		C-19-344461-2		1		✓ 56004		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		GRAND LARCENY LESS THAN \$3500						205.222.2		25000		190900115154			
IN		DC		C-19-344461-2		1		✓ 56004		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		GRAND LARCENY LESS THAN \$3500						205.222.2		0					
IN		DC		C-19-344461-2		1		✓ 56004		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		GRAND LARCENY LESS THAN \$3500						205.222.2		0					
IN		DC		C-19-344461-2		1		✓ 50147		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		CONSP ROBBERY						200.380		0					
IN		DC		C-19-344461-2		1		✓ 50147		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		CONSP ROBBERY						200.380		0					
IN		DC		C-19-344461-2		1		✓ 50138		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		ROBBERY, E/DW						200.380		0					
*OTHER JURISDICTION:				**ARREST TYPES: PC - PROBABLE CAUSE BS - BONDSMAN SURRENDER BW - BENCH WARRANT AW - ARREST WARRANT RM - REMAND GJI - GRAND JURY INDICTMENT																					

TIME STAMP AT BOOKING 11/1/2019 5:26 PM		*ARRESTING OFFICER SIGNATURE OSCAR P MARTINEZ		*PRINTED NAME 7632		*P# MPD		*AGENCY D9		*SECTOR/BEAT OF ARREST DSD		*AREA CMD		FIRST APP DATE: TIME: COURT: <input type="checkbox"/> JUSTICE <input type="checkbox"/> MUNICIPAL <input type="checkbox"/> JUVENILE <input type="checkbox"/> STD BAIL <input type="checkbox"/> O.R. REL <input type="checkbox"/> PC <input type="checkbox"/> I.A.D. JUDGE: P# REL REV P#	
*TRANSPORTING OFFICER SIGNATURE		*PRINTED NAME		*P#		*AGENCY		AREA CMD		CUSTODY RELEASED TO NAME POSITION AGENCY					
*EMERGENCY CONTACT HOSSIE NOTGIVEN		*RELATIONSHIP GRANDMOTHER		*PHONE NUMBER (206) 329-6143		*EMAIL ADDRESS									
*# E8938F		DOC DIST P#		PID: 1:1 RT LT RI LI SCORE: REBOOK		1:N RT LT RI LI SCORE:									
				<input type="checkbox"/> POLICE RECORDS COPY <input type="checkbox"/> COURTS COPY <input checked="" type="checkbox"/> DSD RECORDS COPY <input type="checkbox"/> PROCESSING COPY											

*PAGE 2 OF 2 ☐ UOF ☐ BODY CAM

*ID/CS# 7088448

☐ JUVENILE ☐ DNA SAMPLE TAKEN ☒ DNA NOT REQ'D

CO. SGT APPROVAL

☒ REBOOK ☐ ABSENTIA ☐ FORM 6 ☐ NDOC ☐ EXT TO LAS VEGAS ☐ LVC ☐ HND ☐ NLV ☐ COURTESY HOLD ☐ DETAINER

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
TEMPORARY CUSTODY RECORD
(* DENOTES OFFICER REQUIRED FIELD)

*ARREST DATE: 11/1/2019 *ARREST TIME: 1255

*EVENT #: 190900115154

*CO-DEF:

*INTAKE NAME (AKA, ALIAS, ETC.) LAST SNIPES				FIRST ANDRE		MIDDLE GRANT		TRUE NAME LAST SNIPES				FIRST ANDRE		MIDDLE GRANT									
*HOME ADDRESS (STREET # AND STREET NAME) 480 W BONANZA RD								BLDG./APT.#		*CITY LAS VEGAS		*STATE NV		*ZIP 89106		*PLACE OF BIRTH KANSAS CITY, KANSAS							
*DATE OF BIRTH 04/21/1982		*RACE B		HISP ETHN		*SEX M		*HEIGHT 5'10"		*WEIGHT 180		*HAIR BLK		*EYES BRO		*SOCIAL SECURITY # 513-84-0089		*CITIZENSHIP USA		*ALIEN REGISTRATION #		<input type="checkbox"/> US VETERAN <input type="checkbox"/> ACTIVE MILITARY	
*LOCATION OF CRIME (STREET ADDRESS, CITY, STATE, ZIP) <input checked="" type="checkbox"/> CC <input type="checkbox"/> LV WARRANT LAS VEGAS, NV 89101												*LOCATION OF ARREST (STREET ADDRESS, CITY, STATE, ZIP) CCDC LAS VEGAS, NV 89101										<input type="checkbox"/> CITIZEN'S ARREST <input checked="" type="checkbox"/> SPEAKS ENGLISH	
*ARR ** TYPE		*COURT JURIS		*WARRANT # / CASE #				*# CNTS		*NOC CODE		*M GM F		*CHARGE LITERAL				*ORD / NRS		*BAIL		*EVENT# / NIC#	
GJI		DC		C-19-344461-2				1		50138		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		ROBBERY, E/DW				200.380		0.00			
GJI		DC		C-19-344461-2				1		50426		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY WHILE POSS OF GUN/DW				205.060.4		0.00			
GJI		DC		C-19-344461-2				1		50426		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY WHILE POSS OF GUN/DW				205.060.4		0.00			
GJI		DC		C-19-344461-2				1		50424		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY, (1ST)				205.060.2		0.00		TAPP 11-7-2019	
GJI		DC		C-19-344461-2				1		50424		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY, (1ST)				205.060.2		0.00		@9AM DC 20	
GJI		DC		C-19-344461-2				1		50424		<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY, (1ST)				205.060.2		0.00			
*OTHER JURISDICTION:												**ARREST TYPES: PC - PROBABLE CAUSE BS - BONDSMAN SURRENDER BW - BENCH WARRANT AW - ARREST WARRANT RM - REMAND GJI - GRAND JURY INDICTMENT											

TIME STAMP AT BOOKING 11/1/2019 12:59 PM		*ARRESTING OFFICER SIGNATURE <i>OSCAR Martinez 2.7632 MPD</i>		*PRINTED NAME <i>OSCAR Martinez</i>		*P# <i>27632</i>		*AGENCY <i>MPD</i>		*SECTOR/BEAT 09 OF 09		*OTHER 0900 DC 20		FIRST APP DATE:		TIME STAMP AT RELEASING	
		*TRANSPORTING OFFICER SIGNATURE		*PRINTED NAME		*P#		*AGENCY		AREA CMD				TIME:			
		*EMERGENCY CONTACT HOSSIE NOTGIVEN				CUSTODY RELEASED TO											
		*RELATIONSHIP GRANDMOTHER				NAME											
		*PHONE NUMBER 2063296143				POSITION											
		*EMAIL ADDRESS				AGENCY											
DOC DIST P#		JUDGE:														P#	
PID: 1:1 RT LT RI LI SCORE: REBOOK		REL REV P#															
<input type="checkbox"/> POLICE RECORDS COPY <input type="checkbox"/> COURTS COPY <input checked="" type="checkbox"/> DSD RECORDS COPY <input type="checkbox"/> PROCESSING COPY																	

ORIGINAL

1 IND
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

NOV 8 1 2019
BY, 
KIMBERLY ESTALA, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

CASE NO: C-19-344461-2

-vs-

DEPT NO: XX

GREGORY DELLO MORGAN,
#2752270
ANDRE GRANT SNIPES, #7088448

Defendant(s).

INDICTMENT

STATE OF NEVADA }
COUNTY OF CLARK } ss.

The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT SNIPES, accused by the Clark County Grand Jury of the crime(s) of GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and BURGLARY (Category B Felony - NRS 205.060 - NOC 50424), committed at and within the County of Clark, State of Nevada, on or between September 20, 2019 and October 2, 2019, as follows:

COUNT 1 - GRAND LARCENY

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 20, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner

C-19-344461-2
IND
Indictment
4873546



W-120192

0086

11-1-19

1 permanently thereof, steal, take and carry away, lead away or drive away property owned by
2 FOOTLOCKER, having a value of \$650.00 or more, to wit: merchandise, Defendants being
3 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
4 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
5 commission of this crime with the intent to commit this crime by providing counsel and/or
6 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

7 COUNT 2 - CONSPIRACY TO COMMIT ROBBERY

8 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
9 20, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
10 by the defendants/conspirators committing the acts as set forth in Count 3, said acts being
11 incorporated by this reference as though fully set forth herein.

12 COUNT 3 - ROBBERY WITH USE OF A DEADLY WEAPON

13 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
14 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
15 from the person of BRYAN LAWS, or in his presence, without the consent and against the
16 will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future,
17 to his person, the person of a member of his family, or of anyone in his company at the time
18 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
19 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
20 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
21 more of the following principles of criminal liability, to-wit: (1) by directly committing said
22 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
23 intent to commit this crime by providing counsel and/or encouragement to one another and/or
24 by Defendant GREGORY MORGAN actually possessing and displaying a firearm and
25 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
26 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
27 larceny.

28 //

1 COUNT 4 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
3 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
4 by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County,
5 Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a
6 firearm, a deadly weapon, during the commission of the crime and/or before leaving the
7 structure, Defendants being criminally liable under one or more of the following principles of
8 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
9 abetting one another in the commission of this crime with the intent to commit this crime by
10 providing counsel and/or encouragement to one another and/or by Defendant GREGORY
11 MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge
12 of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

13 COUNT 5 - BURGLARY

14 Defendant ANDRE SNIPES did on or about September 20, 2019, willfully,
15 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
16 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
17 with intent to commit a larceny and/or obtain money or property by false pretenses.

18 COUNT 6 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

19 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
20 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
21 by CHAMP'S SPORTS, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark
22 County, Nevada, with intent to commit larceny, while in possession of and/or gaining
23 possession of a firearm, a deadly weapon, during the commission of the crime and/or before
24 leaving the structure, Defendants being criminally liable under one or more of the following
25 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
26 aiding or abetting one another in the commission of this crime with the intent to commit this
27 crime by providing counsel and/or encouragement to one another and/or by Defendant
28

1 GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having
2 knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

3 COUNT 7- GRAND LARCENY

4 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
5 24, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
6 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
7 property owned by CHAAMP'S SPORTS, having a value of \$650.00 or more, to wit:
8 merchandise, Defendants being criminally liable under one or more of the following principles
9 of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
10 abetting one another in the commission of this crime with the intent to commit this crime by
11 providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy
12 to commit larceny.

13 COUNT 8 - CONSPIRACY TO COMMIT ROBBERY

14 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
15 24, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
16 by the defendants/conspirators committing the acts as set forth in Count 9, said acts being
17 incorporated by this reference as though fully set forth herein.

18 COUNT 9 - ROBBERY WITH USE OF A DEADLY WEAPON

19 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
20 24, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
21 from the person of ABREGO ALDEN, or in his presence, without the consent and against the
22 will of ABREGO ALDEN, by means of force or violence or fear of injury, immediate or future,
23 to his person, the person of a member of his family, or of anyone in his company at the time
24 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
25 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
26 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
27 more of the following principles of criminal liability, to-wit: (1) by directly committing said
28 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the

1 intent to commit this crime by providing counsel and/or encouragement to one another and/or
2 by Defendant GREORY MORGAN actually possessing and displaying a firearm and
3 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
4 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
5 larceny.

6 COUNT 10 - BURGLARY

7 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
8 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
9 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
10 with intent to commit a larceny and/or obtain money or property by false pretenses.

11 COUNT 11 - GRAND LARCENY

12 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
13 29, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
14 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
15 property owned by FOOTLOCKER, located at 2120 Festival Plaza Drive, having a value of
16 \$650.00 or more, to wit: basketball jerseys and/or other merchandise, Defendants being
17 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
18 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
19 commission of this crime with the intent to commit this crime by providing counsel and/or
20 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

21 COUNT 12 - BURGLARY

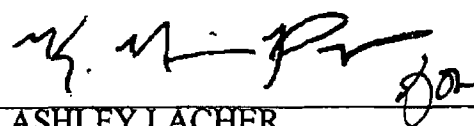
22 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
23 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
24 by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada,
25 with intent to commit larceny, Defendants being criminally liable under one or more of the
26 following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or,
27 (2) by aiding or abetting one another in the commission of this crime with the intent to commit
28 this crime by providing counsel and/or encouragement to one another and/or by Defendant

1 GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving
2 the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

3 DATED this 31 day of October, 2019.

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

7 BY



8 ASHLEY LACHER
9 Deputy District Attorney
10 Nevada Bar #014560

11 ENDORSEMENT: A True Bill

12 
13 Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

3 ALVAREZ, SAMANTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

4 CASTILLO, ELVIN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

5 LASTER, GEORGE – LVMPD #5658

6 LAWS, BRYAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

7
8 Additional Witnesses known to the District Attorney at time of filing the Indictment:

9 CUSTODIAN OF RECORDS - CCDC

10 CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV
11 NV

12 CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

13 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

14 CUSTODIAN OF RECORDS - LVMPD RECORDS

15 CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD,
16 LV NV

17 MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

18 PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

19 SUMMERS, KASHIF – LVMPD #14109

20
21
22
23
24
25
26 18CGJ163A-B/19F21141A-B/ed-GJ

27 LVMPD EV# 190900115154;

190900095652; 191099999927

28 (TK9)

Heather S. Shuman
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-VS-

ANDRE GRANT SNIPES,
ID#7088448

Defendant.

CASE NO: C-19-344461-2
DEPT NO: XX

INDICTMENT WARRANT RETURN

An Indictment having heretofore been found on the 1st day of November, 2019, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (3) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (3) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424), and upon finding the said Indictment, the court issued a warrant for the arrest of said Defendant.

I hereby certify that I received a certified copy of the Indictment Warrant and served the same by arresting the within Defendant on the 1 day of November 2019.

JOSEPH LOMBARDO
Sheriff, Clark County, Nevada

BY:

[Signature]
Deputy

11-01-19 13:02 DSD RCU

WARR

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

NOV 01 2019

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,

-vs-

ANDRE GRANT SNIPES
ID#7088448

Defendant.

BY, KIMBERLY ESTALA, DEPUTY

CASE NO: C-19-344461-2
DEPT NO: XX

WARRANT FOR ARREST

INDICTMENT WARRANT

THE STATE OF NEVADA,

To: Any Sheriff, Constable, Marshall, Policeman, or Peace Officer in This State:

An Indictment having been found on the 1st day of November, 2019, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (3) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (3) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424).

YOU ARE, THEREFORE, COMMANDED forthwith to arrest and bring said Defendant before the Court to answer the Indictment. If the Court is not in session, you are to deliver Defendant into the custody of the Sheriff of Clark County, or if requested by Defendant, take Defendant before any Magistrate in the County where arrested that bail may be given to answer to the Indictment. Defendant shall be admitted to bail in the sum of \$ 25,000 with the following added conditions:


I HEREBY AUTHORIZE THE SERVICE OF THE WITHIN WARRANT BY TELETYPE, PURSUANT TO NRS 171.148. The Warrant may be served at any hour day or night.

GIVEN under my hand this 1st day of November, 2019.


LINDA MARIE BELL
DISTRICT COURT JUDGE VII

DA# 18CGJ163A-B/19F21141A-B/ed
LVMPD EV#190900115154;
190900095652; 19109999927
4/21/1982; BMA; 513-84-0089;
(TK9)

CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE ORIGINAL ON FILE


CLERK OF THE COURT

0094

C-19-344461-2 State of Nevada
 vs
 Andre Snipes

November 01, 2019 11:00 AM Grand Jury Indictment

HEARD BY: Bell, Linda Marie

COURTROOM: RJC Courtroom 03F

COURT CLERK: Estala, Kimberly

RECORDER: Vincent, Renee

REPORTER:

PARTIES PRESENT:

Ashley A. Lacher

Attorney for Plaintiff

State of Nevada

Plaintiff

JOURNAL ENTRIES

Lawrence Holmes, Grand Jury Foreperson, stated to the Court that at least twelve members had concurred in the return of the true bill during deliberation, but had been excused for presentation to the Court. State presented Grand Jury Case Number 18CGJ163B to the Court. COURT ORDERED, the Indictment may be filed and is assigned Case Number C-19-344461-2, Department XX.

State requested a warrant, argued bail, and advised Deft is in custody. COURT ORDERED, \$25,000.00 BAIL; INDICTMENT WARRANT ISSUED, and matter SET for Arraignment.

Upon Court's inquiry, the State advised there are no material witness warrants to quash. COURT FURTHER ORDERED, Exhibits 1-11 to be lodged with the Clerk of the Court; Las Vegas Justice Court case no. 19F21141B DISMISSED per the State's request. In addition, a Pre-Trial Risk Assessment will be prepared if one was not previously done.

I.W. (CUSTODY)

11/07/19 9:00 A.M. INITIAL ARRAIGNMENT (DEPT XX)



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE#: C-19-344461-1
C-19-344461-2

10 vs.

DEPT. VII

11 GREGORY DELLO MORGAN,
12 ANDRE GRANT SNIPES,
13 Defendants.

14 BEFORE THE HONORABLE LINDA MARIE BELL, DISTRICT COURT JUDGE
15 FRIDAY, NOVEMBER 1, 2019

16 **RECORDER'S TRANSCRIPT OF PROCEEDINGS:**
17 **GRAND JURY INDICTMENT**

18 APPEARANCES:

19 For the State:

MICHAEL J. SCHWARTZER, ESQ.,
Chief Deputy District Attorney
ASHLEY A. LACHER, ESQ.
Deputy District Attorney

21
22 For the Defendants:

NO APPEARANCE

23 ALSO PRESENT: LAWRENCE HOLMES, GRAND JURY FOREPERSON

24
25 RECORDED BY: RENEE VINCENT, COURT RECORDER

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

FRIDAY, NOVEMBER 1, 2019 AT 11:26 A.M.

MR. SCHWARTZER: Yesterday the Grand Jury met on Grand Jury case number 18CGJ163A and B and by a vote of 12 or more returned a true bill against Gregory Morgan and Andre Snipes.

Regarding Gregory Morgan, it's three counts of grand larceny, two counts of conspiracy to commit robbery, two counts of robbery with use of a deadly weapon, two counts of burglary while in possession of a deadly weapon, and one count of burglary.

THE COURT: Mr. Foreman, did --

MR. SCHWARTZER: Regard -- I'm sorry.

THE COURT: Oh, I'm sorry.

MR. SCHWARTZER: Do you want me to do the second one or wait?

THE COURT: Yeah, sorry, no.

MR. SCHWARTZER: No problem. And with the -- with Defendant Snipes it's three counts of grand larceny, two counts of conspiracy to commit robbery, two counts of robbery with use of a deadly weapon, two counts of burglary while in possession of a deadly weapon, and one count -- three counts of burglary.

THE COURT: All right. Mr. Foreman, did -- this is -- I know this question, it's just been a really long morning. All right. Did at least 12 members of the Grand Jury concur in finding a true bill as to each count as to each Defendant charged in the Indictments?

THE FOREPERSON: Yes, Your Honor.

1 THE COURT: Thank you.

2 The Indictment will be filed with respect to Mr. Morgan and
3 receive case number C-19-344461-1 and be assigned to Department
4 number 20. Indictment will be filed with respect to Mr. Snipes and
5 receive case number C-19-344461-2 and be assigned to Department
6 number 20.

7 What is the position of the State regarding a warrant or
8 summons?

9 MS. LACHER: As for Mr. Morgan, he was held without bail
10 due to a parole hold pursuant to NRS 178.484(2). I'd ask that that
11 remain.

12 And then as to Defendant Snipes, out of initial arraignment
13 court he -- bail was set in the amount of \$25,000.00, and I'd ask that that
14 stand as well.

15 THE COURT: All right. So, what's the basis -- so, with
16 respect to Mr. Morgan, warrant will issue given the fact that he was on
17 parole at the time of the offense, bail will be set at no bail.

18 With respect to Mr. Snipes, what is the basis of the request?

19 MS. LACHER: The basis of the request is that the -- starting
20 with the facts of the case this was two armed robberies at -- first at the
21 Foot Locker at the Fashion Show Mall as well as the Champs at the
22 Fashion Show Mall with his co-defendant.

23 Additionally, the Defendant has substantial ties to the other
24 community, that being Washington. Per the NPR, a 1997 conviction out
25 of Washington for theft, a 1999 out of Washington as well for theft, 1999,

1 Washington for residential burglary, as well as 2001 for possession of
2 controlled substance with intent to sell. In addition I added, I believe,
3 four additional counts as to him as continued investigation revealed the
4 justification for adding different counts for a Foot Locker burglary at the
5 Meadows Mall as well. So, based upon that, I was asking for the --

6 THE COURT: All right.

7 MS. LACHER: -- for that amount.

8 THE COURT: Based on Mr. Snipes' extensive criminal
9 record, it appears he's a danger to the community. A warrant will issue,
10 bail will be set at \$25,000.00. Las Vegas Justice Court case 19F21141A
11 and B will be dismissed. We'll set a date one week in the department.

12 THE COURT CLERK: November 7th at 9 a.m.

13 THE COURT: Exhibits 1 through 11 will be lodged with the
14 Clerk of the Court and I'll order a Pretrial Risk Assessment. And then,
15 were there any material witness warrants in this case?

16 MS. LACHER: No, Your Honor.

17 THE COURT: Great. Thank you.

18 MS. LACHER: Thank you.

19 [Proceedings concluded at 11:29 a.m.]

20
21 ATTEST: I do hereby certify that I have truly and correctly transcribed
22 the audio/video proceedings in the above-entitled case to the best of my
23 ability.

24 

25 Trisha Garcia
Court Transcriber

C-19-344461-2 State of Nevada
 vs
 Andre Snipes

November 07, 2019 09:00 AM All Pending Motions

HEARD BY: Johnson, Eric **COURTROOM:** RJC Courtroom 12A

COURT CLERK: Skinner, Linda

RECORDER: Calvillo, Angie

REPORTER:

PARTIES PRESENT:

Andre Grant Snipes	Defendant
James J. Ruggeroli	Attorney for Defendant
John T. Jones, Jr.	Attorney for Plaintiff
State of Nevada	Plaintiff

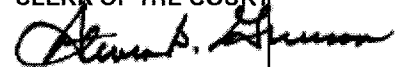
JOURNAL ENTRIES

INITIAL ARRAIGNMENT...INDICTMENT WARRANT RETURN

Upon Court's inquiry, Mr. Ruggeroli advised in speaking with Defendant he is concerned as to competency and provided the paperwork to the Court. Upon review, COURT ORDERED, matter REFERRED to Competency Court. Mr. Ruggeroli stated that Defendant wants another attorney. Court noted that can be addressed after the competency issue.

CUSTODY

12/6/19 10:00 AM FURTHER PROCEEDINGS: COMPETENCY - DEPT. 7



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE #: C-19-344461

10 vs.

DEPT. XX

11 GREGORY DELLO MORGAN and
12 ANDRE GRANT SNIPES,
13 Defendants.

14 BEFORE THE HONORABLE ERIC JOHNSON, DISTRICT COURT JUDGE
15 THURSDAY, NOVEMBER 07, 2019

16 **RECORDER'S TRANSCRIPT OF HEARING:**
17 **INITIAL ARRAIGNMENT; INDICTMENT WARRANT RETURN**

18 APPEARANCES:

19 For the State: JOHN T. JONES, JR.
Chief Deputy District Attorney

20 For Defendant Morgan: RAFAEL NONES
21 Deputy Public Defender

22 For Defendant Snipes: JAMES J. RUGGEROLI, ESQ.

23
24
25 RECORDED BY: ANGIE CALVILLO, COURT RECORDER

1 [Las Vegas, Nevada, Thursday, November 07, 2019, at 9:09 a.m.]

2

3 THE COURT: State of Nevada versus Gregory Morgan and
4 Andre Snipes, case number C344461. Counsel, please note your
5 appearances for the record.

6 MR. JONES: John Jones on behalf of the State.

7 MR. RUGGEROLI: Good morning, Your Honor. James
8 Ruggeroli on behalf of Mr. Snipes who's present in custody.

9 MR. NONES: Rafael Nones. I'm standing in for Alex Bassett
10 on Gregory Morgan, who I've just confirmed is not in custody as well,
11 according to the CCDC website. He's not present. He wouldn't have
12 known to be here. Mr. Bassett asked me to add to the record today that,
13 he didn't received a Marcum notice on this.

14 THE COURT: Okay. So, what do we want to do? Proceed
15 with the arraignment as to Mr. Snipes?

16 MR. RUGGEROLI: Well, Judge, I have an issue with that. I
17 have concerns about his competency in speaking with him this morning
18 and going over the discovery previously in custody as well as trying to
19 explain where we're at and why because of the grand jury indictment. I
20 have concerns that he needs to be looked at, so I've got the paperwork
21 for the request, if I may approach.

22 THE COURT: Sure. Thank you, sir. I assume the State has
23 no position on this.

24 MR. JONES: None, Your Honor.

25 DEFENDANT SNIPES: Can I make a statement?

1 THE COURT: It's not in your interest to make a statement.

2 Mr. Ruggeroli, if you want to walk up there and find out
3 what he's concerned about.

4 MR. RUGGEROLI: Judge, in light of competency issues; I
5 don't know how you want to proceed, but he would like to request a new
6 attorney as well.

7 THE COURT: Well before he made the request, you indicated
8 he needed to go to competency. So, at this point in time, I'm going to
9 put him into competency. And once he gets out of that, and if he still
10 wants a new attorney, we can go forward from there. All right.

11 THE CLERK: So that is December 6th at 10 a.m. in
12 Department 7.

13 MR. RUGGEROLI: Thank you, Judge.

14 THE COURT: Okay.

15 THE CLERK: What are we doing about Mr. Morgan?

16 MR. JONES: And just -- with respect to Morgan, Your
17 Honor, I show that Marcum notice was served on 10/11/19. I show it
18 was served in open court. I additionally have like numerous notes
19 throughout this file that he was being held no bail, so I'm very concerned
20 why he's not in custody.

21 THE COURT: I don't know.

22 MR. NONES: I also don't have any representations to make
23 about that. I'll have Mr. Bassett look into that October 11th Marcum.
24 What I'd ask is just for an opportunity for us to try and get a hold of Mr.
25 Morgan and bring him back on a day that Mr. Bassett is present because

1 he could probably shed some light. He's, unfortunately, leaving on his
2 honeymoon. He'll be back -- the next day that we can do is December
3 3rd if that's okay with the Court.

4 THE COURT: That's a long ways off since we don't know
5 where -- I mean, I'm just saying, he's not in custody; the State shows
6 that he's being held no bail, and you aren't exactly sure where he's at;
7 that's not a high percentage situation. I don't mind kicking it off, but I'd
8 like us to know where he's at.

9 Is there somebody who can reach out? And we just set
10 a status check in a week to see if he appears.

11 MR. NONES: We can do a week. And I'll see if Mr. Bassett
12 can figure out some information and one of us can make representations
13 on it, even if he's gone. Sure.

14 THE COURT: Okay. All right. I'm good with -- since it
15 appears there is some confusion as to him; give him a week before we
16 go the bench warrant route.

17 THE CLERK: Okay. November 14th at nine a.m. And we'll
18 just put it on for a status check?

19 THE COURT: Let's put it on for a status check arraignment. I
20 mean -- you know, maybe if you can get him here, Mr. Bassett -- if he
21 would feel comfortable with one of you guys handling the arraignment for
22 him that day.

23 //

24 //

25 //

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

MR. NONES: Absolutely, Your Honor.

THE COURT: If not, we'll -- once we confirm he's -- I don't have a problem -- he legally out of custody, I don't have a problem kicking it off to December 3 or 4 or whatever date it was.

[Hearing concluded at 9:13 a.m.]

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Angie Calvillo
Court Recorder/Transcriber

Steven D. Grierson

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

BEFORE THE GRAND JURY IMPANELED BY THE AFORESAID
DISTRICT COURT

THE STATE OF NEVADA,)

Plaintiff,)

vs.)

GREGORY DELLO MORGAN, ANDRE GRAND)
SNIPES,)

Defendants.)

GJ No. 18CGJ163A-B

DC No. C344461-2

Taken at Las Vegas, Nevada

Thursday, November 14, 2019

11:00 a.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

SUPERSEDING INDICTMENT

VOLUME 1

Reported by: Lisa Brenske, C.C.R. No. 186

Steven D. Grierson

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

BEFORE THE GRAND JURY IMPANELED BY THE AFORESAID

DISTRICT COURT

THE STATE OF NEVADA,)

Plaintiff,)

vs.)

GREGORY DELLO MORGAN, ANDRE GRAND)

SNIPES,)

Defendants.)

GJ No. 18CGJ163A-B

DC No. C344461-2

Taken at Las Vegas, Nevada

Thursday, November 14, 2019

11:00 a.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

SUPERSEDING INDICTMENT

VOLUME 1

Reported by: Lisa Brenske, C.C.R. No. 186

1 GRAND JURORS PRESENT ON NOVEMBER 14, 2019
2 LAWRENCE HOLMES, Foreperson
3 ROBERT KINNIBURGH, Deputy Foreperson
4 CLAUDIA HUNT, Secretary
5 LINDA MCARTHUR, Assistant Secretary
6 GARLAND BAILEY
7 ANNAMARIE CONKLIN
8 NATHAN CONRAD
9 REGINA CRUNDEN
10 MELISSA HILL
11 MARY KISHMARTON
12 JEANETTE LOMANDO
13 DAVID MILLER
14 JOHN ORR
15 MARY PERKINS
16 ANTHONY SHOR
17
18 Also present at the request of the Grand Jury:
19 Ashley Lacher, Deputy District Attorney
20
21
22
23
24
25

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

INDEX OF WITNESSES

Examined

DANIELA MONTALVO

7

CARMINA PANLILIO

15

KASHIF SUMMERS

21

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

INDEX OF EXHIBITS

Grand Jury Exhibits

Identified

1A - PROPOSED INDICTMENT	6
12 - RECEIPT	9
13 - RECEIPT	9
14 - PHOTOGRAPH	8
15 - PHOTOGRAPH	18
16 - PHOTOGRAPH	18
17 - PHOTOGRAPHS	23

1 LAS VEGAS, NEVADA, NOVEMBER 14, 2019

2 * * * * *

3
4 LISA BRENSKE,

5 having been first duly sworn to faithfully
6 and accurately transcribe the following
7 proceedings to the best of her ability.
8

9 MS. LACHER: Good morning, ladies and
11:00AM 10 gentlemen of the Grand Jury. My name is Deputy
11 District Attorney Ashley Lacher. I'm presenting the
12 case of State of Nevada versus Gregory Dello Morgan and
13 State of Nevada versus Andre Snipes. That's Grand Jury
14 Case Number 18CGJ163A and B. Each of you should have a
11:01AM 15 copy of the superseding Indictment. You've already
16 previously deliberated on Counts 1 through 12 and we'll
17 get a copy of that superseding Indictment marked as an
18 exhibit here soon.

19 With the permission of the foreperson my
11:01AM 20 first witness will be Daniela Montalvo and her
21 testimony will relate to Count 15.

22 THE FOREPERSON: Please raise your right
23 hand.

24 You do solemnly swear the testimony you
11:02AM 25 are about to give upon the investigation now pending

11:02AM

1 before this Grand Jury shall be the truth, the whole
2 truth, and nothing but the truth, so help you God?

3 THE WITNESS: Yes.

11:02AM

4 THE FOREPERSON: You are advised that you
5 are here today to give testimony in the investigation
6 pertaining to the offenses of grand larceny, conspiracy
7 to commit robbery, robbery with use of a deadly weapon,
8 burglary while in possession of a deadly weapon and
9 burglary involving Gregory Morgan and Andre Snipes.

11:02AM

10 Do you understand this advisement?

11 THE WITNESS: Yes.

12 THE FOREPERSON: Please state your first
13 and last name and spell both slowly for the record.

14 THE WITNESS: Daniela Montalvo.

11:02AM

15 D-A-N-I-E-L-A M-O-N-T-A-L-V-O.

16 MS. LACHER: And just before I begin the
17 superseding Indictment was marked as Grand Jury
18 Exhibit 1A and the record will reflect that everybody
19 has a copy of it.

11:03AM

20 And with that may I proceed?

21 THE FOREPERSON: Please.

22 MS. LACHER: Thank you.

23

24

11:03AM

25

11:03AM

1

DANIELA MONTALVO,

2

having been first duly sworn by the Foreperson of the

3

Grand Jury to testify to the truth, the whole truth,

4

and nothing but the truth, testified as follows:

11:03AM

5

6

EXAMINATION

7

BY MS. LACHER:

8

Q. Ma'am, where do you work?

9

A. Foot Locker.

11:03AM

10

Q. Is that the one located at the Meadows

11

Mall at 4300 Meadows Mall Lane?

12

A. Yes.

13

Q. What is your formal title at the Foot

14

Locker?

11:03AM

15

A. Assistant Manager.

16

Q. And I want to direct your attention to

17

October 6, 2019. Were you working that day at the Foot

18

Locker?

19

A. Yes.

11:03AM

20

Q. And is that Foot Locker located here in

21

Clark County, Nevada?

22

A. Yes.

23

Q. On that date did an individual enter your

24

store that caught your attention?

11:03AM

25

A. Yes.

11:03AM

1 Q. What was that person's name?

2 A. Andre.

3 Q. And how did you learn that his name was
4 Andre?

11:03AM

5 A. He had previously been there to return a
6 couple of jerseys.

7 Q. Showing you what's been marked as Grand
8 Jury Exhibit Number 14 do you recognize this person?

9 A. Yes.

11:04AM

10 Q. Who is that?

11 A. Andre.

12 Q. And that's the person who came into your
13 store, correct?

14 A. Yes.

11:04AM

15 Q. What did Andre say to you when he entered
16 the store?

17 A. That he wanted to return those two shoes
18 he was bringing in for a merchandise return card, a
19 gift card.

11:04AM

20 Q. Did you do that transaction for him?

21 A. Yes.

22 Q. He didn't have a receipt or anything
23 for --

24 A. No proof of purchase.

11:04AM

25 Q. But is it part of Foot Locker's policy to

11:04AM

1 still try and do the return regardless of that?

2 A. Yes.

3 Q. And so you did that in this case, correct?

4 A. Yes.

11:04AM

5 Q. I'm showing you Grand Jury Exhibit Number

6 12. Do you recognize that?

7 A. Yes.

8 Q. And is that the receipt from one of the
9 two transactions you did that day?

11:04AM

10 A. Yes.

11 Q. And that transaction was with Andre
12 Snipes, correct?

13 A. Yes.

14 Q. And one of the two transactions was for --

11:05AM

15 what was the first -- what's this transaction for?

16 A. It was for Jordan Team II is the name of
17 the shoe for 140.

18 Q. And you gave him a gift card for the
19 amount of 140?

11:05AM

20 A. Yes.

21 Q. And then now showing you Grand Jury
22 Exhibit Number 13 do you recognize that?

23 A. Yes.

24 Q. What is that?

11:05AM

25 A. That was the Proto-Max 720.

11:05AM

1 Q. That's the other transaction you did with
2 Andre Snipes?

3 A. Yes.

11:05AM

4 Q. Where you gave him a gift card for \$216 in
5 exchange for the shoes?

6 A. Yes.

7 Q. And do these two receipts fairly and
8 accurately depict the transactions that you did that
9 day?

11:05AM

10 A. Yes.

11 Q. And you had access to them as an Assistant
12 Manager and gave them to me for testimony today?

13 A. Yes.

11:05AM

14 Q. Did you later learn that this was part of
15 other transactions that Andre Snipes did at your store?

16 A. Yes. Well, we had -- the jerseys came
17 first and then the shoes. That's how I recognized him
18 from the jerseys.

11:06AM

19 Q. And then you later got law enforcement
20 involved with the incidents related to the jerseys as
21 well as the shoes that you were present for?

22 A. Yes.

23 Q. And Andre Snipes didn't have any
24 permission to return items that he never paid for with
25 your store, correct?

11:06AM

11:06AM

1 A. Can you rephrase that.

2 Q. Sure. He never had permission -- you
3 would never have given him permission had you known
4 about other events to do this transaction?

11:06AM

5 A. No.

6 Q. It was only until later that you learned
7 and reported it, correct?

8 A. Yes.

9 MS. LACHER: I don't have any more

11:06AM

10 questions for this witness. Do any of the Grand
11 Jurors?

12 BY A JUROR:

13 Q. I'm just curious. Within your system of
14 tracking merchandise, if something is stolen it doesn't
15 automatically pop up because of its SKU or whatever as
16 an item that had been not purchased at another store?

11:07AM

17 A. It doesn't --

18 MS. LACHER: Let me kind of maybe ask a
19 different way to keep it cleaner.

11:07AM

20 BY A JUROR:

21 Q. In other words, if I steal a shirt and
22 then bring it into a store to return it, the stolen
23 shirt isn't marked some way in your system as having
24 been stolen and then when you put it in for refund it
25 pops up as a stolen item?

11:07AM

11:07AM

1 A. No. But we have a really good connection
2 with other managers. So I believe when they first
3 stole from Fashion Show, the managers there reported it
4 to all the managers in the area. So we were able to
5 recognize him -- when he provided us with his ID we
6 were able to track that it was the same person.

11:07AM

7 BY MS. LACHER:

8 Q. When you scan an initial item, do you know
9 initially where that item came from?

11:08AM

10 A. No.

11 Q. So somebody could be trying to return an
12 item from let's say any other store, not a Foot Locker
13 store, and you wouldn't necessarily know that just
14 because you scanned it, correct?

11:08AM

15 A. Correct. As long as it scans in the
16 system we're able to take it in.

17 Q. When it scans in the system that just
18 means that Foot Locker carries that brand?

19 A. In general.

11:08AM

20 Q. Not necessarily that it's from that store?

21 A. Yes.

22 MS. LACHER: Anything else based upon
23 that?

24 THE FOREPERSON: Seeing no further

11:08AM

25 questions.

11:08AM

1 By law these proceedings are secret and
2 you are prohibited from disclosing to anyone anything
3 that transpired before us including evidence presented
4 to the Grand Jury, any event occurring or statement
5 made in the presence of the Grand Jury or any
6 information obtained by the Grand Jury.

11:08AM

7 Failure to comply with this admonition is
8 a gross misdemeanor punishable up to 364 days in the
9 Clark County Detention Center and a 2000-dollar fine.

11:08AM

10 In addition you may be held in contempt of court which
11 is punishable by an additional 500-dollar fine and 25
12 days in the Clark County Detention Center.

13 Do you understand this admonition?

14 THE WITNESS: Yes.

11:09AM

15 THE FOREPERSON: Thank you. You're
16 excused.

17 MS. LACHER: State's next witness is
18 Carmina Panlilio and her testimony will relate to
19 Counts 13 and 14.

11:09AM

20 THE FOREPERSON: Please raise your right
21 hand.

22 You do solemnly swear the testimony you
23 are about to give upon the investigation now pending
24 before this Grand Jury shall be the truth, the whole
25 truth, and nothing but the truth, so help you God?

11:09AM

11:00AM

1

THE WITNESS: Yes, sir.

2

THE FOREPERSON: Please be seated.

3

You are advised that you are here today to

4

give testimony in the investigation pertaining to the

11:10AM

5

offenses of grand larceny, conspiracy to commit

6

robbery, robbery with use of a deadly weapon, burglary

7

while in possession of a deadly weapon and burglary

8

involving Gregory Morgan and Andre Snipes.

9

Do you understand this advisement?

11:10AM

10

THE WITNESS: Yes, sir.

11

THE FOREPERSON: Please state your first

12

and last name and spell both slowly for the record.

13

THE WITNESS: Carmina Panlilio.

14

C-A-R-M-I-N-A. Last name is P-A-N-L-I-L-I-O.

11:10AM

15

MS. LACHER: May I proceed?

16

THE FOREPERSON: Please.

17

MS. LACHER: Thank you.

18

19

11:10AM

20

21

22

23

24

11:00AM

25

11:00AM

1

CARMINA PANLILIO,

2

having been first duly sworn by the Foreperson of the

3

Grand Jury to testify to the truth, the whole truth,

4

and nothing but the truth, testified as follows:

11:10AM

5

6

EXAMINATION

7

BY MS. LACHER:

8

Q. Ma'am, where do you work?

9

A. At the Nike Henderson Factory store.

11:10AM

10

Q. And is that the Nike store located at 9851

11

South Eastern here in Clark County, Nevada?

12

A. Yes, it is.

13

Q. I want to direct your attention

14

specifically to October 2nd, 2019. Were you working

11:11AM

15

that day?

16

A. Yes, I was.

17

Q. And when you were working that day did two

18

individuals enter the store that caught your attention?

19

A. Yes.

11:11AM

20

Q. Could you describe for me what they looked

21

like.

22

A. Two African American males. One of them

23

had a darker complexion and a goatee and the other one

24

was a lighter skinned African American also had a

11:11AM

25

goatee but not as long.

11:11AM

1 Q. And what were they doing that caught your
2 attention?

11:11AM

3 A. The first one that caught my attention was
4 the one with the longer goatee. He had a Foot Locker
5 bag and it was very flat as he was walking around our
6 store.

7 Q. And why did that Foot Locker bag catch
8 your attention?

11:11AM

9 A. We're trained as managers to observe those
10 kind of things because there's no Foot Lockers around
11 our vicinity or in our shopping center.

12 Q. And what were those two males doing that
13 you personally observed?

11:11AM

14 A. So they entered the store. They walked
15 around. After I serviced them that's when they started
16 to observe me and started to grab mesh bags, select
17 product, put it in the mesh bags and then exit the
18 store.

19 Q. What did they say to you, if anything?

11:12AM

20 A. So I approached, I was like hi, how are
21 you guys today and the guy in the white tank top, the
22 one with the longer goatee, was like I'm good and just
23 proceeded to walk around.

24 Q. What items did they take?

11:12AM

25 A. Jordan Retros.

11:02AM

1 Q. How many shoes each did they take?

2 A. Three pairs each.

3 Q. And what were the value of those shoes?

4 A. About 220 each.

11:12AM

5 Q. And do you know that based upon being the
6 manager at the store?

7 A. Yeah. So I'm the loss prevention liaison
8 for the district. So after the incidents occur I will
9 watch the videos, approach the product that they took,
10 get those numbers and figures and add them all up.

11:12AM

11 Q. And what was the total value of the items
12 taken from your store estimate?

13 A. About 12 or 1300.

14 Q. When they were exiting the store did

11:13AM

15 anybody try to confront them?

16 A. So once they passed like the point of sale
17 I was already standing by the door because I was
18 already aware of what they were going to be doing. So
19 I asked if they were ready to check out, they just
20 looked at me, ignored me and proceeded to walk out.

11:13AM

21 Q. And they made no efforts to pay?

22 A. No, ma'am.

23 Q. Are you certain that all of the shoes
24 taken were all of one variety?

11:13AM

25 A. All of one variety.

11:13AM

1 Q. And so it's fair to say that these two
2 individuals entered the store together, were
3 communicating with each other while they were in the
4 store and then also left together without paying?

11:13AM

5 A. Yes, ma'am. It'll show that on the video
6 too.

11:14AM

7 Q. I want to talk about as a manager do you
8 have -- you mentioned that you had access to the
9 surveillance video from that date in the ordinary
10 course and scope of your duties as a manager, correct?

11 A. Yes.

12 Q. And that's kept by Nike for surveillance
13 video purposes?

14 A. Yes.

11:14AM

15 Q. And you accessed those and gave them to
16 law enforcement, correct?

17 A. Yes.

18 Q. I'm showing you what's been marked as
19 Grand Jury Exhibits 15 and 16. Do you recognize those?

11:14AM

20 A. Yes.

21 Q. What are those? Let's start with 15,
22 Grand Jury Exhibit 15. What is that?

23 A. So those are the two gentlemen that walked
24 out of the store without paying for the merchandise,
25 both with Nike mesh shopping bags that our consumers

11:14AM

11:14AM

1 use in the store for shopping.

2 Q. And those were the two individuals that
3 you had came into contact with and came and left
4 without paying for those shoes?

11:15AM

5 A. Yes, ma'am.

6 Q. And Grand Jury Exhibits 15 and 16 fairly
7 and accurately depict the still photographs from the
8 surveillance video that you were able to pull from that
9 day, correct?

11:15AM

10 A. Yes.

11 Q. And they're date and time stamped at the
12 bottom, correct?

13 A. Correct.

14 MS. LACHER: I don't have any more

11:15AM

15 questions for this witness. Do any of the Grand
16 Jurors?

17 BY A JUROR:

18 Q. I'm sorry. Would you spell your first
19 name again?

11:15AM

20 A. C-A-R-M-I-N-A.

21 A JUROR: Great. Thank you so much.

22 THE FOREPERSON: By law these proceedings
23 are secret and you are prohibited from disclosing to
24 anyone anything that transpired before us including
25 evidence presented to the Grand Jury, any event

11:15AM

11:15AM

1 occurring or statement made in the presence of the
2 Grand Jury or any information obtained by the Grand
3 Jury.

11:15AM

4 Failure to comply with this admonition is
5 a gross misdemeanor punishable up to 364 days in the
6 Clark County Detention Center and a 2000-dollar fine.
7 In addition you may be held in contempt of court which
8 is punishable by an additional 500-dollar fine and 25
9 days in the Clark County Detention Center.

11:15AM

10 Do you understand this admonition?

11 THE WITNESS: Yes, sir.

12 THE FOREPERSON: Thank you. You're
13 excused.

14 THE WITNESS: Thank you.

11:16AM

15 THE FOREPERSON: Please raise your right
16 hand.

17 You do solemnly swear the testimony you
18 are about to give upon the investigation now pending
19 before this Grand Jury shall be the truth, the whole
20 truth, and nothing but the truth, so help you God?

11:16AM

21 THE WITNESS: Yes, sir.

22 THE FOREPERSON: Please be seated.

23 You are advised that you are here today to
24 give testimony in the investigation pertaining to the
25 offenses of grand larceny, conspiracy to commit

11:16AM

11:16AM

1 robbery, robbery with use of a deadly weapon, burglary
2 while in possession of a deadly weapon and burglary
3 involving Gregory Morgan and Andre Snipes.

4 Do you understand this advisement?

11:16AM

5 THE WITNESS: Yes, sir.

6 THE FOREPERSON: Please state your first
7 and last name and spell both slowly for the record.

8 THE WITNESS: My name is Kashif Summers.
9 That's K-A-S-H-I-F. Last name Summers, S-U-M-M-E-R-S.

11:17AM

10 MS. LACHER: May I proceed?

11 THE FOREPERSON: Please.

12 MS. LACHER: Thank you.

13

14

KASHIF SUMMERS,

11:17AM

15 having been first duly sworn by the Foreperson of the
16 Grand Jury to testify to the truth, the whole truth,
17 and nothing but the truth, testified as follows:

18

19

EXAMINATION

11:17AM

20 BY MS. LACHER:

21 Q. Sir, where do you work?

22 A. I'm a detective with the Las Vegas
23 Metropolitan Police Department.

24 Q. And how long have you worked there?

11:17AM

25 A. I've worked with Metro in total of 10

11:17AM 1 years. I've been a detective in that unit for the past
2 two years.

3 Q. What's your current assignment?

4 A. The organized retail theft unit.

11:17AM 5 Q. Do you have any specialized training or
6 experience that assigns you to that department?

7 A. Yes, ma'am.

8 Q. What's that?

9 A. I've underwent detective school,
11:17AM 10 surveillance classes, confidential informant classes.
11 All the required classes to become a detective within
12 that unit.

13 Q. Around that time period of October 2nd,
14 2019 were you assigned to an investigation related to a
11:17AM 15 Nike store at the 9851 South Eastern Avenue location?

16 A. Yes, ma'am.

17 Q. And what was your involvement with that
18 investigation?

19 A. I was the detective assigned to conduct
11:18AM 20 followup.

21 Q. And what was that?

22 A. To determine who the suspects were
23 involved in the crime.

24 Q. What kind of tools did you use to
11:18AM 25 determine the identity of the suspects?

11:18AM

1 A. I utilized our facial recognition program
2 that's operated by our Fusion Watch Center.

3 Q. Tell us about that and what that involves.

11:18AM

4 A. Facial recognition is a new tool that
5 we've encompassed over the last year and a half. You
6 basically submit a photo of your suspect to the Fusion
7 Watch. They're able to input that photo into our
8 facial recognition system and it gives us a possible
9 match for a suspect based off of DMV photos or other
10 booking photos or other law enforcement tools.

11:18AM

11 Q. In this case did you review the
12 surveillance video from Nike as well as interviewing
13 witnesses and speaking with other law enforcement
14 detectives?

11:19AM

15 A. Yes, I did.

16 Q. I'm going to show you Grand Jury Exhibit
17 Number 17. Do you recognize that exhibit?

18 A. Yes, I do.

19 Q. And what are we looking at at Grand Jury
20 Exhibit Number 17?

11:19AM

21 A. So the top photos here are still photos of
22 the incident at Nike. The below photos are taken from
23 up top and then with a photo of each suspect that was
24 obtained through law enforcement programs.

11:19AM

25 Q. And I'm going to direct your attention to

11:19AM

1 the middle photograph in the series of three. Were you
2 able to determine the identity of that individual from
3 the Nike incident based upon your investigation?

11:20AM

4 A. Yes. Based upon my investigation I
5 determined that individual to be Andre Snipes --
6 Gregory Morgan. I apologize.

7 Q. And that's the middle --

8 A. The middle one, yes.

11:20AM

9 Q. And the photograph on the bottom were you
10 able to use your investigation as well to determine the
11 identity of that individual?

12 A. Yes, ma'am.

11:20AM

13 Q. And who was the individual that you
14 determined to be at the last photograph at the bottom
15 of the page?

16 A. That would be Andre Snipes.

17 Q. And in conjunction you were working with
18 Detective Laster in his investigation as well as
19 determining the suspects' identity, correct?

11:20AM

20 A. That is correct.

21 Q. And not just using facial recognition, you
22 also worked with him in this case?

23 A. That is correct.

11:20AM

24 MS. LACHER: I don't have any more
25 questions for this witness. Do any of the Grand

11:21AM

1 Jurors?

2 THE FOREPERSON: Seeing no further
3 questions.

11:21AM

4 By law these proceedings are secret and
5 you are prohibited from disclosing to anyone anything
6 that transpired before us including evidence presented
7 to the Grand Jury, any event occurring or statement
8 made in the presence of the Grand Jury or any
9 information obtained by the Grand Jury.

11:21AM

10 Failure to comply with this admonition is
11 a gross misdemeanor punishable up to 364 days in the
12 Clark County Detention Center and a 2000-dollar fine.
13 In addition you may be held in contempt of court which
14 is punishable by an additional 500-dollar fine and 25
15 days in the Clark County Detention Center.

16 Do you understand this admonition?

17 THE WITNESS: I do.

18 THE FOREPERSON: Thank you. You're
19 excused.

11:21AM

20 MS. LACHER: Ladies and gentlemen, that'll
21 conclude the testimony here today. I don't have any
22 more witnesses. I'm not going to ask you to
23 deliberate. When you come back next time I will have
24 the transcripts from the first presentment as well as
25 the presentment here today. Thank you for your time.

11:21AM

11:21AM

1 (Proceedings continued to an undetermined date.)

2

3

4

--oo0oo--

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

11:01AM 1 **REPORTER'S CERTIFICATE**

2
3 **STATE OF NEVADA**)
4 : ss
5 **COUNTY OF CLARK**)

11:21AM 6 I, Lisa Brenske, C.C.R. 186, do hereby
7 certify that I took down in Shorthand (Stenotype) all
8 of the proceedings had in the before-entitled matter at
9 the time and place indicated and thereafter said
10 shorthand notes were transcribed at and under my
11 direction and supervision and that the foregoing
12 transcript constitutes a full, true, and accurate
13 record of the proceedings had.

14 Dated at Las Vegas, Nevada,
11:21AM 15 November 18, 2019.

16
17
18 /S/LISA BRENSKE

19 _____
Lisa Brenske, C.C.R. 186
11:21AM 20
21
22
23
24
25

11:21AM

1

AFFIRMATION

2

Pursuant to NRS 239B.030

3

4

The undersigned does hereby affirm that the
preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER
18CGJ163A-B:

11:21AM

5

6

7

8

X Does not contain the social security number of any
person,

9

11:21AM

10

-OR-

11

___ Contains the social security number of a person as
required by:

12

13

A. A specific state or federal law, to-
wit: NRS 656.250.

14

-OR-

11:21AM

15

16

B. For the administration of a public program
or for an application for a federal or
state grant.

17

18

/S/LISA BRENSKE

19

Signature

November 18, 2019

Date

11:21AM

20

21

Lisa Brenske
Print Name

22

23

Official Court Reporter
Title

24

25

1 **IND**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 GREGORY DELLO MORGAN, #2752270
13 ANDRE GRANT SNIPES, #7088448

14 Defendant(s).

CASE NO:

DEPT NO: 7

**SUPERSEDING
INDICTMENT**

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

17 The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT
18 SNIPES, accused by the Clark County Grand Jury of the crime(s) of GRAND LARCENY
19 (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); CONSPIRACY TO
20 COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147);
21 ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380,
22 193.165 - NOC 50138); BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON
23 (Category B Felony - NRS 205.060 - NOC 50426) and BURGLARY (Category B Felony -
24 NRS 205.060 - NOC 50424), committed at and within the County of Clark, State of Nevada,
25 on or between September 20, 2019 and October 6, 2019, as follows:

26 //

27 //

28 //

0135

1 COUNT 1 - GRAND LARCENY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
3 20, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
4 permanently thereof, steal, take and carry away, lead away or drive away property owned by
5 FOOTLOCKER, having a value of \$650.00 or more, to wit: merchandise, Defendants being
6 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
7 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
8 commission of this crime with the intent to commit this crime by providing counsel and/or
9 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

10 COUNT 2 - CONSPIRACY TO COMMIT ROBBERY

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
12 20, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
13 by the defendants/conspirators committing the acts as set forth in Count 3, said acts being
14 incorporated by this reference as though fully set forth herein.

15 COUNT 3 - ROBBERY WITH USE OF A DEADLY WEAPON

16 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
17 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
18 from the person of BRYAN LAWS, or in his presence, without the consent and against the
19 will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future,
20 to his person, the person of a member of his family, or of anyone in his company at the time
21 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
22 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
23 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
24 more of the following principles of criminal liability, to-wit: (1) by directly committing said
25 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
26 intent to commit this crime by providing counsel and/or encouragement to one another and/or
27 by Defendant GREGORY MORGAN actually possessing and displaying a firearm and
28 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with

1 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
2 larceny.

3 COUNT 4- BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

4 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
5 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
6 by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County,
7 Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a
8 firearm, a deadly weapon, during the commission of the crime and/or before leaving the
9 structure, Defendants being criminally liable under one or more of the following principles of
10 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
11 abetting one another in the commission of this crime with the intent to commit this crime by
12 providing counsel and/or encouragement to one another and/or by Defendant GREGORY
13 MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge
14 of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

15 COUNT 5 - BURGLARY

16 Defendant ANDRE SNIPES did on or about September 20, 2019, willfully,
17 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
18 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
19 with intent to commit a larceny and/or obtain money or property by false pretenses.

20 COUNT 6 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

21 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
22 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
23 by CHAMP'S SPORTS, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark
24 County, Nevada, with intent to commit larceny, while in possession of and/or gaining
25 possession of a firearm, a deadly weapon, during the commission of the crime and/or before
26 leaving the structure, Defendants being criminally liable under one or more of the following
27 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
28 aiding or abetting one another in the commission of this crime with the intent to commit this

crime by providing counsel and/or encouragement to one another and/or by Defendant GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

COUNT 7- GRAND LARCENY

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 24, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to deprive the owner permanently thereof, steal, take and carry away, lead away or drive away property owned by CHAAMP'S SPORTS, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

COUNT 8 - CONSPIRACY TO COMMIT ROBBERY

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 24, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery, by the defendants/conspirators committing the acts as set forth in Count 9, said acts being incorporated by this reference as though fully set forth herein.

COUNT 9 - ROBBERY WITH USE OF A DEADLY WEAPON

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 24, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise, from the person of ABREGO ALDEN, or in his presence, without the consent and against the will of ABREGO ALDEN, by means of force or violence or fear of injury, immediate or future, to his person, the person of a member of his family, or of anyone in his company at the time of the robbery, defendant using force or fear to obtain or retain possession of the property, to prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said

1 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
2 intent to commit this crime by providing counsel and/or encouragement to one another and/or
3 by Defendant GREORY MORGAN actually possessing and displaying a firearm and
4 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
5 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
6 larceny.

7 COUNT 10 - BURGLARY

8 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
9 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
10 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
11 with intent to commit a larceny and/or obtain money or property by false pretenses.

12 COUNT 11 - GRAND LARCENY

13 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
14 29, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
15 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
16 property owned by FOOTLOCKER, located at 2120 Festival Plaza Drive, having a value of
17 \$650.00 or more, to wit: basketball jerseys and/or other merchandise, Defendants being
18 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
19 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
20 commission of this crime with the intent to commit this crime by providing counsel and/or
21 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

22 COUNT 12 - BURGLARY

23 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
24 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
25 by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada,
26 with intent to commit larceny, Defendants being criminally liable under one or more of the
27 following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or,
28 (2) by aiding or abetting one another in the commission of this crime with the intent to commit

1 this crime by providing counsel and/or encouragement to one another and/or by Defendant
2 GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving
3 the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

4 COUNT 13 - BURGLARY

5 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
6 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by NIKE,
7 located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to commit
8 larceny, Defendants being criminally liable under one or more of the following principles of
9 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
10 abetting one another in the commission of this crime with the intent to commit this crime by
11 providing counsel and/or encouragement to one another; and/or (3) pursuant to a conspiracy
12 to commit the crime of burglary.

13 COUNT 14 - GRAND LARCENY

14 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
15 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
16 permanently thereof, steal, take and carry away, lead away or drive away property owned by
17 NIKE, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally
18 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
19 committing said crime; and/or, (2) by aiding or abetting one another in the commission of this
20 crime with the intent to commit this crime by providing counsel and/or encouragement to one
21 another; and/or, (3) pursuant to a conspiracy to commit larceny.

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 COUNT 15 – BURGLARY

2 Defendant ANDRE SNIPES did on or about October 6, 2019, willfully, unlawfully,
3 and feloniously enter a retail establishment and/or business, owned or occupied by
4 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
5 with intent to commit a larceny and/or obtain money or property by false pretenses.

6 DATED this _____ day of November, 2019.

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

10 BY

11 ASHLEY LACHER
12 Deputy District Attorney
13 Nevada Bar #014560

14 ENDORSEMENT: A True Bill

15 _____
16 Foreperson, Clark County Grand Jury

17
18
19
20
21
22
23
24
25
26
27
28

0141

Names of Witnesses and testifying before the Grand Jury:

ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

ALVAREZ, SAMANTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

CASTILLO, ELVIN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LASTER, GEORGE – LVMPD #5658

LAWS, BRYAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

Additional Witnesses known to the District Attorney at time of filing the Indictment:

CUSTODIAN OF RECORDS - CCDC

CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV NV

CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS - LVMPD RECORDS

CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD, LV NV

MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

SUMMERS, KASHIF – LVMPD #14109

18CGJ163A-B/19F21141A-B/ed-GJ

LVMPD EV# 190900115154;

190900095652; 191099999927

(TK9)

18CGJ163A-B

Grand Jury Case # _____

Exhibit # 1A

Date 11-14-19



THE MEADOWS MALL 4300 MEADOWS LANE SUITE
115
LAS VEGAS, NV 89107
702-878-8226

Visit Us At www.footlocker.com

Store: 307142 Register: 2
Date: 10/6/19 Time: 1:23 PM
Trans: 40446
Cashier: Daniela M.

Customer: Andre Snipes

Loyalty Information

Loyalty #: *****8204
Program Name: Lockers Loyalty
Program Level: Lockers Platinum
Points Earned Today: -20
Total Earned Points: 0

Reprint - Reprint - Reprint - Reprint

Item	Qty	Price	Amount	Tax%
JM TEAM 2 NV/WT/GUM				
034101113004100	1	-\$140.00	-\$140.00	8.25%

999-SALEABLE
Return without Receipt
Sales Associate: Elvin C.

Subtotal -\$140.00
Tax -\$11.55

0143

11-101-10

Total	-\$151.55
Issue Gift Card	\$151.55
*****8857	
Entry Method: Keyed	
Auth #: 347744	
Balance: \$151.55	
Transaction Type: Refund	
Change	\$0.00

Today Foot Locker VIPS get member-only savings and benefits. Visit www.footlocker.com/VIP or the Footlocker Mobile App to check your status.

SHARE YOUR FEEDBACK

You are eligible to receive an incentive for use on your next purchase in Store or Online.

Go to www.flpulse.com within 14 days and tell us about your visit.
Enter Code: 4JTW-W6QZ-ZHZY-04AP-C7H6-GWFA

Can not be used with any other discount offer. Select merchandise excluded. See site for complete details.

Thanks for Shopping Foot Locker!

Returned Item Count = 1

18CGJ163A-B
Grand Jury Case # _____
Exhibit # 12
Date 11/14/19

****Rep: 11. rint***

- There are no fees charged for exchanges, returns or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for

the last 60 days, which may include special sales and/or multiple offers.

- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise



THE MEADOWS MALL 4300 MEADOWS LANE SUITE
115
LAS VEGAS, NV 89107
702-878-8226

Visit Us At www.footlocker.com

Store: 307142 Register: 2
Date: 10/6/19 Time: 1:21 PM
Trans: 40445
Cashier: Daniela M.

Customer: Andre Snipes

Loyalty Information

Loyalty #: *****8204
Program Name: Lockers Loyalty
Program Level: Lockers Platinum
Points Earned Today: -200
Total Earned Points: 20

****Reprint - Reprint - Reprint - Reprint****

Item	Qty	Price	Amount	Tax%
PROTO MAX 720 WG/BK/VLT				
034101128804110				
	1	-\$200.00	-\$200.00	8.25%

999-SALEABLE
Return without Receipt
Sales Associate: Elvin C.

0147

Subtotal - \$200.00
Tax - \$16.50

GJ-13

11-14-19

Total	- \$216.50
Issue Gift Card	\$216.50
*****3027	
Entry Method: Keyed	
Auth #: 136011	
Balance: \$216.50	
Transaction Type: Refund	
Change	\$0.00

Today Foot Locker VIPS get member-only savings and benefits. Visit www.footlocker.com/VIP or the Footlocker Mobile App to check your status.

SHARE YOUR FEEDBACK

You are eligible to receive an incentive for use on your next purchase in Store or Online.

Go to www.flpulse.com within 14 days and tell us about your visit.
Enter Code: 4JTW-W6JT-HKD2-D09W-QFFC-VAKS

Can not be used with any other discount offer. Select merchandise excluded.
See site for complete details

Thanks for Shopping Foot Locker!

Returned Item Count = 1

Grand Jury Case # 18CGJ163AB
Exhibit # 13
Date 1/14/19

Reprint Reprint***

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.

- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

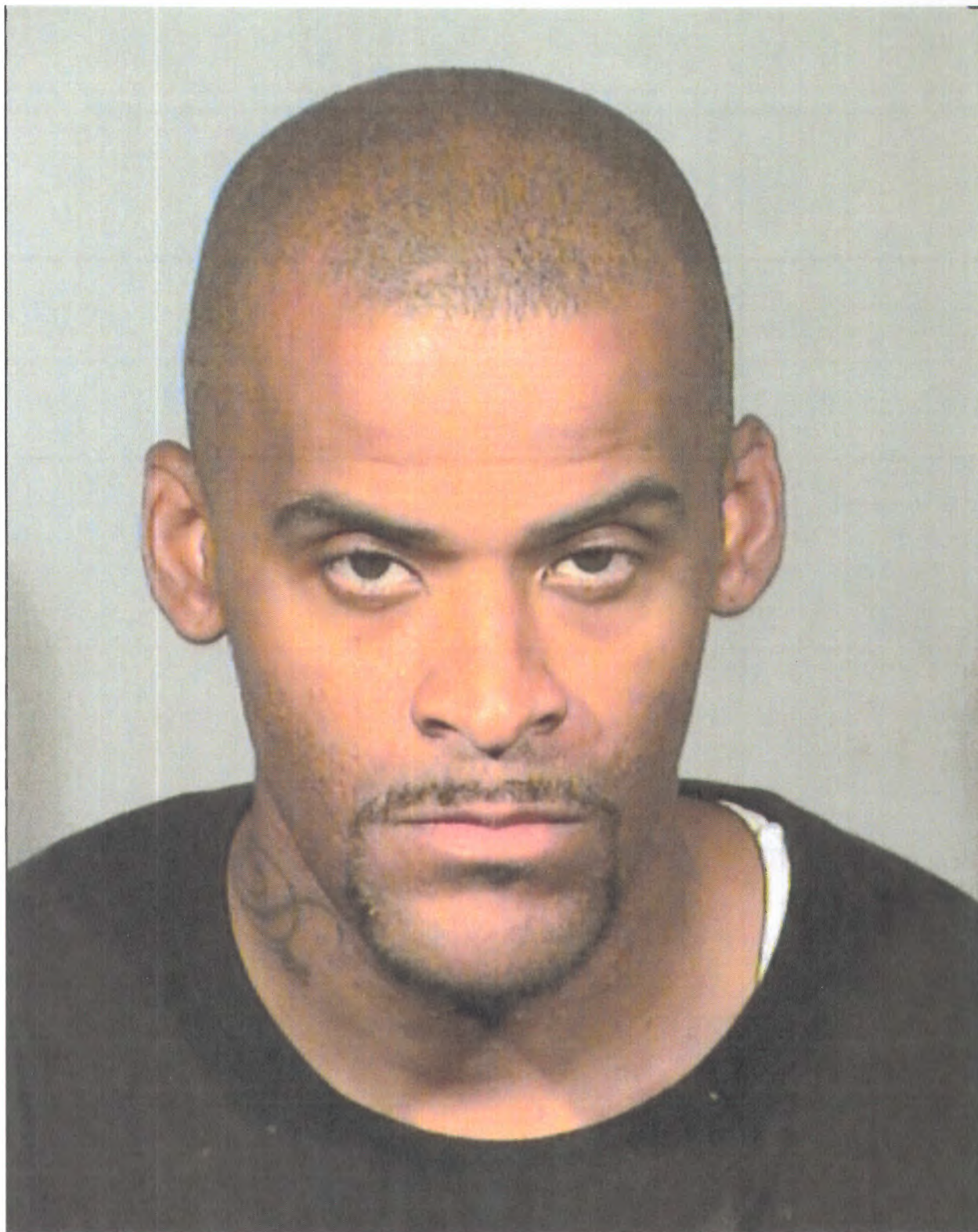
- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or returns.
- A copy of the Return Policy is available upon request.
- Your satisfaction is our concern.
- For questions or comments, call 1-800-991-6682.

FOOT LOCKER PROMISE:

- To give a refund or exchange on unworn merchandise within 45 days WITH a receipt.
- Returns WITHOUT a receipt for unworn merchandise are exchangeable for merchandise or a merchandise return card in the amount of the lowest selling price for the last 60 days, which may include special sales and/or multiple offers.
- There are no fees charged for exchanges, refunds or



0151

11-14-19

11-14-19

Grand Jury Case # 18CGJ/63A-13
Exhibit # 14
Date 11/14/19



0152

F41 10/2/2019 02:02:05.

Grand Jury Case # 18CGJ163A-B

Exhibit # 15

Date 11/14/19

GJ-16



0153

F41 10/2/2019 02:02:04.

11-14-19

18CJ163A-B
Grand Jury Case # _____
Exhibit # 14
Date 11/14/19

LLV191099999927
Nike | 9851 S. Eastern Ave



October 2nd, 2019



Gregory Morgan ID# 2752270 (above) Andre Snipes ID# 7088448 (below)



Grand Jury Case # 18CGJ163 A-B

Exhibit # 17

Date 11/14/19

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

December 06, 2019

C-19-344461-2 State of Nevada
 vs
 Andre Snipes

December 06, 2019 10:00 AM Further Proceedings: Competency

HEARD BY: Bell, Linda Marie COURTROOM: RJC Courtroom 10C

COURT CLERK: Estala, Kimberly

RECORDER: Vincent, Renee

REPORTER:

PARTIES PRESENT:

James J. Ruggeroli

Attorney for Defendant

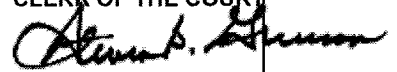
JOURNAL ENTRIES

Also present: Defendant present. Glen O Brien, Deputy District Attorney and Denise Baker of the Specialty Courts.

There being no challenge by Defense Counsel, COURT FINDS Defendant COMPETENT pursuant to the Dusky Standard as Defendant is capable of understanding the nature of the charges against him and is able to assist counsel in his defense and ORDERED, pursuant to 178.420, matter TRANSFERRED back to the originating court for further proceedings.

CUSTODY

12/12/19 9:00 AM FURTHER PROCEEDINGS: RETURN FROM COMPETENCY COURT
DEPT. 20



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE#: C-19-344461-2
DEPT. VII

10 vs.

11 ANDRE GRANT SNIPES,
12 Defendant.

13
14 BEFORE THE HONORABLE LINDA MARIE BELL, DISTRICT COURT JUDGE
15 FRIDAY, DECEMBER 6, 2019

16 **RECORDER'S TRANSCRIPT OF PROCEEDINGS:**
17 **FURTHER PROCEEDINGS: COMPETENCY**

18 APPEARANCES:

19 For the State:

GLEN P. O'BRIEN, ESQ.
Chief Deputy District Attorney

20 For the Defendant:

JAMES J. RUGGEROLI, ESQ.

21
22
23
24
25 RECORDED BY: RENEE VINCENT, COURT RECORDER

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

FRIDAY, DECEMBER 6, 2019 AT 11:39 A.M.

THE COURT: Page 33, State of Nevada versus Andre Snipes, case number C344461-2.

MS. ROMNEY: Your Honor, that's Mr. Ruggeroli's case.

THE COURT: He's present in custody.

All right. Sir, go ahead and have a seat for a minute.

[Proceedings trailed at 11:39 a.m.]

[Proceedings recalled at 11:59 a.m.]

THE COURT: Page 33, State of Nevada versus Andre Snipes, case number C344461.

MR. RUGGEROLI: Good morning, Your Honor, James Ruggeroli appearing on -- apologize for being late. I had an evidentiary hearing in Department XXV.

THE COURT: That's all right. We're not done yet, so you're still on time.

MR. RUGGEROLI: Very good.

THE COURT: So, Doctors Kapel and Harder had found Mr. Snipes competent to proceed with adjudication. Do you have any challenge to that finding?

MR. RUGGEROLI: No challenge, Your Honor.

THE COURT: Pursuant to NRS 178.420, I find Mr. Snipes competent to proceed with adjudication based on reports of Dr. Kapel and Dr. Harder. This case will return to District Court Department XX.

THE COURT CLERK: December 12th at 9 a.m.

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


MR. RUGGEROLI: Thank you, Judge.

THE COURT: Thank you.

MR. RUGGEROLI: Have a nice weekend.

[Proceedings concluded at 11:59 a.m.]

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Trisha Garcia
Court Transcriber

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

December 12, 2019

C-19-344461-2 State of Nevada
 vs
 Andre Snipes

December 12, 2019 09:00 AM Further Proceedings: Return from Competency Court

HEARD BY: Johnson, Eric

COURTROOM: RJC Courtroom 12A

COURT CLERK: Skinner, Linda

RECORDER: Calvillo, Angie

REPORTER:

PARTIES PRESENT:

Andre Grant Snipes

Defendant

Hetty O. Wong

Attorney for Plaintiff

James J. Ruggeroli

Attorney for Defendant

State of Nevada

Plaintiff

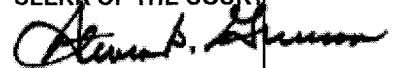
JOURNAL ENTRIES

Mr. Ruggeroli advised Defendant was returned from Competency Court as being competent, requested he be arraigned and a trial date set. Ms. Wong concurred and requested it be set with the co-defendant. DEFENDANT SNIPES ARRAIGNED, PLED NOT GUILTY AND INVOKED THE SIXTY (60) DAY RULE. COURT ORDERED, matter SET for trial with co-defendant.

CUSTODY

1/14/20 8:30 AM CALENDAR CALL

1/21/20 1:00 PM JURY TRIAL



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE #: C-19-344461-2

10 vs.

DEPT. XX

11 ANDRE GRANT SNIPES,
12 Defendant.

13
14 BEFORE THE HONORABLE ERIC JOHNSON, DISTRICT COURT JUDGE
15 THURSDAY, DECEMBER 12, 2019

16 **RECORDER'S TRANSCRIPT OF HEARING:**
17 **FURTHER PROCEEDINGS: RETURN FROM COMPETENCY COURT**

18 APPEARANCES:

19 For the State:

HETTY O. WONG
Chief Deputy District Attorney

20 For the Defendant:

JAMES J. RUGGEROLI, ESQ.

21
22
23
24
25 RECORDED BY: ANGIE CALVILLO, COURT RECORDER

1 [Las Vegas, Nevada, Thursday, December 12, 2019, at 9:39 a.m.]

2

3 THE COURT: State of Nevada versus Andre Snipes, case
4 number C344461. Counsel, please note your appearances for the
5 record.

6 MS. WONG: Hetty Wong for the State.

7 MR. RUGGEROLI: Good morning, Your Honor. James
8 Ruggeroni appearing on his behalf. He's present in custody.

9 Judge, he's been returned from Competency Court.
10 He is competent. He had previously invoked his right to a speedy trial;
11 he'd like to keep that, if we could just have an invoked speedy trial date
12 please.

13 THE COURT: He has been arraigned?

14 MR. RUGGEROLI: I believe he was. If you want to go
15 through it again to be sure, it could be in there.

16 MS. WONG: I don't believe he was.

17 THE COURT: I wasn't sure on that, that's why I have a note
18 down here looking at the prior record.

19 MS. WONG: Yeah. I don't believe he was. And, Judge, the
20 co-defendant in this case is set for trial January 21st, so we would just
21 ask for the same date.

22 THE COURT: Okay. All right. We'll go ahead and do -- all
23 right.

24 Mr. Snipes, would you -- have you received a copy of
25 the Indictment against you in this case?

1 THE DEFENDANT: Yes, I have.
2 THE COURT: All right. Have you read it?
3 THE DEFENDANT: Yes, I have.
4 THE COURT: And do you waive me reading it out loud here
5 in court today?
6 THE DEFENDANT: No, you don't have to read it.
7 THE COURT: Okay. Thank you. Please state your true
8 name.
9 THE DEFENDANT: Andre Grant Snipes.
10 THE COURT: How old are you?
11 THE DEFENDANT: Thirty-seven.
12 THE COURT: How far did you go in school?
13 THE DEFENDANT: Eleventh grade.
14 THE COURT: Do you read, write and understand the English
15 language?
16 THE DEFENDANT: Yes, I do.
17 THE COURT: Okay. You've been provided with a true copy
18 of the Indictment in which you have been charged in Count 1, 7 and 11
19 with grand larceny, a category C felony, in violation of Nevada Revised
20 Statute 205.220.1 and 205.222.2; in Counts 2 and 8 with conspiracy to
21 commit robbery, a category B felony, in violation of Nevada Revised
22 Statute 200.380 and 199.480; in Counts 3 and 9 with robbery with use of
23 a deadly weapon, category B felony, in violation of Nevada Revised
24 Statute 200.380 and 193.165; in Counts 4 and 6 with burglary while in
25 possession of a deadly weapon, category B felony, in violation of

1 Nevada Revised Statute 205.060, and in Counts 5, 10 and 12 with
2 burglary, category B felony, in violation of Nevada Revised Statute
3 205.060.

4 Do you understand the nature of the charges against
5 you in the Indictment?

6 THE DEFENDANT: Yes, I do.

7 THE COURT: And have you discussed these charges
8 sufficiently with your attorney for you to enter a plea here today?

9 THE DEFENDANT: Yes, I have.

10 THE COURT: All right. How then do you plead to the charges
11 in Counts 1 through 12 of the Indictment, guilty or not guilty?

12 THE DEFENDANT: Not guilty.

13 THE COURT: Not guilty. Your attorney has indicated you
14 wish to invoke your right to a speedy trial within 60 days from your date
15 of your arraignment in this case. In other words, 60 days from today's
16 date. Is that correct?

17 THE DEFENDANT: Yes, I do.

18 THE COURT: Okay. Let's go ahead and set this for trial then.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

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

THE CLERK: Calendar call January 14th at 8:30; jury trial
January 21st at 1 p.m.

MR. RUGGEROLI: Thank you, Judge.

[Hearing concluded at 9:42 a.m.]

ATTEST: I do hereby certify that I have truly and correctly transcribed the
audio/video proceedings in the above-entitled case to the best of my ability.



Angie Calvillo
Court Recorder/Transcriber



1 NWEW
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

11 -vs-

12 ANDRE GRANT SNIPES,
13 #7088448

14 Defendant.

CASE NO: C-19-344461-2

DEPT NO: XX

15 **STATE'S NOTICE OF WITNESSES AND/OR EXPERT WITNESSES**
16 **[NRS 174.234]**

17 TO: ANDRE GRANT SNIPES, Defendant; and

18 TO: JAMES J. RUGGEROLI, ESQ., Counsel of Record:

19 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
20 NEVADA intends to call the following witnesses and/or expert witnesses in its case in chief:

21 BEVERIDGE, J. - LVMPD P#6707 - With the Las Vegas Metropolitan Police
22 Department. An expert in the area of organized retail theft investigations, and will give related
23 opinions thereto.

24 LASTER, G. - LVMPD P#5658 - A Detective with the Las Vegas Metropolitan Police
25 Department.

26 SUMMERS, K. - LVMPD P#14109 - A Detective with the Las Vegas Metropolitan
27 Police Department as a Detective and Facial Recognition. An expert in the area of organized
28 retail theft investigations, and will give related opinions thereto.

W:\2019\2019F211\41\19F21141-NWEW-(SNIPES__ANDRE)-001.DOCX

	<u>NAME</u>	<u>ADDRESS</u>
1	ALDEN, ABREGO	C/O DISTRICT ATTORNEY'S OFFICE
2	ALVAREZ, SAMANTHA	ADDRESS UNKNOWN
3	AYLA, MICHELLE	ADDRESS UNKNOWN
4	BEVERIDGE, J.	LVMPD P#6707
5	CASTILLO, ELVIN	ADDRESS UNKNOWN
6	CLARK, J.	LVMPD P#13952
7	COURTLEY, K.	LVMPD P#15762
8	CUSTODIAN OF RECORDS	CCDC
9	CUSTODIAN OF RECORDS	CHAMPS SPORTS, 3200 S Las Vegas Blvd, LVN
10	CUSTODIAN OF RECORDS	FASHION SHOW MALL
11	CUSTODIAN OF RECORDS	Foot Locker, 4300 Meadows Lane Ste 115, LVN
12	CUSTODIAN OF RECORDS	LVMPD - DISPATCH/COMMUNICATIONS
13	CUSTODIAN OF RECORDS	LVMPD - RECORDS
14	CUSTODIAN OF RECORDS	NIKE
15	CUSTODIAN OF RECORDS	WHITTLESEA BLUE CAB
16	CUSTODIAN OF RECORDS	WYNN HOTEL
17	CUSTODIAN OF RECORDS	WYNN HOTEL SECURITY
18	DENSON, A.	LVMPD P#15763
19	DOUGHERTY, EDWARD	DA INVESTIGATOR AND/OR DESIGNEE
20	FISCHER, E.	LVMPD P#16456
21	FLORES, ARMANDO	ADDRESS UNKNOWN
22	GARCIA, C.	LVMPD P#13130
23	JACOBITZ, J.	LVMPD P#9398
24	LASTER, G.	LVMPD P#5658
25	LAWS, JR., BRYAN	C/O DISTRICT ATTORNEY'S OFFICE
26	LNU, RUBY	FOOTLOCKER SUMMERLIN
27	LNU, STEVE	FASHION SHOW FOOTLOCKER
28		

1 MARU, YOHANNES ADDRESS UNKNOWN
2 MIKALONIS, S. LVMPD P#15903
3 MILLS, P. LVMPD P#15854
4 MONTALVO, DANIELLA ADDRESS UNKNOWN
5 PANLILLO, CARMINA ADDRESS UNKNOWN
6 SUMMERS, K. LVMPD P#14109
7 WEBB, T. LVMPD P#15851

8 These witnesses are in addition to those witnesses endorsed on the Information or
9 Indictment and any other witness for which a separate Notice of Witnesses and/or Expert
10 Witnesses has been filed.

11 The substance of each expert witness' testimony and copy of all reports made by or at
12 the direction of the expert witness will be provided in discovery.

13 A copy of each expert witness' curriculum vitae, if available, is attached hereto.

14
15 STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

16
17 BY 

18 ASHLEY LACHER
19 Deputy District Attorney
Nevada Bar #014560

20 CERTIFICATE OF ELECTRONIC FILING

21 I hereby certify that service of the above and foregoing was made this 24th day of
22 December, 2019, by Electronic Filing to:

23
24 JAMES J. RUGGEROLI, ESQ.
Email: ruggeroli@icloud.com

25
26 BY: 

27 Secretary for the District Attorney's Office

28 19F21141B/ckb/L4

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

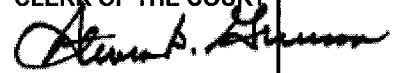
CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

CLERK OF THE COURT
Alvin B. Hanson

Electronically Filed
1/14/2020 2:52 PM
Steven D. Grierson
CLERK OF THE COURT



00:00:59

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

00:00:59

BEFORE THE GRAND JURY IMPANELED BY THE AFORESAID
DISTRICT COURT

00:00:59

THE STATE OF NEVADA,)
)
Plaintiff,)
)
vs.) GJ Case No. 18CGJ163A-B
) DC Case No. C344461
GREGORY DELLO MORGAN,)
ANDRE GRANT SNIPES,)
)
Defendants.)
=====)

00:00:59

Taken at Las Vegas, Nevada
Thursday, January 9, 2020
9:28 a.m.

00:00:59

REPORTER'S TRANSCRIPT OF PROCEEDINGS
Superseding Indictment - Volume 2

00:00:59

Reported by: Donna J. McCord, C.C.R. No. 337

00:00:59

1 GRAND JURORS PRESENT ON JANUARY 9, 2020:

2

3 LAWRENCE HOLMES, Foreperson,

4 ROBERT KINNIBURGH, Deputy Foreperson

00:00:59

5 CLAUDIA HUNT, Secretary

6 LINDA MCARTHUR, Assistant Secretary

7 TONI ANDERSON

8 GARLAND BAILEY

9 ANNAMARIE CONKLIN

00:00:00

10 NATHAN CONRAD

11 REGINA CRUNDEN

12 MELISSA HILL

13 MARY KISHMARTON

14 JEANETTE LOMANDO

00:00:00

15 DAVID MILLER

16 JOHN ORR

17 MARY PERKINS

18 ANTHONY SHOR

19

00:00:00

20

21 Also present at the request of the Grand Jury:

22 Ashley Lacher
23 Deputy District Attorney

24

00:00:00

25

00:00:00

1

INDEX OF WITNESSES

2

EXAMINED

3

CARMINA PANLILIO

8

4

00:00:00

5

6

7

8

9

00:00:00

10

11

12

13

14

00:00:00

15

16

17

18

19

00:00:00

20

21

22

23

24

00:00:01

25

00:00:01

1

INDEX OF EXHIBITS

2

3

GRAND JURY EXHIBITSIDENTIFIED

4

EXHIBIT 1B - SUPERSEDING INDICTMENT

5

00:00:01

5

EXHIBIT 2A - INSTRUCTIONS

6

6

EXHIBIT 17 - PHOTOGRAPH

11

7

EXHIBIT 18 - TRANSCRIPT

5

8

EXHIBIT 19 - TRANSCRIPT

5

9

EXHIBIT 20 - PHOTOGRAPH

9

00:00:01

10

EXHIBIT 21 - PHOTOGRAPH

9

11

EXHIBIT 22 - PHOTOGRAPH

9

12

13

14

00:00:01

15

16

17

18

19

00:00:01

20

21

22

23

24

25

00:00:02

1 LAS VEGAS, NEVADA, JANUARY 9, 2020

2 * * * * *

00:00:023
4 DONNA J. McCORD,5 having been first duly sworn to faithfully
6 and accurately transcribe the following
7 proceedings to the best of her ability.
809:28:399 MS. LACHER: Good morning, ladies and
10 gentlemen. My name is Ashley Lacher. I'm the Deputy
11 District Attorney assigned to the case. I'll be
12 presenting the superseding Indictment in the case of the
13 State of Nevada versus Gregory Morgan and Andre Snipes.
14 A copy of the superseding Indictment has been given to
15 all of the Grand Jurors and --09:28:57

16 A JUROR: It should be 2 --

09:29:3417 MS. LACHER: And the superseding Indictment
18 is going to be marked as Grand Jury Exhibit 1B and the
19 case number is 18CGJ163A and B. Additionally if any of
20 the Grand Jurors were not here for the previous two
21 presentments I have copies of the transcripts from those
22 dates. That's Grand Jury Exhibits 19 and 18 as well.09:29:5423 Before we get started I would just like to
24 make you aware of a couple of changes that I anticipate.
25 On Counts 1 and 2 on page 2 of the superseding

09:29:57

1 Indictment, the only defendant that will be listed will
2 be Defendant Gregory Morgan and/or other unknown
3 co-conspirators. That will be page 2, line 2 and line
4 11. Additionally at the end I'll be adding Count 17.

09:30:18

5 That will be the charge of organized retail theft and
6 the language of that will be that Gregory Morgan and/or
7 Andre Snipes or other unknown co-conspirators did
8 willfully, unlawfully, feloniously participate in
9 organized retail theft, the aggregated value of the

09:30:40

10 property in all the thefts being committed in the
11 organized retail theft in this state during a period of
12 90 days at least \$3,500 but less than \$10,000 by
13 entering and taking either gift card refunds,
14 merchandise from all the named victims in this case,
15 Nike, Foot Locker and Champs, in the time period from
16 July 4th, 2019, to October 2nd, 2019.

09:30:59

17 There's been an updated jury instruction as
18 well and that's marked for that charge that I just
19 discussed as Grand Jury Exhibit 2A. With that and the
20 permission of the Foreperson I would like to call my
21 final witness in this case, Carmina Panlilio and her
22 testimony will relate to Count 22.

09:31:22

23 THE FOREPERSON: Please stand and raise
24 your right hand.

09:31:55

25 You do solemnly swear that the testimony

09:31:55

1 that you're about to give upon the investigation now
2 pending before this Grand Jury shall be the truth, the
3 whole truth, and nothing but the truth, so help you God?

4 THE WITNESS: Yes, sir.

09:32:03

5 THE FOREPERSON: Please be seated.

6 You're advised you're here today to give
7 testimony in the investigation pertaining to the
8 offenses of burglary, grand larceny, conspiracy to
9 commit robbery, robbery with use of a deadly weapon and
10 burglary while in possession of a deadly weapon

09:32:18

11 involving Gregory Morgan and Andre Snipes.

12 Do you understand this advisement?

13 THE WITNESS: Yes, sir.

14 THE FOREPERSON: Please state your first
15 and last name and spell both slowly for the record.

09:32:27

16 THE WITNESS: Carmina Panlilio,
17 C-A-R-M-I-N-A, last name P-A-N-L-I-L-I-O.

18 MS. LACHER: May I proceed?

19 THE FOREPERSON: Please.

09:32:42

20 MS. LACHER: Thank you.

21 CARMINA PANLILIO,

22 having been first duly sworn by the Foreperson of the
23 Grand Jury to testify to the truth, the whole truth
24 and nothing but the truth, testified as follows:

09:32:42

25 ///

09:32:42

1

EXAMINATION

2

BY MS. LACHER:

3

Q Ma'am, you previously testified at this
Grand Jury. You're employed at the Nike store, correct?

4

09:32:49

5

A Correct.

6

Q And which location is that?

7

A 9851 South Eastern Avenue.

8

Q That's here in Clark County, Nevada,
correct?

9

09:32:56

10

A Yes.

11

Q And what is your formal title there?

12

A So I am the consumer experience manager but
I'm also the district loss prevention liaison.

13

14

Q I want to direct your attention to

09:33:09

15

July 4th, 2019. Were you working at the Nike store that
day?

16

17

A Yes.

18

Q Specifically around the time period of 3:00
p.m. that day, did you notice some individuals that
caught your attention?

19

09:33:21

20

21

A Yeah.

22

Q Could you explain what they did that caught
your attention?

23

24

09:33:30

25

A So three African-American males walked in,
they were greeted. They immediately approached the mesh

09:33:35

1 shopping bags. We began to service them, asked them if
2 there's anything we can help them find. They became a
3 bit evasive and kind of just ignored our questions and
4 they began to select footwear, place it in mesh bags and
5 then they proceeded to walk out of the store.

09:33:49

6 Q I'm going to show you Grand Jury
7 Exhibits 20, 21 and 22. Do you recognize those stills?

8 A Yes.

09:34:02

9 Q And are those stills of the surveillance
10 video that's date and timestamped from July 4th, 2019,
11 the date that we're discussing?

12 A Yes.

13 Q And those are the individuals that had
14 entered the store, correct?

09:34:19

15 A Correct.

16 Q I want to start first with Grand Jury
17 Exhibit Number 20. That individual in the gray hoodie
18 and red Nike checkmark, what did that individual take?

09:34:41

19 A So he took six pairs of shoes; two pairs of
20 Air Force 1s and three pairs of, or four pairs of Jordan
21 Retros.

22 Q Now, collectively the total value of all of
23 the merchandise taken by all three individuals, what is
24 the value of that?

09:34:55

25 A About 2100.

09:34:57

1 Q Okay. And the total amount of shoes and
2 merchandise taken?

3 A Ten pairs of shoes, one package of socks.

09:35:12

4 Q Okay. These individuals entered together
5 and left together, right?

6 A Correct.

7 Q They took merchandise without paying and
8 they didn't have permission to do that, correct?

9 A Correct.

09:35:18

10 Q The alarm sounded when they exited and they
11 made no efforts to pay or stop, correct?

12 A Yes. The AIS system did trigger when they
13 all exited and they were asked to pay for the
14 merchandise and they proceeded to just walk out.

09:35:31

15 Q These three photographs that we were just
16 discussing, Grand Jury Exhibits 20, 21 and 22, are true
17 and fair and accurate depictions of the surveillance
18 video that you have access to in your manager capacity,
19 correct?

09:35:44

20 A Correct.

21 Q I want to go back to Grand Jury Exhibit
22 Number 20. That individual, was he the same individual
23 that you had testified previously related to the
24 October 2nd, 2019 event at your store?

09:36:01

25 A Yes, he's a repeat offender.

09:36:02

1 Q Okay. And showing you Grand Jury
2 Exhibit 17, do you recognize that as a still from your
3 surveillance video at the Nike store on the October 2nd,
4 2019 event with that individual in it?

09:36:23

5 A That's correct.

6 MS. LACHER: I don't have anymore questions
7 for this witness. Do any of the Grand Jurors?

8 THE FOREPERSON: Seeing no questions by the
9 Grand Jury.

09:36:33

10 By law these proceedings are secret and you
11 are prohibited from disclosing to anyone anything that
12 transpired before us including any evidence presented to
13 the Grand Jury, any event occurring or a statement made
14 in the presence of the Grand Jury or any information
15 obtained by the Grand Jury.

09:36:33

16 Failure to comply with this admonition is a
17 gross misdemeanor punishable up to 364 days in the Clark
18 County Detention Center and a \$2,000 fine. In addition
19 you may be held in contempt of court punishable by an
20 additional \$500 fine and 25 days in the Clark County
21 Detention Center.

09:36:33

22 Do you understand this admonition?

23 THE WITNESS: Yes, sir.

24 THE FOREPERSON: Thank you. You're

09:37:01

25 excused.

09:37:01

1 THE WITNESS: Thank you.

09:37:14

2 MS. LACHER: With that, ladies and
3 gentlemen, this matter is going to be submitted for your
4 deliberation on the superseding Indictment with the
5 amendments that I had added before this witness
6 testified. If you have any questions regarding the
7 elements or the law on this case, please let me know.
8 Additionally I have the Grand Jury transcripts for your
9 review if you were not here for those presentments as
10 well as a laptop if you need to review any of the
11 exhibits. I've brought down the exhibits and made sure
12 they were here from the first two presentments as well
13 in case you need to look at any of that. And with that
14 I'll submit it to your deliberation.

09:37:3209:37:47

15 (At this time, all persons, except the
16 members of the Grand Jury, exited the room at 9:37 and
17 returned at 9:42.)

09:42:17

18 THE FOREPERSON: Madam District Attorney,
19 by a vote of 12 or more Grand Jurors a true bill has
20 been returned against defendants Gregory Morgan and
21 Andre Snipes charging the crimes of burglary, grand
22 larceny, conspiracy to commit robbery, robbery with use
23 of a deadly weapon and burglary while in possession of a
24 deadly weapon and organized retail theft in Grand Jury
25 case number 18CGJ163A and B.

09:42:40

09:42:46

1 We instruct you to prepare an Indictment in
2 conformance with the amended proposed Indictment
3 previously submitted to us.

4 MS. LACHER: Thank you.

09:42:54

5 (Proceedings concluded.)

6 --oo0oo--

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

09:42:54**REPORTER'S CERTIFICATE**

STATE OF NEVADA)
 : ss
COUNTY OF CLARK)

09:42:54

I, Donna J. McCord, C.C.R. 337, do hereby
certify that I took down in Shorthand (Stenotype) all of
the proceedings had in the before-entitled matter at the
time and place indicated and thereafter said shorthand
notes were transcribed at and under my direction and
supervision and that the foregoing transcript
constitutes a full, true, and accurate record of the
proceedings had.

09:42:54

Dated at Las Vegas, Nevada,
January 14, 2020.

09:42:54

/S/DONNA J. MCCORD
Donna J. McCord, CCR 337

09:42:5409:42:54

09:42:54

1 AFFIRMATION

2 Pursuant to NRS 239B.030

09:42:543
4 The undersigned does hereby affirm that the preceding
5 TRANSCRIPT filed in GRAND JURY CASE NUMBER 18CGJ163A-B:
6
78 X Does not contain the social security number of any
9 person,09:42:54

10 -OR-

11 ____ Contains the social security number of a person as
12 required by:13 A. A specific state or federal law, to-wit:
14 NRS 656.250.

-OR-

09:42:5415 B. For the administration of a public program
16 or for an application for a federal or
17 state grant.18 /S/DONNA J. MCCORD
19 SignatureJanuary 14, 2020
Date09:42:5420 Donna J. McCord
21 Print Name22 Official Court Reporter
23 Title
24
25

12:00

12:00

12:00

12:00

12:00

1 EIGHTH JUDICIAL DISTRICT COURT
2 CLARK COUNTY, NEVADA
3
4
5 THE STATE OF NEVADA,
6 Plaintiff,
7 vs. GJ No. 18CGJ163AB
8 GREGORY DELLO MORGAN, ANDRE GRANT DC No. C344461
9 SNIPE'S,
10 Defendants.

11
12
13 Taken at Las Vegas, Nevada
14 Thursday, October 31, 2019
15 2:46 p.m.

16
17
18
19 REPORTER'S TRANSCRIPT OF PROCEEDINGS

20
21
22
23
24
25 Reported by: Danette L. Antonacci, C.C.R. No. 222

12:00

12:00

12:00

12:00

12:00

12:00

1 GRAND JURORS PRESENT OCTOBER 31, 2019
2
3 LAWRENCE HOLMES, Foreperson
4 ROBERT KINNIBURGH, Deputy Foreperson
5 CLAUDIA HUNT, Secretary
6 LINDA MCARTHUR, Assistant Secretary
7 TONI ANDERSON
8 GARLAND BAILEY
9 ANNAMARIE CONKLIN
10 REGINA CRUNDEN
11 MELISSA HILL
12 MARY KISHMARTON
13 JEANETTE LOMANDO
14 DAVID MILLER
15 JOHN OLIVE
16 MARY PERKINS
17 ANTHONY SHOR
18
19 Also present at the request of the Grand Jury:
20 Ashley Iacher, Deputy District Attorney
21 Quanisha Hollway, Deputy District Attorney
22
23
24
25

12:00

12:00

1 INDEX OF WITNESSES

2 Examined

3
4 BRYAN LAWS 7
5 ALDEN ABREGO 16
6 SAMANTHA ALVAREZ 25
7 ELVIN CASTILLO 31
8 GEORGE LASTER 38
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

12:00

12:00

12:00

1 INDEX OF EXHIBITS

2 Grand Jury Exhibits

3 Identified

4 1 - PROPOSED INDICTMENT 5
5 2 - INSTRUCTIONS 5
6 3 - SURVEILLANCE VIDEO 20
7 4 - RECEIPT 35
8 5 - RECEIPT 33
9 6 - PHOTOGRAPH 29
10 7 - PHOTOGRAPH 29
11 8 - PHOTO LINE-UP 22
12 9 - PHOTO LINE-UP 21
13 10 - PHOTO LINE-UP 12
14 11 - PHOTO LINE-UP 13
15
16
17
18
19
20
21
22
23
24
25

12:00

LAS VEGAS, NEVADA, OCTOBER 31, . . .

DANETTE L. ANTONACCI,

having been first duly sworn to faithfully
and accurately transcribe the following
proceedings to the best of her ability.

02:46

MS. LACHER: Good afternoon ladies and
gentlemen of the Grand Jury. My name is Ashley Lacher.
With me for today is Quanisha Holloway. We're both
deputy district attorney with the Clark County District
Attorney's Office.

02:46

Today we'll be presenting to you Grand Jury
case number 18CGJ163A&B. The defendants Gregory Morgan
and Andre Snipes are charged with multiple counts; grand
larceny, robbery with use of a deadly weapon, burglary
while in use of a deadly weapon, and then burglary as
well. There will be marked as a Grand Jury exhibit a
copy of the proposed Indictment and that's going to be
marked as Exhibit Number 1 and the record will reflect
that all the grand jurors have a copy of it. In
addition I have marked as Grand Jury Exhibit Number 2 a
copy of the instructions related to each and every one
of those counts. Have all the grand jurors been

02:47

02:47

previously instructed on robbery with deadly weapon,
burglary with use of a deadly weapon, grand larceny?
Everybody is indicating that they've been previously
instructed. If you need to refresh your recollection as
to any of those instructions or have any questions about
those, I'm happy to answer those once I end my
presentation.

02:47

With that being said, with the permission
of the foreperson I'd like to call my first witness.

02:48

THE FOREPERSON: Please.

MS. LACHER: The State's first witness is
Bryan Laws, Jr. His testimony will relate to Counts 1,
2 and 3 and I'll probably be adding one count of
conspiracy robbery with that that's not in your current
Indictment.

02:48

THE FOREPERSON: Please raise your right
hand.

Please stand and raise your right hand.

02:48

You do solemnly swear the testimony you are
about to give upon the investigation now pending before
this Grand Jury shall be the truth, the whole truth, and
nothing but the truth, so help you God?

THE WITNESS: Yes, sir.

THE FOREPERSON: Now be seated please.

02:49

THE WITNESS: Thank you.

02:49

THE FOREPERSON: You are advised that you
are here today to give testimony in the investigation
pertaining to the offenses of grand larceny, robbery
with use of a deadly weapon, burglary while in
possession of a deadly weapon, and burglary, involving
Gregory Morgan and Andre Snipes.

02:49

Do you understand this advisement?

THE WITNESS: Yes, sir.

02:49

THE FOREPERSON: Please state your first
and last name and spell both slowly for the record.

THE WITNESS: Bryan Laws. B-P-Y-A-N,
L-A-W-S.

THE FOREPERSON: Thank you.

MS. LACHER: May I proceed?

02:49

THE FOREPERSON: Please.

MS. LACHER: Thank you.

BRYAN LAWS,

02:49

having been first duly sworn by the Foreperson of the
Grand Jury to testify to the truth, the whole truth,
and nothing but the truth, testified as follows:

EXAMINATION

BY MS. LACHER:

Q. Mr. Laws, are you employed as the manager

02:49

at the Foot Locker located at 3200 South Las Vegas
Boulevard here in Clark County, Nevada?

A. Yes, ma'am.

02:49

Q. I want to direct your attention to
September 24, 2019 at approximately 4:00 p.m. that day.
Were you working that day?

A. Yes, ma'am.

02:49

Q. And while you were working at that time did
two individuals enter the Foot Locker that caught your
attention?

A. Yes, ma'am.

Q. What did those individuals look like when
they entered?

A. Two black middle age men walked in normal,
came to return clothes.

02:50

Q. What happened after they tried to return
clothes?

A. I warned my team, we basically say pink
laces for that. Pink laces is our code for theft in our
store. So I called out pink laces on my mic and I told
my team, I had a part timer in the back in HOH where I
keep all my jerseys, he was standing there, he was very
confused, all of a sudden I looked to my right and I see
two gentlemen walking out with at three 15 of my
jerseys.

02:50

02:50 1 Q. What were they doing though. The store
2 that caught your attention that made you put out that
3 call to the rest of your team?
4 A. They returned items from two different
5 stores. One store -- one item had a receipt, the other
6 item didn't, and when I scanned it in my system as all
7 retail stores, it will tell you that it's not from your
8 store and that's a red flag right there. So just giving
9 the best customer service, hey, I can't take this but if
02:51 10 you find anything else let me know, my name's Bryan.
11 Q. Did you end up giving store credits on that
12 or were you not, did not complete those returns?
13 A. No, I did not complete those.
14 Q. The return transactions were not completed?
02:51 15 A. Yes, ma'am.
16 Q. Is that a yes?
17 A. Yes, ma'am.
18 Q. So you said that multiple jerseys were
19 taken by the two individuals who entered your store.
02:51 20 How many jerseys were taken from your store on that day?
21 A. At least 15.
22 Q. And what's the approximate value of those
23 jerseys?
24 A. A hundred and ten each.
02:51 25 Q. And does that matter what type of jersey or

02:51 1 are they all 110?
2 A. It doesn't matter. It's an NBA official
3 jersey so.
4 Q. Did both of the men take jerseys or just
02:51 5 one?
6 A. Both of them.
7 Q. Do you recall what type of jerseys you
8 recall the two men taking?
9 A. Anthony Davis, which he plays for Los
02:52 10 Angeles Lakers. LeBron James, which he plays for the
11 Los Angeles Lakers. And the new rookie in the NBA
12 league, Zion Williamson, and he plays for the New
13 Orleans Pelicans.
14 Q. Did you try to confront them to stop them
02:52 15 from taking the items from the store?
16 A. No, ma'am. There was another key holder,
17 Sui Yow (phonetic), he's been working there for years, I
18 ordered him to stop him, give him customer service, he
19 didn't want to, he's a very old man, so he backed off,
02:52 20 as soon as I seen that I got on the phone with Metro.
21 Q. When the two men were leaving did either
22 one of the men show something to you?
23 A. Yes, ma'am.
24 Q. What did they show, what did that
02:52 25 individual show you?

02:53 1 A. He had his gun tucked in his, it was a gun,
2 but he had it tucked in his pants, so when he lifted his
3 shirt all I seen was a handle. I'm a carrier so I know
4 what a gun looks like.
02:53 5 Q. Did either of them say anything to you
6 while the gun was being shown?
7 A. No, ma'am. He turned around, flashed it, I
8 backed up, and they kept on running wherever they were
9 running to.
02:53 10 Q. Which of the two men was the man who showed
11 you the gun?
12 A. The heavier set gentleman, he had an Afro.
13 Q. And then backtracking a little bit. The
14 value of the jerseys taken is well over \$650; correct?
02:53 15 A. Oh, of course.
16 Q. When the individual flashed the gun at you,
17 was it because you were trying to stop?
18 A. No. I was actually on the phone with Metro
19 helping them out, giving them descriptions of what they
02:53 20 looked like, what they were wearing, where they were
21 going, and once he flashed it in the parking garage, I
22 want to say it's the south parking garage closest to the
23 freeway, I turned around and I went back to my store.
24 Q. Because you were afraid of --
02:53 25 A. Yeah.

02:54 1 Q. -- what they were flashing at you?
2 A. Oh yeah, of course.
3 Q. And those two men entered the store
4 together and left the store together; correct?
02:54 5 A. Yes, ma'am.
6 Q. After you got off the phone with Metro, did
7 you meet with detectives to do a line-up?
8 A. Yes, ma'am.
9 Q. I'm showing you Grand Jury Exhibit
02:54 10 Number 10. Do you recognize that?
11 A. Yes, ma'am.
12 Q. Do you recognize the first page as your
13 handwriting?
14 A. Yes, ma'am.
02:54 15 Q. And it's photo line-up 45335?
16 A. Yes, ma'am.
17 Q. Okay. And then were you shown a six pack
18 of different individuals?
19 A. Yes.
02:54 20 Q. And you circled and initialed the person in
21 position number 5; correct?
22 A. Yes, ma'am.
23 Q. There was a second photo line-up done with
24 detectives; correct?
02:55 25 A. Yes.

13

02:55 1 Q. I'm showing you Grand Jury Exhibit
2 Number 11. Do you recognize that?
3 A. Yes, ma'am.
4 Q. Based upon your handwriting and signature;
5 correct?
6 A. Yes, ma'am.
7 Q. And that's photo line-up 48580; correct?
8 A. Yes.
9 Q. You were given the six pack photo line-up
10 of different individuals; correct?
11 A. Yes, ma'am.
12 Q. And you circled and initialed the
13 individual in position number 2?
14 A. Yes.
15 Q. And was the person in position number 2 the
16 individual who flashed the gun?
17 A. Yes, ma'am.
18 MS. LACHER: I don't have anymore questions
19 for this witness. Do any of the grand jurors?
20 BY A JUROR:
21 Q. Mr. Laws, I just need a clarification.
22 When you asked your other key holder to I guess
23 intervene, he decided not to, so you left the store and
24 followed these two individuals?
25 A. Yes, sir.

14

02:56 1 Q. As far as the parking structure?
2 A. Yes, sir.
3 Q. Okay. And then returned to your store?
4 A. Yes, sir.
5 Q. Thank you.
6 THE FOREPERSON: Any other questions?
7 BY A JUROR:
8 Q. Mr. Law --
9 A. Yes, sir.
10 Q. -- you said you know guns.
11 A. Yes.
12 Q. Was that a semi-automatic or a revolver?
13 A. Semi-automatic.
14 Q. Thank you.
15 A. Yes, sir.
16 THE FOREPERSON: Any other questions?
17 Seeing no further questions.
18 By law, these proceedings are secret and
19 you are prohibited from disclosing to anyone anything
20 that has transpired before us, including evidence and
21 statements presented to the Grand Jury, any event
22 occurring or statement made in the presence of the Grand
23 Jury, and information obtained by the Grand Jury.
24 Failure to comply with this admonition is a
25 gross misdemeanor punishable by up to 364 days in the

15

02:56 1 Clark County Detention Center and a \$2,000 fine. In
2 addition, you may be held in contempt of court
3 punishable by an additional \$500 fine and 25 days in the
4 Clark County Detention Center.
5 Do you understand this admonition?
6 THE WITNESS: Yes, sir.
7 THE FOREPERSON: Thank you. You're
8 excused.
9 THE WITNESS: Thank you.
10 MS. LACHER: The State's next witness will
11 be Alden Abrego and his testimony will relate to the
12 Champs Sports, those being Count 5, Count 6, Count 7,
13 and I do anticipate adding one count of conspiracy to
14 commit robbery which is not contained in the indictment.
15 THE FOREPERSON: Please stand and raise
16 your right hand.
17 You do solemnly swear the testimony you are
18 about to give upon the investigation now pending before
19 this Grand Jury shall be the truth, the whole truth, and
20 nothing but the truth, so help you God?
21 THE WITNESS: Yes, sir.
22 THE FOREPERSON: Please be seated.
23 You are advised that you are here today to
24 give testimony in the investigation pertaining to the
25 offenses of grand larceny, robbery with use of a deadly

16

02:58 1 weapon, burglary while in possession of a deadly weapon,
2 and burglary, involving Gregory Morgan and Andre Snipes.
3 Do you understand this advisement?
4 THE WITNESS: Yes, sir.
5 THE FOREPERSON: Please state your first
6 and last name and spell both slowly for the record.
7 THE WITNESS: My name is Alden, A-L-D-E-N,
8 Abrego, A-B-R-E-G-O.
9 MS. LACHER: May I proceed?
10 THE FOREPERSON: Please.
11 MS. LACHER: Thank you.
12 ALDEN ABREGO,
13 having been first duly sworn by the Foreperson of the
14 Grand Jury to testify to the truth, the whole truth,
15 and nothing but the truth, testified as follows:
16
17 EXAMINATION
18
19 BY MS. LACHER:
20 Q. Alden, are you employed at the Champs store
21 at 3200 South Las Vegas Boulevard in the Fashion Show
22 Mall?
23 A. Yes, ma'am.
24 Q. Are you the manager of that store?
25 A. Yes, ma'am.

02:58 1 Q. That store is here in Clark County, Nevada;
2 correct.
3 A. Yes, ma'am.
4 Q. I want to direct your attention to the date
5 of September 24, 2019. Were you working in your
6 capacity as a manager at the store on that day?
7 A. Yes, ma'am.
8 Q. Specifically around the time frame of 12:15
9 in the afternoon, did two individuals enter your store
10 that caught your attention?
11 A. Yes, ma'am.
12 Q. What did they look like?
13 A. They were two African American men, about
14 like 5'9" or so, one was wearing a brown T-shirt, the
02:59 15 other one was wearing a white wife beater.
16 Q. What did they do when they entered the
17 store?
18 A. As soon as they walked in, the gentleman
19 with the, the skinnier gentleman with the brown T-shirt
03:00 20 approached the front, one of our front tables that we
21 have with a couple of Jordan merchandise, as the other
22 guy with the white tank top headed towards the jerseys.
23 Q. Did you interact with either of them?
24 A. I did. I interacted with the guy with the
03:00 25 brown T-shirt as he walked in and headed straight to the

03:00 1 table in the front. I asked him how he was doing and he
2 said oh, I'm just locking, everything's too expensive.
3 Q. Do you continue to watch the two
4 individuals?
03:00 5 A. Yes, ma'am. As I was talking to him I was
6 also keeping my eye on the other gentleman with the
7 white tank top.
8 Q. And what did the other gentleman with the
9 white tank top, what was he doing?
03:00 10 A. As I was talking briefly for about 30
11 seconds with the gentleman with the brown T-shirt, he
12 was just scoping the jerseys, then he started putting
13 them around his hand and was about to, or was making his
14 way towards the door, and that's when the guy with the
03:00 15 brown also went and got the shirts or jerseys.
16 Q. How many jerseys were taken from the store?
17 A. A total of 14.
18 Q. And how much are those jerseys worth?
19 A. About 1700.
03:00 20 Q. And do you know that based upon being a
21 manager at the store?
22 A. Yes, ma'am.
23 Q. Do you recall the types of jerseys that
24 were taken and their color?
03:01 25 A. There was a couple, there was, it was three

03:01 1 different type of LeBron James jerseys, a purple and
2 yellow one, a white and purple, and a black and purple.
3 And then there was a Kobe Bryant jersey which was
4 yellow. There was two Curry jerseys, I believe those
03:01 5 were gray, and a Mike Bibby jersey, that's like a teal
6 color, and a Kyle Kuzma jersey in the purple.
7 Q. And it's fair to say that the total value
8 of those jerseys exceeded \$650?
9 A. Yes, ma'am.
03:01 10 Q. While you're confronting the two
11 individuals as they're leaving the store with the
12 jerseys, what do you see happen?
13 A. As they're walking out, cause as soon as
14 they walked in I called security, and as they're walking
03:02 15 out, the gentleman with the brown T-shirt says "oh trust
16 me, you don't want to do this," and walks out. And as
17 the second guy is walking out, the guy with the tank
18 top, kind of tugs his shirt and lifts it up a little and
19 you could see the back end of a gun.
03:02 20 Q. What color was it?
21 A. Black. Black, rigid black, so you could
22 only see the handle.
23 Q. Did that put you in fear, in a fearful
24 position?
03:02 25 A. At the moment cause everything happened

03:02 1 just so fast, it was like oh, I don't know what's going
2 on.
3 Q. Did either of those men -- I'll rephrase
4 that. Both of those men left the store without paying
03:02 5 for any of those items?
6 A. Correct.
7 Q. Without any permission to take those items
8 from the store; correct?
9 A. Yes, ma'am.
03:02 10 Q. The store has surveillance video; correct?
11 A. Correct.
12 Q. And it's kept in the ordinary course and
13 scope of business for security purposes?
14 A. Correct.
03:03 15 Q. I'm showing you what's been marked as Grand
16 Jury Exhibit Number 3. Do you recognize this?
17 A. Yes, ma'am.
18 Q. And how do you recognize it?
19 A. It has my initials.
03:03 20 Q. And is this the surveillance video from the
21 front exit/entrance area of the Champs store that you
22 work at?
23 A. Yes, ma'am.
24 Q. And you have access to this kind of
03:03 25 surveillance video as manager of the store; correct?

21

03:03 1 A. Yes, ma'am.
 2 Q. Is that date and time stamped for the
 3 incident of September 24, 2019 about 12:15 p.m.?
 4 A. Yes, ma'am.
 5 Q. And it shows the individual that you
 6 described in the tan shirt as well as the individual in
 7 the white shirt and you trying to stop them; correct?
 8 A. Yes, ma'am.
 9 Q. Also after you called police do they
 10 respond?
 11 A. Yes, ma'am.
 12 Q. And when they respond do you later meet
 13 with detectives?
 14 A. Yes, ma'am.
 03:04 15 Q. I'm showing you what's been marked as Grand
 16 Jury Exhibit Number 9. Do you recognize this?
 17 A. Yes, ma'am.
 18 Q. And do you recognize it based upon your
 19 handwriting and signature?
 03:04 20 A. Yes, ma'am.
 21 Q. Did you review the instructions indicated
 22 on that and indicate a person on the second page?
 23 A. Yes, ma'am.
 24 Q. And this is photo line-up 48580; correct?
 03:01 25 A. Yes, ma'am.

22

03:04 1 Q. And you indicated the person in position
 2 number 2 and initialed by that person; correct?
 3 A. Yes, ma'am.
 4 Q. I'm showing you Grand Jury Exhibit
 03:04 5 Number 8. Do you recognize this as one of the other
 6 photo line-ups that you did with detectives?
 7 A. Yes, ma'am.
 8 Q. And that's photo line-up 48535; correct?
 9 A. Yes, ma'am.
 03:05 10 Q. And you initialed that and that's your
 11 handwriting?
 12 A. Yes, ma'am.
 13 Q. On the second page you selected the person
 14 in position number 5 by indicating your initials A.A. as
 03:05 15 the other individual that entered your store and stole
 16 items; correct?
 17 A. Yes, ma'am.
 18 MS. LACHER: I don't have anymore questions
 19 for this witness. Do any of the grand jurors?
 03:05 20 THE FOREPERSON: Seeing -- we've got one
 21 hand.
 22 BY A JUROR:
 23 Q. Just so that I'm clear, all of the jerseys
 24 were MBA jerseys?
 03:05 25 A. Yes, sir.

23

03:05 1 Q. Thank you.
 2 THE FOREPERSON: Any other questions?
 3 Seeing no additional questions.
 4 By law, these proceedings are secret and
 03:05 5 you are prohibited from disclosing to anyone anything
 6 that has transpired before us, including evidence and
 7 statements presented to the Grand Jury, any event
 8 occurring or statement made in the presence of the Grand
 9 Jury, and information obtained by the Grand Jury.
 03:05 10 Failure to comply with this admonition is a
 11 gross misdemeanor punishable by up to 364 days in the
 12 Clark County Detention Center and a \$2,000 fine. In
 13 addition, you may be held in contempt of court
 14 punishable by an additional \$500 fine and 25 days in the
 03:05 15 Clark County Detention Center.
 16 Do you understand this admonition?
 17 THE WITNESS: Yes, sir.
 18 THE FOREPERSON: Thank you. You're
 19 excused.
 03:06 20 THE WITNESS: Thank you.
 21 MS. LACHER: Our next witness will be
 22 Samantha Alvarez. Her testimony will relate to Count
 23 10, burglary, and the State also anticipates adding a
 24 grand larceny to that count that's not currently in the
 25 indictment.

24

03:07 1 THE FOREPERSON: Please raise your right
 2 hand.
 3 You do solemnly swear the testimony you are
 4 about to give upon the investigation now pending before
 03:07 5 this Grand Jury shall be the truth, the whole truth, and
 6 nothing but the truth, so help you God?
 7 THE WITNESS: Yes.
 8 THE FOREPERSON: Please be seated.
 9 You are advised that you are here today to
 03:07 10 give testimony in the investigation pertaining to the
 11 offenses of grand larceny, robbery with use of a deadly
 12 weapon, burglary while in possession of a deadly weapon,
 13 and burglary, involving Gregory Morgan and Andre Snipes.
 14 Do you understand this advisement?
 03:07 15 THE WITNESS: Yes.
 16 THE FOREPERSON: Please state your first
 17 and last name and spell both for the record.
 18 THE WITNESS: Samantha Alvarez.
 19 S-A-M-A-N-T-H-A, Alvarez is A-L-V-A-R-E-Z.
 03:07 20 MS. LACHER: Ladies and gentlemen, her
 21 testimony will relate to Counts 9 and 10. I did have a
 22 grand larceny already in there that I didn't catch
 23 earlier.
 24 May I proceed?
 03:08 25 THE FOREPERSON: Please.

03:08 1 MS. LACHER: Thank you.
2 SAMANTHA ALVAREZ,
3 having been first duly sworn by the Foreperson of the
4 Grand Jury to testify to the truth, the whole truth,
5 and nothing but the truth, testified as follows:
6

7 EXAMINATION

8
9 BY MS. LACHER:
03:08 10 Q. Ma'am, are you employed as the manager at
11 the Downtown Summerlin Foot Locker at 2120 Festival
12 Plaza here in Clark County, Nevada?
13 A. Yes, I am.
14 Q. Directing your attention to September 27th.
03:08 15 Were you working that day?
16 A. Yes, I was.
17 Q. At approximately 2:20 p.m. did two
18 individuals enter the store that caught your attention?
19 A. Yes.
03:08 20 Q. Why did they catch your attention?
21 A. They fit the description of the two males
22 that were, the two males that had robbed the Fashion
23 Show Foot Locker.
24 Q. And I'm going to instruct the ladies and
03:08 25 gentlemen of the Grand Jury to disregard that statement

03:08 1 as it is hearsay. Does everybody understand that
2 admonition?
3 Everyone is indicating that they understand
4 and can comply with that admonition.
03:09 5 Q. So is it fair to say that you were in
6 communications with other Foot Locker managers?
7 A. Yes.
8 Q. And you had kind of like a group text;
9 correct?
03:09 10 A. Yes.
11 Q. And so without saying what anybody said,
12 were you aware of, to be on the lookout for, as always,
13 for certain thefts related to stores?
14 A. Yes.
03:09 15 Q. So when these two individuals entered into
16 the store, what did they look like to you?
17 A. One was a dark male wearing glasses with a
18 short Afro, and the other one was, he was a little
19 lighter complexion than the dark male but he had like a
03:09 20 low fade, like bald head.
21 Q. And what were they doing when they entered
22 the store?
23 A. So they both walked, came right in, they
24 went straight to the jersey area, they were looking at
03:10 25 the jerseys, and then they just grabbed them. One of

03:10 1 the defendants, I mean one of the guys went, the one
2 with the bald head went towards the exit of Foot Locker
3 and the one with the Afro was heading towards our other
4 exit through HOH and then he had told him hey, this
03:10 5 door's open over here, and then he ran right back with
6 him on the other side.
7 Q. And so the two black males that you
8 described being together were communicating with each
9 other?
03:10 10 A. Yes.
11 Q. About where to go and leave?
12 A. Yes.
13 Q. Were they taking anything in the store?
14 A. They had jerseys, they both had jerseys in
03:10 15 their hands.
16 Q. How many jerseys were taken on
17 September 27th?
18 A. Twenty-one jerseys.
19 Q. And what's the value of those jerseys?
03:10 20 A. \$110.
21 Q. And do you know that based upon being the
22 manager at Foot Locker?
23 A. Yes.
24 Q. And do you recall the types of jerseys that
03:10 25 were taken?

03:11 1 A. Yes. It was two different jerseys that had
2 two different colors in them. It was about ten LeBron
3 jerseys, white and yellow and the other one was purple
4 and black, and then there was another one and it was a
03:11 5 Wilson jersey, it was navy blue and gold.
6 Q. Did either of those men make any attempts
7 to pay for the items, those jerseys that were taken?
8 A. No.
9 Q. And they didn't have any permission to do
03:11 10 that; correct?
11 A. No.
12 Q. Did they say anything else during taking
13 the items other than what you already said?
14 A. There was another associate, he was a
03:11 15 little bit closer to them, and he just, the one with the
16 low Afro had told him "you better not touch me."
17 Q. Was that during the process of the store
18 personnel trying to confront him to prevent them from
19 leaving?
03:12 20 A. Yes.
21 Q. And you personally witnessed them, the two
22 individuals taking jerseys; correct?
23 A. Yes.
24 Q. And leaving without paying for them?
03:12 25 A. Yes.

03:12 1 Q. I'm going to show you Grand Jury Exhibit
2 Number 7. Do you recognize this person?
3 A. Yes.
4 Q. And how do you recognize him?
5 A. He was the one that was running the
6 opposite way before he was told to go through the second
7 exit.
8 Q. I'm going to show you Grand Jury Exhibit
9 Number 6. Do you recognize that person?
03:12 10 A. Yes.
11 Q. And how do you recognize that person?
12 A. He was the one that was basically talking
13 back to the other gentleman telling him which way to go.
14 Q. The other gentleman in Grand Jury Exhibit
03:12 15 Number 7; correct?
16 A. Yes.
17 MS. LACHER: I don't have anymore questions
18 for this witness. Do any of the grand jurors?
19 THE FOREPERSON: Seeing no additional
03:13 20 questions.
21 By law, these proceedings are secret and
22 you are prohibited from disclosing to anyone anything
23 that has transpired before us, including evidence and
24 statements presented to the Grand Jury, any event
03:14 25 occurring or statement made in the presence of the Grand

03:13 1 Jury, and information obtained by the Grand Jury.
2 Failure to comply with this admonition is a
3 gross misdemeanor punishable by up to 364 days in the
4 Clark County Detention Center and a \$2,000 fine. In
03:13 5 addition, you may be held in contempt of court
6 punishable by an additional \$500 fine and 25 days in the
7 Clark County Detention Center.
8 Do you understand this admonition?
9 THE WITNESS: Yes.
03:13 10 THE FOREPERSON: Thank you. You're
11 excused.
12 THE WITNESS: Thank you.
13 MS. LACHER: The State's next witness is
14 going to be Elvin Castillo. His testimony will relate
03:13 15 to Count 4, Count 8 -- and that is all at this point.
16 THE FOREPERSON: Please stand and raise
17 your right hand.
18 You do solemnly swear the testimony you are
19 about to give upon the investigation now pending before
03:14 20 this Grand Jury shall be the truth, the whole truth, and
21 nothing but the truth, so help you God?
22 THE WITNESS: Yes, sir.
23 THE FOREPERSON: Please be seated.
24 You are advised that you are here today to
03:14 25 give testimony in the investigation pertaining to the

03:15 1 offenses of grand larceny, robbery with use of a deadly
2 weapon, burglary while in possession of a deadly weapon,
3 and burglary, involving Gregory Morgan and Andre Snipes.
4 Do you understand this advisement?
03:15 5 THE WITNESS: Yes, sir.
6 THE FOREPERSON: Please state your first
7 and last name and spell both slowly for the record.
8 THE WITNESS: Elvin Castillo. E-L-V-I-N,
9 C-A-S-T-I-L-L-O.
03:15 10 THE FOREPERSON: Thank you.
11 MS. LACHER: May I proceed?
12 THE FOREPERSON: Please.
13 ELVIN CASTILLO,
14 having been first duly sworn by the Foreperson of the
03:15 15 Grand Jury to testify to the truth, the whole truth,
16 and nothing but the truth, testified as follows:
17
18 EXAMINATION
19
03:15 20 BY MS. LACHER:
21 Q. Sir, where do you work?
22 A. I work at Foot Locker inside the Meadows
23 Mall, 4300 Meadows Lane.
24 Q. Is that here in Clark County, Nevada?
25 A. Yes.

03:15 1 Q. And are you the manager of that location?
2 A. Yes.
3 Q. I want to direct your attention
4 specifically to September 20, 2019. Were you working as
03:15 5 the manager that day?
6 A. Yes.
7 Q. And did an individual enter the store that
8 kind of caught your attention as a manager?
9 A. Yes.
03:15 10 Q. Who was that individual?
11 A. After I got his information from, cause I
12 signed him up for the membership program, his name was
13 Andre Snipes.
14 Q. And why were you signing him up for the
03:16 15 membership program?
16 A. Because the individual wanted to make a
17 return. It was a pretty heavy return, about four or
18 \$500, and it was just kind of a shady situation for me
19 so I got his ID and I signed him up for the program and
03:16 20 I ended up giving him like store credit cards. Like
21 store credit, so merchandise return card.
22 Q. And is that the store policy when somebody
23 tries to return something and they don't have a receipt?
24 A. Yes. So the individual knew the policy, he
03:16 25 ended up bringing it up during the conversation, told us

33

03:16 1 we needed to take care of him, so we did, and we split
 2 up the gift cards cause the gift cards have like a 200
 3 cap. So he brought in four jerseys with no receipt, he
 4 knew the policy, we took care of him.

03:17 5 Q. I want to show you Grand Jury Exhibit
 6 Number 7. Do you recognize that person?

7 A. Yes.

8 Q. And who is that?

9 A. That's Andre Snipes.

03:17 10 Q. And that's the person who on September 20th
 11 you interacted with and tried to make a return?

12 A. That's correct.

13 Q. I'm showing you now Grand Jury Exhibit
 14 Number 5. Do you recognize that?

03:17 15 A. Yes.

16 Q. Is that the receipt from September 20, 2019
 17 that you made the transaction on?

18 A. Yes.

19 Q. And does that indicate that the defendant
 03:17 20 Andre Snipes was returning a A. Davis jersey, two of
 21 them, both of them being yellow and white?

22 A. That is correct.

23 Q. As well the defendant was returning a gold,
 24 two Williamson jerseys; correct?

03:18 25 A. Yes.

34

03:18 1 Q. And so you gave him a store credit card in
 2 the amount of \$476.32?

3 A. Yes.

4 Q. Did you later learn about an investigation
 03:18 5 of other Foot Locker stores and some thefts related to
 6 that?

7 A. Yes, I had got a call earlier --

8 Q. Wait. That question -- I'm not trying to
 9 ask you what other people told you.

03:18 10 A. Uh-huh.

11 Q. But just that you learned that other stores
 12 had been hit and that when you looked back at this event
 13 that urged you to kind of let law enforcement know.

14 A. Yes, that's correct.

03:18 15 Q. Okay. And this wasn't later until after
 16 sometime in October; correct?

17 A. Yes.

18 Q. So when this first September 20th event
 19 occurred, you weren't aware of that?

03:18 20 A. That is correct.

21 Q. There was another event where, on
 22 September 24th, were you working at the store that day
 23 at Meadows Mall?

24 A. Yes.

03:18 25 Q. And did the same individual enter that

35

03:19 1 store?

2 A. Yes.

3 Q. And what happened when he entered the store
 4 on September 24th?

03:19 5 A. He had some jerseys as well and we ended up
 6 just giving him credit for one jersey I believe, even
 7 though he had like three jerseys. Two of the jerseys
 8 wasn't scanning in our system meaning they could have
 9 been like a cross divisional merchandise, so we just
 03:19 10 took care of him for the one jersey that scanned in our
 11 system.

12 Q. What does cross divisional mean?

13 A. It could have perhaps been like a Nike unit
 14 or maybe like a Champs unit.

03:19 15 Q. From another store?

16 A. Yep, the SKU wasn't recognizable, it wasn't
 17 scanning.

18 Q. And this was just Andre Snipes coming in by
 19 himself?

03:19 20 A. That is correct.

21 Q. I want to show you Grand Jury Exhibit
 22 Number 4. Do you recognize that?

23 A. Yes.

24 Q. Is that a receipt from the transaction that
 25 you were explaining about on being only one item that

36

03:19 1 you were doing the store credit return for?

2 A. Yes.

3 Q. And was that store credit return for a
 4 yellow Kobe Bryant jersey?

03:20 5 A. Yes.

6 Q. And similar thing, did you later learn that
 7 other stores may have had losses for that particular
 8 jersey?

9 A. Yes.

03:20 10 Q. And that store credit that you gave him on
 11 September 24th before you knew about the other events
 12 was for 100, almost \$100, specifically \$97.41?

13 A. Yes.

14 Q. And so he left the store with a store
 03:20 15 credit for that amount?

16 A. Yes.

17 Q. And you were not present for any other
 18 exchanges; correct?

19 A. That is correct.

03:20 20 MS. LACHER: I don't have anymore questions
 21 for this witness. Do any of the grand jurors?

22 THE FOREPERSON: Seeing no further
 23 questions.

24 By law, these proceedings are secret and
 03:21 25 you are prohibited from disclosing to anyone anything

03:21 1 that has transpired before us, including evidence and
2 statements presented to the Grand Jury, any event
3 occurring or statement made in the presence of the Grand
4 Jury, and information obtained by the Grand Jury. .

5 Failure to comply with this admonition is a
6 gross misdemeanor punishable by up to 364 days in the
7 Clark County Detention Center and a \$2,000 fine. In
8 addition, you may be held in contempt of court
9 punishable by an additional \$500 fine and 25 days in the
03:21 10 Clark County Detention Center.

11 Do you understand this admonition?

12 THE WITNESS: Yes, sir.

13 THE FOREPERSON: Thank you. You're
14 excused.

03:21 15 THE WITNESS: Thank you.

16 MS. LACHER: The State's next witness and
17 the last witness is Detective George Laster.

18 THE FOREPERSON: Please stand in front
19 there and raise your right hand please.

03:22 20 You do solemnly swear the testimony you are
21 about to give upon the investigation now pending before
22 this Grand Jury shall be the truth, the whole truth, and
23 nothing but the truth, so help you God?

24 THE WITNESS: I do.

03:22 25 THE FOREPERSON: Please be seated.

03:22 1 You are advised that you are here today to
2 give testimony in the investigation pertaining to the
3 offenses of grand larceny, robbery with use of a deadly
4 weapon, burglary while in possession of a deadly weapon,
03:22 5 and burglary, involving Gregory Morgan and Andre Snipes.

6 Do you understand this advisement?

7 THE WITNESS: Yes, sir.

8 THE FOREPERSON: Please state your first
9 and last name and spell both slowly for the record.

03:22 10 THE WITNESS: George Laster. G-E-O-R-G-E,
11 L-A-S-T-E-R.

12 MS. LACHER: May I proceed?

13 THE FOREPERSON: Please.

14 GEORGE LASTER,

03:22 15 having been first duly sworn by the Foreperson of the
16 Grand Jury to testify to the truth, the whole truth,
17 and nothing but the truth, testified as follows:

18 EXAMINATION

03:22 20 BY MS. LACHER:

21 Q. Sir, where do you work?

22 A. I work for Las Vegas Metro Police
23 Department.

03:22 24 Q. And what's your current assignment?

03:23 1 A. I'm currently assigned to Convention Area
2 Command as a patrol detective.

3 Q. I want to direct your attention to a series
4 of events in September and October at the Foot Locker
03:23 5 Champs and also a Nike. Were you assigned to
6 investigate a series of thefts in those areas?

7 A. Yes, ma'am.

8 Q. And in the course of your investigation did
9 you develop two potential suspects?

03:23 10 A. Yes, ma'am.

11 Q. Did you develop those suspects based upon
12 reviewing surveillance video in addition to interviewing
13 witnesses?

14 A. Yes, ma'am.

03:23 15 Q. And in the course of doing that, who were
16 the two suspects that you determined to be involved in
17 those events?

18 A. It would be Andre Snipes and Morgan --
19 actually what's his first name? I forget his first
03:24 20 name, but his last name is Morgan.

21 Q. Did you meet with one of the witnesses from
22 a Foot Locker event by the name of Alden Abrego as one
23 of the potential witnesses in this case?

24 A. Yes, ma'am.

25 Q. I'm showing you what has been marked as

03:24 1 Grand Jury Exhibit Number 8. Do you recognize that as
2 the photo line-up that you did with Alden Abrego?

3 A. Yes, ma'am.

4 Q. And you recognize that based upon your name
03:24 5 and P number being indicated on the first page?

6 A. Yes, ma'am.

7 Q. Did you read that witness the instructions
8 before giving him the photo line-up?

9 A. Yes, ma'am, I did.

03:24 10 Q. And did he indicate to you that he
11 understood that?

12 A. Yes, ma'am.

13 Q. Did Alden Abrego select an individual
14 within the six pack photo line-up that you created?

03:24 15 A. Yes, he did.

16 Q. And he selected the individual in position
17 number 5; correct?

18 A. Yes, ma'am.

19 Q. And who is the person in position number 5?

03:24 20 A. That person is Andre Snipes.

21 Q. You also did another photo line-up with him
22 regarding the second suspect; correct?

23 A. Yes, ma'am.

24 Q. I'm showing you Grand Jury Exhibit 9. Do
03:25 25 you recognize that?

03:25 1 A. Yes, ma'am.
 2 Q. Did you follow the same procedure of
 3 reading that witness the instructions?
 4 A. Yes, I did.
 5 Q. And he indicated that he could follow those
 6 instructions; correct?
 7 A. Yes, ma'am.
 8 Q. And Alden Abrego did identify a person,
 9 correct, in this line-up on page 2 of that exhibit?
 03:25 10 A. Yes, ma'am.
 11 Q. He circled the individual in position
 12 number 2; correct?
 13 A. Yes, ma'am.
 14 Q. And the person in position number 2 is
 03:25 15 Gregory Morgan; correct?
 16 A. That's right, Gregory Morgan.
 17 Q. As well you did a photo line-up with
 18 another witness Bryan Laws; correct?
 19 A. Yes, ma'am.
 03:25 20 Q. Showing you Grand Jury Exhibit Number 11.
 21 Do you recognize this photo line-up on sheet one?
 22 A. Yes, ma'am.
 23 Q. Recognize it based upon your P number and
 24 initials on the page?
 03:25 25 A. Yes, ma'am.

03:26 1 Q. Same process as described earlier to the
 2 witness; correct?
 3 A. Yes, ma'am.
 4 Q. And that witness did indicate a person
 03:26 5 located in position number 2; correct?
 6 A. Yes, ma'am.
 7 Q. And within Grand Jury Exhibit Number 11
 8 that witness indicated Gregory Morgan as one of your
 9 potential suspects; correct?
 03:26 10 A. Yes, ma'am.
 11 Q. You did the same for the other suspect.
 12 I'm showing you Grand Jury Exhibit Number 10. Do you
 13 recognize that?
 14 A. Yes, ma'am.
 03:26 15 Q. Same policies and procedures as followed
 16 before; correct?
 17 A. Yes, ma'am.
 18 Q. And the witness Bryan Laws found or circled
 19 and initialed the person in position number 5 as one of
 03:26 20 the other potential suspects in your case; correct?
 21 A. Yes, ma'am.
 22 Q. And that person is Andre Snipes; correct?
 23 A. Yes, ma'am.
 24 Q. And those were the only photo line-ups
 03:26 25 you've done in this case so far; correct?

03:27 1 A. Yes, ma'am.
 2 Q. I'm going to show you Grand Jury Exhibit
 3 Number 6. Who is that?
 4 A. That is Gregory Morgan.
 03:27 5 Q. Okay. And you recognize this photo;
 6 correct?
 7 A. Yes, ma'am.
 8 Q. Within the investigations of all the
 9 events, did you work on compiling and still are
 03:27 10 compiling surveillance video; correct?
 11 A. Yes, ma'am.
 12 Q. And you work with another detective on a
 13 Nike event to work on formulating the suspects in this
 14 case?
 03:27 15 A. Yes, ma'am.
 16 Q. Ultimately as part of your investigation
 17 did you set, did you work with other detectives in
 18 setting up a controlled, or a buy for shoes online?
 19 A. It was actually, it was another detective
 03:28 20 but it was police officers on a different squad.
 21 Q. You worked on coordinating --
 22 A. Yes.
 23 Q. -- that to happen?
 24 A. Yes, ma'am.
 25 Q. And once that happened both of those

03:28 1 suspects, Andre Morgan and Gregory, I'm sorry, Andre
 2 Snipes and Gregory Morgan were apprehended together at
 3 that buy?
 4 A. Yes, ma'am.
 03:28 5 MS. LACHER: Okay. I don't have anymore
 6 questions for this witness. Do any of the grand jurors?
 7 THE FOREPERSON: Seeing no additional
 8 questions.
 9 By law, these proceedings are secret and
 03:28 10 you are prohibited from disclosing to anyone anything
 11 that has transpired before us, including evidence and
 12 statements presented to the Grand Jury, any event
 13 occurring or statement made in the presence of the Grand
 14 Jury, and information obtained by the Grand Jury.
 03:28 15 Failure to comply with this admonition is a
 16 gross misdemeanor punishable by up to 364 days in the
 17 Clark County Detention Center and a \$2,000 fine. In
 18 addition, you may be held in contempt of court
 19 punishable by an additional \$500 fine and 25 days in the
 03:28 20 Clark County Detention Center.
 21 Do you understand this admonition?
 22 THE WITNESS: Yes, sir, I do.
 23 THE FOREPERSON: Thank you. You're
 24 excused.
 03:29 25 THE WITNESS: Thank you.

03:29 1 MS. LACHER: Okay. That's going to
2 conclude our testimony for today. I am going to be
3 making some changes. I'm going to add one count of
4 conspiracy robbery for the events at September 20, 2019
5 at the Foot Locker, as well as a conspiracy robbery at
6 the Champs Sports on September 24th.

7 I do need to make a correction to the date
8 on Counts 9 and 10 for the Summerlin Foot Locker. That
9 date should be September 24th.

03:30 10 I do not want you to deliberate on page 5,
11 count 11, or page 6, Count 12 or 13, do not deliberate.

12 A JUROR: We don't have those on the
13 Indictment.

14 A JUROR: We don't have them in here.

03:30 15 MS. LACHER: Oh, then she didn't include
16 those for me for a reason. Okay. I'll be coming back
17 for additional counts later then. So I will be asking
18 you to deliberate on Count 1, grand larceny; Count 2,
19 robbery with use of a deadly weapon; Count 3, burglary
03:31 20 while in possession of firearm; Count 4, burglary; Count
21 5, burglary while in possession of a firearm; Count 6,
22 grand larceny; Count 7, robbery with use of a deadly
23 weapon; Count 8, burglary; Count 9, grand larceny; Count
24 10, burglary, and then adding the two conspiracy
03:31 25 robberies.

03:31 1 by a vote of 12 or more grand jurors a true bill has
2 been returned against defendants Gregory Morgan and
3 Andre Snipes charging the crimes of grand larceny,
4 robbery with use of a deadly weapon, burglary while in
03:40 5 possession of a deadly weapon, burglary, and conspiracy
6 robbery, in Grand Jury case number 18CGJ163AB. We
7 instruct you to prepare an Indictment in conformance
8 with the amended Indictment previously submitted to us.

9 MS. LACHER: Thank you.

03:40 10 THE FOREPERSON: Adding the two additional
11 charges.

12 (Proceedings concluded.)

13 --oo0oo--

03:31 1 THE FOREPERSON: So where are we going to
2 add those?

3 MS. LACHER: We'll add them at the end. So
4 Counts 11 and 12.

03:31 5 THE FOREPERSON: Can you give me the
6 appropriate wording for those?

7 MS. LACHER: Yes. It will be conspiracy
8 robbery for the September 20th at the Foot Locker for
9 Count 11, and then Count 12, conspiracy robbery,
03:32 10 September 24th at Champs.

11 THE FOREPERSON: What was the date on the
12 second one please?

13 MS. LACHER: September 24th.

14 THE FOREPERSON: Champs.

03:32 15 MS. LACHER: And with that being said,
16 we'll be outside for any questions that you have. And
17 also I left a laptop. If any of you would like or need
18 help with that we'll be outside and can help you. Are
19 there any questions?

03:33 20 Seeing no questions, we'll be right
21 outside. Thank you.

22 (At this time, all persons, other than
23 members of the Grand Jury, exit the room at 3:33 p.m.
24 and return at 3:39 p.m.)

03:39 25 THE FOREPERSON: Madame District Attorney,

REPORTER'S CERTIFICATE

03:40 1
2
3 STATE OF NEVADA)
4 COUNTY OF CLARK) ss

03:40 5
6 I, Danette L. Antonacci, C.C.R. 222, do
7 hereby certify that I took down in Shorthand (Stenotype)
8 all of the proceedings had in the before-entitled matter
9 at the time and place indicated and thereafter said
03:40 10 shorthand notes were transcribed at and under my
11 direction and supervision and that the foregoing
12 transcript constitutes a full, true, and accurate record
13 of the proceedings had.

14 Dated at Las Vegas, Nevada,
03:40 15 November 12, 2019.

17 /s/ Danette L. Antonacci

18 Danette L. Antonacci, C.C.R. 222
19
03:40 20
21
22
23
24
25

AFFIRMATION

Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER 18CGJ163A2:

X Does not contain the social security number of any person,

-OR-

Contains the social security number of a person as required by:

A. A specific state or federal law, to-wit: NRS 696.250.

-OR-

B. For the administration of a public program or for an application for a federal or state grant.

/s/ Danette L. Antonacci

11-12-19
Date

Signature

Danette L. Antonacci
Print Name

Official Court Reporter
Title

18 CGJ 163 A-B

Grand Jury Case # _____

Exhibit # 18

Date 1-9-2020

12:00AM

12:00AM

12:00AM

12:00AM

12:00AM

12:00AM

1

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

BEFORE THE GRAND JURY IMPANELED BY THE AFORESAID
DISTRICT COURT

THE STATE OF NEVADA,
Plaintiff,

vs.

GREGORY DELLO MORGAN, ANDRE GRAND
SNIPES,

Defendants.

GJ No. 18CGJ163A-B
DC No.

Taken at Las Vegas, Nevada
Thursday, November 14, 2019
11:00 a.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS
SUPERSEDING INDICTMENT
VOLUME 2

Reported by: Lisa Brenske, C.C.R. No. 186

2

12:00AM

12:00AM

12:00AM

12:00AM

12:00AM

GRAND JURORS PRESENT ON NOVEMBER 14, 2019
LAWRENCE HOLMES, Foreperson
ROBERT KINNIBURGH, Deputy Foreperson
CLAUDIA HUNT, Secretary
LINDA MCARTHUR, Assistant Secretary
GARLAND BAILEY
ANNAYARIE CONKLIN
NATHAN CONRAD
REGINA CRUNDEN
MELISSA HILL
MARY KISHMARTON
JEANETTE LOMANDO
DAVID MILLER
JOHN ORR
MARY PERKINS
ANTHONY SHOR
Also present at the request of the Grand Jury:
Ashley Lacher, Deputy District Attorney

3

12:00AM

12:00AM

INDEX OF WITNESSES

Examined

DANIELA MONTALVO	7
CARMINA PANLILIO	15
KASHIF SUMMERS	21

12:00AM

12:00AM

12:00AM

INDEX OF EXHIBITS

<u>Grand Jury Exhibits</u>	<u>Identified</u>
1A - PROPOSED INDICTMENT	6
12 - RECEIPT	9
13 - RECEIPT	9
14 - PHOTOGRAPH	8
15 - PHOTOGRAPH	18
16 - PHOTOGRAPH	18
17 - PHOTOGRAPHS	23

LAS VEGAS, NEVADA, NOVEMBER 14, 2019

LISA BRENSKE,

having been first duly sworn to faithfully
and accurately transcribe the following
proceedings to the best of her ability.

MS. LACHER: Good morning, ladies and
gentlemen of the Grand Jury. My name is Deputy
District Attorney Ashley Lacher. I'm presenting the
case of State of Nevada versus Gregory Dello Morgan and
State of Nevada versus Andre Snipes. That's Grand Jury
Case Number 18CGJ163A and B. Each of you should have a
copy of the superseding Indictment. You've already
previously deliberated on Counts 1 through 12 and we'll
get a copy of that superseding Indictment marked as an
exhibit here soon.

With the permission of the foreperson my
first witness will be Daniela Montalvo and her
testimony will relate to Count 15.

THE FOREPERSON: Please raise your right
hand.

You do solemnly swear the testimony you
are about to give upon the investigation now pending

before this Grand Jury shall be the truth, the whole
truth, and nothing but the truth, so help you God?

THE WITNESS: Yes.

THE FOREPERSON: You are advised that you
are here today to give testimony in the investigation
pertaining to the offenses of grand larceny, conspiracy
to commit robbery, robbery with use of a deadly weapon,
burglary while in possession of a deadly weapon and
burglary involving Gregory Morgan and Andre Snipes.

Do you understand this advisement?

THE WITNESS: Yes.

THE FOREPERSON: Please state your first
and last name and spell both slowly for the record.

THE WITNESS: Daniela Montalvo.

D-A-N-I-E-L-A M-O-N-T-A-L-V-O.

MS. LACHER: And just before I begin the
superseding Indictment was marked as Grand Jury
Exhibit 1A and the record will reflect that everybody
has a copy of it.

And with that may I proceed?

THE FOREPERSON: Please.

MS. LACHER: Thank you.

DANIELA MONTALVO,

having been first duly sworn by the Foreperson of the
Grand Jury to testify to the truth, the whole truth,
and nothing but the truth, testified as follows:

EXAMINATION

BY MS. LACHER:

Q. Ma'am, where do you work?

A. Foot Locker.

Q. Is that the one located at the Meadows
Mall at 4300 Meadows Mall Lane?

A. Yes.

Q. What is your formal title at the Foot
Locker?

A. Assistant Manager.

Q. And I want to direct your attention to
October 6, 2019. Were you working that day at the Foot
Locker?

A. Yes.

Q. And is that Foot Locker located here in
Clark County, Nevada?

A. Yes.

Q. On that date did an individual enter your
store that caught your attention?

A. Yes.

Q. What was that person's name?

A. Andre.

Q. And how did you learn that his name was
Andre?

A. He had previously been there to return a
couple of jerseys.

Q. Showing you what's been marked as Grand
Jury Exhibit Number 14 do you recognize this person?

A. Yes.

Q. Who is that?

A. Andre.

Q. And that's the person who came into your
store, correct?

A. Yes.

Q. What did Andre say to you when he entered
the store?

A. That he wanted to return those two shoes
he was bringing in for a merchandise return card, a
gift card.

Q. Did you do that transaction for him?

A. Yes.

Q. He didn't have a receipt or anything
for --

A. No proof of purchase.

Q. But is it part of Foot Locker's policy to

11:04AM 1 still try and do the return regardless of that?
 2 A. Yes.
 3 Q. And so you did that in this case, correct?
 4 A. Yes.
 11:04AM 5 Q. I'm showing you Grand Jury Exhibit Number
 6 12. Do you recognize that?
 7 A. Yes.
 8 Q. And is that the receipt from one of the
 9 two transactions you did that day?
 11:04AM 10 A. Yes.
 11 Q. And that transaction was with Andre
 12 Snipes, correct?
 13 A. Yes.
 14 Q. And one of the two transactions was for --
 11:05AM 15 what was the first -- what's this transaction for?
 16 A. It was for Jordan Team II is the name of
 17 the shoe for 140.
 18 Q. And you gave him a gift card for the
 19 amount of 140?
 11:05AM 20 A. Yes.
 21 Q. And then now showing you Grand Jury
 22 Exhibit Number 13 do you recognize that?
 23 A. Yes.
 24 Q. What is that?
 11:05AM 25 A. That was the Proto-Max 720.

11:05AM 1 Q. That's the other transaction you did with
 2 Andre Snipes?
 3 A. Yes.
 4 Q. Where you gave him a gift card for \$216 in
 11:05AM 5 exchange for the shoes?
 6 A. Yes.
 7 Q. And do these two receipts fairly and
 8 accurately depict the transactions that you did that
 9 day?
 11:05AM 10 A. Yes.
 11 Q. And you had access to them as an Assistant
 12 Manager and gave them to me for testimony today?
 13 A. Yes.
 14 Q. Did you later learn that this was part of
 11:05AM 15 other transactions that Andre Snipes did at your store?
 16 A. Yes. Well, we had -- the jerseys came
 17 first and then the shoes. That's how I recognized him
 18 from the jerseys.
 19 Q. And then you later got law enforcement
 11:06AM 20 involved with the incidents related to the jerseys as
 21 well as the shoes that you were present for?
 22 A. Yes.
 23 Q. And Andre Snipes didn't have any
 24 permission to return items that he never paid for with
 11:06AM 25 your store, correct?

11:06AM 1 A. Can you rephrase that.
 2 Q. Sure. He never had permission -- you
 3 would never have given him permission had you known
 4 about other events to do this transaction?
 11:06AM 5 A. No.
 6 Q. It was only until later that you learned
 7 and reported it, correct?
 8 A. Yes.
 9 MS. LACHER: I don't have any more
 11:06AM 10 questions for this witness. Do any of the Grand
 11 Jurors?
 12 BY A JUROR:
 13 Q. I'm just curious. Within your system of
 14 tracking merchandise, if something is stolen it doesn't
 11:07AM 15 automatically pop up because of its SKU or whatever as
 16 an item that had been not purchased at another store?
 17 A. It doesn't --
 18 MS. LACHER: Let me kind of maybe ask a
 19 different way to keep it cleaner.
 11:07AM 20 BY A JUROR:
 21 Q. In other words, if I steal a shirt and
 22 then bring it into a store to return it, the stolen
 23 shirt isn't marked some way in your system as having
 24 been stolen and then when you put it in for refund it
 11:07AM 25 pops up as a stolen item?

11:07AM 1 A. No. But we have a really good connection
 2 with other managers. So I believe when they first
 3 stole from Fashion Show, the managers there reported it
 4 to all the managers in the area. So we were able to
 11:07AM 5 recognize him -- when he provided us with his ID we
 6 were able to track that it was the same person.
 7 BY MS. LACHER:
 8 Q. When you scan an initial item, do you know
 9 initially where that item came from?
 11:08AM 10 A. No.
 11 Q. So somebody could be trying to return an
 12 item from let's say any other store, not a Foot Locker
 13 store, and you wouldn't necessarily know that just
 14 because you scanned it, correct?
 11:08AM 15 A. Correct. As long as it scans in the
 16 system we're able to take it in.
 17 Q. When it scans in the system that just
 18 means that Foot Locker carries that brand?
 19 A. In general.
 11:08AM 20 Q. Not necessarily that it's from that store?
 21 A. Yes.
 22 MS. LACHER: Anything else based upon
 23 that?
 24 THE FOREPERSON: Seeing no further
 11:08AM 25 questions.

11:08AM 1 By law these proceedings are secret and
2 you are prohibited from disclosing to anyone anything
3 that transpired before us including evidence presented
4 to the Grand Jury, any event occurring or statement
11:08AM 5 made in the presence of the Grand Jury or any
6 information obtained by the Grand Jury.

7 Failure to comply with this admonition is
8 a gross misdemeanor punishable up to 364 days in the
9 Clark County Detention Center and a 2000-dollar fine.
11:08AM 10 In addition you may be held in contempt of court which
11 is punishable by an additional 500-dollar fine and 25
12 days in the Clark County Detention Center.

13 Do you understand this admonition?
14 THE WITNESS: Yes.

11:09AM 15 THE FOREPERSON: Thank you. You're
16 excused.

17 MS. LACHER: State's next witness is
18 Carmina Panlilio and her testimony will relate to
19 Counts 13 and 14.

11:09AM 20 THE FOREPERSON: Please raise your right
21 hand.

22 You do solemnly swear the testimony you
23 are about to give upon the investigation now pending
24 before this Grand Jury shall be the truth, the whole
11:10AM 25 truth, and nothing but the truth, so help you God?

11:10AM 1 THE WITNESS: Yes, sir.

2 THE FOREPERSON: Please be seated.

3 You are advised that you are here today to
4 give testimony in the investigation pertaining to the
11:10AM 5 offenses of grand larceny, conspiracy to commit
6 robbery, robbery with use of a deadly weapon, burglary
7 while in possession of a deadly weapon and burglary
8 involving Gregory Morgan and Andre Snipes.

9 Do you understand this advisement?

11:10AM 10 THE WITNESS: Yes, sir.

11 THE FOREPERSON: Please state your first
12 and last name and spell both slowly for the record.

13 THE WITNESS: Carmina Panlilio.
14 C-A-R-M-I-N-A. Last name is P-A-N-L-I-L-I-O.

11:10AM 15 MS. LACHER: May I proceed?

16 THE FOREPERSON: Please.

17 MS. LACHER: Thank you.

18

19

11:10AM 20

21

22

23

24

11:10AM 25

11:10AM 1 CARMINA PANLILIO,
2 having been first duly sworn by the Foreperson of the
3 Grand Jury to testify to the truth, the whole truth,
4 and nothing but the truth, testified as follows:

11:10AM 5
6 EXAMINATION

7 BY MS. LACHER:

8 Q. Ma'am, where do you work?

9 A. At the Nike Henderson Factory store.

11:10AM 10 Q. And is that the Nike store located at 9851
11 South Eastern here in Clark County, Nevada?

12 A. Yes, it is.

13 Q. I want to direct your attention
14 specifically to October 2nd, 2019. Were you working
11:11AM 15 that day?

16 A. Yes, I was.

17 Q. And when you were working that day did two
18 individuals enter the store that caught your attention?

19 A. Yes.

11:11AM 20 Q. Could you describe for me what they looked
21 like.

22 A. Two African American males. One of them
23 had a darker complexion and a goatee and the other one
24 was a lighter skinned African American also had a
11:11AM 25 goatee but not as long.

11:11AM 1 Q. And what were they doing that caught your
2 attention?

3 A. The first one that caught my attention was
4 the one with the longer goatee. He had a Foot Locker
11:11AM 5 bag and it was very flat as he was walking around our
6 store.

7 Q. And why did that Foot Locker bag catch
8 your attention?

9 A. We're trained as managers to observe those
11:11AM 10 kind of things because there's no Foot Lockers around
11 our vicinity or in our shopping center.

12 Q. And what were those two males doing that
13 you personally observed?

14 A. So they entered the store. They walked
11:11AM 15 around. After I serviced them that's when they started
16 to observe me and started to grab mesh bags, select
17 product, put it in the mesh bags and then exit the
18 store.

19 Q. What did they say to you, if anything?

11:12AM 20 A. So I approached, I was like hi, how are
21 you guys today and the guy in the white tank top, the
22 one with the longer goatee, was like I'm good and just
23 proceeded to walk around.

24 Q. What items did they take?

11:12AM 25 A. Jordan Retros.

11:12AM 1 Q. How many shoes each did they take?
 2 A. Three pairs each.
 3 Q. And what were the value of those shoes?
 4 A. About 220 each.
 11:12AM 5 Q. And do you know that based upon being the
 6 manager at the store?
 7 A. Yeah. So I'm the loss prevention liaison
 8 for the district. So after the incidents occur I will
 9 watch the videos, approach the product that they took,
 10 get those numbers and figures and add them all up.
 11 Q. And what was the total value of the items
 12 taken from your store estimate?
 13 A. About 12 or 1300.
 14 Q. When they were exiting the store did
 15 anybody try to confront them?
 16 A. So once they passed like the point of sale
 17 I was already standing by the door because I was
 18 already aware of what they were going to be doing. So
 19 I asked if they were ready to check out, they just
 20 looked at me, ignored me and proceeded to walk out.
 11:13AM 21 Q. And they made no efforts to pay?
 22 A. No, ma'am.
 23 Q. Are you certain that all of the shoes
 24 taken were all of one variety?
 11:13AM 25 A. All of one variety.

11:13AM 1 Q. And so it's fair to say that these two
 2 individuals entered the store together, were
 3 communicating with each other while they were in the
 4 store and then also left together without paying?
 11:13AM 5 A. Yes, ma'am. It'll show that on the video
 6 too.
 7 Q. I want to talk about as a manager do you
 8 have -- you mentioned that you had access to the
 9 surveillance video from that date in the ordinary
 10 course and scope of your duties as a manager, correct?
 11 A. Yes.
 12 Q. And that's kept by Nike for surveillance
 13 video purposes?
 14 A. Yes.
 15 Q. And you accessed those and gave them to
 16 law enforcement, correct?
 17 A. Yes.
 18 Q. I'm showing you what's been marked as
 19 Grand Jury Exhibits 15 and 16. Do you recognize those?
 11:14AM 20 A. Yes.
 21 Q. What are those? Let's start with 15,
 22 Grand Jury Exhibit 15. What is that?
 23 A. So those are the two gentlemen that walked
 24 out of the store without paying for the merchandise,
 11:14AM 25 both with Nike mesh shopping bags that our consumers

11:14AM 1 use in the store for shopping.
 2 Q. And those were the two individuals that
 3 you had came into contact with and came and left
 4 without paying for those shoes?
 11:15AM 5 A. Yes, ma'am.
 6 Q. And Grand Jury Exhibits 15 and 16 fairly
 7 and accurately depict the still photographs from the
 8 surveillance video that you were able to pull from that
 9 day, correct?
 11:15AM 10 A. Yes.
 11 Q. And they're date and time stamped at the
 12 bottom, correct?
 13 A. Correct.
 14 MS. LACHER: I don't have any more
 15 questions for this witness. Do any of the Grand
 16 Jurors?
 17 BY A JUROR:
 18 Q. I'm sorry. Would you spell your first
 19 name again?
 11:15AM 20 A. C-A-R-M-I-N-A.
 21 A JUROR: Great. Thank you so much.
 22 THE FOREPERSON: By law these proceedings
 23 are secret and you are prohibited from disclosing to
 24 anyone anything that transpired before us including
 11:15AM 25 evidence presented to the Grand Jury, any event

11:15AM 1 occurring or statement made in the presence of the
 2 Grand Jury or any information obtained by the Grand
 3 Jury.
 4 Failure to comply with this admonition is
 11:15AM 5 a gross misdemeanor punishable up to 364 days in the
 6 Clark County Detention Center and a 2000-dollar fine.
 7 In addition you may be held in contempt of court which
 8 is punishable by an additional 500-dollar fine and 25
 9 days in the Clark County Detention Center.
 11:15AM 10 Do you understand this admonition?
 11 THE WITNESS: Yes, sir.
 12 THE FOREPERSON: Thank you. You're
 13 excused.
 14 THE WITNESS: Thank you.
 11:16AM 15 THE FOREPERSON: Please raise your right
 16 hand.
 17 You do solemnly swear the testimony you
 18 are about to give upon the investigation now pending
 19 before this Grand Jury shall be the truth, the whole
 20 truth, and nothing but the truth, so help you God?
 11:16AM 21 THE WITNESS: Yes, sir.
 22 THE FOREPERSON: Please be seated.
 23 You are advised that you are here today to
 24 give testimony in the investigation pertaining to the
 11:16AM 25 offenses of grand larceny, conspiracy to commit

11:16AM 1 robbery, robbery with use of a deadly weapon, burglary
2 while in possession of a deadly weapon and burglary
3 involving Gregory Morgan and Andre Snipes.

4 Do you understand this advisement?

11:16AM 5 THE WITNESS: Yes, sir.

6 THE FOREPERSON: Please state your first
7 and last name and spell both slowly for the record.

8 THE WITNESS: My name is Kashif Summers.

9 That's K-A-S-H-I-F. Last name Summers, S-U-M-M-E-R-S.

11:17AM 10 MS. LACHER: May I proceed?

11 THE FOREPERSON: Please.

12 MS. LACHER: Thank you.

13 **KASHIF SUMMERS,**

11:17AM 14 having been first duly sworn by the Foreperson of the
15 Grand Jury to testify to the truth, the whole truth,
16 and nothing but the truth, testified as follows:

17 **EXAMINATION**

18 BY MS. LACHER:

19 Q. Sir, where do you work?

20 A. I'm a detective with the Las Vegas
21 Metropolitan Police Department.

22 Q. And how long have you worked there?

11:17AM 23 A. I've worked with Metro in total of 10

11:17AM 1 years. I've been a detective in that unit for the past
2 two years.

3 Q. What's your current assignment?

4 A. The organized retail theft unit.

11:17AM 5 Q. Do you have any specialized training or
6 experience that assigns you to that department?

7 A. Yes, ma'am.

8 Q. What's that?

9 A. I've underwent detective school,
10 surveillance classes, confidential informant classes.
11 All the required classes to become a detective within
12 that unit.

13 Q. Around that time period of October 2nd,
14 2019 were you assigned to an investigation related to a
11:17AM 15 Nike store at the 9851 South Eastern Avenue location?

16 A. Yes, ma'am.

17 Q. And what was your involvement with that
18 investigation?

19 A. I was the detective assigned to conduct
11:18AM 20 followup.

21 Q. And what was that?

22 A. To determine who the suspects were
23 involved in the crime.

24 Q. What kind of tools did you use to
11:18AM 25 determine the identity of the suspects?

11:18AM 1 A. I utilized our facial recognition program
2 that's operated by our Fusion Watch Center.

3 Q. Tell us about that and what that involves.

4 A. Facial recognition is a new tool that
11:18AM 5 we've encompassed over the last year and a half. You
6 basically submit a photo of your suspect to the Fusion
7 Watch. They're able to input that photo into our
8 facial recognition system and it gives us a possible
9 match for a suspect based off of DMV photos or other
10 booking photos or other law enforcement tools.

11 Q. In this case did you review the
12 surveillance video from Nike as well as interviewing
13 witnesses and speaking with other law enforcement
14 detectives?

11:19AM 15 A. Yes, I did.

16 Q. I'm going to show you Grand Jury Exhibit
17 Number 17. Do you recognize that exhibit?

18 A. Yes, I do.

19 Q. And what are we looking at at Grand Jury
11:19AM 20 Exhibit Number 17?

21 A. So the top photos here are still photos of
22 the incident at Nike. The below photos are taken from
23 up top and then with a photo of each suspect that was
24 obtained through law enforcement programs.

11:19AM 25 Q. And I'm going to direct your attention to

11:19AM 1 the middle photograph in the series of three. Were you
2 able to determine the identity of that individual from
3 the Nike incident based upon your investigation?

4 A. Yes. Based upon my investigation I
11:20AM 5 determined that individual to be Andre Snipes --
6 Gregory Morgan. I apologize.

7 Q. And that's the middle --

8 A. The middle one, yes.

9 Q. And the photograph on the bottom were you
10 able to use your investigation as well to determine the
11 identity of that individual?

12 A. Yes, ma'am.

13 Q. And who was the individual that you
14 determined to be at the last photograph at the bottom
11:20AM 15 of the page?

16 A. That would be Andre Snipes.

17 Q. And in conjunction you were working with
18 Detective Laster in his investigation as well as
19 determining the suspects' identity, correct?

11:20AM 20 A. That is correct.

21 Q. And not just using facial recognition, you
22 also worked with him in this case?

23 A. That is correct.

24 MS. LACHER: I don't have any more
11:20AM 25 questions for this witness. Do any of the Grand

11:21AM 1 Jurors?

2 THE FOREPERSON: Seeing no further

3 questions.

4 By law these proceedings are secret and

11:21AM 5 you are prohibited from disclosing to anyone anything

6 that transpired before us including evidence presented

7 to the Grand Jury, any event occurring or statement

8 made in the presence of the Grand Jury or any

9 information obtained by the Grand Jury.

11:21AM 10 Failure to comply with this admonition is

11 a gross misdemeanor punishable up to 364 days in the

12 Clark County Detention Center and a 2000-dollar fine.

13 In addition you may be held in contempt of court which

14 is punishable by an additional 500-dollar fine and 25

11:21AM 15 days in the Clark County Detention Center.

16 Do you understand this admonition?

17 THE WITNESS: I do.

18 THE FOREPERSON: Thank you. You're

19 excused.

11:21AM 20 MS. LACHER: Ladies and gentlemen, that'll

21 conclude the testimony here today. I don't have any

22 more witnesses. I'm not going to ask you to

23 deliberate. When you come back next time I will have

24 the transcripts from the first presentment as well as

11:21AM 25 the presentment here today. Thank you for your time.

11:21AM 1 (Proceedings continued to an undetermined date.)

2

3

4 --oo0oo--

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

11:21AM 1 **REPORTER'S CERTIFICATE**

2

3 **STATE OF NEVADA**)

4 **COUNTY OF CLARK**) ss

11:21AM 5

6 I, Lisa Brenske, C.C.R. 186, do hereby

7 certify that I took down in Shorthand (Stenotype) all

8 of the proceedings had in the before-entitled matter at

9 the time and place indicated and thereafter said

11:21AM 10 shorthand notes were transcribed at and under my

11 direction and supervision and that the foregoing

12 transcript constitutes a full, true, and accurate

13 record of the proceedings had.

14 Dated at Las Vegas, Nevada,

11:21AM 15 November 18, 2019.

16

17

18 /S/LISA BRENSKE

19 Lisa Brenske, C.C.R. 186

11:21AM 20

21

22

23

24

25

11:21AM 1 **AFFIRMATION**

2 Pursuant to NRS 239B.030

3

4 The undersigned does hereby affirm that the

11:21AM 5 preceding TRANSCRIPT filed in GRAND JURY CASE NUMBER

6 18CGJ163A-B:

7

8 ☒ Does not contain the social security number of any

9 person,

11:21AM 10 -OR-

11 ☐ Contains the social security number of a person as

12 required by:

13 A. A specific state or federal law, to-

14 wit: NRS 656.250.

11:21AM 15 -OR-

16 B. For the administration of a public program

17 or for an application for a federal or

18 state grant.

19 /S/LISA BRENSKE

20 Signature

21 Lisa Brenske

22 Print Name

23 Official Court Reporter

24 Title

25

November 18, 2019

Date

18CGJ163 A-B
Grand Jury Case # _____
Exhibit # 19
Date 1-9-2020

9J-20

1-9-20



0204

F41 7/4/2019 03:35

Grand Jury Case # 18CGJ163A-B

Exhibit # 20

Date 1-9-2020

6-1-21

1-9-20

0205



F41 7/4/2019 03:35:15.2

Grand Jury Case # 18(G)143A-B

Exhibit # 21

Date 1-9-2020

61-22

1-9-20

0206



F41 7/4/2019 03:35

Grand Jury Case # 18CG163A-B

Exhibit # 22

Date 1-9-2020

WARR

01-10-20 13:33 DSDRSU

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

DISTRICT COURT
CLARK COUNTY, NEVADA

JAN 10 2020

THE STATE OF NEVADA,

Plaintiff,

-vs-

ANDRE GRANT SNIPES
ID#7088448

Defendant.

BY, KIMBERLY ESTALA, DEPUTY

CASE NO: C-19-344461-2

DEPT NO: XX

WARRANT FOR ARREST

SUPERSEDING INDICTMENT WARRANT

THE STATE OF NEVADA,

To: Any Sheriff, Constable, Marshall, Policeman, or Peace Officer in This State:

A Superseding Indictment having been found on the 10th day of January, 2020, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (5) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424); (4) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (1) CT - PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS 205.08345 - NOC 55986).

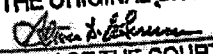
YOU ARE, THEREFORE, COMMANDED forthwith to arrest and bring said Defendant before the Court to answer the Indictment. If the Court is not in session, you are to deliver Defendant into the custody of the Sheriff of Clark County, or if requested by Defendant, take Defendant before any Magistrate in the County where arrested that bail may be given to answer to the Indictment. Defendant shall be admitted to bail in the sum of \$ 25,000 with the following added conditions:

I HEREBY AUTHORIZE THE SERVICE OF THE WITHIN WARRANT BY TELETYPE, PURSUANT TO NRS 171.148. The Warrant may be served at any hour day or night.

GIVEN under my hand this 10th day of January, 2020.


LINDA MARIE BELL
DISTRICT COURT JUDGE VII

DA# 18CGJ163A-B/19F21141A-B/ed
LVMPD EV#190900115154;
190900095652; 19109999927
4/21/1982; BMA; 513-84-0089;
(TK9)

CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE ORIGINAL ON FILE

CLERK OF THE COURT

*PAGE 1 OF 1 ☐ UOF ☐ BODY CAM
*ID/CS# 7088448 ☐ NEW ID
☐ JUVENILE ☐ DNA SAMPLE TAKEN ☒ DNA NOT REQ'D

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
TEMPORARY CUSTODY RECORD
(* DENOTES OFFICER REQUIRED FIELD)

*ARREST DATE: 1/10/2020 *ARREST TIME: 1920
*EVENT #:
*CO-DEF:

CO. SGT APPROVAL

☒ REBOOK ☐ ABSENTIA ☐ FORM 6 ☐ NDOC ☐ EXT TO LAS VEGAS ☐ LVC ☐ HND ☐ NLV ☐ COURTESY HOLD ☐ DETAINER

*INTAKE NAME (AKA, ALIAS, ETC.) LAST SNIPES FIRST ANDRE MIDDLE GRANT				TRUE NAME LAST SNIPES FIRST ANDRE MIDDLE GRANT																									
*HOME ADDRESS (STREET # AND STREET NAME) 480 W BONANZA RD				BLDG./APT.#		*CITY LAS VEGAS		*STATE NV		*ZIP 89106		*PLACE OF BIRTH KANSAS CITY, KANSAS																	
*DATE OF BIRTH 04/21/1982		*RACE B	*HISP ETHN NH	*SEX M	*HEIGHT 5'10"	*WEIGHT 180	*HAIR BLK	*EYES BRO	*SOCIAL SECURITY # 513-84-0089		*CITIZENSHIP USA		*ALIEN REGISTRATION #	<input type="checkbox"/> US VETERAN <input type="checkbox"/> ACTIVE MILITARY															
*LOCATION OF CRIME (STREET ADDRESS, CITY, STATE, ZIP) <input checked="" type="checkbox"/> CC <input type="checkbox"/> LV WARRANT LAS VEGAS, NV 89101								*LOCATION OF ARREST (STREET ADDRESS, CITY, STATE, ZIP) CCDC LAS VEGAS, NV 89101 > ST-4N-06-S						<input type="checkbox"/> CITIZEN'S ARREST <input checked="" type="checkbox"/> SPEAKS ENGLISH															
*ARR ** TYPE	*COURT JURIS	*WARRANT # / CASE #		*# CNTS	*NOC CODE	* M GM F		*CHARGE LITERAL				*ORD / NRS	*BAIL	*EVENT# / NIC#															
GJI	DC	C-19-344461-2		1	56004	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		GRAND LARCENY LESS THAN \$3500				205.222.2	25000																
GJI	DC	C-19-344461-2		1	50424	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY, (1ST)				205.060.2	0																
GJI	DC	C-19-344461-2		1	50424	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		BURGLARY, (1ST)				205.060.2	0																
GJI	DC	C-19-344461-2		1	55986	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		PART ORGANIZED RETAIL THEFT RING, \$3500				205.08345.1	0																
						<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>																							
						<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		TAPP 1-14-20 @ 830AM ALB 20																					
*OTHER JURISDICTION:															**ARREST TYPES: PC - PROBABLE CAUSE BS - BONDSMAN SURRENDER BW - BENCH WARRANT AW - ARREST WARRANT RM - REMAND GJI - GRAND JURY INDICTMENT														

TIME STAMP AT BOOKING 1/10/2020 2:58 PM		*ARRESTING OFFICER SIGNATURE N. Diaz *PRINTED NAME		15404 *P#		LVMPD *AGENCY		OT *SECTOR/BEAT OF ARREST		FIRST APP DATE:		TIME STAMP AT RELEASING			
		*TRANSPORTING OFFICER SIGNATURE N. Diaz *PRINTED NAME		15404 *P#		LVMPD *AGENCY		OTHER AREA CMD		TIME:					
		*EMERGENCY CONTACT HOSSIE NOTGIVEN		CUSTODY RELEASED TO								COURT: <input type="checkbox"/> JUSTICE <input type="checkbox"/> MUNICIPAL <input type="checkbox"/> JUVENILE			
		*RELATIONSHIP GRANDMOTHER		NAME								<input type="checkbox"/> STD BAIL <input type="checkbox"/> O.R. REL			
		*PHONE NUMBER 2063296143		POSITION								<input type="checkbox"/> PC <input type="checkbox"/> I.A.D.			
		*EMAIL ADDRESS		AGENCY								JUDGE:		P#	
DOC DIST P#												REL REV P#			
PID: 1:1 RT LT RI LI SCORE: REBBOK		1:N RT LT RI LI SCORE:													
<input type="checkbox"/> POLICE RECORDS COPY <input type="checkbox"/> COURTS COPY <input checked="" type="checkbox"/> DSD RECORDS COPY <input type="checkbox"/> PROCESSING COPY															

WARR

ORIGINAL

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

DISTRICT COURT
CLARK COUNTY, NEVADA

JAN 10 2020

THE STATE OF NEVADA,

Plaintiff,

-vs-

ANDRE GRANT SNIPES
ID#7088448

Defendant.

BY,

KIM ESTALA, DEPUTY

CASE NO: C-19-344461-2

DEPT NO: XX

WARRANT FOR ARREST

SUPERSEDING INDICTMENT WARRANT

THE STATE OF NEVADA,

To: Any Sheriff, Constable, Marshall, Policeman, or Peace Officer in This State:

C-19-344461-2
WARR
Warrant
4887297



A Superseding Indictment having been found on the 10th day of January, 2020, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (5) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424); (4) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (1) CT - PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS 205.08345 - NOC 55986).

YOU ARE, THEREFORE, COMMANDED forthwith to arrest and bring said Defendant before the Court to answer the Indictment. If the Court is not in session, you are to deliver Defendant into the custody of the Sheriff of Clark County, or if requested by Defendant, take Defendant before any Magistrate in the County where arrested that bail may be given to answer to the Indictment. Defendant shall be admitted to bail in the sum of \$ 25,000 with the following added conditions:

I HEREBY AUTHORIZE THE SERVICE OF THE WITHIN WARRANT BY TELETYPE, PURSUANT TO NRS 171.148. The Warrant may be served at any hour day or night.

GIVEN under my hand this 10th day of January, 2020.


LINDA MARIE BELL
DISTRICT COURT JUDGE VII

DA# 18CGJ163A-B/19F21141A-B/ed
LVMPD EV#190900115154;
190900095652; 19109999927
4/21/1982; BMA; 513-84-0089;
(TK9)

0209

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

ANDRE GRANT SNIPES,
ID#7088448

Defendant.

CASE NO: C-19-344461-2
DEPT NO: XX

SUPERSEDING INDICTMENT WARRANT RETURN

A Superseding Indictment having heretofore been found on the 10th day of January, 2020, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (5) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424); (4) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (1) CT - PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS 205.08345 - NOC 55986), and upon finding the said Superseding Indictment, the court issued a warrant for the arrest of said Defendant.

I hereby certify that I received a certified copy of the Superseding Indictment Warrant and served the same by arresting the within Defendant on the ____ day of _____ 2020.

JOSEPH LOMBARDO
Sheriff, Clark County, Nevada

BY: _____

Deputy

ORIGINAL

1 **IND**
2 **STEVEN B. WOLFSON**
3 **Clark County District Attorney**
4 **Nevada Bar #001565**
5 **ASHLEY LACHER**
6 **Deputy District Attorney**
7 **Nevada Bar #014560**
8 **200 Lewis Avenue**
9 **Las Vegas, Nevada 89155-2212**
10 **(702) 671-2500**
11 **Attorney for Plaintiff**

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

JAN 10 2020

BY 
KIM ESTALA, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

C-19-344461-2
SIND
Superseding Indictment
4887296



9 THE STATE OF NEVADA,
10 Plaintiff,
11 -vs-
12 GREGORY DELLO MORGAN,
13 #2752270
14 **ANDRE GRANT SNIPES, #7088448**
15 Defendant(s).

CASE NO: C-19-344461-2

DEPT NO: XX

**SUPERSEDING
INDICTMENT**

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

17 The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT
18 SNIPES, accused by the Clark County Grand Jury of the crime(s) of BURGLARY (Category
19 B Felony - NRS 205.060 - NOC 50424); GRAND LARCENY (Category C Felony - NRS
20 205.220.1, 205.222.2 - NOC 56004); CONSPIRACY TO COMMIT ROBBERY (Category B
21 Felony - NRS 200.380, 199.480 - NOC 50147); ROBBERY WITH USE OF A DEADLY
22 WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); BURGLARY WHILE
23 IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC
24 50426) and PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS
25 205.08345 - NOC 55986), committed at and within the County of Clark, State of Nevada, on
26 or between July 4, 2019 and October 6, 2019, as follows:

27 //

28 //

1 COUNT 1 - BURGLARY

2 Defendant GREGORY MORGAN and/or unknown co-conspirators did on or about
3 July 4, 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by
4 NIKE, located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to
5 commit larceny, Defendants being criminally liable under one or more of the following
6 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
7 aiding or abetting one another in the commission of this crime with the intent to commit this
8 crime by providing counsel and/or encouragement to one another; and/or (3) pursuant to a
9 conspiracy to commit the crime of burglary.

10 COUNT 2 - GRAND LARCENY

11 Defendant GREGORY MORGAN and/ or unknown co-conspirators did on or about
12 July 4, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the
13 owner permanently thereof, steal, take and carry away, lead away or drive away property
14 owned by NIKE, located at 9851 S. EASTERN AVENUE, having a value of \$650.00 or more,
15 to wit: merchandise, Defendants being criminally liable under one or more of the following
16 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
17 aiding or abetting one another in the commission of this crime with the intent to commit this
18 crime by providing counsel and/or encouragement to one another; and/or, (3) pursuant to a
19 conspiracy to commit larceny.

20 COUNT 3 - GRAND LARCENY

21 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
22 20, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
23 permanently thereof, steal, take and carry away, lead away or drive away property owned by
24 FOOTLOCKER, having a value of \$650.00 or more, to wit: merchandise, Defendants being
25 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
26 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
27 commission of this crime with the intent to commit this crime by providing counsel and/or
28 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

1 COUNT 4 - CONSPIRACY TO COMMIT ROBBERY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
3 20, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
4 by the defendants/conspirators committing the acts as set forth in Count 5, said acts being
5 incorporated by this reference as though fully set forth herein.

6 COUNT 5 - ROBBERY WITH USE OF A DEADLY WEAPON

7 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
8 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
9 from the person of BRYAN LAWS, or in his presence, without the consent and against the
10 will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future,
11 to his person, the person of a member of his family, or of anyone in his company at the time
12 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
13 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
14 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
15 more of the following principles of criminal liability, to-wit: (1) by directly committing said
16 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
17 intent to commit this crime by providing counsel and/or encouragement to one another and/or
18 by Defendant GREGORY MORGAN actually possessing and displaying a firearm and
19 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
20 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
21 larceny.

22 COUNT 6- BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

23 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
24 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
25 by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County,
26 Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a
27 firearm, a deadly weapon, during the commission of the crime and/or before leaving the
28 structure, Defendants being criminally liable under one or more of the following principles of

1 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
2 abetting one another in the commission of this crime with the intent to commit this crime by
3 providing counsel and/or encouragement to one another and/or by Defendant GREGORY
4 MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge
5 of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

6 COUNT 7 - BURGLARY

7 Defendant ANDRE SNIPES did on or about September 20, 2019, willfully,
8 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
9 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
10 with intent to commit a larceny and/or obtain money or property by false pretenses.

11 COUNT 6 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

12 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
13 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
14 by CHAMP'S SPORTS, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark
15 County, Nevada, with intent to commit larceny, while in possession of and/or gaining
16 possession of a firearm, a deadly weapon, during the commission of the crime and/or before
17 leaving the structure, Defendants being criminally liable under one or more of the following
18 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
19 aiding or abetting one another in the commission of this crime with the intent to commit this
20 crime by providing counsel and/or encouragement to one another and/or by Defendant
21 GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having
22 knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

23 COUNT 8- GRAND LARCENY

24 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
25 24, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
26 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
27 property owned by CHAAMP'S SPORTS, having a value of \$650.00 or more, to wit:
28 merchandise, Defendants being criminally liable under one or more of the following principles

1 of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
2 abetting one another in the commission of this crime with the intent to commit this crime by
3 providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy
4 to commit larceny.

5 COUNT 9 - CONSPIRACY TO COMMIT ROBBERY

6 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
7 24, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
8 by the defendants/conspirators committing the acts as set forth in Count 10, said acts being
9 incorporated by this reference as though fully set forth herein.

10 COUNT 10 - ROBBERY WITH USE OF A DEADLY WEAPON

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
12 24, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
13 from the person of ABREGO ALDEN, or in his presence, without the consent and against the
14 will of ABREGO ALDEN, by means of force or violence or fear of injury, immediate or future,
15 to his person, the person of a member of his family, or of anyone in his company at the time
16 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
17 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
18 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
19 more of the following principles of criminal liability, to-wit: (1) by directly committing said
20 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
21 intent to commit this crime by providing counsel and/or encouragement to one another and/or
22 by Defendant GREORY MORGAN actually possessing and displaying a firearm and
23 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
24 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
25 larceny.

26 //

27 //

28 //

1 COUNT 11 - BURGLARY

2 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
3 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
4 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
5 with intent to commit a larceny and/or obtain money or property by false pretenses.

6 COUNT 12 - GRAND LARCENY

7 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
8 29, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
9 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
10 property owned by FOOTLOCKER, located at 2120 Festival Plaza Drive, having a value of
11 \$650.00 or more, to wit: basketball jerseys and/or other merchandise, Defendants being
12 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
13 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
14 commission of this crime with the intent to commit this crime by providing counsel and/or
15 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

16 COUNT 13 - BURGLARY

17 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
18 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
19 by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada,
20 with intent to commit larceny, Defendants being criminally liable under one or more of the
21 following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or,
22 (2) by aiding or abetting one another in the commission of this crime with the intent to commit
23 this crime by providing counsel and/or encouragement to one another and/or by Defendant
24 GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving
25 the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

26 //

27 //

28 //

1 COUNT 14 - BURGLARY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
3 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by NIKE,
4 located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to commit
5 larceny, Defendants being criminally liable under one or more of the following principles of
6 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
7 abetting one another in the commission of this crime with the intent to commit this crime by
8 providing counsel and/or encouragement to one another; and/or (3) pursuant to a conspiracy
9 to commit the crime of burglary.

10 COUNT 15 - GRAND LARCENY

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
12 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
13 permanently thereof, steal, take and carry away, lead away or drive away property owned by
14 NIKE, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally
15 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
16 committing said crime; and/or, (2) by aiding or abetting one another in the commission of this
17 crime with the intent to commit this crime by providing counsel and/or encouragement to one
18 another; and/or, (3) pursuant to a conspiracy to commit larceny.

19 COUNT 16 - BURGLARY

20 Defendant ANDRE SNIPES did on or about October 6, 2019, willfully, unlawfully,
21 and feloniously enter a retail establishment and/or business, owned or occupied by
22 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
23 with intent to commit a larceny and/or obtain money or property by false pretenses.

24 COUNT 17 - PARTICIPATION IN ORGANIZED RETAIL THEFT

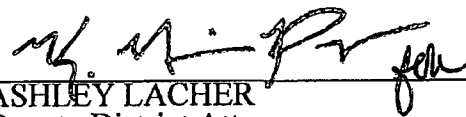
25 Defendants GREGORY MORGAN and ANDRE SNIPES and/or unknown co-
26 conspirators did on or between July 4, 2019 and October 2, 2019 willfully, unlawfully, and
27 feloniously participate in organized retail theft, the aggregated value of the property in all the
28 thefts committed in the organized retail theft in this State during a period of 90 days, being at

1 least \$3,500.00, but less than \$10,000.00, by entering and making exchanges for gift cards
2 and/or taking merchandise from NIKE and/or FOOTLOCKER and/or CHAMPS'S SPORTS.

3 DATED this 9th day of January, 2020.

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

7 BY


8 ASHLEY LACHER
9 Deputy District Attorney
10 Nevada Bar #014560

11 ENDORSEMENT: A True Bill

12 
13 Foreperson, Clark County Grand Jury
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Names of Witnesses and testifying before the Grand Jury:

2 ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

3 ALVAREZ, SAMANTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

4 CASTILLO, ELVIN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

5 LASTER, GEORGE – LVMPD #5658

6 LAWS, BRYAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

7 MONTALVO, DANIELA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

8 PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

9 SUMMERS, KASHIF – LVMPD #14109

10
11 Additional Witnesses known to the District Attorney at time of filing the Indictment:

12 CUSTODIAN OF RECORDS - CCDC

13 CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV
14 NV

15 CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

16 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

17 CUSTODIAN OF RECORDS - LVMPD RECORDS

18 CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD,
19 LV NV

20 MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

21
22
23
24
25
26 18CGJ163A-B/19F21141A-B/ed-GJ
27 LVMPD EV# 190900115154;
190900095652; 191099999927
28 (TK9)

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

January 10, 2020

C-19-344461-2 State of Nevada
 vs
 Andre Snipes

January 10, 2020 11:00 AM SUPERSEDING INDICMENT**HEARD BY:** Bell, Linda Marie **COURTROOM:** RJC Courtroom 17A**COURT CLERK:** Estala, Kimberly**RECORDER:** Vincent, Renee**REPORTER:****PARTIES PRESENT:**

Ashley A. Lacher

Attorney for Plaintiff

State of Nevada

Plaintiff

JOURNAL ENTRIES

Lawrence Holmes, Grand Jury Foreperson, stated to the Court that at least twelve members had concurred in the return of the true bill during deliberation, but had been excused for presentation to the Court. State presented Grand Jury Case Number 18CGJ163B to the Court. COURT ORDERED, the Superseding Indictment may be filed and is assigned Case Number C-19-344461-2, Department XX.

State requested a warrant, argued bail, and advised Deft is in custody. COURT ORDERED, \$25,000 BAIL; INDICTMENT WARRANT ISSUED, and matter SET for Arraignment.

Upon Court's inquiry, the State advised there are no material witness warrants to quash. COURT FURTHER ORDERED, Exhibits 1a, 1b, 12-22 to be lodged with the Clerk of the Court.

I.W. (CUSTODY)

01/14/20 8:30 A.M. INITIAL ARRAIGNMENT (DEPT XX)



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE#: C-19-344461-1
C-19-344461-2

10 vs.

DEPT. VII

11 GREGORY DELLO MORGAN,
12 ANDRE GRANT SNIPES,
13 Defendants.

14 BEFORE THE HONORABLE LINDA MARIE BELL, DISTRICT COURT JUDGE
15 FRIDAY, JANUARY 10, 2020

16 **RECORDER'S TRANSCRIPT OF PROCEEDINGS:**
17 **SUPERSEDING INDICTMENT**

18 APPEARANCES:

19 For the State:

ERIKA MENDOZA, ESQ.,
Chief Deputy District Attorney
ASHLEY A. LACHER, ESQ.
Deputy District Attorney

22 For the Defendants:

NO APPEARANCE

23 ALSO PRESENT: LAWRENCE HOLMES, GRAND JURY FOREPERSON

24
25 RECORDED BY: RENEE VINCENT, COURT RECORDER

1 FRIDAY, JANUARY 10, 2020 AT 11:29 A.M.

2
3 MS. MENDOZA: Yesterday the Grand Jury met on Grand
4 Jury case number 18CGJ163A and B and by a vote of 12 or more
5 returned a true bill against Gregory Dello Morgan and Andre Grant
6 Snipes on the following charges.

7 As to Defendant Morgan, three counts of burglary, five counts
8 of grand larceny, two counts of conspiracy to commit robbery, two
9 counts robbery with use of a deadly weapon, two counts burglary while
10 in possession of a deadly weapon, and one count participation in
11 organized retail theft.

12 As to Defendant Snipes, five counts of burglary, four counts of
13 grand larceny, two counts of conspiracy to commit robbery, two counts
14 of robbery with use of a deadly weapon, two counts burglary while in
15 possession of a deadly weapon, and one count participation in
16 organized retail theft.

17 THE COURT: Mr. Foreman, did at least 12 members of the
18 Grand Jury concur in finding a true bill as to each charge contained in
19 the Indictment?

20 THE FOREPERSON: Yes, Your Honor.

21 THE COURT: Thank you.

22 The Indictment will be filed with respect to -- the Superseding
23 Indictment will be filed with respect to Mr. Morgan. The case has
24 already received case number C-19-344461-1 and been assigned to
25 Department number 20.

1 The Indictment -- Superseding Indictment will be filed with
2 respect to Mr. Snipes. The case has already been assigned case
3 number C-19-344461-2 and has also been assigned to number --
4 Department number 20.

5 What is the position of the State regarding a warrant or
6 summons?

7 MS. LACHER: Your Honor, as to Defendant Gregory Morgan,
8 the A Defendant, I just ask that it remain at no bail. This particular
9 Defendant picked up these cases while on parole, hitting the number of
10 the same stores as his case in C-17-37775-1 [sic]. And in Justice Court,
11 the origination of my case, he was held without bail because of the
12 parole hold. He was revoked on parole, and I'd ask that that just be
13 maintained.

14 THE COURT: All right.

15 MS. LACHER: As to Mr. Snipes, the bail was originally set in
16 Justice Court when there was only, I believe, seven charges at
17 \$25,000.00. I added ten additional counts, but I'm still asking that it
18 remain at \$25,000.00 warrant as to Andre Snipes, the B Defendant.

19 THE COURT: Does he have any criminal history or failures to
20 appear?

21 MS. LACHER: Yes, Your Honor, based upon the NPR,
22 there's a 1997 Washington conviction for theft, 1999 Washington
23 conviction for theft, '99 Washington residential burglary, 2001
24 Washington conviction for PCS with intent to sell, two other
25 misdemeanor convictions.

1 THE COURT: All right. So, with respect to Mr. Morgan,
2 warrant will issue. I'll set bail at no bail given that he was on parole at
3 the time of the offense.

4 With respect to Mr. Snipes, I find that he is a danger to the
5 community given his prior criminal history. Warrant will issue and then
6 bail will be set at \$25,000.00.

7 We'll set a date one week in the department.

8 THE COURT CLERK: January 14th at 8:30 a.m.

9 THE COURT: And there's no Justice Court case to dismiss;
10 that's already happened. Exhibits 1A, 1B and 12 through 22 will be
11 lodged with the Clerk of the Court along with the previously lodged
12 exhibits. Were there any material witness warrants in this case?

13 MS. LACHER: No, Your Honor.

14 THE COURT: Great. Thank you.

15 MS. LACHER: Thank you.

16

17 [Proceedings concluded at 11:32 a.m.]

18

19

20

21 ATTEST: I do hereby certify that I have truly and correctly transcribed
22 the audio/video proceedings in the above-entitled case to the best of my
23 ability.

23

24

25



Trisha Garcia
Court Transcriber

Alvin J. Smith
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

ANDRE GRANT SNIPES,
ID#7088448

Defendant.

CASE NO: C-19-344461-2
DEPT NO: XX


SUPERSEDING INDICTMENT WARRANT RETURN

A Superseding Indictment having heretofore been found on the 10th day of January, 2020, in the above entitled Court, charging Defendant ANDRE GRANT SNIPES, above named, with the crime(s) of: (5) CTS - BURGLARY (Category B Felony - NRS 205.060 - NOC 50424); (4) CTS - GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); (2) CTS - CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); (2) CTS - ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); (2) CTS - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426) and (1) CT - PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS 205.08345 - NOC 55986), and upon finding the said Superseding Indictment, the court issued a warrant for the arrest of said Defendant.

I hereby certify that I received a certified copy of the Superseding Indictment Warrant and served the same by arresting the within Defendant on the 10th day of January 2020.

JOSEPH LOMBARDO
Sheriff, Clark County, Nevada

BY: N. DIAZ 15404
Deputy



1 IND
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

CASE NO: C-19-344461-1, -2

11 -vs-

DEPT NO: XX

12 GREGORY DELLO MORGAN,
13 #2752270
14 ANDRE GRANT SNIPES, #7088448

Defendant(s).

AMENDED
SUPERSEDING
INDICTMENT

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

17 The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT
18 SNIPES, accused by the Clark County Grand Jury of the crime(s) of BURGLARY (Category
19 B Felony - NRS 205.060 - NOC 50424); GRAND LARCENY (Category C Felony - NRS
20 205.220.1, 205.222.2 - NOC 56004); CONSPIRACY TO COMMIT ROBBERY (Category B
21 Felony - NRS 200.380, 199.480 - NOC 50147); ROBBERY WITH USE OF A DEADLY
22 WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138); BURGLARY WHILE
23 IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC
24 50426) and PARTICIPATION IN ORGANIZED RETAIL THEFT (Category B Felony - NRS
25 205.08345 - NOC 55986), committed at and within the County of Clark, State of Nevada, on
26 or between July 4, 2019 and October 6, 2019, as follows:

27 //

28 //

1 COUNT 1 - BURGLARY

2 Defendant GREGORY MORGAN and/or unknown co-conspirators did on or about
3 July 4, 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by
4 NIKE, located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to
5 commit larceny, Defendants being criminally liable under one or more of the following
6 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
7 aiding or abetting one another in the commission of this crime with the intent to commit this
8 crime by providing counsel and/or encouragement to one another; and/or (3) pursuant to a
9 conspiracy to commit the crime of burglary.

10 COUNT 2 - GRAND LARCENY

11 Defendant GREGORY MORGAN and/ or unknown co-conspirators did on or about
12 July 4, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the
13 owner permanently thereof, steal, take and carry away, lead away or drive away property
14 owned by NIKE, located at 9851 S. EASTERN AVENUE, having a value of \$650.00 or more,
15 to wit: merchandise, Defendants being criminally liable under one or more of the following
16 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
17 aiding or abetting one another in the commission of this crime with the intent to commit this
18 crime by providing counsel and/or encouragement to one another; and/or, (3) pursuant to a
19 conspiracy to commit larceny.

20 COUNT 3 - GRAND LARCENY

21 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
22 20, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
23 permanently thereof, steal, take and carry away, lead away or drive away property owned by
24 FOOTLOCKER, having a value of \$650.00 or more, to wit: merchandise, Defendants being
25 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
26 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
27 commission of this crime with the intent to commit this crime by providing counsel and/or
28 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

1 COUNT 4 - CONSPIRACY TO COMMIT ROBBERY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
3 20, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
4 by the defendants/conspirators committing the acts as set forth in Count 5, said acts being
5 incorporated by this reference as though fully set forth herein.

6 COUNT 5 - ROBBERY WITH USE OF A DEADLY WEAPON

7 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
8 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
9 from the person of BRYAN LAWS, or in his presence, without the consent and against the
10 will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future,
11 to his person, the person of a member of his family, or of anyone in his company at the time
12 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
13 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
14 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
15 more of the following principles of criminal liability, to-wit: (1) by directly committing said
16 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
17 intent to commit this crime by providing counsel and/or encouragement to one another and/or
18 by Defendant GREGORY MORGAN actually possessing and displaying a firearm and
19 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
20 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
21 larceny.

22 COUNT 6- BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

23 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
24 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
25 by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County,
26 Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a
27 firearm, a deadly weapon, during the commission of the crime and/or before leaving the
28 structure, Defendants being criminally liable under one or more of the following principles of

1 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
2 abetting one another in the commission of this crime with the intent to commit this crime by
3 providing counsel and/or encouragement to one another and/or by Defendant GREGORY
4 MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge
5 of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

6 COUNT 7 - BURGLARY

7 Defendant ANDRE SNIPES did on or about September 20, 2019, willfully,
8 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
9 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
10 with intent to commit a larceny and/or obtain money or property by false pretenses.

11 COUNT 8 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

12 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
13 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
14 by CHAMP'S SPORTS, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark
15 County, Nevada, with intent to commit larceny, while in possession of and/or gaining
16 possession of a firearm, a deadly weapon, during the commission of the crime and/or before
17 leaving the structure, Defendants being criminally liable under one or more of the following
18 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by
19 aiding or abetting one another in the commission of this crime with the intent to commit this
20 crime by providing counsel and/or encouragement to one another and/or by Defendant
21 GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having
22 knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

23 COUNT 9 - GRAND LARCENY

24 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
25 24, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
26 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
27 property owned by CHAAMP'S SPORTS, having a value of \$650.00 or more, to wit:
28 merchandise, Defendants being criminally liable under one or more of the following principles

1 of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
2 abetting one another in the commission of this crime with the intent to commit this crime by
3 providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy
4 to commit larceny.

5 COUNT 10 - CONSPIRACY TO COMMIT ROBBERY

6 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
7 24, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
8 by the defendants/conspirators committing the acts as set forth in Count 10, said acts being
9 incorporated by this reference as though fully set forth herein.

10 COUNT 11 - ROBBERY WITH USE OF A DEADLY WEAPON

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
12 24, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
13 from the person of ABREGO ALDEN, or in his presence, without the consent and against the
14 will of ABREGO ALDEN, by means of force or violence or fear of injury, immediate or future,
15 to his person, the person of a member of his family, or of anyone in his company at the time
16 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
17 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
18 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
19 more of the following principles of criminal liability, to-wit: (1) by directly committing said
20 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
21 intent to commit this crime by providing counsel and/or encouragement to one another and/or
22 by Defendant GREORY MORGAN actually possessing and displaying a firearm and
23 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
24 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
25 larceny.

26 //

27 //

28 //

1 COUNT 12 - BURGLARY

2 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
3 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by
4 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
5 with intent to commit a larceny and/or obtain money or property by false pretenses.

6 COUNT 13 - GRAND LARCENY

7 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
8 29, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
9 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
10 property owned by FOOTLOCKER, located at 2120 Festival Plaza Drive, having a value of
11 \$650.00 or more, to wit: basketball jerseys and/or other merchandise, Defendants being
12 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
13 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
14 commission of this crime with the intent to commit this crime by providing counsel and/or
15 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

16 COUNT 14 - BURGLARY

17 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
18 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
19 by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada,
20 with intent to commit larceny, Defendants being criminally liable under one or more of the
21 following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or,
22 (2) by aiding or abetting one another in the commission of this crime with the intent to commit
23 this crime by providing counsel and/or encouragement to one another and/or by Defendant
24 GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving
25 the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

26 //

27 //

28 //

1 COUNT 15 - BURGLARY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
3 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by NIKE,
4 located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to commit
5 larceny, Defendants being criminally liable under one or more of the following principles of
6 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
7 abetting one another in the commission of this crime with the intent to commit this crime by
8 providing counsel and/or encouragement to one another; and/or (3) pursuant to a conspiracy
9 to commit the crime of burglary.

10 COUNT 16 - GRAND LARCENY

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
12 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
13 permanently thereof, steal, take and carry away, lead away or drive away property owned by
14 NIKE, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally
15 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
16 committing said crime; and/or, (2) by aiding or abetting one another in the commission of this
17 crime with the intent to commit this crime by providing counsel and/or encouragement to one
18 another; and/or, (3) pursuant to a conspiracy to commit larceny.

19 COUNT 17 - BURGLARY

20 Defendant ANDRE SNIPES did on or about October 6, 2019, willfully, unlawfully,
21 and feloniously enter a retail establishment and/or business, owned or occupied by
22 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
23 with intent to commit a larceny and/or obtain money or property by false pretenses.

24 COUNT 18 - PARTICIPATION IN ORGANIZED RETAIL THEFT

25 Defendants GREGORY MORGAN and ANDRE SNIPES and/or unknown co-
26 conspirators did on or between July 4, 2019 and October 2, 2019 willfully, unlawfully, and
27 feloniously participate in organized retail theft, the aggregated value of the property in all the
28 thefts committed in the organized retail theft in this State during a period of 90 days, being at

1 least \$3,500.00, but less than \$10,000.00, by entering and making exchanges for gift cards
2 and/or taking merchandise from NIKE and/or FOOTLOCKER and/or CHAMPS'S SPORTS.

3 DATED this 14th day of January, 2020.

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

7 BY /s// ASHLEY LACHER
8 ASHLEY LACHER
9 Deputy District Attorney
10 Nevada Bar #014560
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Names of Witnesses and testifying before the Grand Jury:

ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

ALVAREZ, SAMANTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

CASTILLO, ELVIN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LASTER, GEORGE – LVMPD #5658

LAWS, BRYAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

MONTALVO, DANIELA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

SUMMERS, KASHIF – LVMPD #14109

Additional Witnesses known to the District Attorney at time of filing the Indictment:

CUSTODIAN OF RECORDS - CCDC

CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV NV

CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS - LVMPD RECORDS

CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD, LV NV

MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

18CGJ163A-B/19F21141A-B/ed-GJ
LVMPD EV# 190900115154;
190900095652; 191099999927
(TK9)

DISTRICT COURT
CLARK COUNTY, NEVADA

Felony/Gross Misdemeanor

COURT MINUTES

January 14, 2020

C-19-344461-2 State of Nevada
vs
Andre Snipes

January 14, 2020 08:30 AM All Pending Motions

HEARD BY: Johnson, Eric COURTROOM: RJC Courtroom 12A

COURT CLERK: Skinner, Linda

RECORDER: Calvillo, Angie

REPORTER:

PARTIES PRESENT:

Andre Grant Snipes

Defendant

Hetty O. Wong

Attorney for Plaintiff

James J. Ruggeroli

Attorney for Defendant

State of Nevada

Plaintiff

JOURNAL ENTRIES

INITIAL ARRAIGNMENT: SUPERSEDING INDICTMENT...BENCH WARRANT
RETURN...CALENDAR CALL

Upon Court's inquiry, Mr. Ruggeroli advised he has not received a copy of the Superseding Indictment and that they have received a great deal of discovery that needs to be reviewed. Ms. Lacher advised the offer that will be kept open for 3 weeks from today is, plead guilty to Robbery, a category B felony, Burglary first, category B felony, full right to argue, name all victims, State will not seek habitual treatment, pay restitution and it is contingent on both Defendants.

Mr. Bassett advised he has been trying for a month to visit Defendant at NDOC, however, spoke to him this morning, he has no objections to a continuance to discuss the offer and trial strategy if need be. Mr. Ruggeroli stated that he simply is not prepared to go forward, however, Deft Snipes does not want to waive his speedy rights. Mr. Bassett stated he has not seen the Superseding Indictment, however, Deft Morgan will waive his rights.

Upon Court's inquiry, Deft Morgan advised he will WAIVE the sixty day rule. Deft Snipes advised he will not waive his speedy rights. As to the new discovery, Mr. Ruggeroli advised there are multiple compact discs that have surveillance video footage and there are multiple events. Following, Court stated it would keep the Defendants together for witness and judicial economy. Further, based on representations as to the discovery, as counsel needs additional time to prepare for trial, good cause exists for an extension past the 60 days. Counsel feel the trial will take 5-6 days. Following additional colloquy, COURT ORDERED, trial date VACATED and RESET with a status check as to negotiations in TWO (2) WEEKS at which time Defendants will also be arraigned on the Superseding Indictments.

CUSTODY

1/30/20 9:00 AM STATUS CHECK: NEGOTIATIONS

Printed Date: 1/16/2020

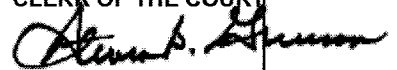
Page 1 of 2

Minutes Date:

January 14, 2020

Prepared by: Linda Skinner

0235



1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 THE STATE OF NEVADA,
9 Plaintiff,

CASE #: C-19-344461

10 vs.

DEPT. XX

11 GREGORY DELLO MORGAN and
12 ANDRE GRANT SNIPES,
13 Defendants.

14 BEFORE THE HONORABLE ERIC JOHNSON, DISTRICT COURT JUDGE
15 TUESDAY, JANUARY 14, 2020

16 **RECORDER'S TRANSCRIPT OF HEARING:**
17 **INITIAL ARRAIGNMENT: SUPERSEDING INDICTMENT;**
CALENDAR CALL

18 APPEARANCES:

19 For the State: ASHLEY A. LACHER
20 Deputy District Attorney

21 For Defendant Morgan: ALEXANDER BASSETT
22 Deputy Public Defender

23 For Defendant Snipes: JAMES J. RUGGEROLI, ESQ.

24
25 RECORDED BY: ANGIE CALVILLO, COURT RECORDER

1 [Las Vegas, Nevada, Tuesday, January 14, 2020, at 10:22 a.m.]

2
3 THE COURT: State of Nevada versus Gregory Morgan, case
4 number C344461. Counsel, please note your appearances for the
5 record.

6 MS. LACHER: Ashler Lacher for the State.

7 MR. RUGGEROLI: *Good morning*, Your Honor. James
8 Ruggeroli appearing on behalf of Mr. Snipes. He's maybe on a different
9 page, this is a co-defendant case.

10 MR. BASSETT: And Alex Bassett present for Gregory
11 Morgan.

12 THE COURT: State of Nevada versus Andre Snipes with the
13 same case number. All right. Okay. We're here on initial arraignment
14 superseding indictment and calendar call.

15 So, where do we stand with all of this?

16 MR. RUGGEROLI: Judge, I have not received a copy of the
17 superseding indictment, I made Mr. Snipes aware of it. We've also been
18 provided with a great deal of discovery that needs to be gone through.
19 My investigator is going through portions and plans to review that with
20 Mr. Snipes.

21 Mr. Snipes -- if we had the superseding indictment;
22 would enter a not guilty plea. I think the State was going to put on the
23 record what the offer had been or is. She's going to hold it open for a
24 certain amount of time, but I think we need to come back for the
25 arraignment.

1 MS. LACHER: Yes. Your Honor, I had made both the court
2 aware in an e-mail and defense counsel that I would be adding a
3 superseding indictment back when Defense and I did our file review.
4 That didn't make it over in the mail run over to me, so I don't have those.
5 So we would have to, if the Court will allow, kick it for the initial
6 arraignment.

7 But Defense had notified me at our file review that they
8 would be seeking a continuance, and I let both your JEA and law clerk
9 know. As for the offer that I'll hold open for three weeks from today, it's
10 to plead guilty to a category B, robbery; burglary 1st, category B; full right
11 to argue; name all victims; State will agree not to seek habitual
12 treatment, and then contingent on both defendants and restitution.

13 THE COURT: Okay. All right.

14 MR. BASSETT: And, Your Honor, just for the record. Mr.
15 Morgan, as you can see from his orange, is currently up at NDOC. I
16 have been trying to get up there to meet with him for the last month and
17 been forwarded by the insane red tape and bureaucracy that goes into
18 doing a visit up there. So I explained the situation to Mr. Morgan this
19 morning, and he had no objections to continuing the case for a couple of
20 weeks so that we can discuss the offer and trial strategy if the offer
21 doesn't go through and work out because we just have not had the
22 opportunity to do that yet.

23 THE COURT: All right. So both of you -- both defendants are
24 requesting continuances?

25 MR. RUGGEROLI: Judge, I'm not ready to proceed. I don't

1 think Mr. Snipes agrees to the continuance. But with the amount of
2 discovery that we have; with the superseding indictment that I haven't
3 even been able to review to really understand what the new charges are,
4 I'm not prepared to announce ready.

5 MR. BASSETT: I have not seen the superseding indictment
6 either. Mr. Morgan is prepared to agree to a continuance.

7 DEFENDANT MORGAN: I'm here.

8 THE COURT: Mr. Morgan.

9 DEFENDANT MORGAN: Yes, sir.

10 THE COURT: Did he invoke at his original --

11 MR. BASSETT: It was invoked, this went through -- this went
12 through Grand Jury, so it was invoked and set before I actually was
13 given the case. But Mr. Morgan's aware of the situation, he and I
14 discussed it. I turned over a copy of the physical discovery I handed to
15 him today which is the first time he's had the chance to look over it. We
16 just -- we just haven't had time to prepare for a trial that's going forward
17 in a week because at NDOC I have no ready access to him.

18 THE COURT: All right.

19 Mr. Morgan, do you recall at the time of your
20 arraignment on December 3, 2019, you invoked, what's referenced as
21 the 60-day rule, a right to at trial, within 60 days of your date of
22 arraignment?

23 DEFENDANT MORGAN: Yes, sir.

24 THE COURT: All right. Your attorney is representing that
25 today that you're prepared to waive that right and allow a continuance of

1 your trial, is that correct?

2 DEFENDANT MORGAN: Yes, sir.

3 THE COURT: Okay. All right.

4 And then let me -- Mr. Snipes, do you recall on your
5 arraignment on December 12, 2019, you had also invoked the
6 60-day rule?

7 DEFENDANT SNIPES: Yes.

8 THE COURT: All right. Are you prepared to waive the 60-day
9 rule and to allow a continuance of your trial?

10 DEFENDANT SNIPES: Absolutely not. No, I didn't discuss
11 that with him.

12 THE COURT: You didn't discuss it with him at all, Mr.
13 Ruggeroli?

14 DEFENDANT SNIPES: Not about waiving my speedy rights,
15 absolutely not.

16 THE COURT: Well, I mean, I'm not asking you that there
17 would be an agreement. I'm asking, did you discuss that with him?

18 MR. RUGGEROLI: No. We've discussed it, but he doesn't
19 agree to it.

20 THE COURT: Okay.

21 MR. RUGGEROLI: So he's made it very clear he doesn't
22 want to waive.

23 THE COURT: Okay. All right.

24 Can you give me a sense of how much discovery you're
25 talking about?

1 MR. RUGGEROLI: Its multiple compact discs that have
2 surveillance or video footage. There's a great deal that the State
3 provided us, this is multiple events. And with the new superseding
4 indictment -- I mean, it would be one thing if you were inclined to sever
5 those counts, but I still am getting my investigator to go through things.

6 And if you recall, and I don't know if you do, but Mr.
7 Snipes originally was sent to -- for competency evaluation. And so there
8 was a great deal of time that we did not have the availability to discuss
9 the case. I have met with him at least two times since he returned. And
10 he's made very clear, he doesn't want to waive. But I'm in a position
11 where we get a file review; the State was very diligent in giving me the
12 materials, but there's just a lot.

13 THE COURT: All right. Well I can grant a continuance as one
14 in that -- and with the joinder of the two defendants, the continuance as
15 to the one is a basis for the continuance as to the other. Also, that's for
16 the purposes of the judicial economy and witness economy.

17 Also, I will find, based upon the representations relating
18 to the discovery, that counsel does need additional time in order to
19 effectively prepare for trial and that good cause exists for an extension
20 past the 60 days.

21 This looks -- I assume, to be a trial that would take more
22 than one week to try? Or do you think it could be overflow eligible?

23 MS. LACHER: There's about six events at different stores. I
24 know you move pretty quick, I think I can do it in five days but that's
25 pushing.

1 THE COURT: All right. Let's set this on the next criminal
2 stack.

3 MR. RUGGEROLI: Judge, I have the end of May through
4 April that is full.

5 THE COURT: End of May -- April?

6 MR. RUGGEROLI: Excuse me.

7 THE COURT: Let's try the end of April through the end of
8 May.

9 MR. RUGGEROLI: The end of March through April.

10 THE COURT: So May is the earliest you could do this?

11 MR. RUGGEROLI: Unless you can do in March the 7th.

12 DEFENDANT SNIPES: If he can't do it, I need a new lawyer.
13 I'll take a new attorney, he ain't ready. I've been in here hundreds of
14 days.

15 THE CLERK: When did you say?

16 MR. RUGGEROLI: March 7th.

17 THE CLERK: Well March 9th?

18 MR. RUGGEROLI: Yes.

19 THE CLERK: That's the last date of our civil stack.

20 THE COURT: Let's take a shot and see if we --

21 THE CLERK: Can do it then.

22 THE COURT: -- can do it then.

23 THE CLERK: Calendar call is March 3rd at 8:30; jury trial
24 March 9th at nine a.m.

25 THE COURT: We do need to do the arraignment, so do you

1 want -- when do you want to the arraignment and status check
2 negotiations and arraignment? When do you want to do that?

3 MS. LACHER: I need to do another transport order for
4 Morgan. So the jail -- the prison tells me about two weeks to get him
5 back, if the Court's calendar allows or outside of that just so they have
6 notice to get him down.

7 THE COURT: All right.

8 THE CLERK: How about January 30th at nine a.m.?

9 MS. LACHER: Thank you.

10 MR. RUGGEROLI: Thank you, Judge.

11 THE COURT: All right. Thank you.

12 [Hearing concluded at 10:31 a.m.]

13

14

15 ATTEST: I do hereby certify that I have truly and correctly transcribed the
16 audio/video proceedings in the above-entitled case to the best of my ability.

17

18



19

Angie Calvillo
Court Recorder/Transcriber

20

21

22

23

24

25

1 **IND**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 ASHLEY LACHER
6 Deputy District Attorney
7 Nevada Bar #014560
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

CASE NO:

-vs-

DEPT NO:

GREGORY DELLO MORGAN, #2752270
ANDRE GRANT SNIPES, #7088448

Defendant(s).

**SUPERSEDING
INDICTMENT**

STATE OF NEVADA }
COUNTY OF CLARK } ss.

The Defendant(s) above named, GREGORY DELLO MORGAN, ANDRE GRANT SNIPES, accused by the Clark County Grand Jury of the crime(s) of BURGLARY (Category B Felony - NRS 205.060 - NOC 50424); GRAND LARCENY (Category C Felony - NRS 205.220.1, 205.222.2 - NOC 56004); CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS 200.380, 199.480 - NOC 50147); ROBBERY WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.380, 193.165 - NOC 50138) and BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON (Category B Felony - NRS 205.060 - NOC 50426), committed at and within the County of Clark, State of Nevada, on or between July 4, 2019 and October 6, 2019, as follows:

//

//

//

1 COUNT 1 - BURGLARY

2 Defendants GREGORY MORGAN and ANDRE SNIPES and/or unknown co-
3 conspirators did on or about July 4, 2019, willfully, unlawfully, and feloniously enter a
4 building, owned or occupied by NIKE, located at 9851 S. Eastern Avenue, Las Vegas, Clark
5 County, Nevada, with intent to commit larceny, Defendants being criminally liable under one
6 or more of the following principles of criminal liability, to-wit: (1) by directly committing said
7 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
8 intent to commit this crime by providing counsel and/or encouragement to one another; and/or
9 (3) pursuant to a conspiracy to commit the crime of burglary.

10 COUNT 2 – GRAND LARCENY

11 Defendants GREGORY MORGAN and ANDRE SNIPES and/ or unknown co-
12 conspirators did on or about July 4, 2019, then and there willfully, unlawfully, and feloniously
13 with intent to deprive the owner permanently thereof, steal, take and carry away, lead away or
14 drive away property owned by NIKE, located at 9851 S. EASTERN AVENUE, having a value
15 of \$650.00 or more, to wit: merchandise, Defendants being criminally liable under one or
16 more of the following principles of criminal liability, to-wit: (1) by directly committing said
17 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
18 intent to commit this crime by providing counsel and/or encouragement to one another; and/or,
19 (3) pursuant to a conspiracy to commit larceny.

20 COUNT 3 - GRAND LARCENY

21 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
22 20, 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
23 permanently thereof, steal, take and carry away, lead away or drive away property owned by
24 FOOTLOCKER, having a value of \$650.00 or more, to wit: merchandise, Defendants being
25 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
26 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
27 commission of this crime with the intent to commit this crime by providing counsel and/or
28 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

1 COUNT 4 - CONSPIRACY TO COMMIT ROBBERY

2 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
3 20, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
4 by the defendants/conspirators committing the acts as set forth in Count 5, said acts being
5 incorporated by this reference as though fully set forth herein.

6 COUNT 5 - ROBBERY WITH USE OF A DEADLY WEAPON

7 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
8 20, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
9 from the person of BRYAN LAWS, or in his presence, without the consent and against the
10 will of BRYAN LAWS, by means of force or violence or fear of injury, immediate or future,
11 to his person, the person of a member of his family, or of anyone in his company at the time
12 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
13 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
14 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
15 more of the following principles of criminal liability, to-wit: (1) by directly committing said
16 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
17 intent to commit this crime by providing counsel and/or encouragement to one another and/or
18 by Defendant GREGORY MORGAN actually possessing and displaying a firearm and
19 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
20 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
21 larceny.

22 COUNT 6- BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

23 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
24 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
25 by FOOTLOCKER, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County,
26 Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a
27 firearm, a deadly weapon, during the commission of the crime and/or before leaving the
28 structure, Defendants being criminally liable under one or more of the following principles of

criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another and/or by Defendant GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

COUNT 7 - BURGLARY

Defendant ANDRE SNIPES did on or about September 20, 2019, willfully, unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada, with intent to commit a larceny and/or obtain money or property by false pretenses.

COUNT 6 - BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied by CHAMP'S SPORTS, located at 3200 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, with intent to commit larceny, while in possession of and/or gaining possession of a firearm, a deadly weapon, during the commission of the crime and/or before leaving the structure, Defendants being criminally liable under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the intent to commit this crime by providing counsel and/or encouragement to one another and/or by Defendant GREGORY MORGAN actually possessing a firearm and Defendant ANDRE SNIPES having knowledge of that fact; and/or (3) pursuant to a conspiracy to commit the crime of burglary.

COUNT 8- GRAND LARCENY

Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September 24, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to deprive the owner permanently thereof, steal, take and carry away, lead away or drive away property owned by CHAAMP'S SPORTS, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally liable under one or more of the following principles

1 of criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or
2 abetting one another in the commission of this crime with the intent to commit this crime by
3 providing counsel and/or encouragement to one another; and/or, (3) pursuant to a conspiracy
4 to commit larceny.

5 COUNT 9 - CONSPIRACY TO COMMIT ROBBERY

6 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
7 24, 2019, willfully, unlawfully, and feloniously conspire with each other to commit a robbery,
8 by the defendants/conspirators committing the acts as set forth in Count 10, said acts being
9 incorporated by this reference as though fully set forth herein.

10 COUNT 10 - ROBBERY WITH USE OF A DEADLY WEAPON

11 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
12 24, 2019, willfully, unlawfully, and feloniously take personal property, to wit: merchandise,
13 from the person of ABREGO ALDEN, or in his presence, without the consent and against the
14 will of ABREGO ALDEN, by means of force or violence or fear of injury, immediate or future,
15 to his person, the person of a member of his family, or of anyone in his company at the time
16 of the robbery, defendant using force or fear to obtain or retain possession of the property, to
17 prevent or overcome resistance to the taking of the property, and/or to facilitate escape, with
18 use of a deadly weapon, to wit: a firearm, Defendants being criminally liable under one or
19 more of the following principles of criminal liability, to-wit: (1) by directly committing said
20 crime; and/or, (2) by aiding or abetting one another in the commission of this crime with the
21 intent to commit this crime by providing counsel and/or encouragement to one another and/or
22 by Defendant GREORY MORGAN actually possessing and displaying a firearm and
23 Defendant ANDRE SNIPES having knowledge of that fact and both defendants escaping with
24 the merchandise; and/or (3) pursuant to a conspiracy to commit the crimes of burglary and/or
25 larceny.

26 COUNT 11 - BURGLARY

27 Defendant ANDRE SNIPES did on or about September 24, 2019, willfully,
28 unlawfully, and feloniously enter a retail establishment and/or business, owned or occupied by

1 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
2 with intent to commit a larceny and/or obtain money or property by false pretenses.

3 COUNT 12 - GRAND LARCENY

4 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
5 29, 2019, then and there willfully, unlawfully, feloniously, and intentionally, with intent to
6 deprive the owner permanently thereof, steal, take and carry away, lead away or drive away
7 property owned by FOOTLOCKER, located at 2120 Festival Plaza Drive, having a value of
8 \$650.00 or more, to wit: basketball jerseys and/or other merchandise, Defendants being
9 criminally liable under one or more of the following principles of criminal liability, to-wit: (1)
10 by directly committing said crime; and/or, (2) by aiding or abetting one another in the
11 commission of this crime with the intent to commit this crime by providing counsel and/or
12 encouragement to one another; and/or, (3) pursuant to a conspiracy to commit larceny.

13 COUNT 13 - BURGLARY

14 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about September
15 24, 2019, willfully, unlawfully, and feloniously enter a retail establishment, owned or occupied
16 by FOOTLOCKER, located at 2120 Festival Plaza Drive, Las Vegas, Clark County, Nevada,
17 with intent to commit larceny, Defendants being criminally liable under one or more of the
18 following principles of criminal liability, to-wit: (1) by directly committing said crime; and/or,
19 (2) by aiding or abetting one another in the commission of this crime with the intent to commit
20 this crime by providing counsel and/or encouragement to one another and/or by Defendant
21 GREGORY MORGAN and/or Defendant ANDRE SNIPES taking merchandise and leaving
22 the store (3) pursuant to a conspiracy to commit the crime of burglary and/or larceny.

23 COUNT 14 - BURGLARY

24 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
25 2019, willfully, unlawfully, and feloniously enter a building, owned or occupied by NIKE,
26 located at 9851 S. Eastern Avenue, Las Vegas, Clark County, Nevada, with intent to commit
27 larceny, Defendants being criminally liable under one or more of the following principles of
28 criminal liability, to-wit: (1) by directly committing said crime; and/or, (2) by aiding or

1 abetting one another in the commission of this crime with the intent to commit this crime by
2 providing counsel and/or encouragement to one another; and/or (3) pursuant to a conspiracy
3 to commit the crime of burglary.

4 COUNT 15 - GRAND LARCENY

5 Defendants GREGORY MORGAN and ANDRE SNIPES did on or about October 2,
6 2019, then and there willfully, unlawfully, and feloniously with intent to deprive the owner
7 permanently thereof, steal, take and carry away, lead away or drive away property owned by
8 NIKE, having a value of \$650.00 or more, to wit: merchandise, Defendants being criminally
9 liable under one or more of the following principles of criminal liability, to-wit: (1) by directly
10 committing said crime; and/or, (2) by aiding or abetting one another in the commission of this
11 crime with the intent to commit this crime by providing counsel and/or encouragement to one
12 another; and/or, (3) pursuant to a conspiracy to commit larceny.

13 COUNT 16 - BURGLARY

14 Defendant ANDRE SNIPES did on or about October 6, 2019, willfully, unlawfully,
15 and feloniously enter a retail establishment and/or business, owned or occupied by
16 FOOTLOCKER, located at 4300 MEADOWS LANE SUITE 115, Clark County, Nevada,
17 with intent to commit a larceny and/or obtain money or property by false pretenses.

18 DATED this ____ day of January, 2020.

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

21 BY

22 ASHLEY LACHER
23 Deputy District Attorney
Nevada Bar #014560

24 ENDORSEMENT: A True Bill

25
26 _____
Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 ABREGO, ALDEN – CHAMPS SPORTS – 3200 LAS VEGAS BLVD S, LV NV

3 ALVAREZ, SAMANTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

4 CASTILLO, ELVIN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

5 LASTER, GEORGE – LVMPD #5658

6 LAWS, BRYAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

7
8 Additional Witnesses known to the District Attorney at time of filing the Indictment:

9 CUSTODIAN OF RECORDS - CCDC

10 CUSTODIAN OF RECORDS – FOOTLOCKER – 2120 FESTIVAL PLZ DR., STE 180, LV
11 NV

12 CUSTODIAN OF RECORDS – FOOTLOCKER – 4300 MEADOWS LN, LV NV

13 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

14 CUSTODIAN OF RECORDS - LVMPD RECORDS

15 CUSTODIAN OF RECORDS – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD,
16 LV NV

17 MARU, YOHANNES – WHITTLESEA BLUE CAB – 2000 S. INDUSTRIAL RD., LV NV

18 PANLILIO, CAMINA – NIKE – 905 S GRAND CENTRAL PKWY, LV NV

19 SUMMERS, KASHIF – LVMPD #14109

20
21
22
23
24
25
26 18CGJ163A-B/19F21141A-B/ed-GJ
27 LVMPD EV# 190900115154;
28 190900095652; 191099999927
(TK9)

Grand Jury Case # 18CGJ163A-B
Exhibit # 1B
Date 1/19/2020