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Clerk of Supreme Court

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STEVEN WOLFSON  
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State of Nevada

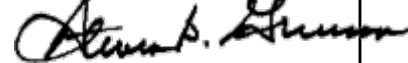
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AA 1 – AA 18	Indictment
AA 19 – AA 36	Amended Indictment
AA 37 – AA 57	Superseding Indictment
AA 58 – AA 62	Amended Superseding Indictment
AA 63 – AA 78	Second Amended Superseding Indictment
AA 79 – AA 136	Jury Instructions
AA 137 – AA 143	Verdict Form
AA 144 – AA 151	Judgment of Conviction
AA 152 – AA 153	Notice of Appeal
AA 154 – AA 184	Minutes
AA 185 – AA 325	Transcript October 21, 2020
AA 326 – AA 331	Transcript October 22, 2020
AA 332 – AA 418	Transcript October 28, 2020
AA 419 – AA 423	Transcript October 29, 2020
AA 424 - AA 435	Transcript November 5, 2020
AA 436 – AA 445	Transcript November 25, 2020
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AA 460 – AA 464	Transcript February 2, 2021
AA 465 – AA 650	Transcript April 12, 2021
AA 651 – AA 857	Transcript April 13, 2021
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AA 1294-AA 1457	Transcript April 16, 2021
AA 1458-AA 1469	Transcript April 19, 2021
AA 1470-AA 1500	Transcript April 20, 2021
AA 1501-AA 1518	Transcript June 15, 2021
AA 1519-AA1525	Transcript June 17, 2021

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AA 1526-AA1534	Transcript June 24, 2021
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1 **IND**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 MADILYN COLE  
6 Deputy District Attorney  
7 Nevada Bar #14693  
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: C-20-351676-1

-vs-

DEPT NO: XVII

**VANESHIA OLIVER, aka,**  
**Veneshia Lanette Oliver, #1821240**  
**DARRELL CLARK #7038569,**

INDICTMENT

Defendant(s).

STATE OF NEVADA }  
COUNTY OF CLARK } ss.

The Defendant(s) above named, VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, accused by the Clark County Grand Jury of the crime(s) of CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor - NRS 205.220, 199.480 - NOC 55982); CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor - NRS 205.060, 199.480 - NOC 50445); RESIDENTIAL BURGLARY (Category B Felony - NRS 205.060.2C - NOC 61934); INVASION OF THE HOME (Category B Felony - NRS 205.067 - NOC 50435); BURGLARY OF A BUSINESS (Category C Felony - NRS 205.060 - NOC 61938); THEFT (Category C Felony - NRS 205.0832, 205.0835.3 - NOC 55989); FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1) - NOC 50796); ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E Felony/Gross Misdemeanor - NRS 205.760(1), 193.330 - NOC 50821/50822); ROBBERY

(Category B Felony - NRS 200.380 - NOC 50137); COERCION (Category B Felony - NRS 207.190 - NOC 53159); THEFT (Category B Felony - NRS 205.0832, 205.0835 - NOC 55991) POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (Category C Felony - NRS 205.465 - NOC 50696); POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT (Category D Felony - NRS 205.690 - NOC 50790); POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor - NRS 205.080 - NOC 50441); CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON (Category C Felony - NRS 202.350 (1)(d)(3) - NOC 51459) and OWNERSHIP OR POSSESSION OF FIREARM BY PROHIBITED PERSON (Category B Felony - NRS 202.360 - NOC 51460), committed at and within the County of Clark, State of Nevada, on or between August 16, 2020 and August 21, 2020, as follows:

COUNT 1 - CONSPIRACY TO COMMIT LARCENY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or about August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit larceny, by the Defendants committing the acts as set forth in Count 3, said acts being incorporated by this reference as though fully set forth herein.

## COUNT 2 - CONSPIRACY TO COMMIT BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or about August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit a burglary, by the Defendants committing the acts as set forth in Count 3 and 5, said acts being incorporated by this reference as though fully set forth herein.

COUNT 3 - RESIDENTIAL BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or between August 16, 2020 and August 17, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a dwelling, owned or occupied by ANNA SALAZAR, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2359, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,

1 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
2 Defendant(s) being criminally liable under one or more of the following principles of criminal  
3 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
4 commission of this crime, with the intent that this crime be committed, by counseling,  
5 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
6 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
7 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
8 concert throughout.

9 COUNT 4 - INVASION OF THE HOME

10 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
11 CLARK did on or between August 16, 2020 and August 17, 2020, willfully, unlawfully,  
12 feloniously, and forcibly enter an inhabited dwelling, to wit: PARIS HOTEL 3655 South Las  
13 Vegas Boulevard, Las Vegas, Room No. 2359, Clark County, Nevada, without permission of  
14 the owner, resident, or lawful occupant, to wit: ANNA SALAZAR, the Defendant(s) being  
15 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
16 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
17 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
18 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
19 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
20 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

21 COUNT 5 - THEFT

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK did on or about August 17, 2020, willfully, knowingly, feloniously, and without  
24 lawful authority commit theft of property having a value of \$1,200 or more, to wit: U.S.  
25 Currency and/or purse and contents and/or jewelry, belonging to ANNA SALAZAR, PARIS  
26 HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2359, Las Vegas, under  
27 one or more of the following theories, to wit: 1) controlling the property with the intent to  
28 deprive ANNA SALAZAR of the property, 2) converting, making an unauthorized transfer of

1 an interest in, and/or, without authorization, controlling or using the services or property  
2 entrusted to them and/or placed in their possession for a limited, authorized period of  
3 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
4 or intangible property or the services by a material misrepresentation with intent to deprive  
5 ANNA SALAZAR of the property or services, in the following manner, to wit: by taking said  
6 property from hotel room, the Defendant(s) being criminally liable under one or more of the  
7 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
8 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be  
9 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
10 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
11 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
12 conspiring by Defendants acting in concert throughout.

13 COUNT 6 - BURGLARY OF A BUSINESS

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK, did on or about August 17, 2020, willfully and feloniously unlawfully enter or  
16 unlawfully remain in a business structure, owned or occupied by ARCO, located at 209 East  
17 Flamingo, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
18 assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the Defendant(s)  
19 being criminally liable under one or more of the following principles of criminal liability, to  
20 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
21 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
22 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
23 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
24 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

25 COUNT 7 - BURGLARY OF A BUSINESS

26 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
27 CLARK, did on or about August 17, 2020, willfully and feloniously unlawfully enter or  
28 unlawfully remain in a business structure, owned or occupied by CVS, located at 3645 South

Las Vegas Blvd., Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the Defendant(s) being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or about August 17, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, use a Mastercard ending in 6788, issued in the name of ANNA SALAZAR, the Defendants presenting the said debit or credit card to ARCO, located at 209 East Flamingo, Las Vegas, Clark County, Nevada, to obtain money, goods, property, services or anything of value, to wit: to purchase miscellaneous food items, the Defendants not being the cardholder, nor being authorized by the cardholder to use said card or card number, the Defendant(s) being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

## COUNT 9 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or about August 17, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, use a Mastercard ending in 2975, issued in the name of ANNA

1 SALAZAR, the Defendants presenting the said debit or credit card to CVS, located at 3645  
2 South Las Vegas Blvd., Las Vegas, Clark County, Nevada, to obtain money, goods, property,  
3 services or anything of value, to wit: to purchase miscellaneous food items, the Defendants  
4 not being the cardholder, nor being authorized by the cardholder to use said card or card  
5 number, the Defendant(s) being criminally liable under one or more of the following principles  
6 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
7 abetting in the commission of this crime, with the intent that this crime be committed, by  
8 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
9 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
10 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
11 acting in concert throughout.

12 COUNT 10 - CONSPIRACY TO COMMIT LARCENY

13 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
14 CLARK, did on or about August 21, 2020, willfully and unlawfully conspire with each other  
15 to commit larceny, by the Defendants committing the acts as set forth in Count 12, said acts  
16 being incorporated by this reference as though fully set forth herein.

17 COUNT 11 - CONSPIRACY TO COMMIT BURGLARY

18 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
19 CLARK did on or about August 21, 2020, willfully and unlawfully conspire with each other  
20 to commit a burglary, by the Defendants committing the acts as set forth in Counts 12 and 14,  
21 said acts being incorporated by this reference as though fully set forth herein.

22 COUNT 12 - RESIDENTIAL BURGLARY

23 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
24 CLARK, did on or about August 21, 2020, willfully and feloniously unlawfully enter or  
25 unlawfully remain in a dwelling, owned or occupied by INGA WILLIAMS and/or KATE  
26 BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA  
27 FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No. unknown,  
28 Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or

1 battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
2 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
3 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
4 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
5 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
6 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
7 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

8 COUNT 13 - INVASION OF THE HOME

9 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
10 CLARK did on or about August 21, 2020, willfully, unlawfully, feloniously, and forcibly enter  
11 an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
12 unknown, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
13 lawful occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO  
14 and/or BROOK BARGHOLTZ and/or REBECCA FINGER, the Defendant(s) being  
15 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
16 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
17 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
18 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
19 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
20 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

21 COUNT 14 - THEFT

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK did on or about August 21, 2020, willfully, knowingly, feloniously, and without  
24 lawful authority commit theft of property having a value of \$1,200 or more, to wit: Apple  
25 watch and/or purse and/or wallets and/or U.S. currency, belonging to INGA WILLIAMS  
26 and/or KATE BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or  
27 REBECCA FINGER, PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
28 unknown, Las Vegas, under one or more of the following theories, to wit: 1) controlling the

1 property with the intent to deprive INGA WILLIAMS and/or KATE BERRY and/or  
2 MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA FINGER of the  
3 property, 2) converting, making an unauthorized transfer of an interest in, and/or, without  
4 authorization, controlling or using the services or property entrusted to them and/or placed in  
5 their possession for a limited, authorized period of determined or prescribed duration or for a  
6 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
7 material misrepresentation with intent to deprive INGA WILLIAMS and/or KATE BERRY  
8 and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA FINGER of  
9 the property or services, in the following manner, to wit: by taking said property from hotel  
10 room, the Defendant(s) being criminally liable under one or more of the following principles  
11 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
12 abetting in the commission of this crime, with the intent that this crime be committed, by  
13 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
14 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
15 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
16 acting in concert throughout.

17 COUNT 15 - BURGLARY OF A BUSINESS

18 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, did on or about  
19 August 21, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a business  
20 structure, owned or occupied by TARGET, located at 400I South Maryland Parkway, Las  
21 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
22 battery, and/or a felony, to wit: fraudulent use of a credit card.

23 COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

24 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
25 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
26 to use a Visa ending in 2309, issued in the name of BROOK BARGHOLTZ, the Defendant  
27 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
28 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,

1 property, services or anything of value, to wit: to purchase miscellaneous food items, the  
2 Defendant not being the cardholder, nor being authorized by the cardholder to use said card or  
3 card number.

4 COUNT 17 - CONSPIRACY TO COMMIT LARCENY

5 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
6 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
7 commit larceny, by the Defendants committing the acts as set forth in Count 19, said acts being  
8 incorporated by this reference as though fully set forth herein.

9 COUNT 18 - CONSPIRACY TO COMMIT BURGLARY

10 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
11 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
12 commit a burglary, by the Defendants committing the acts as set forth in Counts 19 and 21,  
13 said acts being incorporated by this reference as though fully set forth herein.

14 COUNT 19 - RESIDENTIAL BURGLARY

15 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
16 CLARK did on or about June 15, 2020, willfully and feloniously unlawfully enter or  
17 unlawfully remain in a dwelling, owned or occupied by ESTHER CHAE, located at  
18 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 4401, Las Vegas, Clark  
19 County, Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain  
20 money or property by false pretenses, and/or a felony, the Defendant(s) being criminally liable  
21 under one or more of the following principles of criminal liability, to wit: (1) by directly  
22 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
23 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
24 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
25 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
26 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 20 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 4401, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: ESTHER CHAE, the Defendant(s) being criminally liable under one  
7 or more of the following principles of criminal liability, to wit: (1) by directly committing this  
8 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this  
9 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
10 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
11 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
12 and/or conspiring by Defendants acting in concert throughout.

13 COUNT 21 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about June 15, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$1,200 or more, to wit: two (2) laptop  
17 computers and/or a wallet and/or a cellular telephone, belonging to ESTHER CHAE, 3475  
18 South Las Vegas Boulevard, Las Vegas, under one or more of the following theories, to wit:  
19 1) controlling the property with the intent to deprive ESTHER CHAE of the property, 2)  
20 converting, making an unauthorized transfer of an interest in, and/ or, without authorization,  
21 controlling or using the services or property entrusted to them and/or placed in their possession  
22 for a limited, authorized period of determined or prescribed duration or for a limited use, and/or  
23 3) obtaining the real, personal or intangible property or the services by a material  
24 misrepresentation with intent to deprive ESTHER CHASE of the property or services, in the  
25 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
26 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
27 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
28 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,

1 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
2 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
3 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

4 COUNT 22 - ROBBERY

5 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
6 CLARK did on or about June 15, 2020, willfully, unlawfully, and feloniously take personal  
7 property, to wit: two (2) laptop computers and/or a wallet and/or a cellular telephone, from the  
8 person of ESTHER CHAE, or in her presence, without the consent and against the will of  
9 ESTHER CHAE, by means of force or violence or fear of injury, immediate or future, to her  
10 person, the person of a member of her family, or of anyone in her company at the time of the  
11 robbery, defendant using force or fear to obtain or retain possession of the property, to prevent  
12 or overcome resistance to the taking of the property, and/or to facilitate escape, the  
13 Defendant(s) being criminally liable under one or more of the following principles of criminal  
14 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
15 commission of this crime, with the intent that this crime be committed, by counseling,  
16 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
17 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
18 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
19 concert throughout.

20 COUNT 23 - COERCION

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK did on or about June 15, 2020, then and there willfully, unlawfully, and feloniously  
23 use physical force, or the immediate threat of such force, against ESTHER CHAE, with intent  
24 to compel her to do, or abstain from doing, an act which she had a right to do, or abstain from  
25 doing, by taking a cellular telephone to prevent the said ESTHER CHAE from calling the  
26 police, the Defendant(s) being criminally liable under one or more of the following principles  
27 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
28 abetting in the commission of this crime, with the intent that this crime be committed, by

1 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
2 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
3 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
4 acting in concert throughout.

5 COUNT 24 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
8 commit larceny, by the Defendants committing the acts as set forth in Count 26, said acts being  
9 incorporated by this reference as though fully set forth herein.

10 COUNT 25 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
13 commit a burglary, by the defendants committing the acts as set forth in Counts 26 and 28,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 26 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by MICHAEL LEE and/or EMELY  
19 ARMENTA, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
20 58064, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
21 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
22 Defendant(s) being criminally liable under one or more of the following principles of criminal  
23 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
24 commission of this crime, with the intent that this crime be committed, by counseling,  
25 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
26 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
27 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
28 concert throughout.

1 COUNT 27 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 58064, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: MICHAEL LEE and/or EMELY ARMENTA, the Defendant(s) being  
7 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
8 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
9 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 28 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: designer clothing  
17 items, belonging to MICHAEL LEE and/or EMELY ARMENTA, 3475 South Las Vegas  
18 Boulevard, Las Vegas, under one or more of the following theories, to wit: 1) controlling the  
19 property with the intent to deprive MICHAEL LEE and/or EMELY ARMENTA of the  
20 property, 2) converting, making an unauthorized transfer of an interest in, and/ or, without  
21 authorization, controlling or using the services or property entrusted to them and/or placed in  
22 their possession for a limited, authorized period of determined or prescribed duration or for a  
23 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
24 material misrepresentation with intent to deprive MICHAEL LEE and/or EMELY  
25 ARMENTA of the property or services, in the following manner, to wit: by taking said  
26 property from hotel room, the Defendant(s) being criminally liable under one or more of the  
27 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
28 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be

1 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
2 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
3 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
4 conspiring by Defendants acting in concert throughout.

5 COUNT 29 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
8 commit larceny, by the Defendants committing the acts as set forth in Count 31, said acts being  
9 incorporated by this reference as though fully set forth herein.

10 COUNT 30 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
13 commit a burglary, by the defendants committing the acts as set forth in Counts 31 and 33,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 31 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by BERTHA GERADEAU and/or  
19 LATOYA GUSTUS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
20 Room No. 10060, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
21 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
22 Defendant(s) being criminally liable under one or more of the following principles of criminal  
23 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
24 commission of this crime, with the intent that this crime be committed, by counseling,  
25 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
26 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
27 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
28 concert throughout.

1 COUNT 32 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 10060, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: BERTHA GERADEAU and/or LATOYA GUSTUS, the Defendant(s)  
7 being criminally liable under one or more of the following principles of criminal liability, to  
8 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
9 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 33 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: miscellaneous  
17 clothing items and/or U.S. Currency, belonging to BERTHA GERADEAU and/or LATOYA  
18 GUSTUS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the following  
19 theories, to wit: 1) controlling the property with the intent to deprive BERTHA GERADEAU  
20 and/or LATOYA GUSTUS of the property, 2) converting, making an unauthorized transfer of  
21 an interest in, and/ or, without authorization, controlling or using the services or property  
22 entrusted to them and/or placed in their possession for a limited, authorized period of  
23 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
24 or intangible property or the services by a material misrepresentation with intent to deprive  
25 BERTHA GERADEAU and/or LATOYA GUSTUS of the property or services, in the  
26 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
27 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
28 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this

1 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
2 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
3 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
4 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

5 COUNT 34 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
6 INFORMATION

7 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
8 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
9 information, to wit: Social Security card in the name of Emely Armenta, for the purpose of  
10 establishing a false status, occupation, membership, license or identity for herself or any other  
11 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
12 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

13 COUNT 35 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
14 INFORMATION

15 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
16 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
17 information, to wit: Driver's License in the name of Emely Armenta, for the purpose of  
18 establishing a false status, occupation, membership, license or identity for herself or any other  
19 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
20 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

21 COUNT 36 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT  
22 CARDHOLDER'S CONSENT

23 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
24 27, 2020, willfully, unlawfully, and feloniously, have in her possession, without the consent  
25 of the cardholder, a credit or debit card, to wit: Victoria's Secret Credit Card ending in 0947,  
26 issued in the name of Esther Chae, with intent to circulate, use, sell, or transfer said card, with  
27 intent to defraud the cardholder and/or the issuer of said credit or debit card.

28 //

1 COUNT 37 - POSSESSION OF BURGLARY TOOLS

2 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
3 27, 2020, willfully and unlawfully have in her possession, a tool, to wit: screwdrivers and/or  
4 a glass breaking tool, which is commonly used for the commission of a burglary, invasion of  
5 the home, larceny, and/or other crime, under circumstances evincing an intent to use or employ  
6 said tools in the commission of a crime.

7 COUNT 38 - CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON

8 Defendant DARRELL CLARK did on or about August 27, 2020, then and there  
9 willfully, unlawfully and feloniously carry concealed upon his person, a firearm or other  
10 deadly weapon, to wit: a Sig Sauer P229 Elite firearm bearing serial number AM168509.

11 COUNT 39 - OWNERSHIP OR POSSESSION OF FIREARM BY PROHIBITED PERSON

12 Defendant DARRELL CLARK did on or about August 27, 2020, willfully, unlawfully,  
13 and feloniously own, or have in his possession and/or under his custody or control, a firearm,  
14 to wit: a Sig Sauer P229 Elite bearing serial number AM168509, the Defendant being a  
15 convicted felon, having in 2019, been convicted of ATTEMPT BURGLARY, in Case No. C-  
16 19-338625-I, in the Eighth Judicial District Court, Clark County, a felony under the laws of  
17 the State of Nevada.

18 DATED this 2 day of October, 2020.

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

22 BY /s/MADILYN COLE  
23 MADILYN COLE  
24 Deputy District Attorney  
25 Nevada Bar #14693

26 ENDORSEMENT: A True Bill

27 /s/STEVE LURVEY

28 Foreperson, Clark County Grand Jury

Names of Witnesses and testifying before the Grand Jury:

ARMENTA, EMELY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BAGHERI, HOMAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BARGHOLTZ, BROOK – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

CHAE, ESTHER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

DERRICK, SAWN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

GERANDEAU, BERTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

KUSINSKI, GARY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LEMONS, ANTHONY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

MANN, DAVID – LVMPD

MONTALBANO, ANTHONY – LVMPD

NICHOLS, JENNIFER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

PALACIO, CINDY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

SALAZAR, ANNA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

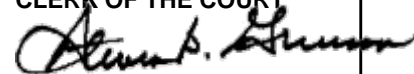
Additional Witnesses known to the District Attorney at time of filing the Indictment:

CUSTODIAN OF RECORDS - CCDC

CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS - LVMPD RECORDS

19BGJ212A-B/20CR020622/20CR020969/mcb-GJ  
LVMPD EV# 200600059192; 200800025433;  
200800025605; 200800025672; 200800088817  
(TK7)



1 **AIND**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 MADILYN COLE  
6 Deputy District Attorney  
7 Nevada Bar #14693  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

7 DISTRICT COURT  
8 CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 **VANESHIA OLIVER, aka,**  
13 **Veneshia Lanette Oliver, #1821240**  
14 **DARRELL CLARK #7038569,**

15 Defendant(s).

CASE NO: C-20-351676-1

DEPT NO: XVII

AMENDED  
INDICTMENT

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

18 The Defendant(s) above named, VANESHIA OLIVER, aka, Veneshia Lanette Oliver  
19 and DARRELL CLARK, accused by the Clark County Grand Jury of the crime(s) of  
20 CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor - NRS 205.220, 199.480 -  
21 NOC 55982); CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor - NRS  
22 205.060, 199.480 - NOC 50445); RESIDENTIAL BURGLARY (Category B Felony - NRS  
23 205.060.2C - NOC 61934); INVASION OF THE HOME (Category B Felony - NRS 205.067  
24 - NOC 50435); BURGLARY OF A BUSINESS (Category C Felony - NRS 205.060 - NOC  
25 61938); THEFT (Category D Felony - NRS 205.0832, 205.0835 - NOC 61955);  
26 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1)  
27 - NOC 50796); ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category  
28 E Felony/Gross Misdemeanor - NRS 205.760(1), 193.330 - NOC 50821/50822); ROBBERY

(Category B Felony - NRS 200.380 - NOC 50137); COERCION (Category B Felony - NRS 207.190 - NOC 53159); THEFT (Category C Felony - NRS 205.0832, 205.0835 - NOC 61958); POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (Category C Felony - NRS 205.465 - NOC 50696); POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT (Category D Felony - NRS 205.690 - NOC 50790); POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor - NRS 205.080 - NOC 50441); CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON (Category C Felony - NRS 202.350 (1)(d)(3) - NOC 51459) and OWNERSHIP OR POSSESSION OF FIREARM BY PROHIBITED PERSON (Category B Felony - NRS 202.360 - NOC 51460), committed at and within the County of Clark, State of Nevada, on or between August 16, 2020 and August 21, 2020, as follows:

COUNT 1 - CONSPIRACY TO COMMIT LARCENY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or about August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit larceny, by the Defendants committing the acts as set forth in Count 3, said acts being incorporated by this reference as though fully set forth herein.

COUNT 2 - CONSPIRACY TO COMMIT BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or about August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit a burglary, by the Defendants committing the acts as set forth in Count 3 and 5, said acts being incorporated by this reference as though fully set forth herein.

COUNT 3 - RESIDENTIAL BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or between August 16, 2020 and August 17, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a dwelling, owned or occupied by ANNA SALAZAR, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2359, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,

1 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
2 Defendant(s) being criminally liable under one or more of the following principles of criminal  
3 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
4 commission of this crime, with the intent that this crime be committed, by counseling,  
5 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
6 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
7 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
8 concert throughout.

9 COUNT 4 - INVASION OF THE HOME

10 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
11 CLARK did on or between August 16, 2020 and August 17, 2020, willfully, unlawfully,  
12 feloniously, and forcibly enter an inhabited dwelling, to wit: PARIS HOTEL 3655 South Las  
13 Vegas Boulevard, Las Vegas, Room No. 2359, Clark County, Nevada, without permission of  
14 the owner, resident, or lawful occupant, to wit: ANNA SALAZAR, the Defendant(s) being  
15 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
16 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
17 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
18 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
19 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
20 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

21 COUNT 5 - THEFT

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK did on or about August 17, 2020, willfully, knowingly, feloniously, and without  
24 lawful authority commit theft of property having a value of \$1,200 or more, to wit: U.S.  
25 Currency and/or purse and contents and/or jewelry, belonging to ANNA SALAZAR, PARIS  
26 HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2359, Las Vegas, under  
27 one or more of the following theories, to wit: 1) controlling the property with the intent to  
28 deprive ANNA SALAZAR of the property, 2) converting, making an unauthorized transfer of

1 an interest in, and/or, without authorization, controlling or using the services or property  
2 entrusted to them and/or placed in their possession for a limited, authorized period of  
3 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
4 or intangible property or the services by a material misrepresentation with intent to deprive  
5 ANNA SALAZAR of the property or services, in the following manner, to wit: by taking said  
6 property from hotel room, the Defendant(s) being criminally liable under one or more of the  
7 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
8 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be  
9 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
10 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
11 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
12 conspiring by Defendants acting in concert throughout.

13 COUNT 6 - BURGLARY OF A BUSINESS

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK, did on or about August 17, 2020, willfully and feloniously unlawfully enter or  
16 unlawfully remain in a business structure, owned or occupied by ARCO, located at 209 East  
17 Flamingo, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
18 assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the Defendant(s)  
19 being criminally liable under one or more of the following principles of criminal liability, to  
20 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
21 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
22 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
23 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
24 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

25 COUNT 7 - BURGLARY OF A BUSINESS

26 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
27 CLARK, did on or about August 17, 2020, willfully and feloniously unlawfully enter or  
28 unlawfully remain in a business structure, owned or occupied by CVS, located at 3645 South

1 Las Vegas Blvd., Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
2 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
3 Defendant(s) being criminally liable under one or more of the following principles of criminal  
4 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
5 commission of this crime, with the intent that this crime be committed, by counseling,  
6 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
7 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
8 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
9 concert throughout.

10 COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK, did on or about August 17, 2020, then and there willfully, unlawfully, feloniously,  
13 and with intent to defraud, use a Mastercard ending in 6788, issued in the name of ANNA  
14 SALAZAR, the Defendants presenting the said debit or credit card to ARCO, located at 209  
15 East Flamingo, Las Vegas, Clark County, Nevada, to obtain money, goods, property, services  
16 or anything of value, to wit: to purchase miscellaneous food items, the Defendants not being  
17 the cardholder, nor being authorized by the cardholder to use said card or card number, the  
18 Defendant(s) being criminally liable under one or more of the following principles of criminal  
19 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
20 commission of this crime, with the intent that this crime be committed, by counseling,  
21 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
22 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
23 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
24 concert throughout.

25 COUNT 9 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

26 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
27 CLARK, did on or about August 17, 2020, then and there willfully, unlawfully, feloniously,  
28 and with intent to defraud, use a Mastercard ending in 2975, issued in the name of ANNA

1 SALAZAR, the Defendants presenting the said debit or credit card to CVS, located at 3645  
2 South Las Vegas Blvd., Las Vegas, Clark County, Nevada, to obtain money, goods, property,  
3 services or anything of value, to wit: to purchase miscellaneous food items, the Defendants  
4 not being the cardholder, nor being authorized by the cardholder to use said card or card  
5 number, the Defendant(s) being criminally liable under one or more of the following principles  
6 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
7 abetting in the commission of this crime, with the intent that this crime be committed, by  
8 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
9 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
10 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
11 acting in concert throughout.

12 COUNT 10 - CONSPIRACY TO COMMIT LARCENY

13 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
14 CLARK, did on or about August 21, 2020, willfully and unlawfully conspire with each other  
15 to commit larceny, by the Defendants committing the acts as set forth in Count 12, said acts  
16 being incorporated by this reference as though fully set forth herein.

17 COUNT 11 - CONSPIRACY TO COMMIT BURGLARY

18 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
19 CLARK did on or about August 21, 2020, willfully and unlawfully conspire with each other  
20 to commit a burglary, by the Defendants committing the acts as set forth in Counts 12 and 14,  
21 said acts being incorporated by this reference as though fully set forth herein.

22 COUNT 12 - RESIDENTIAL BURGLARY

23 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
24 CLARK, did on or about August 21, 2020, willfully and feloniously unlawfully enter or  
25 unlawfully remain in a dwelling, owned or occupied by INGA WILLIAMS and/or KATE  
26 BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA  
27 FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No. unknown,  
28 Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or

1 battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
2 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
3 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
4 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
5 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
6 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
7 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

8 COUNT 13 - INVASION OF THE HOME

9 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
10 CLARK did on or about August 21, 2020, willfully, unlawfully, feloniously, and forcibly enter  
11 an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
12 unknown, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
13 lawful occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO  
14 and/or BROOK BARGHOLTZ and/or REBECCA FINGER, the Defendant(s) being  
15 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
16 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
17 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
18 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
19 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
20 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

21 COUNT 14 - THEFT

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK did on or about August 21, 2020, willfully, knowingly, feloniously, and without  
24 lawful authority commit theft of property having a value of \$1,200 or more, to wit: Apple  
25 watch and/or purse and/or wallets and/or U.S. currency, belonging to INGA WILLIAMS  
26 and/or KATE BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or  
27 REBECCA FINGER, PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
28 unknown, Las Vegas, under one or more of the following theories, to wit: 1) controlling the

1 property with the intent to deprive INGA WILLIAMS and/or KATE BERRY and/or  
2 MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA FINGER of the  
3 property, 2) converting, making an unauthorized transfer of an interest in, and/or, without  
4 authorization, controlling or using the services or property entrusted to them and/or placed in  
5 their possession for a limited, authorized period of determined or prescribed duration or for a  
6 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
7 material misrepresentation with intent to deprive INGA WILLIAMS and/or KATE BERRY  
8 and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA FINGER of  
9 the property or services, in the following manner, to wit: by taking said property from hotel  
10 room, the Defendant(s) being criminally liable under one or more of the following principles  
11 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
12 abetting in the commission of this crime, with the intent that this crime be committed, by  
13 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
14 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
15 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
16 acting in concert throughout.

17 COUNT 15 - BURGLARY OF A BUSINESS

18 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, did on or about  
19 August 21, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a business  
20 structure, owned or occupied by TARGET, located at 4001 South Maryland Parkway, Las  
21 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
22 battery, and/or a felony, to wit: fraudulent use of a credit card.

23 COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

24 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
25 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
26 to use a Visa ending in 2309, issued in the name of BROOK BARGHOLTZ, the Defendant  
27 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
28 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,

property, services or anything of value, to wit: to purchase miscellaneous food items, the Defendant not being the cardholder, nor being authorized by the cardholder to use said card or card number.

COUNT 17 - CONSPIRACY TO COMMIT LARCENY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to commit larceny, by the Defendants committing the acts as set forth in Count 19, said acts being incorporated by this reference as though fully set forth herein.

COUNT 18 - CONSPIRACY TO COMMIT BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to commit a burglary, by the Defendants committing the acts as set forth in Counts 19 and 21, said acts being incorporated by this reference as though fully set forth herein.

COUNT 19 - RESIDENTIAL BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or about June 15, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a dwelling, owned or occupied by ESTHER CHAE, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 4401, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 20 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 4401, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: ESTHER CHAE, the Defendant(s) being criminally liable under one  
7 or more of the following principles of criminal liability, to wit: (1) by directly committing this  
8 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this  
9 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
10 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
11 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
12 and/or conspiring by Defendants acting in concert throughout.

13 COUNT 21 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about June 15, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$1,200 or more, to wit: two (2) laptop  
17 computers and/or a wallet and/or a cellular telephone, belonging to ESTHER CHAE, 3475  
18 South Las Vegas Boulevard, Las Vegas, under one or more of the following theories, to wit:  
19 1) controlling the property with the intent to deprive ESTHER CHAE of the property, 2)  
20 converting, making an unauthorized transfer of an interest in, and/ or, without authorization,  
21 controlling or using the services or property entrusted to them and/or placed in their possession  
22 for a limited, authorized period of determined or prescribed duration or for a limited use, and/or  
23 3) obtaining the real, personal or intangible property or the services by a material  
24 misrepresentation with intent to deprive ESTHER CHASE of the property or services, in the  
25 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
26 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
27 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
28 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,

1 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
2 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
3 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

4 COUNT 22 - ROBBERY

5 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
6 CLARK did on or about June 15, 2020, willfully, unlawfully, and feloniously take personal  
7 property, to wit: two (2) laptop computers and/or a wallet and/or a cellular telephone, from the  
8 person of ESTHER CHAE, or in her presence, without the consent and against the will of  
9 ESTHER CHAE, by means of force or violence or fear of injury, immediate or future, to her  
10 person, the person of a member of her family, or of anyone in her company at the time of the  
11 robbery, defendant using force or fear to obtain or retain possession of the property, to prevent  
12 or overcome resistance to the taking of the property, and/or to facilitate escape, the  
13 Defendant(s) being criminally liable under one or more of the following principles of criminal  
14 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
15 commission of this crime, with the intent that this crime be committed, by counseling,  
16 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
17 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
18 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
19 concert throughout.

20 COUNT 23 - COERCION

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK did on or about June 15, 2020, then and there willfully, unlawfully, and feloniously  
23 use physical force, or the immediate threat of such force, against ESTHER CHAE, with intent  
24 to compel her to do, or abstain from doing, an act which she had a right to do, or abstain from  
25 doing, by taking a cellular telephone to prevent the said ESTHER CHAE from calling the  
26 police, the Defendant(s) being criminally liable under one or more of the following principles  
27 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
28 abetting in the commission of this crime, with the intent that this crime be committed, by

1 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
2 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
3 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants  
4 acting in concert throughout.

5 COUNT 24 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
8 commit larceny, by the Defendants committing the acts as set forth in Count 26, said acts being  
9 incorporated by this reference as though fully set forth herein.

10 COUNT 25 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
13 commit a burglary, by the defendants committing the acts as set forth in Counts 26 and 28,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 26 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by MICHAEL LEE and/or EMELY  
19 ARMENTA, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
20 58064, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
21 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
22 Defendant(s) being criminally liable under one or more of the following principles of criminal  
23 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
24 commission of this crime, with the intent that this crime be committed, by counseling,  
25 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
26 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
27 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
28 concert throughout.

1 COUNT 27 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 58064, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: MICHAEL LEE and/or EMELY ARMENTA, the Defendant(s) being  
7 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
8 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
9 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 28 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: designer clothing  
17 items, belonging to MICHAEL LEE and/or EMELY ARMENTA, 3475 South Las Vegas  
18 Boulevard, Las Vegas, under one or more of the following theories, to wit: 1) controlling the  
19 property with the intent to deprive MICHAEL LEE and/or EMELY ARMENTA of the  
20 property, 2) converting, making an unauthorized transfer of an interest in, and/ or, without  
21 authorization, controlling or using the services or property entrusted to them and/or placed in  
22 their possession for a limited, authorized period of determined or prescribed duration or for a  
23 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
24 material misrepresentation with intent to deprive MICHAEL LEE and/or EMELY  
25 ARMENTA of the property or services, in the following manner, to wit: by taking said  
26 property from hotel room, the Defendant(s) being criminally liable under one or more of the  
27 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
28 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be

1 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
2 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
3 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
4 conspiring by Defendants acting in concert throughout.

5 COUNT 29 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
8 commit larceny, by the Defendants committing the acts as set forth in Count 31, said acts being  
9 incorporated by this reference as though fully set forth herein.

10 COUNT 30 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
13 commit a burglary, by the defendants committing the acts as set forth in Counts 31 and 33,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 31 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by BERTHA GERADEAU and/or  
19 LATOYA GUSTUS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
20 Room No. 10060, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
21 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
22 Defendant(s) being criminally liable under one or more of the following principles of criminal  
23 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
24 commission of this crime, with the intent that this crime be committed, by counseling,  
25 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
26 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
27 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
28 concert throughout.

1 COUNT 32 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 10060, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: BERTHA GERADEAU and/or LATOYA GUSTUS, the Defendant(s)  
7 being criminally liable under one or more of the following principles of criminal liability, to  
8 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
9 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 33 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: miscellaneous  
17 clothing items and/or U.S. Currency, belonging to BERTHA GERADEAU and/or LATOYA  
18 GUSTUS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the following  
19 theories, to wit: 1) controlling the property with the intent to deprive BERTHA GERADEAU  
20 and/or LATOYA GUSTUS of the property, 2) converting, making an unauthorized transfer of  
21 an interest in, and/ or, without authorization, controlling or using the services or property  
22 entrusted to them and/or placed in their possession for a limited, authorized period of  
23 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
24 or intangible property or the services by a material misrepresentation with intent to deprive  
25 BERTHA GERADEAU and/or LATOYA GUSTUS of the property or services, in the  
26 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
27 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
28 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this

1 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
2 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
3 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
4 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

5 COUNT 34 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
6 INFORMATION

7 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
8 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
9 information, to wit: Social Security card in the name of Emely Armenta, for the purpose of  
10 establishing a false status, occupation, membership, license or identity for herself or any other  
11 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
12 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

13 COUNT 35 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
14 INFORMATION

15 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
16 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
17 information, to wit: Driver's License in the name of Emely Armenta, for the purpose of  
18 establishing a false status, occupation, membership, license or identity for herself or any other  
19 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
20 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

21 COUNT 36 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT  
22 CARDHOLDER'S CONSENT

23 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
24 27, 2020, willfully, unlawfully, and feloniously, have in her possession, without the consent  
25 of the cardholder, a credit or debit card, to wit: Victoria's Secret Credit Card ending in 0947,  
26 issued in the name of Esther Chae, with intent to circulate, use, sell, or transfer said card, with  
27 intent to defraud the cardholder and/or the issuer of said credit or debit card.

28 //

1 COUNT 37 - POSSESSION OF BURGLARY TOOLS

2 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
3 27, 2020, willfully and unlawfully have in her possession, a tool, to wit: screwdrivers and/or  
4 a glass breaking tool, which is commonly used for the commission of a burglary, invasion of  
5 the home, larceny, and/or other crime, under circumstances evincing an intent to use or employ  
6 said tools in the commission of a crime.

7 COUNT 38 - CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON

8 Defendant DARRELL CLARK did on or about August 27, 2020, then and there  
9 willfully, unlawfully and feloniously carry concealed upon his person, a firearm or other  
10 deadly weapon, to wit: a Sig Sauer P229 Elite firearm bearing serial number AM168509.

11 COUNT 39 - OWNERSHIP OR POSSESSION OF FIREARM BY PROHIBITED PERSON

12 Defendant DARRELL CLARK did on or about August 27, 2020, willfully, unlawfully,  
13 and feloniously own, or have in his possession and/or under his custody or control, a firearm,  
14 to wit: a Sig Sauer P229 Elite bearing serial number AM168509, the Defendant being a  
15 convicted felon, having in 2019, been convicted of ATTEMPT BURGLARY, in Case No. C-  
16 19-338625-1, in the Eighth Judicial District Court, Clark County, a felony under the laws of  
17 the State of Nevada.

18 DATED this 27th day of October, 2020.

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

22 BY /s/MADILYN COLE  
23 MADILYN COLE  
24 Deputy District Attorney  
25 Nevada Bar #14693  
26  
27  
28

Names of Witnesses and testifying before the Grand Jury:

ARMENTA, EMELY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BAGHERI, HOMAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BARGHOLTZ, BROOK – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

CHAE, ESTHER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

DERRICK, SAWN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

GERANDEAU, BERTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

KUSINSKI, GARY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LEMONS, ANTHONY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

MANN, DAVID – LVMPD

MONTALBANO, ANTHONY – LVMPD

NICHOLS, JENNIFER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

PALACIO, CINDY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

SALAZAR, ANNA – 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 - LVMPD COMMUNICATIONS

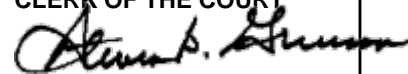
CUSTODIAN OF RECORDS - LVMPD RECORDS

19BGJ212A-B/20CR020622/20CR020969/mcb-GJ

LVMPD EV# 200600059192; 200800025433;

200800025605; 200800025672; 200800088817

(TK7)



1 **IND**  
2 **STEVEN B. WOLFSON**  
3 **Clark County District Attorney**  
4 **Nevada Bar #001565**  
5 **MADILYN COLE**  
6 **Deputy District Attorney**  
7 **Nevada Bar #14693**  
8 **ANN DUNN**  
9 **Deputy District Attorney**  
10 **Nevada Bar #14511**  
11 **200 Lewis Avenue**  
12 **Las Vegas, Nevada 89155-2212**  
13 **(702) 671-2500**  
14 **Attorney for Plaintiff**

9 **DISTRICT COURT.**  
10 **CLARK COUNTY, NEVADA**

11 **THE STATE OF NEVADA,**

12 **Plaintiff,**

13 **-vs-**

14 **VANESHIA OLIVER, aka,**  
15 **Veneshia Lanette Oliver, #1821240**  
16 **DARRELL CLARK #7038569,**

17 **Defendant(s).**

**CASE NO: C-20-351676-1**

**DEPT NO: XVII**

**SUPERSEDING**  
**INDICTMENT**

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

19 The Defendant(s) above named, VANESHIA OLIVER, aka, Veneshia Lanette Oliver  
20 and DARRELL CLARK, accused by the Clark County Grand Jury of the crime(s) of  
21 CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor - NRS 205.220, 199.480 -  
22 NOC 55982); CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor - NRS  
23 205.060, 199.480 - NOC 50445); RESIDENTIAL BURGLARY (Category B Felony - NRS  
24 205.060.2C - NOC 61934); INVASION OF THE HOME (Category B Felony - NRS 205.067  
25 - NOC 50435); BURGLARY OF A BUSINESS (Category C Felony - NRS 205.060 - NOC  
26 61938); THEFT (Category D Felony - NRS 205.0832, 205.0835 - NOC 61955);  
27 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1)  
28 - NOC 50796); ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category

1 E Felony/Gross Misdemeanor - NRS 205.760(1), 193.330 - NOC 50821/50822); ROBBERY  
2 (Category B Felony - NRS 200.380 - NOC 50137); COERCION (Category B Felony - NRS  
3 207.190 - NOC 53159); THEFT (Category C Felony - NRS 205.0832, 205.0835 - NOC 61958)  
4 POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION  
5 (Category C Felony - NRS 205.465 - NOC 50696); POSSESSION OF CREDIT OR DEBIT  
6 CARD WITHOUT CARDHOLDER'S CONSENT (Category D Felony - NRS 205.690 - NOC  
7 50790); POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor - NRS 205.080 - NOC  
8 50441); CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON  
9 (Category C Felony - NRS 202.350 (1)(d)(3) - NOC 51459) and OWNERSHIP OR  
10 POSSESSION OF FIREARM BY PROHIBITED PERSON (Category B Felony - NRS  
11 202.360 - NOC 51460), committed at and within the County of Clark, State of Nevada, on or  
12 between August 16, 2020 and August 21, 2020, as follows:

13 COUNT 1 - CONSPIRACY TO COMMIT LARCENY

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and unlawfully  
16 conspire with each other to commit larceny, by the Defendants committing the acts as set forth  
17 in Count 3, said acts being incorporated by this reference as though fully set forth herein.

18 COUNT 2 - CONSPIRACY TO COMMIT BURGLARY

19 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
20 CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully and unlawfully  
21 conspire with each other to commit a burglary, by the Defendants committing the acts as set  
22 forth in Count 3, said acts being incorporated by this reference as though fully set forth herein.

23 COUNT 3 - RESIDENTIAL BURGLARY

24 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
25 CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and feloniously  
26 unlawfully enter or unlawfully remain in a dwelling, owned or occupied by GARY  
27 KRUSINSKI, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room  
28 No. 2198P, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or

1 battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
2 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
3 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
4 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
5 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
6 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
7 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

8 COUNT 4 - INVASION OF THE HOME

9 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
10 CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully, unlawfully,  
11 feloniously, and forcibly enter an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las  
12 Vegas Boulevard, Las Vegas, Room No. 2198P, Clark County, Nevada, without permission  
13 of the owner, resident, or lawful occupant, to wit: GARY KRUSINSKI, the Defendant(s) being  
14 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
15 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
16 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
17 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
18 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
19 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

20 COUNT 5 - BURGLARY OF A BUSINESS

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
23 unlawfully remain in a business structure, owned or occupied by SBARRO, located at 3645  
24 South Las Vegas Boulevard, Clark County, Nevada, with the intent to commit grand or petit  
25 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
26 Defendant(s) being criminally liable under one or more of the following principles of criminal  
27 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
28 commission of this crime, with the intent that this crime be committed, by counseling,

1 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
2 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
3 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
4 concert throughout.

5 COUNT 6 - BURGLARY OF A BUSINESS

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
8 unlawfully remain in a business structure, owned or occupied by 7-ELEVEN, located at 4158  
9 Koval, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
10 assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the Defendant(s)  
11 being criminally liable under one or more of the following principles of criminal liability, to  
12 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
13 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
14 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
15 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
16 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

17 COUNT 7 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

18 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
19 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
20 and with intent to defraud, use an American Express credit card ending in number 1004, issued  
21 in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit card to  
22 SBARRO, located at 3645 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, to  
23 obtain money, goods, property, services or anything of value, to wit: miscellaneous food  
24 items, the Defendant not being the cardholder, nor being authorized by the cardholder to use  
25 said card or card number.

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1 COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
4 and with intent to defraud, use a Capital One Visa credit card ending in number 0452, issued  
5 in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit card to  
6 7-ELEVEN, located at 4158 Koval, Las Vegas, Clark County, Nevada, to obtain money,  
7 goods, property, services or anything of value, to wit: miscellaneous food items, the Defendant  
8 not being the cardholder, nor being authorized by the cardholder to use said card or card  
9 number.

10 COUNT 9 - CONSPIRACY TO COMMIT LARCENY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK, did on or about August 21, 2020, willfully and unlawfully conspire with each other  
13 to commit larceny, by the Defendants committing the acts as set forth in Count 11, said acts  
14 being incorporated by this reference as though fully set forth herein.

15 COUNT 10 - CONSPIRACY TO COMMIT BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 21, 2020, willfully and unlawfully conspire with each other  
18 to commit a burglary, by the Defendants committing the acts as set forth in Counts 11 and 13,  
19 said acts being incorporated by this reference as though fully set forth herein.

20 COUNT 11 - RESIDENTIAL BURGLARY

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK, did on or about August 21, 2020, willfully and feloniously unlawfully enter or  
23 unlawfully remain in a dwelling, owned or occupied by INGA WILLIAMS and/or KATE  
24 BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA  
25 FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No. 2186, Las  
26 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
27 battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
28 criminally liable under one or more of the following principles of criminal liability, to wit: (1)

1 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
2 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
3 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
4 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
5 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

6 COUNT 12 - INVASION OF THE HOME

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about August 21, 2020, willfully, unlawfully, feloniously, and forcibly enter  
9 an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
10 2186, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or lawful  
11 occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO and/or  
12 BROOK BARGHOLTZ and/or REBECCA FINGER, the Defendant(s) being criminally liable  
13 under one or more of the following principles of criminal liability, to wit: (1) by directly  
14 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
15 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
16 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
17 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
18 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

19 COUNT 13 - THEFT

20 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
21 CLARK did on or about August 21, 2020, willfully, knowingly, feloniously, and without  
22 lawful authority commit theft of property having a value of \$1,200 or more, to wit: Apple  
23 watch and/or purse and/or wallets and/or U.S. currency and/or computer and/or AirPods and/or  
24 backpack, belonging to INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO  
25 and/or BROOK BARGHOLTZ and/or REBECCA FINGER, PARIS HOTEL, 3655 South Las  
26 Vegas Boulevard, Room No. unknown, Las Vegas, under one or more of the following  
27 theories, to wit: 1) controlling the property with the intent to deprive INGA WILLIAMS and/or  
28 KATE BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or

1 REBECCA FINGER of the property, 2) converting, making an unauthorized transfer of an  
2 interest in, and/or, without authorization, controlling or using the services or property entrusted  
3 to them and/or placed in their possession for a limited, authorized period of determined or  
4 prescribed duration or for a limited use, and/or 3) obtaining the real, personal or intangible  
5 property or the services by a material misrepresentation with intent to deprive INGA  
6 WILLIAMS and/or KATE BERRY and/or MARISSA METRO and/or BROOK  
7 BARGHOLTZ and/or REBECCA FINGER of the property or services, in the following  
8 manner, to wit: by taking said property from hotel room, the Defendant(s) being criminally  
9 liable under one or more of the following principles of criminal liability, to wit: (1) by directly  
10 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
11 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
12 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
13 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
14 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

15 COUNT 14 - BURGLARY OF A BUSINESS

16 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, did on or about  
17 August 21, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a business  
18 structure, owned or occupied by TARGET, located at 4001 South Maryland Parkway, Las  
19 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
20 battery, and/or a felony, to wit: fraudulent use of a credit card.

21 COUNT 15 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

22 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
23 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
24 to use a Visa ending in 4786, issued in the name of REBECCA FINGER, the Defendant  
25 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
26 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
27 property, services or anything of value, to wit: to purchase miscellaneous food items, the  
28 Defendant not being the cardholder, nor being authorized by the cardholder to use said card or

1 card number.

2 COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

3 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
4 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
5 to use a Visa ending in 4786, issued in the name of REBECCA FINGER, the Defendant  
6 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
7 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
8 property, services or anything of value, to wit: to purchase miscellaneous food items, the  
9 Defendant not being the cardholder, nor being authorized by the cardholder to use said card or  
10 card number.

11 COUNT 17 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

12 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
13 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
14 to use a Visa ending in 9984, issued in the name of REBECCA FINGER, the Defendant  
15 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
16 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
17 property, services or anything of value, to wit: to purchase miscellaneous food items, the  
18 Defendant not being the cardholder, nor being authorized by the cardholder to use said card or  
19 card number.

20 COUNT 18 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

21 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
22 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
23 to use a Visa ending in 2309, issued in the name of BROOK BARGHOLTZ, the Defendant  
24 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
25 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
26 property, services or anything of value, to wit: to purchase miscellaneous food items, the  
27 Defendant not being the cardholder, nor being authorized by the cardholder to use said card or  
28 card number.

1 COUNT 19 - CONSPIRACY TO COMMIT LARCENY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
4 commit larceny, by the Defendants committing the acts as set forth in Count 21, said acts being  
5 incorporated by this reference as though fully set forth herein.

6 COUNT 20 - CONSPIRACY TO COMMIT BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
9 commit a burglary, by the Defendants committing the acts as set forth in Counts 21 and 23,  
10 said acts being incorporated by this reference as though fully set forth herein.

11 COUNT 21 - RESIDENTIAL BURGLARY

12 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
13 CLARK did on or about June 15, 2020, willfully and feloniously unlawfully enter or  
14 unlawfully remain in a dwelling, owned or occupied by ESTHER CHAE, located at  
15 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 4401, Las Vegas, Clark  
16 County, Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain  
17 money or property by false pretenses, and/or a felony, the Defendant(s) being criminally liable  
18 under one or more of the following principles of criminal liability, to wit: (1) by directly  
19 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
20 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
21 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
22 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
23 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

24 COUNT 22 - INVASION OF THE HOME

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about June 15, 2020, willfully, unlawfully, feloniously, and forcibly enter  
27 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
28 No. 4401, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or

1 lawful occupant, to wit: ESTHER CHAE, the Defendant(s) being criminally liable under one  
2 or more of the following principles of criminal liability, to wit: (1) by directly committing this  
3 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this  
4 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
5 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
6 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
7 and/or conspiring by Defendants acting in concert throughout.

8 COUNT 23 - THEFT

9 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
10 CLARK did on or about June 15, 2020, willfully, knowingly, feloniously, and without lawful  
11 authority commit theft of property having a value of \$1,200 or more, to wit: two (2) laptop  
12 computers and/or a wallet and/or a cellular telephone, belonging to ESTHER CHAE, 3475  
13 South Las Vegas Boulevard, Las Vegas, under one or more of the following theories, to wit:  
14 1) controlling the property with the intent to deprive ESTHER CHAE of the property, 2)  
15 converting, making an unauthorized transfer of an interest in, and/ or, without authorization,  
16 controlling or using the services or property entrusted to them and/or placed in their possession  
17 for a limited, authorized period of determined or prescribed duration or for a limited use, and/or  
18 3) obtaining the real, personal or intangible property or the services by a material  
19 misrepresentation with intent to deprive ESTHER CHAE of the property or services, in the  
20 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
21 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
22 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
23 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
24 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
25 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
26 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 24 - ROBBERY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully, unlawfully, and feloniously take personal  
4 property, to wit: two (2) laptop computers and/or a wallet and/or a cellular telephone, from the  
5 person of ESTHER CHAE, or in her presence, without the consent and against the will of  
6 ESTHER CHAE, by means of force or violence or fear of injury, immediate or future, to her  
7 person, the person of a member of her family, or of anyone in her company at the time of the  
8 robbery, defendant using force or fear to obtain or retain possession of the property, to prevent  
9 or overcome resistance to the taking of the property, and/or to facilitate escape, the  
10 Defendant(s) being criminally liable under one or more of the following principles of criminal  
11 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
12 commission of this crime, with the intent that this crime be committed, by counseling,  
13 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
14 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
15 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
16 concert throughout.

17 COUNT 25 - COERCION

18 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
19 CLARK did on or about June 15, 2020, then and there willfully, unlawfully, and feloniously  
20 use physical force, or the immediate threat of such force, against ESTHER CHAE, with intent  
21 to compel her to do, or abstain from doing, an act which she had a right to do, or abstain from  
22 doing, by taking a cellular telephone to prevent the said ESTHER CHAE from calling the  
23 police, the Defendant(s) being criminally liable under one or more of the following principles  
24 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
25 abetting in the commission of this crime, with the intent that this crime be committed, by  
26 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
27 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent  
28 that this crime be committed, Defendants aiding or abetting and/or conspiring by Defendants

1 acting in concert throughout.

2 COUNT 26 - CONSPIRACY TO COMMIT LARCENY

3 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
4 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
5 commit larceny, by the Defendants committing the acts as set forth in Count 28, said acts being  
6 incorporated by this reference as though fully set forth herein.

7 COUNT 27 - CONSPIRACY TO COMMIT BURGLARY

8 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
9 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
10 commit a burglary, by the defendants committing the acts as set forth in Counts 28 and 30,  
11 said acts being incorporated by this reference as though fully set forth herein.

12 COUNT 28 - RESIDENTIAL BURGLARY

13 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
14 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
15 unlawfully remain in a dwelling, owned or occupied by MICHAEL LEE and/or EMELY  
16 ARMENTA, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
17 58064, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
18 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
19 Defendant(s) being criminally liable under one or more of the following principles of criminal  
20 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
21 commission of this crime, with the intent that this crime be committed, by counseling,  
22 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
23 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
24 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
25 concert throughout.

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1 COUNT 29 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 58064, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: MICHAEL LEE and/or EMELY ARMENTA, the Defendant(s) being  
7 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
8 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
9 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 30 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: designer clothing  
17 items, belonging to MICHAEL LEE and/or EMELY ARMENTA, 3475 South Las Vegas  
18 Boulevard, Las Vegas, under one or more of the following theories, to wit: 1) controlling the  
19 property with the intent to deprive MICHAEL LEE and/or EMELY ARMENTA of the  
20 property, 2) converting, making an unauthorized transfer of an interest in, and/ or, without  
21 authorization, controlling or using the services or property entrusted to them and/or placed in  
22 their possession for a limited, authorized period of determined or prescribed duration or for a  
23 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
24 material misrepresentation with intent to deprive MICHAEL LEE and/or EMELY  
25 ARMENTA of the property or services, in the following manner, to wit: by taking said  
26 property from hotel room, the Defendant(s) being criminally liable under one or more of the  
27 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
28 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be

1 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
2 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
3 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
4 conspiring by Defendants acting in concert throughout.

5 COUNT 31 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
8 commit larceny, by the Defendants committing the acts as set forth in Count 33, said acts being  
9 incorporated by this reference as though fully set forth herein.

10 COUNT 32 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
13 commit a burglary, by the defendants committing the acts as set forth in Counts 33 and 35,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 33 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by BERTHA GERADEAU and/or  
19 LATOYA GUSTUS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
20 Room No. 10060, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
21 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
22 Defendant(s) being criminally liable under one or more of the following principles of criminal  
23 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
24 commission of this crime, with the intent that this crime be committed, by counseling,  
25 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
26 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
27 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
28 concert throughout.

1 COUNT 34 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 10060, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: BERTHA GERADEAU and/or LATOYA GUSTUS, the Defendant(s)  
7 being criminally liable under one or more of the following principles of criminal liability, to  
8 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
9 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
10 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
11 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
12 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

13 COUNT 35 - THEFT

14 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
15 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
16 authority commit theft of property having a value of \$5,000 or more, to wit: miscellaneous  
17 clothing items and/or U.S. Currency, belonging to BERTHA GERADEAU and/or LATOYA  
18 GUSTUS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the following  
19 theories, to wit: 1) controlling the property with the intent to deprive BERTHA GERADEAU  
20 and/or LATOYA GUSTUS of the property, 2) converting, making an unauthorized transfer of  
21 an interest in, and/ or, without authorization, controlling or using the services or property  
22 entrusted to them and/or placed in their possession for a limited, authorized period of  
23 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
24 or intangible property or the services by a material misrepresentation with intent to deprive  
25 BERTHA GERADEAU and/or LATOYA GUSTUS of the property or services, in the  
26 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
27 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
28 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this

1 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
2 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
3 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
4 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

5 COUNT 36 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
8 to commit larceny, by the Defendants committing the acts as set forth in Count 38 said acts  
9 being incorporated by this reference as though fully set forth herein.

10 COUNT 37 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
13 to commit a burglary, by the defendants committing the acts as set forth in Counts 38 and 40,  
14 said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 38 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 23, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by JEWELL LOVE and/or RAVEN  
19 HOUGH and/or DOUINREA JONES and/or PATRICIA WILLIAMS, located at HARRAH'S  
20 HOTEL, 3475 South Las Vegas Boulevard, Room No. 15058, Las Vegas, Clark County,  
21 Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain money or  
22 property by false pretenses, and/or a felony, the Defendant(s) being criminally liable under  
23 one or more of the following principles of criminal liability, to wit: (1) by directly committing  
24 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that  
25 this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
26 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
27 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
28 and/or conspiring by Defendants acting in concert throughout.

1 COUNT 39 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 23, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
5 No. 15058, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
6 lawful occupant, to wit: JEWELL LOVE and/or RAVEN HOUGH and/or DOUINREA  
7 JONES and/or PATRICIA WILLIAMS, the Defendant(s) being criminally liable under one or  
8 more of the following principles of criminal liability, to wit: (1) by directly committing this  
9 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this  
10 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
11 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
12 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
13 and/or conspiring by Defendants acting in concert throughout.

14 COUNT 40 - THEFT

15 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
16 CLARK did on or about August 23, 2020, willfully, knowingly, feloniously, and without  
17 lawful authority commit theft of property having a value of \$5,000 or more, to wit: jewelry,  
18 and/or Louis Vuitton backpack, and/or a Tupac t-shirt, belonging to JEWELL LOVE and/or  
19 RAVEN HOUGH and/or DOUINCEA JONES and/or PATRICIA WILLIAMS, 3475 South  
20 Las Vegas Boulevard, Las Vegas, under one or more of the following theories, to wit: 1)  
21 controlling the property with the intent to deprive JEWELL LOVE and/or RAVEN HOUGH  
22 and/or DOUINCEA JONES and/or PATRICIA WILLIAMS of the property, 2) converting,  
23 making an unauthorized transfer of an interest in, and/ or, without authorization, controlling  
24 or using the services or property entrusted to them and/or placed in their possession for a  
25 limited, authorized period of determined or prescribed duration or for a limited use, and/or 3)  
26 obtaining the real, personal or intangible property or the services by a material  
27 misrepresentation with intent to deprive JEWELL LOVE and/or RAVEN HOUGH and/or  
28 DOUINCEA JONES and/or PATRICIA WILLIAMS of the property or services, in the

1 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
2 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
3 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
4 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
5 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
6 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
7 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

8 COUNT 41 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
9 INFORMATION

10 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
11 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
12 information, to wit: Social Security card in the name of Emely Armenta, for the purpose of  
13 establishing a false status, occupation, membership, license or identity for herself or any other  
14 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
15 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

16 COUNT 42 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING  
17 INFORMATION

18 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
19 27, 2020, willfully, knowingly, and feloniously possess any document or personal identifying  
20 information, to wit: Driver's License in the name of Emely Armenta, for the purpose of  
21 establishing a false status, occupation, membership, license or identity for herself or any other  
22 person, to commit any of the crimes set forth in NRS 205.085 through 205.217, inclusive,  
23 205.473 through 205.513, inclusive or 205.610 through 205.810, inclusive.

24 COUNT 43 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT  
25 CARDHOLDER'S CONSENT

26 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
27 27, 2020, willfully, unlawfully, and feloniously, have in her possession, without the consent  
28 of the cardholder, a credit or debit card, to wit: Victoria's Secret Credit Card ending in 0947,

1 issued in the name of Esther Chae, with intent to circulate, use, sell, or transfer said card, with  
2 intent to defraud the cardholder and/or the issuer of said credit or debit card.

3 COUNT 44 - POSSESSION OF BURGLARY TOOLS

4 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
5 27, 2020, willfully and unlawfully have in her possession, a tool, to wit: screwdrivers and/or  
6 a glass breaking tool, which is commonly used for the commission of a burglary, invasion of  
7 the home, larceny, and/or other crime, under circumstances evincing an intent to use or employ  
8 said tools in the commission of a crime.

9 COUNT 45 - CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON

10 Defendant DARRELL CLARK did on or about August 27, 2020, then and there  
11 willfully, unlawfully and feloniously carry concealed upon his person, a firearm or other  
12 deadly weapon, to wit: a Sig Sauer P229 Elite firearm bearing serial number AM168509.

13 COUNT 46 - OWNERSHIP OR POSSESSION OF FIREARM BY PROHIBITED PERSON

14 Defendant DARRELL CLARK did on or about August 27, 2020, willfully, unlawfully,  
15 and feloniously own, or have in his possession and/or under his custody or control, a firearm,  
16 to wit: a Sig Sauer P229 Elite bearing serial number AM168509, the Defendant being a

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1 convicted felon, having in 2019, been convicted of ATTEMPT BURGLARY, in Case No. C-  
2 19-338625-1, in the Eighth Judicial District Court, Clark County, a felony under the laws of  
3 the State of Nevada.

4 DATED this 28th day of October, 2020.

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

8 BY /s/MADILYN COLE  
9 MADILYN COLE  
10 Deputy District Attorney  
11 Nevada Bar #14693

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

15 BY /s/ANN DUNN  
16 ANN DUNN  
17 Deputy District Attorney  
18 Nevada Bar #14511

19 ENDORSEMENT: A True Bill

20 /s/STEVE LURVEY  
21 Foreperson, Clark County Grand Jury  
22  
23  
24  
25  
26  
27  
28

Names of Witnesses and testifying before the Grand Jury:

ARMENTA, EMELY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BAGHERI, HOMAN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BARGHOLTZ, BROOK – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

BYRD, TRENT - LVMPD

CHAE, ESTHER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

DERRICK, SAWN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

FINGER, REBECCA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

GERANDEAU, BERTHA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

HOUGH, RAEN – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

KUSINSKI, GARY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LEMONS, ANTHONY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

LOVE, JEWELL – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

MANN, DAVID – LVMPD

MONTALBANO, ANTHONY – LVMPD

NICHOLS, JENNIFER – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

PALACIO, CINDY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

PATEL, PRAZMESH – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

SALAZAR, ANNA – 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 - LVMPD COMMUNICATIONS

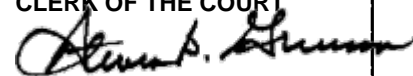
CUSTODIAN OF RECORDS - LVMPD RECORDS

19BGJ212A-B/20CR020622/20CR020969/mcb-GJ

LVMPD EV# 200600059192; 200800025433;

200800025605; 200800025672; 200800088817

(TK7)



1 **AIND**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 ANN DUNN  
6 Deputy District Attorney  
7 Nevada Bar #014511  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

1 I.A.  
2 8:00 AM  
3 HART, ESQ.

4 THE STATE OF NEVADA,  
5  
6 Plaintiff,

CASE NO: C-20-351676-1

7 -vs-

DEPT NO: XVII

8 VANESHIA OLIVER, aka  
9 Veneshia Lanette Oliver, #1821420  
10  
11 Defendant.

AMENDED SUPERSEDING  
INDICTMENT

12 STATE OF NEVADA )  
13 ) ss.  
14 COUNTY OF CLARK )

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

17 That VANESHIA OLIVER, aka Veneshia Lanette Oliver, the Defendant(s) above  
18 named, having committed the crimes of **BURGLARY OF A BUSINESS (Category C**  
19 **Felony - NRS 205.060 - NOC 61938); INVASION OF THE HOME (Category B Felony -**  
20 **NRS 205.067 - NOC 50435); and, RESIDENTIAL BURGLARY (Category B Felony -**  
21 **NRS 205.060.2C - NOC 61934),** on or between June 15, 2020 and August 23, 2020, within  
22 the County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such  
23 cases made and provided, and against the peace and dignity of the State of Nevada,

24 COUNT 1 - BURGLARY OF A BUSINESS

25 On or about August 16, 2020, VENESHIA OLIVER aka Veneshia Lanette Oliver did

26 C:\USERS\JIMENEZ\APPDATA\LOCAL\MICROSOFT\WINDOWS\INETCACHE\CONTENT.OUTLOOK\K7PBSHAN\202035938C-INFM-  
27 (OLIVER VENESHIA)-001.DOCX

28

AA0058

1 willfully and feloniously unlawfully enter or unlawfully remain in a business structure, owned  
2 or occupied by SBARRO, located at 3645 South Las Vegas Boulevard, Las Vegas, and/or 7-  
3 ELEVEN, located at 4158 Koval, Las Vegas, and/or TARGET, located at 4001 South  
4 Maryland Parkway, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
5 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
6 Defendant(s) being criminally liable under one or more of the following principles of criminal  
7 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
8 commission of this crime, with the intent that this crime be committed, by counseling,  
9 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
10 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
11 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
12 concert throughout.

13 COUNT 2 - BURGLARY OF A BUSINESS

14 On or about August 21, 2020, VENESHIA OLIVER aka Veneshia Lanette Oliver did  
15 willfully and feloniously unlawfully enter or unlawfully remain in a business structure, owned  
16 or occupied by SBARRO, located at 3645 South Las Vegas Boulevard, Las Vegas, and/or 7-  
17 ELEVEN, located at 4158 Koval, Las Vegas, and/or TARGET, located at 4001 South  
18 Maryland Parkway, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
19 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
20 Defendant(s) being criminally liable under one or more of the following principles of criminal  
21 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
22 commission of this crime, with the intent that this crime be committed, by counseling,  
23 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
24 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
25 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
26 concert throughout.

27 COUNT 3 - INVASION OF THE HOME

1 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver on or between June 15,  
2 2020 and/or August 21, 2020, did willfully, unlawfully, feloniously, and forcibly enter an  
3 inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard, Las Vegas,  
4 Room No. 2198P, Clark County, Nevada, without permission of the owner, resident, or lawful  
5 occupant, to wit: GARY KRUSINSKI and/or PARIS HOTEL, 3655 South Las Vegas  
6 Boulevard, Room No. unknown, Las Vegas, Clark County, Nevada, without permission of the  
7 owner, resident, or lawful occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or  
8 MARISSA METRO and/or BROOK BARGHOLTZ and/or REBECCA FINGER and/or  
9 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 4401, Las Vegas, Clark  
10 County, Nevada, without permission of the owner, resident, or lawful occupant, to wit:  
11 ESTHER CHAE, and/or HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
12 58064, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or lawful  
13 occupant, to wit: MICHAEL LEE and/or EMELY ARMENTA and/or HARRAH'S HOTEL,  
14 3475 South Las Vegas Boulevard, Room No. 10060, Las Vegas, Clark County, Nevada,  
15 without permission of the owner, resident, or lawful occupant, to wit: BERTHA GERADEAU  
16 and/or LATOYA GUSTUS, and/or HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
17 Room No. 15058, Las Vegas, Clark County, Nevada, without permission of the owner,  
18 resident, or lawful occupant, to wit: JEWELL LOVE and/or RAVEN HOUGH and/or  
19 DOUINREA JONES and/or PATRICIA WILLIAMS, the Defendant(s) being criminally liable  
20 under one or more of the following principles of criminal liability, to wit: (1) by directly  
21 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
22 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
23 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
24 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
25 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

26 COUNT 4 - RESIDENTIAL BURGLARY  
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1 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, on or between August  
2 16, 2020 and/or August 17, 2020, did willfully and feloniously unlawfully enter or unlawfully  
3 remain in a dwelling, owned or occupied by GARY KRUSINSKI, located at PARIS HOTEL,  
4 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2198P, and/or INGA WILLIAMS  
5 and/or KATE BERRY and/or MARISSA METRO and/or BROOK BARGHOLTZ and/or  
6 REBECCA FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room  
7 No. 2186, Las Vegas, and/or ESTHER CHAE, located at HARRAH'S HOTEL, 3475 South  
8 Las Vegas Boulevard, Room No. 4401, Las Vegas, and/or MICHAEL LEE and/or EMELY  
9 ARMENTA, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
10 58064, Las Vegas, and/or BERTHA GERADEAU and/or LATOYA GUSTUS, located at  
11 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 10060, Las Vegas, and/or  
12 JEWELL LOVE and/or RAVEN HOUGH and/or DOUINREA JONES and/or PATRICIA  
13 WILLIAMS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No.  
14 15058, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
15 assault or battery, obtain money or property by false pretenses, and/or a felony, the  
16 Defendant(s) being criminally liable under one or more of the following principles of criminal  
17 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
18 commission of this crime, with the intent that this crime be committed, by counseling,  
19 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit

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1 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
2 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
3 concert throughout.

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

7 BY /s/ANN DUNN  
8 ANN DUNN  
9 Deputy District Attorney  
10 Nevada Bar #014511  
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26 20CR020969/eg/L1  
27 LVMPD EV# 200600059192; 200800025433;  
28 200800025605; 200800025672; 200800088817  
(TK11)

1 IND  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 CHAD LEXIS  
6 Deputy District Attorney  
7 Nevada Bar #10391  
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

APR 13 2021

BY,   
SAMANTHA ALBRECHT, DEPUTY

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

CASE NO: C-20-351676-1

-vs-

DEPT NO: XVII

VANESHIA OLIVER, aka,  
Veneshia Lanette Oliver, #1821240  
DARRELL CLARK #7038569,

SECOND AMENDED  
SUPERSEDING  
INDICTMENT

Defendant(s).

STATE OF NEVADA }  
COUNTY OF CLARK } ss.

The Defendant(s) above named, VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, accused by the Clark County Grand Jury of the crime(s) of CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor - NRS 205.220, 199.480 - NOC 55982); CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor - NRS 205.060, 199.480 - NOC 50445); RESIDENTIAL BURGLARY (Category B Felony - NRS 205.060.2C - NOC 61934); INVASION OF THE HOME (Category B Felony - NRS 205.067 - NOC 50435); BURGLARY OF A BUSINESS (Category C Felony - NRS 205.060 - NOC 61938); THEFT (Category D Felony - NRS 205.0832, 205.0835 - NOC 61955); FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1) - NOC 50796); ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E Felony/Gross Misdemeanor - NRS 205.760(1), 193.330 - NOC 50821/50822); ROBBERY

C-20-351676-1  
IND  
Indictment  
4961126



(Category B Felony - NRS 200.380 - NOC 50137); COERCION (Category B Felony - NRS 207.190 - NOC 53159); POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (Category C Felony - NRS 205.465 - NOC 50696); POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT (Category D Felony - NRS 205.690 - NOC 50790); POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor - NRS 205.080 - NOC 50441); and CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON (Category C Felony - NRS 202.350 (1)(d)(3) - NOC 51459), committed at and within the County of Clark, State of Nevada, on or between June 15, 2020 through August 27, 2020, as follows:

COUNT 1 - CONSPIRACY TO COMMIT LARCENY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit larceny, by the Defendants committing the acts as set forth in Count 3, said acts being incorporated by this reference as though fully set forth herein.

COUNT 2 - CONSPIRACY TO COMMIT BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit a burglary, by the Defendants committing the acts as set forth in Count 3, said acts being incorporated by this reference as though fully set forth herein.

COUNT 3 - RESIDENTIAL BURGLARY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a dwelling, owned or occupied by GARY KRUSINSKI, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Las Vegas, Room No. 2198P, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of this

1 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
2 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
3 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
4 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

5 COUNT 4 - INVASION OF THE HOME

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully, unlawfully,  
8 feloniously, and forcibly enter an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las  
9 Vegas Boulevard, Las Vegas, Room No. 2198P, Clark County, Nevada, without permission  
10 of the owner, resident, or lawful occupant, to wit: GARY KRUSINSKI, the Defendant(s) being  
11 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
12 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
13 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
14 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
15 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
16 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

17 COUNT 5 - BURGLARY OF A BUSINESS

18 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
19 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
20 unlawfully remain in a business structure, owned or occupied by SBARRO, located at 3645  
21 South Las Vegas Boulevard, Clark County, Nevada, with the intent to commit grand or petit  
22 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
23 Defendant(s) being criminally liable under one or more of the following principles of criminal  
24 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
25 commission of this crime, with the intent that this crime be committed, by counseling,  
26 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
27 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this

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1 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
2 concert throughout.

3 COUNT 6 - BURGLARY OF A BUSINESS

4 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
5 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
6 unlawfully remain in a business structure, owned or occupied by 7-ELEVEN, located at 4158  
7 Koval, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
8 assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the Defendant(s)  
9 being criminally liable under one or more of the following principles of criminal liability, to  
10 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
11 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
12 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
13 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
14 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

15 COUNT 7 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
18 and with intent to defraud, use an American Express credit card ending in number 1004, issued  
19 in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit card to  
20 SBARRO, located at 3645 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, to  
21 obtain money, goods, property, services or anything of value, to wit: miscellaneous food  
22 items, the Defendant not being the cardholder, nor being authorized by the cardholder to use  
23 said card or card number.

24 COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
27 and with intent to defraud, use a Capital One Visa credit card ending in number 0452, issued  
28 in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit card to

1 7-ELEVEN, located at 4158 Koval, Las Vegas, Clark County, Nevada, to obtain money,  
2 goods, property, services or anything of value, to wit: miscellaneous food items, the Defendant  
3 not being the cardholder, nor being authorized by the cardholder to use said card or card  
4 number.

5 COUNT 9 - CONSPIRACY TO COMMIT LARCENY

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK, did on or about August 21, 2020, willfully and unlawfully conspire with each other  
8 to commit larceny, by the Defendants committing the acts as set forth in Count 11, said acts  
9 being incorporated by this reference as though fully set forth herein.

10 COUNT 10 - CONSPIRACY TO COMMIT BURGLARY

11 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
12 CLARK did on or about August 21, 2020, willfully and unlawfully conspire with each other  
13 to commit a burglary, by the Defendants committing the acts as set forth in Counts 11, said  
14 acts being incorporated by this reference as though fully set forth herein.

15 COUNT 11 - RESIDENTIAL BURGLARY

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK, did on or about August 21, 2020, willfully and feloniously unlawfully enter or  
18 unlawfully remain in a dwelling, owned or occupied by INGA WILLIAMS and/or KATE  
19 BERRY and/or MARISSA METRO and/or BROOKE BARGHOLTZ and/or REBECCA  
20 FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No. 2186, Las  
21 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
22 battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
23 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
24 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
25 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
26 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
27 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
28 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

1 COUNT 12 - INVASION OF THE HOME

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 21, 2020, willfully, unlawfully, feloniously, and forcibly enter  
4 an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No.  
5 2186, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or lawful  
6 occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO and/or  
7 BROOKE BARGHOLTZ and/or REBECCA FINGER, the Defendant(s) being criminally  
8 liable under one or more of the following principles of criminal liability, to wit: (1) by directly  
9 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
10 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
11 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
12 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
13 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

14 COUNT 13 - THEFT

15 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
16 CLARK did on or about August 21, 2020, willfully, knowingly, feloniously, and without  
17 lawful authority commit theft of property having a value of \$1,200 or more, to wit: Apple  
18 watch and/or purse and/or wallets and/or U.S. currency and/or computer and/or AirPods and/or  
19 backpack, belonging to INGA WILLIAMS and/or KATE BERRY and/or MARISSA METRO  
20 and/or BROOKE BARGHOLTZ and/or REBECCA FINGER, PARIS HOTEL, 3655 South  
21 Las Vegas Boulevard, Room No. 2186, Las Vegas, under one or more of the following  
22 theories, to wit: 1) controlling the property with the intent to deprive INGA WILLIAMS and/or  
23 KATE BERRY and/or MARISSA METRO and/or BROOKE BARGHOLTZ and/or  
24 REBECCA FINGER of the property, 2) converting, making an unauthorized transfer of an  
25 interest in, and/or, without authorization, controlling or using the services or property entrusted  
26 to them and/or placed in their possession for a limited, authorized period of determined or  
27 prescribed duration or for a limited use, and/or 3) obtaining the real, personal or intangible  
28 property or the services by a material misrepresentation with intent to deprive INGA

1 WILLIAMS and/or KATE BERRY and/or MARISSA METRO and/or BROOKE  
2 BARGHOLTZ and/or REBECCA FINGER of the property or services, in the following  
3 manner, to wit: by taking said property from hotel room, the Defendant(s) being criminally  
4 liable under one or more of the following principles of criminal liability, to wit: (1) by directly  
5 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
6 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
7 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
8 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
9 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

10 COUNT 14 - BURGLARY OF A BUSINESS

11 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, did on or about  
12 August 21, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a business  
13 structure, owned or occupied by TARGET, located at 4001 South Maryland Parkway, Las  
14 Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault or  
15 battery, and/or a felony, to wit: fraudulent use of a credit card.

16 COUNT 15 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

17 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
18 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
19 to use a Visa ending in 4786, issued in the name of REBECCA FINGER, the Defendant  
20 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
21 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
22 property, services or anything of value, to wit: to purchase miscellaneous food items and/or  
23 good and/or merchandise, the Defendant not being the cardholder, nor being authorized by the  
24 cardholder to use said card or card number.

25 COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

26 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
27 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
28 to use a Visa ending in 4786, issued in the name of REBECCA FINGER, the Defendant

1 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
2 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
3 property, services or anything of value, to wit: to purchase miscellaneous food items and/or  
4 good and/or merchandise, the Defendant not being the cardholder, nor being authorized by the  
5 cardholder to use said card or card number.

6 COUNT 17 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

7 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
8 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
9 to use a Visa ending in 9984, issued in the name of REBECCA FINGER, the Defendant  
10 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
11 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
12 property, services or anything of value, to wit: to purchase miscellaneous food items and/or  
13 good and/or merchandise, the Defendant not being the cardholder, nor being authorized by the  
14 cardholder to use said card or card number.

15 COUNT 18 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

16 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
17 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to defraud, attempt  
18 to use a Visa ending in 2309, issued in the name of BROOK BARGHOLTZ, the Defendant  
19 presenting or attempting to present the said debit or credit card to TARGET, located at 4001  
20 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain money, goods,  
21 property, services or anything of value, to wit: to purchase miscellaneous food items and/or  
22 good and/or merchandise, the Defendant not being the cardholder, nor being authorized by the  
23 cardholder to use said card or card number.

24 COUNT 19 - CONSPIRACY TO COMMIT LARCENY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
27 commit larceny, by the Defendants committing the acts as set forth in Count 21, said acts being  
28 incorporated by this reference as though fully set forth herein.

1 COUNT 20 - CONSPIRACY TO COMMIT BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
4 commit a burglary, by the Defendants committing the acts as set forth in Counts 21, said acts  
5 being incorporated by this reference as though fully set forth herein.

6 COUNT 21 - RESIDENTIAL BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about June 15, 2020, willfully and feloniously unlawfully enter or  
9 unlawfully remain in a dwelling, owned or occupied by ESTHER CHAE, located at  
10 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 44001, Las Vegas, Clark  
11 County, Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain  
12 money or property by false pretenses, and/or a felony, the Defendant(s) being criminally liable  
13 under one or more of the following principles of criminal liability, to wit: (1) by directly  
14 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with  
15 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,  
16 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a  
17 conspiracy to commit this crime, with the intent that this crime be committed, Defendants  
18 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

19 COUNT 22 - INVASION OF THE HOME

20 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
21 CLARK did on or about June 15, 2020, willfully, unlawfully, feloniously, and forcibly enter  
22 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
23 No. 44001, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
24 lawful occupant, to wit: ESTHER CHAE, the Defendant(s) being criminally liable under one  
25 or more of the following principles of criminal liability, to wit: (1) by directly committing this  
26 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this  
27 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
28 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to

1 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
2 and/or conspiring by Defendants acting in concert throughout.

3 COUNT 23 - THEFT

4 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
5 CLARK did on or about June 15, 2020, willfully, knowingly, feloniously, and without lawful  
6 authority commit theft of property having a value of \$1,200 or more, to wit: two (2) laptop  
7 computers and/or a wallet and/or a cellular telephone and/or miscellaneous items, belonging to  
8 ESTHER CHAE, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the  
9 following theories, to wit: 1) controlling the property with the intent to deprive ESTHER  
10 CHAE of the property, 2) converting, making an unauthorized transfer of an interest in, and/  
11 or, without authorization, controlling or using the services or property entrusted to them and/or  
12 placed in their possession for a limited, authorized period of determined or prescribed duration  
13 or for a limited use, and/or 3) obtaining the real, personal or intangible property or the services  
14 by a material misrepresentation with intent to deprive ESTHER CHAE of the property or  
15 services, in the following manner, to wit: by taking said property from hotel room, the  
16 Defendant(s) being criminally liable under one or more of the following principles of criminal  
17 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
18 commission of this crime, with the intent that this crime be committed, by counseling,  
19 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
20 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
21 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
22 concert throughout.

23 COUNT 24 - ROBBERY

24 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
25 CLARK did on or about June 15, 2020, willfully, unlawfully, and feloniously take personal  
26 property, to wit: two (2) laptop computers and/or a wallet and/or a cellular telephone and/or  
27 miscellaneous items, from the person of ESTHER CHAE, or in her presence, without the  
28 consent and against the will of ESTHER CHAE, by means of force or violence or fear of

1 injury, immediate or future, to her person, the person of a member of her family, or of anyone  
2 in her company at the time of the robbery, defendant using force or fear to obtain or retain  
3 possession of the property, to prevent or overcome resistance to the taking of the property,  
4 and/or to facilitate escape, the Defendant(s) being criminally liable under one or more of the  
5 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
6 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be  
7 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
8 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
9 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
10 conspiring by Defendants acting in concert throughout.

11 COUNT 25 - COERCION

12 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
13 CLARK did on or about June 15, 2020, then and there willfully, unlawfully, and feloniously  
14 use physical force, or the immediate threat of such force, against ESTHER CHAE, with intent  
15 to compel her to do, or abstain from doing, an act which she had a right to do, or abstain from  
16 doing, by taking a cellular telephone to prevent the said ESTHER CHAE from making a phone  
17 call, the Defendant(s) being criminally liable under one or more of the following principles of  
18 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting  
19 in the commission of this crime, with the intent that this crime be committed, by counseling,  
20 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
21 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
22 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
23 concert throughout.

24 COUNT 26 - CONSPIRACY TO COMMIT LARCENY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
27 commit larceny, by the Defendants committing the acts as set forth in Count 33, said acts being  
28 incorporated by this reference as though fully set forth herein.

1 COUNT 27 - CONSPIRACY TO COMMIT BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other to  
4 commit a burglary, by the defendants committing the acts as set forth in Counts 33, said acts  
5 being incorporated by this reference as though fully set forth herein.

6 COUNT 28 - RESIDENTIAL BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
9 unlawfully remain in a dwelling, owned or occupied by BERTHA GERADEAU and/or  
10 LATOYA GUSTUS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
11 Room No. 10060, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
12 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
13 Defendant(s) being criminally liable under one or more of the following principles of criminal  
14 liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the  
15 commission of this crime, with the intent that this crime be committed, by counseling,  
16 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit  
17 the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this  
18 crime be committed, Defendants aiding or abetting and/or conspiring by Defendants acting in  
19 concert throughout.

20 COUNT 29 - INVASION OF THE HOME

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly enter  
23 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
24 No. 10060, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
25 lawful occupant, to wit: BERTHA GERADEAU and/or LATOYA GUSTUS, the Defendant(s)  
26 being criminally liable under one or more of the following principles of criminal liability, to  
27 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
28 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,

1 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
2 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
3 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

4 COUNT 30 - THEFT

5 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
6 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without lawful  
7 authority commit theft of property having a value of \$1,200 or more, to wit: miscellaneous  
8 clothing items and/or U.S. Currency, belonging to BERTHA GERADEAU and/or LATOYA  
9 GUSTUS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the following  
10 theories, to wit: 1) controlling the property with the intent to deprive BERTHA GERADEAU  
11 and/or LATOYA GUSTUS of the property, 2) converting, making an unauthorized transfer of  
12 an interest in, and/ or, without authorization, controlling or using the services or property  
13 entrusted to them and/or placed in their possession for a limited, authorized period of  
14 determined or prescribed duration or for a limited use, and/or 3) obtaining the real, personal  
15 or intangible property or the services by a material misrepresentation with intent to deprive  
16 BERTHA GERADEAU and/or LATOYA GUSTUS of the property or services, in the  
17 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
18 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
19 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
20 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
21 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
22 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
23 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

24 COUNT 31 - CONSPIRACY TO COMMIT LARCENY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
27 to commit larceny, by the Defendants committing the acts as set forth in Count 38 said acts  
28 being incorporated by this reference as though fully set forth herein.

1 COUNT 32 - CONSPIRACY TO COMMIT BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
4 to commit a burglary, by the defendants committing the acts as set forth in Counts 38, said  
5 acts being incorporated by this reference as though fully set forth herein.

6 COUNT 33 - RESIDENTIAL BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about August 23, 2020, willfully and feloniously unlawfully enter or  
9 unlawfully remain in a dwelling, owned or occupied by JEWELL LOVE and/or RAVEN  
10 HOUGH and/or DAVONICA JONES and/or PATRICIA WILLIAMS, located at HARRAH'S  
11 HOTEL, 3475 South Las Vegas Boulevard, Room No. 15058, Las Vegas, Clark County,  
12 Nevada, with the intent to commit grand or petit larceny, assault or battery, obtain money or  
13 property by false pretenses, and/or a felony, the Defendant(s) being criminally liable under  
14 one or more of the following principles of criminal liability, to wit: (1) by directly committing  
15 this crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that  
16 this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
17 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
18 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
19 and/or conspiring by Defendants acting in concert throughout.

20 COUNT 34 - INVASION OF THE HOME

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK did on or about August 23, 2020, willfully, unlawfully, feloniously, and forcibly enter  
23 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room  
24 No. 15058, Las Vegas, Clark County, Nevada, without permission of the owner, resident, or  
25 lawful occupant, to wit: JEWELL LOVE and/or RAVEN HOUGH and/or DAVONICA  
26 JONES and/or PATRICIA WILLIAMS, the Defendant(s) being criminally liable under one or  
27 more of the following principles of criminal liability, to wit: (1) by directly committing this  
28 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that this

1 crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
2 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
3 commit this crime, with the intent that this crime be committed, Defendants aiding or abetting  
4 and/or conspiring by Defendants acting in concert throughout.

5 COUNT 35 - THEFT

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 23, 2020, willfully, knowingly, feloniously, and without  
8 lawful authority commit theft of property having a value of \$1,200 or more, to wit: jewelry,  
9 and/or Louis Vuitton backpack, and/or a Tupac t-shirt and/or miscellaneous items, belonging  
10 to JEWELL LOVE and/or RAVEN HOUGH and/or DAVONICA JONES and/or PATRICIA  
11 WILLIAMS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the following  
12 theories, to wit: 1) controlling the property with the intent to deprive JEWELL LOVE and/or  
13 RAVEN HOUGH and/or DAVONICA JONES and/or PATRICIA WILLIAMS of the  
14 property, 2) converting, making an unauthorized transfer of an interest in, and/ or, without  
15 authorization, controlling or using the services or property entrusted to them and/or placed in  
16 their possession for a limited, authorized period of determined or prescribed duration or for a  
17 limited use, and/or 3) obtaining the real, personal or intangible property or the services by a  
18 material misrepresentation with intent to deprive JEWELL LOVE and/or RAVEN HOUGH  
19 and/or DAVONICA JONES and/or PATRICIA WILLIAMS of the property or services, in the  
20 following manner, to wit: by taking said property from hotel room, the Defendant(s) being  
21 criminally liable under one or more of the following principles of criminal liability, to wit: (1)  
22 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
23 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
24 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
25 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
26 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 36 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT  
2 CARDHOLDER'S CONSENT

3 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
4 27, 2020, willfully, unlawfully, and feloniously, have in her possession, without the consent  
5 of the cardholder, a credit or debit card, to wit: Victoria's Secret Credit Cards ending in 0947,  
6 issued in the name of Esther Chae, with intent to circulate, use, sell, or transfer said card, with  
7 intent to defraud the cardholder and/or the issuer of said credit or debit card.

8 COUNT 37 - POSSESSION OF BURGLARY TOOLS

9 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about August  
10 27, 2020, willfully and unlawfully have in her possession, a tool, to wit: screwdrivers and/or  
11 a glass breaking tool, which is commonly used for the commission of a burglary, invasion of  
12 the home, larceny, and/or other crime, under circumstances evincing an intent to use or employ  
13 said tools in the commission of a crime.

14 COUNT 38 - CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON

15 Defendant DARRELL CLARK did on or about August 27, 2020, then and there  
16 willfully, unlawfully and feloniously carry concealed upon his person, a firearm or other  
17 deadly weapon, to wit: a Sig Sauer P229 bearing serial number AM168509.

18 DATED this 28th day of April, 2021.

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

22 BY /s/CHAD LEXIS  
23 CHAD LEXIS  
24 Deputy District Attorney  
25 Nevada Bar #10391

26 19BGJ212A-B/20CR020622/20CR020969/mcb-GJ  
27 LVMPD EV# 200600059192; 200800025433;  
28 200800025605; 200800025672; 200800088817  
(TK7)

1 INST

2 FILED IN OPEN COURT  
3 STEVEN D. GRIERSON  
4 CLERK OF THE COURT

5 APR 20 2021

6 BY: Kory Schlitz  
7 KORY SCHLITZ, DEPUTY

8 DISTRICT COURT  
9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

CASE NO: C-20-351676

12 -vs-

DEPT NO: XVII

13 VANESHIA OLIVER, aka Veneshia  
14 Lanette Oliver, #1821240  
15 DARRELL CLARK #7038569,

16 Defendants.

17 INSTRUCTIONS TO THE JURY (INSTRUCTION NO. 1)

18 MEMBERS OF THE JURY:

19 It is now my duty as judge to instruct you in the law that applies to this case. It is  
20 your duty as jurors to follow these instructions and to apply the rules of law to the facts as  
21 you find them from the evidence.

22 You must not be concerned with the wisdom of any rule of law stated in these  
23 instructions. Regardless of any opinion you may have as to what the law ought to be, it  
24 would be a violation of your oath to base a verdict upon any other view of the law than that  
25 given in the instructions of the Court.  
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If, in these instructions, any rule, direction or idea is repeated or stated in different ways, no emphasis thereon is intended by me and none may be inferred by you. For that reason, you are not to single out any certain sentence or any individual point or instruction and ignore the others, but you are to consider all the instructions as a whole and regard each in the light of all the others.

The order in which the instructions are given has no significance as to their relative importance.

An Indictment is but a formal method of accusing a person of a crime and is not of itself any evidence of his guilt.

In this case, it is charged in an Second Amended Superseding Indictment that the Defendants above named, VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, accused by the Clark County Grand Jury of the crime(s) of CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor - NRS 205.220, 199.480 - NOC 55982); CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor - NRS 205.060, 199.480 - NOC 50445); RESIDENTIAL BURGLARY (Category B Felony - NRS 205.060.2C - NOC 61934); INVASION OF THE HOME (Category B Felony - NRS 205.067 - NOC 50435); BURGLARY OF A BUSINESS (Category C Felony - NRS 205.060 - NOC 61938); THEFT (Category D Felony - NRS 205.0832, 205.0835 - NOC 61955); FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1) - NOC 50796); ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E Felony/Gross Misdemeanor - NRS 205.760(1), 193.330 - NOC 50821/50822); ROBBERY (Category B Felony - NRS 200.380 - NOC 50137); COERCION (Category B Felony - NRS 207.190 - NOC 53159); POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (Category C Felony - NRS 205.465 - NOC 50696); POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT (Category D Felony - NRS 205.690 - NOC 50790); POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor - NRS 205.080 - NOC 50441); and CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON (Category C Felony - NRS 202.350 (1)(d)(3) - NOC 51459), committed at and within the County of Clark, State of Nevada, on or between June 15, 2020 through August 27, 2020, as follows:

COUNT 1 - CONSPIRACY TO COMMIT LARCENY

Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and unlawfully conspire with each other to commit larceny, by the Defendants committing the

1 acts as set forth in Count 3, said acts being incorporated by this reference as though fully set  
2 forth herein.

3 COUNT 2 - CONSPIRACY TO COMMIT BURGLARY

4 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
5 CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully and  
6 unlawfully conspire with each other to commit a burglary, by the Defendants committing the  
7 acts as set forth in Count 3, said acts being incorporated by this reference as though fully set  
8 forth herein.

9 COUNT 3 - RESIDENTIAL BURGLARY

10 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
11 CLARK, did on or between August 16, 2020 and/or August 17, 2020, willfully and  
12 feloniously unlawfully enter or unlawfully remain in a dwelling, owned or occupied by  
13 GARY KRUSINSKI, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Las  
14 Vegas, Room No. 2198P, Clark County, Nevada, with the intent to commit grand or petit  
15 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
16 Defendant(s) being criminally liable under one or more of the following principles of  
17 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
18 abetting in the commission of this crime, with the intent that this crime be committed, by  
19 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
20 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
21 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
22 Defendants acting in concert throughout.

23 COUNT 4 - INVASION OF THE HOME

24 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
25 CLARK did on or between August 16, 2020 and/or August 17, 2020, willfully, unlawfully,  
26 feloniously, and forcibly enter an inhabited dwelling, to wit: PARIS HOTEL, 3655 South  
27 Las Vegas Boulevard, Las Vegas, Room No. 2198P, Clark County, Nevada, without  
28 permission of the owner, resident, or lawful occupant, to wit: GARY KRUSINSKI, the

1 Defendant(s) being criminally liable under one or more of the following principles of  
2 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
3 abetting in the commission of this crime, with the intent that this crime be committed, by  
4 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
5 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
6 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
7 Defendants acting in concert throughout.

8 COUNT 5 - BURGLARY OF A BUSINESS

9 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
10 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
11 unlawfully remain in a business structure, owned or occupied by SBARRO, located at 3645  
12 South Las Vegas Boulevard, Clark County, Nevada, with the intent to commit grand or petit  
13 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
14 Defendant(s) being criminally liable under one or more of the following principles of  
15 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
16 abetting in the commission of this crime, with the intent that this crime be committed, by  
17 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
18 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
19 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
20 Defendants acting in concert throughout.

21 COUNT 6 - BURGLARY OF A BUSINESS

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK, did on or about August 16, 2020, willfully and feloniously unlawfully enter or  
24 unlawfully remain in a business structure, owned or occupied by 7-ELEVEN, located at  
25 4158 Koval, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
26 larceny, assault or battery, and/or a felony, to wit: fraudulent use of a credit card, the  
27 Defendant(s) being criminally liable under one or more of the following principles of  
28 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or

1 abetting in the commission of this crime, with the intent that this crime be committed, by  
2 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
3 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
4 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
5 Defendants acting in concert throughout.

6 COUNT 7 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
9 and with intent to defraud, use an American Express credit card ending in number 1004,  
10 issued in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit  
11 card to SBARRO, located at 3645 South Las Vegas Boulevard, Las Vegas, Clark County,  
12 Nevada, to obtain money, goods, property, services or anything of value, to wit:  
13 miscellaneous food items, the Defendant not being the cardholder, nor being authorized by  
14 the cardholder to use said card or card number.

15 COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK, did on or about August 16, 2020, then and there willfully, unlawfully, feloniously,  
18 and with intent to defraud, use a Capital One Visa credit card ending in number 0452, issued  
19 in the name of GARY KRUSINSKI, the Defendant presenting the said debit or credit card to  
20 7-ELEVEN, located at 4158 Koval, Las Vegas, Clark County, Nevada, to obtain money,  
21 goods, property, services or anything of value, to wit: miscellaneous food items, the  
22 Defendant not being the cardholder, nor being authorized by the cardholder to use said card  
23 or card number.

24 COUNT 9 - CONSPIRACY TO COMMIT LARCENY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK, did on or about August 21, 2020, willfully and unlawfully conspire with each other  
27 to commit larceny, by the Defendants committing the acts as set forth in Count 11, said acts  
28 being incorporated by this reference as though fully set forth herein.

1 COUNT 10 - CONSPIRACY TO COMMIT BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 21, 2020, willfully and unlawfully conspire with each other  
4 to commit a burglary, by the Defendants committing the acts as set forth in Counts 11, said  
5 acts being incorporated by this reference as though fully set forth herein.

6 COUNT 11 - RESIDENTIAL BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK, did on or about August 21, 2020, willfully and feloniously unlawfully enter or  
9 unlawfully remain in a dwelling, owned or occupied by INGA WILLIAMS and/or KATE  
10 BERRY and/or MARISSA METRO and/or BROOKE BARGHOLTZ and/or REBECCA  
11 FINGER, located at PARIS HOTEL, 3655 South Las Vegas Boulevard, Room No. 2186,  
12 Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny, assault  
13 or battery, obtain money or property by false pretenses, and/or a felony, the Defendant(s)  
14 being criminally liable under one or more of the following principles of criminal liability, to  
15 wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission  
16 of this crime, with the intent that this crime be committed, by counseling, encouraging,  
17 hiring, commanding, inducing and/or otherwise procuring the other to commit the crime;  
18 and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be  
19 committed, Defendants aiding or abetting and/or conspiring by Defendants acting in concert  
20 throughout.

21 COUNT 12 - INVASION OF THE HOME

22 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
23 CLARK did on or about August 21, 2020, willfully, unlawfully, feloniously, and forcibly  
24 enter an inhabited dwelling, to wit: PARIS HOTEL, 3655 South Las Vegas Boulevard,  
25 Room No. 2186, Las Vegas, Clark County, Nevada, without permission of the owner,  
26 resident, or lawful occupant, to wit: INGA WILLIAMS and/or KATE BERRY and/or  
27 MARISSA METRO and/or BROOKE BARGHOLTZ and/or REBECCA FINGER, the  
28 Defendant(s) being criminally liable under one or more of the following principles of

1 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
2 abetting in the commission of this crime, with the intent that this crime be committed, by  
3 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
4 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
5 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
6 Defendants acting in concert throughout.

7 COUNT 13 - THEFT

8 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
9 CLARK did on or about August 21, 2020, willfully, knowingly, feloniously, and without  
10 lawful authority commit theft of property having a value of \$1,200 or more, to wit: Apple  
11 watch and/or purse and/or wallets and/or U.S. currency and/or computer and/or AirPods  
12 and/or backpack, belonging to INGA WILLIAMS and/or KATE BERRY and/or MARISSA  
13 METRO and/or BROOKE BARGHOLTZ and/or REBECCA FINGER, PARIS HOTEL,  
14 3655 South Las Vegas Boulevard, Room No. 2186, Las Vegas, under one or more of the  
15 following theories, to wit: 1) controlling the property with the intent to deprive INGA  
16 WILLIAMS and/or KATE BERRY and/or MARISSA METRO and/or BROOKE  
17 BARGHOLTZ and/or REBECCA FINGER of the property, 2) converting, making an  
18 unauthorized transfer of an interest in, and/or, without authorization, controlling or using the  
19 services or property entrusted to them and/or placed in their possession for a limited,  
20 authorized period of determined or prescribed duration or for a limited use, and/or 3)  
21 obtaining the real, personal or intangible property or the services by a material  
22 misrepresentation with intent to deprive INGA WILLIAMS and/or KATE BERRY and/or  
23 MARISSA METRO and/or BROOKE BARGHOLTZ and/or REBECCA FINGER of the  
24 property or services, in the following manner, to wit: by taking said property from hotel  
25 room, the Defendant(s) being criminally liable under one or more of the following principles  
26 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
27 abetting in the commission of this crime, with the intent that this crime be committed, by  
28 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other

1 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
2 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
3 Defendants acting in concert throughout.

4 COUNT 14 - BURGLARY OF A BUSINESS

5 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver, did on or about  
6 August 21, 2020, willfully and feloniously unlawfully enter or unlawfully remain in a  
7 business structure, owned or occupied by TARGET, located at 4001 South Maryland  
8 Parkway, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit larceny,  
9 assault or battery, and/or a felony, to wit: fraudulent use of a credit card.

10 COUNT 15 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

11 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
12 August 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to  
13 defraud, attempt to use a Visa ending in 4786, issued in the name of REBECCA FINGER,  
14 the Defendant presenting or attempting to present the said debit or credit card to TARGET,  
15 located at 4001 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain  
16 money, goods, property, services or anything of value, to wit: to purchase miscellaneous  
17 food items and/or good and/or merchandise, the Defendant not being the cardholder, nor  
18 being authorized by the cardholder to use said card or card number.

19 COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

20 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
21 August 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to  
22 defraud, attempt to use a Visa ending in 4786, issued in the name of REBECCA FINGER,  
23 the Defendant presenting or attempting to present the said debit or credit card to TARGET,  
24 located at 4001 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain  
25 money, goods, property, services or anything of value, to wit: to purchase miscellaneous  
26 food items and/or good and/or merchandise, the Defendant not being the cardholder, nor  
27 being authorized by the cardholder to use said card or card number.

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1 COUNT 17 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

2 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
3 August 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to  
4 defraud, attempt to use a Visa ending in 9984, issued in the name of REBECCA FINGER,  
5 the Defendant presenting or attempting to present the said debit or credit card to TARGET,  
6 located at 4001 South Maryland Parkway, Las Vegas, Clark County, Nevada, to obtain  
7 money, goods, property, services or anything of value, to wit: to purchase miscellaneous  
8 food items and/or good and/or merchandise, the Defendant not being the cardholder, nor  
9 being authorized by the cardholder to use said card or card number.

10 COUNT 18 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD

11 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
12 August 21, 2020, then and there willfully, unlawfully, feloniously, and with intent to  
13 defraud, attempt to use a Visa ending in 2309, issued in the name of BROOK  
14 BARGHOLTZ, the Defendant presenting or attempting to present the said debit or credit  
15 card to TARGET, located at 4001 South Maryland Parkway, Las Vegas, Clark County,  
16 Nevada, to obtain money, goods, property, services or anything of value, to wit: to purchase  
17 miscellaneous food items and/or good and/or merchandise, the Defendant not being the  
18 cardholder, nor being authorized by the cardholder to use said card or card number.

19 COUNT 19 - CONSPIRACY TO COMMIT LARCENY

20 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
21 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
22 commit larceny, by the Defendants committing the acts as set forth in Count 21, said acts  
23 being incorporated by this reference as though fully set forth herein.

24 COUNT 20 - CONSPIRACY TO COMMIT BURGLARY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about June 15, 2020, willfully and unlawfully conspire with each other to  
27 commit a burglary, by the Defendants committing the acts as set forth in Counts 21, said acts  
28 being incorporated by this reference as though fully set forth herein.

1 COUNT 21 - RESIDENTIAL BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about June 15, 2020, willfully and feloniously unlawfully enter or  
4 unlawfully remain in a dwelling, owned or occupied by ESTHER CHAE, located at  
5 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 44001, Las Vegas,  
6 Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery,  
7 obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
8 criminally liable under one or more of the following principles of criminal liability, to wit:  
9 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of  
10 this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
11 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
12 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
13 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

14 COUNT 22 - INVASION OF THE HOME

15 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
16 CLARK did on or about June 15, 2020, willfully, unlawfully, feloniously, and forcibly enter  
17 an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
18 Room No. 44001, Las Vegas, Clark County, Nevada, without permission of the owner,  
19 resident, or lawful occupant, to wit: ESTHER CHAE, the Defendant(s) being criminally  
20 liable under one or more of the following principles of criminal liability, to wit: (1) by  
21 directly committing this crime; and/or (2) by aiding or abetting in the commission of this  
22 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
23 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
24 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
25 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

26 COUNT 23 - THEFT

27 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
28 CLARK did on or about June 15, 2020, willfully, knowingly, feloniously, and without lawful

1 authority commit theft of property having a value of \$1,200 or more, to wit: two (2) laptop  
2 computers and/or a wallet and/or a cellular telephone and/or miscellaneous items, belonging  
3 to ESTHER CHAE, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the  
4 following theories, to wit: 1) controlling the property with the intent to deprive ESTHER  
5 CHAE of the property, 2) converting, making an unauthorized transfer of an interest in, and/  
6 or, without authorization, controlling or using the services or property entrusted to them  
7 and/or placed in their possession for a limited, authorized period of determined or prescribed  
8 duration or for a limited use, and/or 3) obtaining the real, personal or intangible property or  
9 the services by a material misrepresentation with intent to deprive ESTHER CHAE of the  
10 property or services, in the following manner, to wit: by taking said property from hotel  
11 room, the Defendant(s) being criminally liable under one or more of the following principles  
12 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
13 abetting in the commission of this crime, with the intent that this crime be committed, by  
14 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
15 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
16 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
17 Defendants acting in concert throughout.

18 COUNT 24 - ROBBERY

19 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
20 CLARK did on or about June 15, 2020, willfully, unlawfully, and feloniously take personal  
21 property, to wit: two (2) laptop computers and/or a wallet and/or a cellular telephone and/or  
22 miscellaneous items, from the person of ESTHER CHAE, or in her presence, without the  
23 consent and against the will of ESTHER CHAE, by means of force or violence or fear of  
24 injury, immediate or future, to her person, the person of a member of her family, or of  
25 anyone in her company at the time of the robbery, defendant using force or fear to obtain or  
26 retain possession of the property, to prevent or overcome resistance to the taking of the  
27 property, and/or to facilitate escape, the Defendant(s) being criminally liable under one or  
28 more of the following principles of criminal liability, to wit: (1) by directly committing this

1 crime; and/or (2) by aiding or abetting in the commission of this crime, with the intent that  
2 this crime be committed, by counseling, encouraging, hiring, commanding, inducing and/or  
3 otherwise procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to  
4 commit this crime, with the intent that this crime be committed, Defendants aiding or  
5 abetting and/or conspiring by Defendants acting in concert throughout.

6 COUNT 25 - COERCION

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about June 15, 2020, then and there willfully, unlawfully, and feloniously  
9 use physical force, or the immediate threat of such force, against ESTHER CHAE, with  
10 intent to compel her to do, or abstain from doing, an act which she had a right to do, or  
11 abstain from doing, by taking a cellular telephone to prevent the said ESTHER CHAE from  
12 making a phone call, the Defendant(s) being criminally liable under one or more of the  
13 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or  
14 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be  
15 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
16 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
17 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
18 conspiring by Defendants acting in concert throughout.

19 COUNT 26 - CONSPIRACY TO COMMIT LARCENY

20 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
21 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other  
22 to commit larceny, by the Defendants committing the acts as set forth in Count 33, said acts  
23 being incorporated by this reference as though fully set forth herein.

24 COUNT 27 - CONSPIRACY TO COMMIT BURGLARY

25 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
26 CLARK did on or about August 6, 2020, willfully and unlawfully conspire with each other  
27 to commit a burglary, by the defendants committing the acts as set forth in Counts 33, said  
28 acts being incorporated by this reference as though fully set forth herein.

1 COUNT 28 - RESIDENTIAL BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully and feloniously unlawfully enter or  
4 unlawfully remain in a dwelling, owned or occupied by BERTHA GERADEAU and/or  
5 LATOYA GUSTUS, located at HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
6 Room No. 10060, Las Vegas, Clark County, Nevada, with the intent to commit grand or petit  
7 larceny, assault or battery, obtain money or property by false pretenses, and/or a felony, the  
8 Defendant(s) being criminally liable under one or more of the following principles of  
9 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
10 abetting in the commission of this crime, with the intent that this crime be committed, by  
11 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
12 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
13 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
14 Defendants acting in concert throughout.

15 COUNT 29 - INVASION OF THE HOME

16 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
17 CLARK did on or about August 6, 2020, willfully, unlawfully, feloniously, and forcibly  
18 enter an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
19 Room No. 10060, Las Vegas, Clark County, Nevada, without permission of the owner,  
20 resident, or lawful occupant, to wit: BERTHA GERADEAU and/or LATOYA GUSTUS, the  
21 Defendant(s) being criminally liable under one or more of the following principles of  
22 criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
23 abetting in the commission of this crime, with the intent that this crime be committed, by  
24 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
25 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
26 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
27 Defendants acting in concert throughout.

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1 COUNT 30 - THEFT

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 6, 2020, willfully, knowingly, feloniously, and without  
4 lawful authority commit theft of property having a value of \$1,200 or more, to wit:  
5 miscellaneous clothing items and/or U.S. Currency, belonging to BERTHA GERADEAU  
6 and/or LATOYA GUSTUS, 3475 South Las Vegas Boulevard, Las Vegas, under one or  
7 more of the following theories, to wit: 1) controlling the property with the intent to deprive  
8 BERTHA GERADEAU and/or LATOYA GUSTUS of the property, 2) converting, making  
9 an unauthorized transfer of an interest in, and/ or, without authorization, controlling or using  
10 the services or property entrusted to them and/or placed in their possession for a limited,  
11 authorized period of determined or prescribed duration or for a limited use, and/or 3)  
12 obtaining the real, personal or intangible property or the services by a material  
13 misrepresentation with intent to deprive BERTHA GERADEAU and/or LATOYA GUSTUS  
14 of the property or services, in the following manner, to wit: by taking said property from  
15 hotel room, the Defendant(s) being criminally liable under one or more of the following  
16 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by  
17 aiding or abetting in the commission of this crime, with the intent that this crime be  
18 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise  
19 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this  
20 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or  
21 conspiring by Defendants acting in concert throughout.

22 COUNT 31 - CONSPIRACY TO COMMIT LARCENY

23 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
24 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
25 to commit larceny, by the Defendants committing the acts as set forth in Count 38 said acts  
26 being incorporated by this reference as though fully set forth herein.

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1 COUNT 32 - CONSPIRACY TO COMMIT BURGLARY

2 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
3 CLARK did on or about August 23, 2020, willfully and unlawfully conspire with each other  
4 to commit a burglary, by the defendants committing the acts as set forth in Counts 38, said  
5 acts being incorporated by this reference as though fully set forth herein.

6 COUNT 33 - RESIDENTIAL BURGLARY

7 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
8 CLARK did on or about August 23, 2020, willfully and feloniously unlawfully enter or  
9 unlawfully remain in a dwelling, owned or occupied by JEWELL LOVE and/or RAVEN  
10 HOUGH and/or DAVONICA JONES and/or PATRICIA WILLIAMS, located at  
11 HARRAH'S HOTEL, 3475 South Las Vegas Boulevard, Room No. 15058, Las Vegas,  
12 Clark County, Nevada, with the intent to commit grand or petit larceny, assault or battery,  
13 obtain money or property by false pretenses, and/or a felony, the Defendant(s) being  
14 criminally liable under one or more of the following principles of criminal liability, to wit:  
15 (1) by directly committing this crime; and/or (2) by aiding or abetting in the commission of  
16 this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
17 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
18 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
19 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

20 COUNT 34 - INVASION OF THE HOME

21 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
22 CLARK did on or about August 23, 2020, willfully, unlawfully, feloniously, and forcibly  
23 enter an inhabited dwelling, to wit: HARRAH'S HOTEL, 3475 South Las Vegas Boulevard,  
24 Room No. 15058, Las Vegas, Clark County, Nevada, without permission of the owner,  
25 resident, or lawful occupant, to wit: JEWELL LOVE and/or RAVEN HOUGH and/or  
26 DAVONICA JONES and/or PATRICIA WILLIAMS, the Defendant(s) being criminally  
27 liable under one or more of the following principles of criminal liability, to wit: (1) by  
28 directly committing this crime; and/or (2) by aiding or abetting in the commission of this

1 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,  
2 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)  
3 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,  
4 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

5 COUNT 35 - THEFT

6 Defendants VANESHIA OLIVER, aka, Veneshia Lanette Oliver and DARRELL  
7 CLARK did on or about August 23, 2020, willfully, knowingly, feloniously, and without  
8 lawful authority commit theft of property having a value of \$1,200 or more, to wit: jewelry,  
9 and/or Louis Vuitton backpack, and/or a Tupac t-shirt and/or miscellaneous items, belonging  
10 to JEWELL LOVE and/or RAVEN HOUGH and/or DAVONICA JONES and/or PATRICIA  
11 WILLIAMS, 3475 South Las Vegas Boulevard, Las Vegas, under one or more of the  
12 following theories, to wit: 1) controlling the property with the intent to deprive JEWELL  
13 LOVE and/or RAVEN HOUGH and/or DAVONICA JONES and/or PATRICIA  
14 WILLIAMS of the property, 2) converting, making an unauthorized transfer of an interest in,  
15 and/ or, without authorization, controlling or using the services or property entrusted to them  
16 and/or placed in their possession for a limited, authorized period of determined or prescribed  
17 duration or for a limited use, and/or 3) obtaining the real, personal or intangible property or  
18 the services by a material misrepresentation with intent to deprive JEWELL LOVE and/or  
19 RAVEN HOUGH and/or DAVONICA JONES and/or PATRICIA WILLIAMS of the  
20 property or services, in the following manner, to wit: by taking said property from hotel  
21 room, the Defendant(s) being criminally liable under one or more of the following principles  
22 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or  
23 abetting in the commission of this crime, with the intent that this crime be committed, by  
24 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other  
25 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the  
26 intent that this crime be committed, Defendants aiding or abetting and/or conspiring by  
27 Defendants acting in concert throughout.

28 COUNT 36 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT  
CARDHOLDER'S CONSENT

1 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
2 August 27, 2020, willfully, unlawfully, and feloniously, have in her possession, without the  
3 consent of the cardholder, a credit or debit card, to wit: Victoria's Secret Credit Cards  
4 ending in 0947, issued in the name of Esther Chae, with intent to circulate, use, sell, or  
5 transfer said card, with intent to defraud the cardholder and/or the issuer of said credit or  
6 debit card.

7 COUNT 37 - POSSESSION OF BURGLARY TOOLS

8 Defendant VANESHIA OLIVER, aka, Veneshia Lanette Oliver did on or about  
9 August 27, 2020, willfully and unlawfully have in her possession, a tool, to wit: screwdrivers  
10 and/or a glass breaking tool, which is commonly used for the commission of a burglary,  
11 invasion of the home, larceny, and/or other crime, under circumstances evincing an intent to  
12 use or employ said tools in the commission of a crime.

13 COUNT 38 - CARRYING CONCEALED FIREARM OR OTHER DEADLY WEAPON

14 Defendant DARRELL CLARK did on or about August 27, 2020, then and there  
15 willfully, unlawfully and feloniously carry concealed upon his person, a firearm or other  
16 deadly weapon, to wit: a Sig Sauer P229 bearing serial number AM168509.

17 It is the duty of the jury to apply the rules of law contained in these instructions to the  
18 facts of the case and determine whether or not the Defendants are guilty of the offenses  
19 charged.

20 Each charge and the evidence pertaining to it should be considered separately. The  
21 fact that you may find a defendant guilty or not guilty as to one of the offenses charged  
22 should not control your verdict as to any other Defendant offense charged.  
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To constitute the crime charged, there must exist a union or joint operation of an act forbidden by law and an intent to do the act.

The intent with which an act is done is shown by the facts and circumstances surrounding the case.

Do not confuse intent with motive. Motive is what prompts a person to act. Intent refers only to the state of mind with which the act is done.

Motive is not an element of the crime charged and the State is not required to prove a motive on the part of the Defendant in order to convict. However, you may consider evidence of motive or lack of motive as a circumstance in the case.

The evidence which you are to consider in this case consists of the testimony of the witnesses, the exhibits, and any facts admitted or agreed to by counsel.

There are two types of evidence; direct and circumstantial. Direct evidence is the testimony of a person who claims to have personal knowledge of the commission of the crime which has been charged, such as an eyewitness. Circumstantial evidence is the proof of a chain of facts and circumstances which tend to show whether the Defendant is guilty or not guilty. The law makes no distinction between the weight to be given either direct or circumstantial evidence. Therefore, all of the evidence in the case, including the circumstantial evidence, should be considered by you in arriving at your verdict.

Statements, arguments and opinions of counsel are not evidence in the case. However, if the attorneys stipulate to the existence of a fact, you must accept the stipulation as evidence and regard that fact as proved.

You must not speculate to be true any insinuations suggested by a question asked a witness. A question is not evidence and may be considered only as it supplies meaning to the answer.

You must disregard any evidence to which an objection was sustained by the court and any evidence ordered stricken by the court.

Anything you may have seen or heard outside the courtroom is not evidence and must also be disregarded.

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.

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. Conspiracy is seldom susceptible of direct proof and is usually established by inference from the conduct of the parties. In particular, a conspiracy may be supported by a coordinated series of acts, in furtherance of the underlying offense, sufficient to infer the existence of an agreement.

A conspiracy to commit a crime does not end upon the completion of the crime. The conspiracy continues until the co-conspirators have successfully gotten away and concealed the crime.

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. You are instructed that presence, companionship, and conduct before, during and after the offense are circumstances from which one's participation in the criminal intent may be inferred.

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.

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.

Evidence of participation in a conspiracy may, in itself, be sufficient evidence of aiding and abetting an act in furtherance of the conspiracy to subject the participant to criminal liability as a principal.

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, 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.

**Pertains only to Home Invasions charge that occurred prior to 7/1/20 (Count 22)**

INSTRUCTION NO. 10

A person who, by day or night, forcibly enters an inhabited dwelling without permission of the owner, resident or lawful occupant, whether or not a person is present at the time of the entry, is guilty of Invasion of the Home.

"Forcibly enters" means the entry of an inhabited dwelling involving any act of physical force resulting in damage to the structure.

"Inhabited dwelling" means any structure, building, house, room, apartment, tenement, tent, conveyance, vessel, boat, vehicle, house trailer, travel trailer, motor home or railroad car in which the owner or other lawful occupant resides.

1 **Pertains to all Home Invasions charges that occurred after 7/1/20**

2 INSTRUCTION NO. 11

3 A person who, by day or night, forcibly enters a dwelling without permission of the  
4 owner, resident or lawful occupant, whether or not a person is present at the time of the  
5 entry, is guilty of Invasion of the Home.

6 "Forcibly enters" means the entry of an inhabited dwelling involving any act of  
7 physical force resulting in damage to the structure.

8 "Dwelling" means any structure, building, house, room, apartment, tenement, tent,  
9 conveyance, vessel, boat, vehicle, house trailer, travel trailer, motor home or railroad car,  
10 including, without limitation, any part thereof that is divided into a separately occupied unit:

11 1) In which any person lives; or

12 2) Which is customarily used by a person for overnight accommodations,  
13 regardless of whether the person is inside at the time of the offense.

**Pertains only to Residential Burglary charge that occurred prior to 7/1/20  
(Count 21)**

INSTRUCTION NO. 12

A person who, a 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 larceny and/or to obtain money or property by false pretenses, is guilty of Burglary.

**Pertains to all Residential Burglary charges that occurred after 7/1/20**

INSTRUCTION NO. 13

Every person who, by day or night, enters any dwelling, with the intent to commit a larceny and/or obtain money or property by false pretenses therein is guilty of Residential Burglary.

“Dwelling” means any structure, building, house, room, apartment, tenement, tent, conveyance, vessel, boat, vehicle, house trailer, travel trailer, motor home or railroad car, including, without limitation, any part thereof that is divided into a separately occupied unit:

(1) In which any person lives; or

(2) Which is customarily used by a person for overnight accommodations, regardless of whether the person is inside at the time of the offense.

Every person who, by day or night, enters any business structure, with the intent to commit a larceny and/or fraudulent use of a credit card therein is guilty of Burglary of Business.

“Business structure” means any structure or building, the primary purpose of which is to carry on any lawful effort for a business, including, without limitation, any business with an educational, industrial, benevolent, social or political purpose, regardless of whether the business is operated for profit.

When two or more persons participate in the commission of a burglary, and one or more of them enters, it is not necessary to prove the other individual actually entered because one who aids and abets another in the commission of a burglary is equally guilty as a principal.

INSTRUCTION NO. 16

The intention with which entry was made is a question of fact which may be inferred from the Defendant's conduct and all other circumstances disclosed by the evidence.

Larceny is defined as the stealing, taking and carrying away of the personal goods or property of another with the intent to permanently deprive the owner thereof

Obtain Money or Property by False Pretenses means when a person who knowingly and designedly by any false pretense obtains from any other person any chose in action, money, goods, wares, chattels, effects or other valuable thing with the intent to cheat or defraud the other person.

It is not necessary that the State prove the defendant actually committed larceny and/or obtain money under false pretense and/or fraudulent use of debit/credit card inside after he/she entered in order for you to find he/she guilty of Burglary. The gist of the crime of Burglary is the unlawful entry with criminal intent. Therefore, a Burglary was committed if the defendant entered with the intent to commit larceny and/or obtain money under false pretense and/or fraudulent use of debit/credit card regardless of whether or not that crime occurred.

Every person who, in the commission of a burglary, commits any other crime, may be prosecuted for each crime separately.

A person who makes or mends or causes to be made or mended, or has in his or her possession in the day or nighttime, any engine, machine, tool, false key, picklock, bit, nippers or implement adapted, designed or commonly used for the commission of burglary, invasion of the home, larceny or other crime, under circumstances evincing an intent to use or employ, or allow the same to be used or employed in the commission of a crime, or knowing that the same is intended to be so used is guilty Possession of Burglary Tools.

A person who, with the intent to defraud, uses a credit card where the person possesses the credit card without the consent of the cardholder or knows the credit card is forged or is the expired or revoked number of another is guilty of Fraudulent Use of Credit Card.

The elements of an attempt to commit a crime are:

- 1) the intent to commit the crime;
- 2) performance of some act towards its commission; and
- 3) failure to consummate its commission.

Any person who possesses a credit card without consent of the cardholder and with the intent to circulate, use, sell, or transfer the credit card with intent to defraud is guilty of Possession of Credit Card Without Cardholder's Consent.

In a criminal prosecution for Possession of a Credit Card Without Cardholder's Consent, you may infer, but are not required to do so, that any person who has in his possession or under his control two or more credit cards issued in the name of another person, obtained and possessed the credit cards with the knowledge that they have been stolen and with the intent to circulate, use, sell, or transfer them with the intent to defraud.

For you to draw this inference, its existence must, on all the evidence, be proved beyond a reasonable doubt.

A person who is in possession, sells or transfers any document or personal identifying information for the purpose of establishing a false status, occupation, membership, license or identity for himself or herself or any other person is guilty of Possession of Document or Personal Identifying Information.

A person who, without lawful authority, knowingly controls any property of another with the intent to deprive that person of the property is guilty of Theft.

If you determine that the Defendant committed the crime of Theft, you must a determination as to the amount of the Theft.

If you find beyond a reasonable doubt that the Theft amount was \$1200.00 or more, then you are instructed that the verdict of Theft \$1200.00 or more is the appropriate verdict.

If, however, you find beyond a reasonable doubt a Theft occurred, but the value was \$1200.00 or less, then you are instructed that the verdict of Theft is the appropriate verdict.

You may only return one verdict for each count.

“Value” means the fair market value of the property or services at the time of the theft. The trier of fact shall determine the value of all other property whose value is not readily ascertainable, and may, in making that determination, consider all relevant evidence, including evidence of the value of the property to its owner.

The amount involved in a Theft shall be deemed to be the highest value, by any reasonable standard, of the property or services which are obtained. Amounts involved in thefts committed pursuant to a scheme or continuing course of conduct, whether from one or more persons, may be aggregated in determining the grade of the offense.

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.

Robbery requires the intent to take property by fear or force; a good faith belief that the property at issue is one's own does not nullify the intent to take property from another by force.

It is unnecessary to prove both violence and intimidation. If the fact be attended with circumstances of threatening word or gesture as in common experience and is likely to create an apprehension of danger and induce a man to part with his property for the safety of his person, it is robbery. It is not necessary to prove actual fear, as the law will presume it in such a case.

The value of property or money taken is not an element of the crime of Robbery, and it is only necessary that the State prove the taking of some property or money.

Any person who uses violence upon another person or threatens violence or injury to another person with the specific intent to compel another to do or abstain from doing an act which such other person has a right to do or abstain from doing is guilty of Coercion.

In determining whether a defendant has made an immediate threat of physical force, the inquiry must focus on the viewpoint of a reasonable person.

A person who carries concealed upon his or her person a firearm is guilty of Carrying Concealed Firearm or Other Deadly Weapon.

“Concealed weapon” means a weapon described in these instructions that is carried upon a person in such a manner as not to be discernible by ordinary observation.

“Firearm” is defined in this crime as 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.

Mere presence at the scene of a crime or knowledge that a crime is being committed is not sufficient to establish that a defendant is guilty of an offense unless you find beyond reasonable doubt that the defendant was a participant and not merely a knowing spectator.

However, the presence of a person at the scene of a crime and companionship with another person engaged in the commission of the crime and a course of conduct before and after the offense are circumstances which may be considered in determining whether such person directly committed or aided or abetted the commission of that crime.

The law recognizes two kinds of possession: actual possession and constructive possession. A person who knowingly has direct physical control over a thing, at a given time, is then in actual possession of it.

A person who, although not in actual possession, knowingly has both the power and the intention, at a given time, to exercise dominion or control over a thing, either directly or through another person or persons, is then in constructive possession of it.

The law recognizes also that possession may be sole or joint. If one person alone has actual or constructive possession of a thing, possession is sole. If two or more persons share actual or constructive possession of a thing, possession is joint.

You may find that the element of possession as that term is used in these instructions is present if you find beyond a reasonable doubt that a defendant had actual or constructive possession, either alone or jointly with others.

You are here to determine whether the Defendant is guilty or not guilty from the evidence in the case. You are not called upon to return a verdict as to the guilt or innocence of any other person. So, if the evidence in the case convinces you beyond a reasonable doubt of the guilt of the Defendant, you should so find, even though you may believe one or more persons are also guilty.

Although your verdict must be unanimous as to the charge, you do not have to agree on the theory of liability. Therefore, even if you cannot agree on whether the facts establish that the defendant is liable as a principal, aider and abettor, or co-conspirator, so long as all of you agree that the evidence establishes the defendant's guilt of the offense, you shall find him guilty of the offense.

The Defendant is presumed innocent until the contrary is proved. This presumption places upon the State the burden of proving beyond a reasonable doubt every element of the crime charged and that the Defendant is the person who committed the offense.

A reasonable doubt is one based on reason. It is not mere possible doubt but is such a doubt as would govern or control a person in the more weighty affairs of life. If the minds of the jurors, after the entire comparison and consideration of all the evidence, are in such a condition that they can say they feel an abiding conviction of the truth of the charge, there is not a reasonable doubt. Doubt to be reasonable must be actual, not mere possibility or speculation.

If you have a reasonable doubt as to the guilt of the Defendant, he is entitled to a verdict of not guilty.

It is a constitutional right of a defendant in a criminal trial that he may not be compelled to testify. Thus, the decision as to whether he should testify is left to the defendant on the advice and counsel of his attorney. You must not draw any inference of guilt from the fact that he does not testify, nor should this fact be discussed by you or enter your deliberations in any way.

A witness who has special knowledge, skill, experience, training or education in a particular science, profession or occupation is an expert witness. An expert witness may give his opinion as to any matter in which he is skilled.

You should consider such expert opinion and weigh the reasons, if any, given for it. You are not bound, however, by such an opinion. Give it the weight to which you deem it entitled, whether that be great or slight, and you may reject it, if, in your judgment, the reasons given for it are unsound.

The credibility or believability of a witness should be determined by his manner upon the stand, his relationship to the parties, his fears, motives, interests or feelings, his opportunity to have observed the matter to which he testified, the reasonableness of his statements and the strength or weakness of his recollections.

If you believe that a witness has lied about any material fact in the case, you may disregard the entire testimony of that witness or any portion of his testimony which is not proved by other evidence.

1  
2 If, during your deliberation, you should desire to be further informed on any point of  
3 law or hear again portions of the testimony, you must reduce your request to writing signed  
4 by the foreperson. The officer will then return you to court where the information sought  
5 will be given you in the presence of, and after notice to, the district attorney and the  
6 Defendant and his/her counsel.

7 Playbacks of testimony are time-consuming and are not encouraged unless you deem  
8 it a necessity. Should you require a playback, you must carefully describe the testimony to  
9 be played back so that the court recorder can arrange his/her notes. Remember, the court is  
10 not at liberty to supplement the evidence.

Although you are to consider only the evidence in the case in reaching a verdict, you must bring to the consideration of the evidence your everyday common sense and judgment as reasonable men and women. Thus, you are not limited solely to what you see and hear as the witnesses testify. You may draw reasonable inferences from the evidence which you feel are justified in the light of common experience, keeping in mind that such inferences should not be based on speculation or guess.

A verdict may never be influenced by sympathy, prejudice or public opinion. Your decision should be the product of sincere judgment and sound discretion in accordance with these rules of law.

During the course of this trial, and your deliberations, you are not to:

- (1) communicate with anyone in any way regarding this case or its merits-either by phone, text, Internet, or other means;
- (2) read, watch, or listen to any news or media accounts or commentary about the case;
- (3) do any research, such as consulting dictionaries, using the Internet, or using reference materials;
- (4) make any investigation, test a theory of the case, re-create any aspect of the case, or in any other way investigate or learn about the case on your own.

In your deliberation you may not discuss or consider the subject of punishment, as that is a matter which lies solely with the court. Your duty is confined to the determination of the guilt or innocence of the Defendant.

When you retire to consider your verdict, you must select one of your member to act as foreperson who will preside over your deliberation and will be your spokesperson here in court.

During your deliberation, you will have all the exhibits which were admitted into evidence, these written instructions and forms of verdict which have been prepared for your convenience.

Your verdict must be unanimous. As soon as you have agreed upon a verdict, have it signed and dated by your foreperson and then return with it to this room.

Now you will listen to the arguments of counsel who will endeavor to aid you to reach a proper verdict by refreshing in your minds the evidence and by showing the application thereof to the law; but, whatever counsel may say, you will bear in mind that it is your duty to be governed in your deliberation by the evidence as you understand it and remember it to be and by the law as given to you in these instructions, with the sole, fixed and steadfast purpose of doing equal and exact justice between the Defendant and the State of Nevada.

GIVEN: 

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DISTRICT JUDGE

APR 20 2021

DISTRICT COURT  
CLARK COUNTY, NEVADA

BY Kory Schlitz  
KORY SCHLITZ, DEPUTY

1 VER

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3  
4 THE STATE OF NEVADA,

5 Plaintiff,

6 -vs-

7 VANESHIA OLIVER, #1821240

8 Defendant.  
9

CASE NO: C-20-351676-1

DEPT NO: XVII

10  
11 VERDICT

12 We, the jury in the above entitled case, find the Defendant VANESHIA OLIVER, as  
13 follows:

14 COUNT 1 – CONSPIRACY TO COMMIT LARCENY – Gary Krusinski

15 *(Please check the appropriate box, select only one)*

16 ☐ Not Guilty

17 ☒ Guilty of Conspiracy to Commit Larceny

18 COUNT 2 – CONSPIRACY TO COMMIT BURGLARY – Gary Krusinski

19 *(please check the appropriate box, select only one)*

20 ☐ Not Guilty

21 ☒ Guilty of Conspiracy to Commit Burglary

22 COUNT 3 – RESIDENTIAL BURGLARY – Gary Krusinski

23 *(Please check the appropriate box, select only one)*

24 ☐ Not Guilty

25 ☒ Guilty of Residential Burglary  
26  
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C-20-351676-1  
VER  
Verdict  
4961848



1 **COUNT 4** – INVASION OF A HOME – Gary Krusinski

2 *(Please check the appropriate box, select only one)*

3 ☐ Not Guilty

4 ☒ Guilty of Invasion of a Home

5 -  
6 **COUNT 5** – BURGLARY OF BUSINESS - Sbarro

7 *(please check the appropriate box, select only one)*

8 ☐ Not Guilty

9 ☒ Guilty of Burglary of a Business

10 **COUNT 6** – BURGLARY OF A BUSINESS – 7-Eleven

11 *(Please check the appropriate box, select only one)*

12 ☐ Not Guilty

13 ☒ Guilty of Burglary of a Business

14 **COUNT 7** – FRAUDULENT USE OF A DEBIT OR CREDIT CARD – Gary Krusinski  
15 (Sabarro)

16 *(Please check the appropriate box, select only one)*

17 ☐ Not Guilty

18 ☒ Guilty of Fraudulent Use of Debit or Credit Card

19 **COUNT 8** – FRAUDULENT USE OF A DEBIT OR CREDIT CARD – Gary Krusinski (7-  
20 Eleven)

21 *(please check the appropriate box, select only one)*

22 ☐ Not Guilty

23 ☒ Guilty of Fraudulent Use of Debit or Credit Card

24 **COUNT 9** – CONSPIRACY TO COMMIT LARCENY – Inga Williams and/or Kate Berry  
25 and/or Marissa Metro and/or Brooke Bargholtz and/or Rebeca Finger

26 *(Please check the appropriate box, select only one)*

27 ☐ Not Guilty

28 ☒ Guilty of Conspiracy to Commit Larceny

**COUNT 10** – CONSPIRACY TO COMMIT BURGLARY – Inga Williams and/or Kate Berry and/or Marissa Metro and/or Brooke Bargholtz and/or Rebeca Finger

*(Please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Conspiracy Burglary

**COUNT 11** – RESIDENTIAL BURGLARY – Inga Williams and/or Kate Berry and/or Marissa Metro and/or Brooke Bargholtz and/or Rebeca Finger

*(please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Residential Burglary

**COUNT 12** – INVASION OF A HOME – Inga Williams and/or Kate Berry and/or Marissa Metro and/or Brooke Bargholtz and/or Rebeca Finger

*(Please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Invasion of a Home

**COUNT 13** – THEFT – Inga Williams and/or Kate Berry and/or Marissa Metro and/or Brooke Bargholtz and/or Rebeca Finger

*(Please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Theft (\$1200.00 or more)

☐ Guilty of Theft (under \$1200.00)

**COUNT 14** – BURGLARY OF A BUSINESS- Target

*(Please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Burglary of a Business

1 **COUNT 15** – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD – Rebecca  
2 Finger (Target)

3 *(please check the appropriate box, select only one)*

4 ☐ Not Guilty

5 ☒ Guilty of Attempt Fraudulent Use of Credit or Debit Card

6 **COUNT 16** – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD – Rebecca  
7 Finger (Target)

8 *(please check the appropriate box, select only one)*

9 ☐ Not Guilty

10 ☒ Guilty of Attempt Fraudulent Use of Credit or Debit Card

11 **COUNT 17** – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD – Rebecca  
12 Finger (Target)

13 *(Please check the appropriate box, select only one)*

14 ☐ Not Guilty

15 ☒ Guilty of Attempt Fraudulent Use of Credit or Debit Card

16 **COUNT 18** – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD – Brooke  
17 Bargholtz (Target)

18 *(please check the appropriate box, select only one)*

19 ☐ Not Guilty

20 ☒ Guilty of Attempt Fraudulent Use of Credit or Debit Card

21 **COUNT 19** – CONSPIRACY TO COMMIT LARCENY – Eshter Chae

22 *(please check the appropriate box, select only one)*

23 ☐ Not Guilty

24 ☒ Guilty of Conspiracy to Commit Larceny

25 **COUNT 20** – CONSPIRACY TO COMMIT BURGLARY – Esther Chae

26 *(Please check the appropriate box, select only one)*

27 ☐ Not Guilty

28 ☒ Guilty of Conspiracy to Commit Burglary

1 **COUNT 21** – RESIDENTIAL BURGLARY – Esther Chae

2 *(please check the appropriate box, select only one)*

3 ☐ Not Guilty

4 ☒ Guilty of Residential Burglary

5 **COUNT 22** – INVASION OF HOME – Esther Chae

6 *(please check the appropriate box, select only one)*

7 ☐ Not Guilty

8 ☒ Guilty of Invasion of Home

9 **COUNT 23** – THEFT – Esther Chae

10 *(Please check the appropriate box, select only one)*

11 ☐ Not Guilty

12 ☒ Guilty of Theft (\$1200.00 or more)

13 ☐ Guilty of Theft (under \$1200.00)

14 **COUNT 24** – ROBBERY – Esther Chae

15 *(please check the appropriate box, select only one)*

16 ☐ Not Guilty

17 ☒ Guilty of Robbery

18 **COUNT 25** – COERCION – Esther Chae

19 *(please check the appropriate box, select only one)*

20 ☐ Not Guilty

21 ☒ Guilty of Coercion

22 **COUNT 26** – Conspiracy to Commit Larceny – Bertha Geradeau and/or Latoya Gustus

23 *(Please check the appropriate box, select only one)*

24 ☐ Not Guilty

25 ☒ Guilty of Conspiracy to Commit Larceny

1 **COUNT 27** – Conspiracy to Commit Burglary – Bertha Geradeau and/or Latoya Gustus

2 *(please check the appropriate box, select only one)*

3 ☐ Not Guilty

4 ☒ Guilty of Conspiracy to Commit Burglary

5 **COUNT 28** – RESIDENTIAL BURGLARY – Bertha Geradeau and/or Latoya Gustus

6 *(please check the appropriate box, select only one)*

7 ☐ Not Guilty

8 ☒ Guilty of Residential Burglary

9 **COUNT 29** – INVASION OF THE HOME – Bertha Geradeau and/or Latoya Gustus

10 *(please check the appropriate box, select only one)*

11 ☐ Not Guilty

12 ☒ Guilty of Invasion of the Home

13 **COUNT 30** – THEFT – Bertha Geradeau and/or Latoya Gustus

14 *(please check the appropriate box, select only one)*

15 ☐ Not Guilty

16 ☒ Guilty of Theft (\$1200.00 or more)

17 ☐ Guilty of Theft (under \$1200.00)

18 **COUNT 31** – Conspiracy to Commit Larceny – Jewell Love and/or Raven Hough and/or  
19 Davonica Jones and/or Patricia Williams

20 *(Please check the appropriate box, select only one)*

21 ☐ Not Guilty

22 ☒ Guilty of Conspiracy to Commit Larceny

23 **COUNT 32** – Conspiracy to Commit Burglary – Jewell Love and/or Raven Hough and/or  
24 Davonica Jones and/or Patricia Williams

25 *(Please check the appropriate box, select only one)*

26 ☐ Not Guilty

27 ☒ Guilty of Conspiracy to Commit Burglary

**COUNT 33** – RESIDENTIAL BURGLARY – Jewell Love and/or Raven Hough and/or Davonica Jones and/or Patricia Williams

*(please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Residential Burglary

**COUNT 34** – INVASION OF THE HOME – Jewell Love and/or Raven Hough and/or Davonica Jones and/or Patricia Williams

*(please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Invasion of the Home

**COUNT 35** – THEFT – Jewell Love and/or Raven Hough and/or Davonica Jones and/or Patricia Williams

*(please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Theft (\$1200.00 or more)

☐ Guilty of Theft (under \$1200.00)

**COUNT 36** – POSSESSION OF DEBIT OR CREDIT CARD WITHOUT CARDHOLDER'S CONSENT – Victoria Secret Card

☐ Not Guilty

☒ Guilty of Possession of Document or Personal Identifying Information

**COUNT 37** – POSSESSION OF BURGLARY TOOLS

*(please check the appropriate box, select only one)*

☐ Not Guilty

☒ Guilty of Possession of Burglary Tools

DATED this 20 day of April, 2021

  
FOREPERSON

JOC

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

VANESHIA OLIVER aka  
Veneshia Lanette Oliver  
#1821240

Defendant.

CASE NO. C-20-351676-1

DEPT. NO. XVII

JUDGMENT OF CONVICTION

(JURY TRIAL)

The Defendant previously entered a plea of not guilty to the crimes of COUNT 1 – CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor) in violation of NRS 205.220, 199.480; COUNT 2 – CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor) in violation of NRS 205.060, 199.480; COUNT 3 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT 4 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067; COUNT 5 – BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060, COUNT 6 – BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060; COUNT 7 – FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony) in violation of NRS 205.760(1); COUNT 8 – FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony) in violation of

AA0144

1 NRS 205.760(1); COUNT 9 – CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor)  
2 in violation of NRS 205.220, 199.480; COUNT 10 – CONSPIRACY TO COMMIT  
3 BURGLARY (Gross Misdemeanor) in violation of NRS 205.060, 199.480; COUNT 11 –  
4 RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT  
5 12 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067; COUNT  
6 13 – THEFT (Category D Felony) in violation of NRS 205.0832, 205.0835; COUNT 14 –  
7 BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060; COUNT 15  
8 – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E  
9 Felony/Misdemeanor) in violation of NRS 205.760(1), 193.330; COUNT 16 – ATTEMPT  
10 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E Felony/Misdemeanor) in  
11 violation of NRS 205.760(1), 193.330; COUNT 17 – ATTEMPT FRAUDULENT USE OF  
12 CREDIT OR DEBIT CARD (Category E Felony/Misdemeanor) in violation of NRS  
13 205.760(1), 193.330; COUNT 18 – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT  
14 CARD (Category E Felony/Misdemeanor) in violation of NRS 205.760(1), 193.330; COUNT  
15 19 – CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor) in violation of NRS  
16 205.220; COUNT 20 – CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor) in  
17 violation of NRS 205.060, 199.480; COUNT 21 – RESIDENTIAL BURGLARY (Category B  
18 Felony) in violation of NRS 205.060.2C; COUNT 22 – INVASION OF THE HOME (Category  
19 B Felony) in violation of NRS 205.067; COUNT 23 – THEFT (Category D Felony) in  
20 violation of NRS 205.0832, 205.0835; COUNT 24 – ROBBERY (Category B Felony) in  
21 violation of NRS 200.380; COUNT 25 – COERCION (Category B Felony) in violation of NRS  
22 207.190; COUNT 26 – CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor) in  
23 violation of NRS 205.220, 199.480; COUNT 27 – CONSPIRACY TO COMMIT BURGLARY  
24 (Gross

Misdemeanor) in violation of NRS 205.060, 199.480; COUNT 28 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT 29 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067; COUNT 30 – THEFT (Category D Felony) in violation of NRS 205.0832, 205.0835; COUNT 31 – CONSPIRACY TO COMMIT LARCENY (Gross Misdemeanor) in violation of NRS 205.220, 199.480; COUNT 32 – CONSPIRACY TO COMMIT BURGLARY (Gross Misdemeanor) in violation of NRS 205.060, 199.480; COUNT 33 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT 34 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067; COUNT 35 – THEFT (Category D Felony) in violation of NRS 205.0832, 205.0835; COUNT 36 – POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER’S CONSENT (Category D Felony) in violation of NRS 205.690; COUNT 37 – POSSESSION OF BURGLARY TOOLS (Gross Misdemeanor) in violation of NRS 205.080, and the matter having been tried before a jury and the Defendant having been found guilty of the crimes of COUNT 3 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT 4 – INVASION OF A HOME (Category B Felony) in violation of NRS 205.067; COUNT 5 – BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060, COUNT 6 – BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060; COUNT 7 – FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony) in violation of NRS 205.760(1); COUNT 8 – FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony) in violation of NRS 205.760(1); COUNT 11 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C; COUNT 12 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067; COUNT 13 – THEFT (Category D Felony) in violation of NRS 205.0832, 205.0835; COUNT 14 –

1 BURGLARY OF A BUSINESS (Category C Felony) in violation of NRS 205.060; COUNT 15  
2 – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E  
3 Felony/Misdemeanor) in violation of NRS 205.760(1), 193.330; COUNT 16 – ATTEMPT  
4 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category E Felony/Misdemeanor) in  
5 violation of NRS 205.760(1), 193.330; COUNT 17 – ATTEMPT FRAUDULENT USE OF  
6 CREDIT OR DEBIT CARD (Category E Felony/Misdemeanor) in violation of NRS  
7 205.760(1), 193.330; COUNT 18 – ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT  
8 CARD (Category E Felony/Misdemeanor) in violation of NRS 205.760(1), 193.330; COUNT  
9 21 – RESIDENTIAL BURGLARY (Category B Felony) in violation of NRS 205.060.2C;  
10 COUNT 22 – INVASION OF THE HOME (Category B Felony) in violation of NRS 205.067,  
11 COUNT 23 – THEFT (Category D Felony) in violation of NRS 205.0832, 205.0835; COUNT  
12 24 – ROBBERY (Category B Felony) in violation of NRS 200.380; COUNT 25 – COERCION  
13 (Category B Felony) in violation of NRS 207.190; COUNT 28 – RESIDENTIAL BURGLARY  
14 (Category B Felony) in violation of NRS 205.060.2C; COUNT 29 – INVASION OF THE  
15 HOME (Category B Felony) in violation of NRS 205.067; COUNT 30 – THEFT (Category D  
16 Felony) in violation of NRS 205.0832, 205.0835; COUNT 33 – RESIDENTIAL BURGLARY  
17 (Category B Felony) in violation of NRS 205.060.2C; COUNT 34 – INVASION OF THE  
18 HOME (Category B Felony) in violation of NRS 205.067; COUNT 35 – THEFT (Category D  
19 Felony) in violation of NRS 205.0832, 205.0835; COUNT 36 – POSSESSION OF  
20 DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (Category C Felony) in  
21 violation of NRS 205.465; thereafter, on the 15<sup>th</sup> day of June, 2021, the Defendant was present  
22 in court for sentencing with counsel MARTIN W. HART, ESQ., and good cause appearing,  
23  
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1 THE DEFENDANT IS HEREBY ADJUDGED guilty of said offenses and, in addition  
2 to the \$25.00 Administrative Assessment Fee, \$250.00 Indigent Defense Civil Assessment Fee,  
3 \$3,212.11 Restitution to be paid Jointly or Severally with Co-Defendant Darrell Clark to Esther  
4 Chae, \$2,414.00 Restitution to be paid Jointly or Severally with Co-Defendant Darrell Clark to  
5 Brooke Bargholtz, \$250.00 Restitution to be paid Jointly or Severally with Co-Defendant  
6 Darrell Clark to Davonica Jones and \$3.00 DNA Collection Fee, the Defendant is  
7 SENTENCED to the Nevada Department of Corrections (NDC) as follows: **COUNT 3** - a  
8 MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS with a MINIMUM Parole  
9 Eligibility of TWENTY-FOUR (24) MONTHS; **COUNT 4** - a MAXIMUM of ONE  
10 HUNDRED TWENTY (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-  
11 FOUR (24) MONTHS, CONCURRENT with COUNT 3; **COUNT 5** - a MAXIMUM of  
12 FORTY-EIGHT (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12)  
13 MONTHS, CONSECUTIVE to COUNT 4; **COUNT 6** – a MAXIMUM of FORTY-EIGHT  
14 (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS,  
15 CONSECUTIVE to COUNT 5; **COUNT 7** - a MAXIMUM of FORTY-EIGHT (48) MONTHS  
16 with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS, CONCURRENT with  
17 COUNT 6; **COUNT 8** - a MAXIMUM of FORTY-EIGHT (48) MONTHS with a MINIMUM  
18 Parole Eligibility of TWELVE (12) MONTHS, CONCURRENT with COUNT 6; **COUNT 11** -  
19 a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS with a MINIMUM Parole  
20 Eligibility of TWENTY-FOUR (24) MONTHS, CONSECUTIVE to COUNT 8; **COUNT 12** - a  
21 MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS with a MINIMUM Parole  
22 Eligibility of TWENTY-FOUR (24) MONTHS, CONCURRENT with COUNT 11; **COUNT**  
23 **13** – a MAXIMUM of FORTY-EIGHT (48) MONTHS with a MINIMUM Parole Eligibility of

1 TWELVE (12) MONTHS, CONCURRENT with COUNT 12; **COUNT 14** - a MAXIMUM of  
2 FORTY-EIGHT (48) MONTHS with a MINIMUM Parole  
3 Eligibility of TWELVE (12) MONTHS, CONSECUTIVE to COUNT 13; **COUNT 15** - a  
4 MAXIMUM of FORTY-EIGHT (48) MONTHS with a MINIMUM Parole Eligibility of  
5 TWELVE (12) MONTHS, CONCURRENT with COUNT 14; **COUNT 16** - a MAXIMUM of  
6 FORTY-EIGHT (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12)  
7 MONTHS, CONCURRENT with COUNT 15; **COUNT 17** - a MAXIMUM of FORTY-EIGHT  
8 (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS,  
9 CONCURRENT with COUNT 16; **COUNT 18** – a MAXIMUM of FORTY-EIGHT (48)  
10 MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS, CONCURRENT  
11 with COUNT 17; **COUNT 21** - a MAXIMUM of ONE HUNDRED TWENTY (120)  
12 MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24) MONTHS,  
13 CONSECUTIVE to COUNT 18; **COUNT 22** - a MAXIMUM of ONE HUNDRED TWENTY  
14 (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24) MONTHS,  
15 CONCURRENT with COUNT 21; **COUNT 23** - a MAXIMUM of FORTY-EIGHT (48)  
16 MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS, CONCURRENT  
17 with COUNT 22; **COUNT 24** - a MAXIMUM of ONE HUNDRED TWENTY (120)  
18 MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24) MONTHS,  
19 CONSECUTIVE to COUNT 22; **COUNT 25** – a MAXIMUM of ONE HUNDRED TWENTY  
20 (120) MONTHS with a MINIMUM Parole Eligibility of FORTY-EIGHT (48) MONTHS,  
21 CONCURRENT with COUNT 24; **COUNT 28** - a MAXIMUM of ONE HUNDRED  
22 TWENTY (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24)  
23 MONTHS, CONSECUTIVE to COUNT 24; **COUNT 29** - a MAXIMUM of ONE HUNDRED  
24  
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1 TWENTY (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24)  
2 MONTHS, CONCURRENT with COUNT 28; **COUNT 30** - a MAXIMUM of FORTY-EIGHT  
3 (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS,  
4 CONCURRENT with COUNT 29; **COUNT 33** - a MAXIMUM of ONE HUNDRED  
5 TWENTY (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24)  
6 MONTHS, CONSECUTIVE to COUNT 30; **COUNT 34** – a MAXIMUM of ONE HUNDRED  
7 TWENTY (120) MONTHS with a MINIMUM Parole Eligibility of TWENTY-FOUR (24)  
8 MONTHS, CONCURRENT with COUNT 23; **COUNT 35** - a MAXIMUM of FORTY-EIGHT  
9 (48) MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS,  
10 CONCURRENT with COUNT 24; **COUNT 36** - a MAXIMUM of FORTY-EIGHT (48)  
11 MONTHS with a MINIMUM Parole Eligibility of TWELVE (12) MONTHS, CONCURRENT  
12 with COUNT 25; **COUNTS 1, 2, 9, 10, 19, 20, 26, 27, 31, 32 and 37** – SENTENCED to  
13 THREE HUNDRED THIRTY FOUR (364) DAYS in Clark County Detention Center (CCDC),  
14 Run CONCURRENT with Each Other and COUNT 35; with TWO HUNDRED NINETY-  
15 THREE (293) DAYS credit for time served. As the \$150.00 DNA Analysis Fee and Genetic  
16 Testing have been previously imposed, the Fee and Testing in the current case are WAIVED.  
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Dated this 28th day of June, 2021



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**999 32E 8036 5B9E**  
**Michael Villani**  
**District Court Judge**

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 State of Nevada

CASE NO: C-20-351676-1

7 vs

DEPT. NO. Department 17

8 VENESHIA OLIVER

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District  
12 Court. The foregoing Judgment of Conviction was served via the court's electronic eFile  
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/28/2021

15 Marty Hart

mh@martinhartlaw.com

16 Madilyn Cole

madilyn.cole@clarkcountydacountyda.com

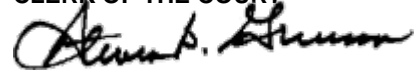
17 Martin HART, ESQ.

mh@martinhartlaw.com

18 Dept17 LC

dept17lc@clarkcountcourts.us

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21  
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23  
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AA0151



NOA

MARTIN W. HART, ESQ.

Nevada Bar #005984

LAW OFFICES OF MARTIN HART, LLC

526 S. 7<sup>th</sup> Street.

Las Vegas, NV 89101

Telephone: (702) 380-4278

Fax: (702) 384-6006

**EIGHTH JUDICIAL DISTRICT COURT  
COUNTY OF CLARK**

STATE OF NEVADA,

Plaintiff,

vs.

VANESHIA OLIVER,

Defendant.

CASE NO. C-20-351676-1

DEPT. NO. XVII

**NOTICE OF APPEAL**

Notice is hereby given that the above-named Defendant, appeals to the Supreme Court of Nevada from the Judgment of Conviction and sentence entered in this action on the 28th day of June, 2021.

DATED this 19th day of July, 2021.

LAW OFFICES OF MARTIN HART, LLC

By: /s/ Martin Hart

MARTIN W. HART, ESQ.

Nevada Bar #005984

526 S. 7<sup>th</sup> Street.

Las Vegas, Nevada 89101

Telephone: (702) 380-4278

Facsimile: (702) 384-6006

Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Notice of Appeal was served this 19th\_ day of July, 2021, on the following persons by Electronic Service and/or First Class United States Mail, postage prepaid:

STEVE WOLFSON  
Clark County District Attorney  
Appellate Division  
200 E. Lewis Ave.  
Las Vegas, Nevada 89155  
motions@clarkcountyda.com

AARON FORD  
Nevada Attorney General  
100 N. Carson St.  
Carson City, NV 89701-4717

Vaneshia Oliver, BAC # 1177740  
Florence McClure Women's Correctional Center  
4370 Smiley Rd,  
Las Vegas, NV 89115

/s/ Martin Hart  
Employee, Law Offices of Martin Hart, LLC

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**October 22, 2020**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**October 22, 2020      11:00 AM      Grand Jury Indictment**

**HEARD BY:** Bell, Linda Marie

**COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Kimberly Estala

**RECORDER:** De'Awna Takas

**REPORTER:**

**PARTIES**

**PRESENT:** Cole, Madilyn M.      Attorney  
State of Nevada      Plaintiff

**JOURNAL ENTRIES**

- Steve Lurvey , 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 19BGJ212A to the Court. COURT ORDERED, the Indictment may be filed and is assigned Case Number C-20-351676-1, Department XVII.

State requested a warrant, argued bail, and advised Deft is in custody. COURT ORDERED, NO 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 1-158 to be lodged with the Clerk of the Court; Las Vegas Justice Court case no. 20CR020969-01 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)

10/29/20 10:15 A.M. INITIAL ARRAIGNMENT (DEPT XVII)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**October 29, 2020**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**October 29, 2020      11:00 AM      Grand Jury Indictment**

**HEARD BY:** Bell, Linda Marie      **COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Kimberly Estala

**RECORDER:** De'Awna Takas

**REPORTER:**

**PARTIES**

**PRESENT:**      Dunn, Ann Marie      Attorney  
                                 State of Nevada      Plaintiff

**JOURNAL ENTRIES**

- Steve Lurvey , 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 19BGJ212A to the Court. COURT ORDERED, the Superseding Indictment may be filed and is assigned Case Number C-20-351676-1, Department XVII.

State requested a warrant, argued bail, and advised Deft is in custody. COURT ORDERED, NO 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 and 159 to be lodged with the Clerk of the Court.

I.W. (CUSTODY)

11/05/20 10:15 A.M. INITIAL ARRAIGNMENT (DEPT XVII)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**November 05, 2020**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**November 05, 2020      10:15 AM      All Pending Motions**

**HEARD BY:** Johnson, Eric      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	Stanton, David L.	Attorney
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- INITIAL ARRAIGNMENT...INITIAL ARRAIGNMENT:SUPERSEDING INDICTMENT

DEFT. OLIVER ARRAIGNED, PLED NOT GUILTY, and INVOKED the 60-DAY RULE. COURT ORDERED, matter SET for trial.

CUSTODY

11/25/2020 11:30 AM CENTRAL TRIAL READINESS CONFERENCE (DEPT. 7 LLA)

12/15/2020 10:15 AM CALENDAR CALL

1/4/2021 9:00 AM JURY TRIAL

Clerk's Note: The Central Trial Readiness Conference (CTRC) was not set during Court. An e-mail

PRINT DATE: 07/22/2021

Page 3 of 31

Minutes Date: October 22, 2020

AA0156

was sent to Martin Hart, Esq. (mh@martinhartlaw.com) and David Stanton, Esq. (david.stanton@clarkcountyda.com) notifying counsel of the CTRC hearing date and time. 11/5/2020  
sa

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**November 25, 2020**

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C-20-351676-1	State of Nevada
	vs
	VENESHIA OLIVER

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<b>November 25, 2020</b>	<b>11:30 AM</b>	<b>Central Trial Readiness Conference</b>
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**HEARD BY:** Bell, Linda Marie

**COURTROOM:** RJC Lower Level Arraignment

**COURT CLERK:** Kimberly Estala

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Co-Defendant Darrell Clark present with counsel Carl Arnold.

Court noted due to current Covid-19 restrictions trials are unable to proceed. State advised a settlement conference would be beneficial in this matter. COURT ORDERED, trial date VACATED and RESET and matter SET for settlement conference.

**CUSTODY**

01/05/21 2:00 PM SETTLEMENT CONFERENCE (LLA)

01/13/21 2:00 PM CENTRAL CALENDAR CALL (LLA)

01/19/21 9:00 AM JURY TRIAL (DEPT 17)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**January 07, 2021**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**January 07, 2021      10:30 AM      Settlement Conference**

**HEARD BY:** Bonaventure, Joseph T.      **COURTROOM:** No Location

**COURT CLERK:** Kimberly Estala

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Parties participated in a settlement conference with Senior Judge Bonaventure where a settlement was reached.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**January 07, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**January 07, 2021      3:00 PM      Entry of Plea**

**HEARD BY:** Thompson, Charles

**COURTROOM:** RJC Lower Level Arraignment

**COURT CLERK:** Dulce Romea

**RECORDER:** Angelica Michaux

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Dunn, Ann Marie	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Co-Deft Darrell Clark also present.

DEFT. OLIVER ARRAIGNED. Counsel read the plea. Colloquy regarding whether or not Deft Oliver would take the plea. Court briefly passed this matter to take Co-Deft's plea.

COURT FINDS plea not voluntarily given by Co-Deft Clark and Deft Oliver's plea contingent on Mr. Clark's. COURT ORDERED, proceedings terminated.

IN CUSTODY

1-13-21      2:00 PM      CENTRAL CALENDAR CALL

1-19-21      9:00 AM      JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**January 13, 2021**

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C-20-351676-1	State of Nevada
	vs
	VENESHIA OLIVER

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**January 13, 2021      2:00 PM      Central Calendar Call**

**HEARD BY:** Jones, Tierra      **COURTROOM:** RJC Lower Level Arraignment

**COURT CLERK:**  
Teri Berkshire

**RECORDER:** Victoria Boyd

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant

**JOURNAL ENTRIES**

- APPEARANCES CONTINUED: Ms. Overly present via video on behalf of the State. Mr. Hart present via video, on behalf of deft. Oliver. Mr. Arnold present via video, on behalf of co-deft. Clark, through bluejeans technology.

Court noted this Court cannot accommodate the current trial date due to orders by the Governor. Colloquy as to the next trial readiness date. Mr. Arnold advised he will go speak with his client again. COURT ORDERED, matter SET for Central Trial Readiness on the date given. Jury trial VACATED.

CUSTODY OLIVER / CLARK

02/24/21 11:30 A.M. CENTRAL TRIAL READINESS LLA OLIVER / CLARK

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**February 02, 2021**

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C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

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**February 02, 2021      8:30 AM      Request**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Upon Court's inquiry, the Defendant confirmed she was rejecting the State's offer. Counsel advised the Court not to set a trial date as Judge Bell would at the Central Trial Readiness Conference.

**CUSTODY**

2/24/2021 11:30 AM CENTRAL TRIAL READINESS CONFERENCE (LLA)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**February 24, 2021**

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C-20-351676-1	State of Nevada
	vs
	VENESHIA OLIVER

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<b>February 24, 2021</b>	<b>11:30 AM</b>	<b>Central Trial Readiness Conference</b>
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**HEARD BY:** Jones, Tierra **COURTROOM:** RJC Lower Level Arraignment

**COURT CLERK:** Natalie Ortega

**RECORDER:** Victoria Boyd

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Defendant Oliver (C351676-1) present with Martin W. Hart, Esq., Defendant Clark (C351676-2) present with Carl E. Arnold, Esq.,

Mr. Hart advised they were waiting on cell tower records. Ms. Cole indicated she would supply the Defense with the discovery as soon as she received it. COURT NOTED Defendants invoked in November. COURT DIRECTED Ms. Cole to contact the detective on this case as it would need a trial setting. COURT ORDERED, matter CONTINUED noting a trial would be set at the next hearing.

CUSTODY - BOTH

CONTINUED TO 03/10/21 11:30 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor****COURT MINUTES****March 10, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**March 10, 2021      11:30 AM      Central Trial Readiness  
Conference**

**HEARD BY:** Barker, David**COURTROOM:** RJC Lower Level Arraignment**COURT CLERK:** Natalie Ortega**RECORDER:** Kaihla Berndt**REPORTER:****PARTIES**

<b>PRESENT:</b>	Dunn, Ann Marie	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Defendant Veneshia Oliver present with Attorney Martin W. Hart. Defendant Darrell Clark present with Attorney Carl E. Arnold.

Ms. Dunn noted the photos taken of Defendant Clark at CCDC would be sent over. Mr. Hart noted he picked up 12 video DVDS. Mr. Hart indicated they were ready for trial. Mr. Arnold noted he had a murder trial starting Monday and could not be ready as well as there was now additional discovery. Statements by Defendants. COURT NOTED it took note of Defendants' opposition to any continuance and affirmed their sixty day right. Colloquy regarding setting a trial. Defendant Clark indicated he did not receive some paperwork. Mr. Arnold noted Defendant Clark wanted some specific paperwork from the investigator. Court requested Mr. Arnold to focus his attention on Defendant's request. Ms. Dunn estimated one, possibly two, weeks for trial noting there were out-of-state witnesses. COURT NOTED the State had out of state witnesses and required FIVE (5) days for trial. COURT ORDERED, trial SET.

**C-20-351676-1**

CUSTODY - BOTH

04/07/21 2:00 PM CENTRAL CALENDAR CALL

04/12/21 9:00 AM CENTRAL JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 07, 2021**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

---

**April 07, 2021      2:00 PM      Central Calendar Call**

**HEARD BY:** Jones, Tierra      **COURTROOM:** RJC Lower Level Arraignment

**COURT CLERK:** Teri Berkshire

**RECORDER:** Victoria Boyd

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- APPEARANCES CONTINUED: Parties present via video, through bluejeans technology. Mr. Arnold present on behalf of co-deft. Clark.

Upon Court's inquiry, both sides announced ready. Ms. Cole advised the State has 30-40 days with 7-8 days for trial. COURT ORDERED, central Jury trial SET on the date given.

CUSTODY OLIVER / CLARK

04/12/21 9:00 A.M. CENTRAL JURY TRIAL - OLIVER / CLARK

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 12, 2021**

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C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

---

**April 12, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** No Location

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY PANEL:**

Colloquy regarding the duration of the trial. Upon Court's inquiry, Mr. Lexis advised there had been multiple offers, as well as a Settlement Conference, which was rejected by Co-Defendant Clark. Second Amended Superseding Indictment and Third Amended Superseding Indictment FILED IN OPEN COURT.

**PROSPECTIVE JURY PANEL PRESENT:**

Introductions by Court and counsel. Prospective Jury Panel SWORN IN, Voir Dire begins. Peremptory challenges EXECUTED, Jury SELECTED. Court thanked and DISMISSED the additional jurors. COURT ORDERED, trial CONTINUED. Jurors are to report to Courtroom 3F for service.

**CUSTODY**

PRINT DATE: 07/22/2021

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Minutes Date: October 22, 2020

AA0167

CONTINUED TO: 4/13/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 13, 2021**

---

C-20-351676-1	State of Nevada
	vs
	VENESHIA OLIVER

---

**April 13, 2021                      9:00 AM                      Central Jury Trial**

**HEARD BY:** Villani, Michael                      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**OUTSIDE THE PRESENCE OF THE JURY:**

Mr. Lexis requested the Second Amended Superseding Indictment filed yesterday be stricken. No objection by Mr. Hart or Mr. Arnold. COURT ORDERED, Second Amended Superseding Indictment filed 4/12/2021 STRICKEN. Second Amended Superseding Indictment FILED IN OPEN COURT.

**JURY PANEL PRESENT:**

Jury Panel SWORN IN. Second Amended Superseding Indictment READ. Opening Statement by Ms. Cole and Mr. Arnold, Mr. Hart WAIVED his Opening Statement. Witness TESTIMONY, Exhibits ADMITTED (see worksheets). CONFERENCE AT BENCH. COURT ORDERED, trial CONTINUED.

**OUTSIDE THE PRESENCE OF THE JURY:**

Colloquy regarding Defense counsels' objection to the reference of Bally's. Court DIRECTED the State

not to mention anything regarding room burglaries at Bally's. Parties STIPULATED to Exhibits 1-176 being admitted, subject to proper foundation.

CUSTODY

CONTINUED TO: 4/14/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 14, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**April 14, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**JURY PANEL PRESENT:**

Witness TESTIMONY, Exhibits ADMITTED (see worksheets). COURT ORDERED, trial CONTINUED.

**OUTSIDE PRESENCE OF JURY PANEL:**

CONFERENCE AT BENCH. Colloquy regarding Jury Instructions.

**CUSTODY**

CONTINUED TO: 4/15/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 15, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**April 15, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**OUTSIDE PRESENCE OF JURY PANEL:**

Colloquy regarding Bally's issue and other room burglaries, COVID 19 protocols, settling Jury Instructions, Mr. Hart's request for a mistrial, and the Detective's testimony.

**JURY PANEL PRESENT:**

Witness TESTIMONY, Exhibits ADMITTED (see worksheets). CONFERENCE AT BENCH. COURT ORDERED, trial CONTINUED.

**CUSTODY**

**CONTINUED TO:** 4/16/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 16, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**April 16, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**OUTSIDE PRESENCE OF THE JURY:**

Defendants canvassed regarding their 5th Amendment Rights. Defendants INVOKED their 5th Amendment Right NOT to testify. Colloquy regarding settling Jury Instructions. Mr. Hart requested the trial be severed or a mistrial. COURT ORDERED, Motion DENIED.

**JURY PRESENT:**

Witness TESTIMONY (see worksheet). CONFERENCE AT BENCH. State and Defense RESTS. Jury INSTRUCTED. Closing arguments by Ms. Cole, Mr. Hart and Mr. Arnold, State's Rebuttal by Mr. Lexis. COURT ORDERED, trial CONTINUED.

**CUSTODY**

CONTINUED TO: 4/19/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 19, 2021**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**April 19, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

**JURY PRESENT:**

At the hour of 9:10 am, the Jury RETIRED to deliberate. COURT ORDERED, trial CONTINUED.

**OUTSIDE PRESENCE OF THE JURY:**

Colloquy regarding Jury's question.

**CUSTODY**

CONTINUED TO: 4/20/2021 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**April 20, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**April 20, 2021      9:00 AM      Central Jury Trial**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 03F

**COURT CLERK:** Kory Schlitz

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- APPEARANCES CONTINUED: Defendant CLARK present in custody represented by Carl Arnold Esq.

**OUTSIDE THE PRESENCE OF THE JURY**

COURT ADVISED once the verdict was reached, the Jurors were told they could take a quick break, and during that break maintenance men came into the Courtroom and were discussing what work needed to be completed in the Courtroom, adding the Marshal returned and directed them to leave as they were in the middle of trial.

**JURY PRESENT**

At the hour of 10:21 a.m. the Jury returned with a verdict as follows: GUILTY of COUNT 1 - CONSPIRACY TO COMMIT LARCENY (GM), and COUNT 2 - CONSPIRACY TO COMMIT BURGLARY (GM), and COUNT 3 - RESIDENTIAL BURGLARY (F), and COUNT 4 - INVASION OF THE HOME (F), and COUNT 5 - BURGLARY OF A BUSINESS (F), and COUNT 6 - BURGLARY OF

A BUSINESS (F), and COUNT 7 - FRAUDULENT USE OF CREDIT OR DEBIT CARD (F), and COUNT 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD (F), and COUNT 9 - CONSPIRACY TO COMMIT LARCENY (GM), and COUNT 10 - CONSPIRACY TO COMMIT BURGLARY (GM), and COUNT 11 - RESIDENTIAL BURGLARY (F), and COUNT 12 - INVASION OF THE HOME (F), and COUNT 13 - THEFT (F) \$1200.00 OR MORE, and COUNT 14 - BURGLARY OF A BUSINESS (F), and COUNT 15 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (F-GM), and COUNT 16 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (F-GM), and COUNT 17 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (F-GM), and COUNT 18 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (F-GM), and COUNT 19 - CONSPIRACY TO COMMIT LARCENY (GM), and COUNT 20 - CONSPIRACY TO COMMIT BURGLARY (GM), and COUNT 21 - RESIDENTIAL BURGLARY (F), and COUNT 22 - INVASION OF THE HOME (F), and COUNT 23 - THEFT (F), and COUNT 24 - ROBBERY (F), and COUNT 25 - COERCION (F), and COUNT 26 - CONSPIRACY TO COMMIT LARCENY (GM), and COUNT 27 - CONSPIRACY TO COMMIT BURGLARY (GM), and COUNT 28 - RESIDENTIAL BURGLARY (F), and COUNT 29 - INVASION OF THE HOME (F), and COUNT 30 - THEFT (F), and COUNT 31 - CONSPIRACY TO COMMIT LARCENY (GM), and COUNT 32 - CONSPIRACY TO COMMIT BURGLARY (GM), and COUNT 33 - RESIDENTIAL BURGLARY (F), and COUNT 34 - INVASION OF THE HOME (F), and COUNT 35 - THEFT (F), and COUNT 36 - POSSESSION OF CREDIT OR DEBIT CARD WITHOUT CARDHOLDER'S CONSENT (F), and COUNT 37 - POSSESSION OF BURGLARY TOOLS (GM). Jury Polled. Court thanked and excused the Jury Panel.

COURT REMANDED DEFENDANT WITHOUT BAIL; matter SET for Sentencing.

CUSTODY

6/3/2021 8:30 A.M. SENTENCING

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**May 12, 2021**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**May 12, 2021      3:00 AM      Minute Order**

**HEARD BY:** Villani, Michael      **COURTROOM:** Chambers

**COURT CLERK:** Samantha Albrecht

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- By stipulation and agreement by Parties via email communications with Dept. 17 Law Clerk,  
COURT ORDERS, matter SET for June 3, 2021, VACATED and RESET to June 8, 2021, at 8:30 AM.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**June 08, 2021**

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C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

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**June 08, 2021      8:30 AM      Sentencing**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

Colloquy regarding scheduling conflicts. COURT ORDERED, matter CONTINUED.

REMANDED WITHOUT BAIL

CONTINUED TO: 6/15/2021 8:30 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor****COURT MINUTES****June 15, 2021**

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

**June 15, 2021      8:30 AM      Sentencing**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Carl Arnold, Esq. and Co-Defendant Clark also present.

DEFENDANT OLIVER ADJUDGED GUILTY of COUNTS 1, 9, 19, 26, 31 - CONSPIRACY TO COMMIT LARCENY (GM), COUNTS 2,10, 20, 27, 32 - CONSPIRACY TO COMMIT BURGLARY (GM), COUNTS 3, 11, 21, 28, 33 - RESIDENTIAL BURGLARY (F), COUNTS 4, 12, 22, 29, 34 - INVASION OF THE HOME (F), COUNTS 5, 6, 14 - BURGLARY OF A BUSINESS (F), COUNTS 7, 8 - FRAUDULENT USE OF CREDIT OR DEBIT CARD (F), COUNTS 13, 23 - THEFT (F), COUNTS 15, 16, 17, 18 - ATTEMPT FRAUDULENT USE OF CREDIT OR DEBIT CARD (F-GM), COUNT 24- ROBBERY (F), COUNT 25 - COERCION (F), COUNTS 30, 35 - THEFT (F), COUNT 36 - POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION (F) and COUNT 37 - POSSESSION OF BURGLARY TOOLS (GM). Arguments by counsel and statement by Defendants. Victim Speaker, Davonica Jones SWORN and TESTIFIED. Pursuant to NRS 176.063, COURT ORDERED, in addition to the \$25.00 Administrative Assessment fee, a \$250.00 Indigent Defense Civil Assessment fee, \$150.00 DNA Analysis fee including testing to determine genetic markers, WAIVED as previously taken, \$3.00 DNA Collection fee, and Restitution in the amount of \$3,212.11 to Esther

Chae, \$2,414.00 to Brooke Bargholtz and \$250.00 to Davonica Jones, Restitution to be paid Joint and Severally with Co- Defendant Darrell Clark; Deft. Oliver SENTENCED to Nevada Department of Corrections (NDC) as follows, on COUNT 3 to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, COUNT 4 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONCURRENT TO COUNT 3, COUNT 5 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONSECUTIVE TO COUNT 4, COUNT 6 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONSECUTIVE TO COUNT 5, COUNT 7 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 6, COUNT 8 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 6, COUNT 11 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONSECUTIVE TO COUNT 8, COUNT 12 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONCURRENT TO COUNT 11, COUNT 13 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 12, COUNT 14 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONSECUTIVE TO COUNT 13, COUNT 15 -

to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 14, COUNT 16 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 15, COUNT 17 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 16 COUNT 18 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 17, COUNT 21 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONSECUTIVE TO COUNT 18, COUNT 22 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONCURRENT TO COUNT 21, COUNT 23 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 22, COUNT 24 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONSECUTIVE TO COUNT 22, COUNT 25 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of FORTY-EIGHT (48) MONTHS, CONCURRENT TO COUNT 24, COUNT 36 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 25, COUNT 28 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONSECUTIVE TO COUNT 24, COUNT 29 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONCURRENT TO COUNT 28, COUNT 30 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO COUNT 29, COUNT 33 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONSECUTIVE TO COUNT 30, COUNT 34 - to a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS, CONCURRENT TO COUNT 23, COUNT 35 - to a MAXIMUM of FORTY-EIGHT (48) MONTHS and a MINIMUM of TWELVE (12) MONTHS, CONCURRENT TO

COUNT 24 and COUNTS 1, 2, 9, 10, 19, 20, 26, 27, 31, 32, 37 - SENTENCED to the Clark County Detention Center (CCDC) for THREE HUNDRED SIXTY FOUR (364) DAYS, to run CONCURRENT TO EACH OTHER AND to COUNT 35. Defendant to receive TWO HUNDRED NINETY- THREE (293) DAYS CREDIT FOR TIME SERVED. COURT FURTHER ORDERED, matter CONTINUED to calculate the total aggregate sentence. Court directed Mr. Lexis to provide the name of Victim #3 to the Court as soon as possible.

BOND, if any, EXONERATED.

CUSTODY

CONTINUED TO: 6/17/2021 8:30 AM

CLERK'S NOTE: Mr. Lexis provided the name of Victim #3 by e-mail on 6/17/2021. sa

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**June 17, 2021**

---

C-20-351676-1      State of Nevada  
                                 vs  
                                 VENESHIA OLIVER

---

**June 17, 2021      8:30 AM      Sentencing**

**HEARD BY:** Villani, Michael      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Cole, Madilyn M.	Attorney
	Hart, Martin W	Attorney
	Lexis, Chad N.	Attorney
	OLIVER, VENESHIA L	Defendant
	State of Nevada	Plaintiff

**JOURNAL ENTRIES**

- Colloquy regarding the total aggregate sentence for Defendant. COURT ORDERED, matter CONTINUED to confirm the calculation of the total aggregate sentence.

REMANDED WITHOUT BAIL

CONTINUED TO: 6/24/2021 8:30 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**June 24, 2021**

---

C-20-351676-1      State of Nevada  
vs  
VENESHIA OLIVER

---

**June 24, 2021      8:30 AM      Sentencing**

**HEARD BY:** Ellsworth, Carolyn      **COURTROOM:** RJC Courtroom 11A

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Cynthia Georgilas

**REPORTER:**

**PARTIES**

**PRESENT:**      Cole, Madilyn M.      Attorney  
                 Hart, Martin W      Attorney  
                 OLIVER, VENESHIA L      Defendant  
                 State of Nevada      Plaintiff

**JOURNAL ENTRIES**

- Colloquy regarding aggregate sentence. COURT ORDERED, the total AGGREGATE SENTENCE is a MINIMUM of ONE HUNDRED EIGHTY (180) MONTHS AND a MAXIMUM of EIGHT HUNDRED SIXTY-FOUR (864) MONTHS in the Nevada Department of Corrections (NDC).

CUSTODY

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

BEFORE THE GRAND JURY IMPANELED BY THE AFORESAID

DISTRICT COURT

THE STATE OF NEVADA,

Plaintiff,

VS.

VANESHIA OLIVER, aka Veneshia  
Lanette Oliver,  
DARRELL CLARK,

Defendants .

GJ Case No. 19BGJ212A-B  
DC Case No. C351676

Taken at Las Vegas, Nevada

Wednesday, October 21, 2020

1:06 p.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Reported by: Donna J. McCord, C.C.R. No. 337

00:00:59 1 GRAND JURORS PRESENT ON OCTOBER 21, 2020:  
2  
3 STEVE LURVEY, Foreperson  
4 NOEL WELLMAN, Secretary  
00:00:59 5 DANIEL STACK, Assistant Secretary  
6 JOHN FINKOWSKI  
7 PAUL GILLENWATER  
8 MARK GOODMAN  
9 JEFFREY GRUBER  
00:00:00 10 DAVID HACKETT  
11 JEFF HILL  
12 JOHN PELKEY  
13 GERALD REID  
14 MANOLO SAEMZ  
00:00:00 15 SUSAN ZEMAN  
16  
17  
18  
19  
00:00:00 20 Also present at the request of the Grand Jury:  
21 Madilyn Cole  
22 Ann Dunn  
23 Deputy District Attorneys  
24 Maggie Huggins  
25 District Attorney Intern  
00:00:00

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00:00:01

1

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GRAND JURY EXHIBITSIDENTIFIED

4

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5

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00:00:02

1

LAS VEGAS, NEVADA, OCTOBER 21, 2020

2

\* \* \* \* \*

3

4

DONNA J. McCORD,00:00:02

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. DUNN: Good afternoon, everyone. My

13:06:28

10

name is Ann Dunn. I'm a Deputy District Attorney. Here

11

with me today is Deputy District Attorney Madilyn Cole

12

as well as an intern from our office Maggie Huggins. I

13

previously received the permission of the Foreperson to

14

have her present here in the Grand Jury today. Today we

13:06:45

15

are presenting Grand Jury case number 19BGJ212A-B, State

16

of Nevada versus Vaneshia Oliver and Darrell Clark. The

17

record will reflect that we have marked a copy of the

18

proposed Indictment as Exhibit 1. The defendants in

19

this case are charged with conspiracy to commit larceny,

13:07:06

20

conspiracy to commit burglary, residential burglary,

21

invasion of the home, theft, burglary of a business,

22

fraudulent use of credit or debit card, attempt

23

fraudulent use of credit or debit card, robbery,

24

coercion, possession of document or personal identifying

13:07:23

25

information, possession of credit or debit card without

13:07:26 1 cardholder's consent, possession of burglary tools,  
2 carrying concealed firearm or other deadly weapon and  
3 ownership or possession of firearm by prohibited person.

4 We are required by law to advise you of the  
13:07:38 5 elements of these charges. A copy of the elements has  
6 been marked as Grand Jury Exhibit 2. Are there any  
7 members of the Grand Jury who would like me to read the  
8 instructions out loud?

9 THE FOREPERSON: No.

13:07:50 10 MS. DUNN: Nobody is indicating so. Do any  
11 members of the Grand Jury have any questions at this  
12 time? Okay. The State's first witness is going to be  
13 Tony Lemons.

14 Walk through here over to that blue chair  
13:08:28 15 there.

16 THE FOREPERSON: Raise your right hand,  
17 please.

18 You do solemnly swear that the testimony  
19 that you're about to give upon the investigation now  
13:08:35 20 pending before this Grand Jury shall be the truth, the  
21 whole truth, and nothing but the truth, so help you God?

22 THE WITNESS: Yes.

23 THE FOREPERSON: You are advised that you  
24 are here today to give testimony in the investigation  
13:08:50 25 pertaining to the offenses of conspiracy to commit

13:08:55 1 larceny, conspiracy to commit burglary, residential  
2 burglary, invasion of the home, burglary of a business,  
3 theft, fraudulent use of credit or debit card, attempt  
4 fraudulent use of credit or debit card, robbery,  
13:09:10 5 coercion, theft, possession of document or personal  
6 identifying information, possession of credit or debit  
7 card without cardholder's consent, possession of  
8 burglary tools, carrying a concealed firearm or other  
9 deadly weapon, ownership or possession of a firearm by  
13:09:30 10 prohibited person involving Vaneshia Oliver and Darrell  
11 Clark.

12 Do you understand this advisement?

13 THE WITNESS: Yes.

14 THE FOREPERSON: Please state your first  
13:09:40 15 and last name and spell both for the record.

16 THE WITNESS: Anthony Lemons, A-N-T-H-O-N-Y  
17 L-E-M-O-N-S.

18 THE FOREPERSON: Thank you.

19 ANTHONY LEMONS,

13:09:49 20 having been first duly sworn by the Foreperson of the  
21 Grand Jury to testify to the truth, the whole truth  
22 and nothing but the truth, testified as follows:

23 ///

24 ///

13:09:49 25 ///

13:09:49

1

EXAMINATION

2

BY MS. COLE:

3

Q Good morning, sir. Where do you work?

4

A I work for Caesar's Entertainment.

13:10:01

5

Q And what do you do at Caesar's

6

Entertainment?

7

A Investigations.

8

Q As part of an investigator at Caesar's

9

Entertainment, what are you tasked with?

13:10:11

10

A We are tasked with looking at different

11

types of criminal activity that happens upon our

12

properties.

13

Q And how long have you worked there in that

14

capacity?

13:10:20

15

A Sixteen years.

16

Q In the summertime of this year, between

17

June and August, did you start a dialogue with

18

representatives from Metro regarding some room

19

burglaries that had taken place across several of your

13:10:34

20

properties?

21

A Yes.

22

Q Okay. And was that including the Paris,

23

Harrah's as well as Bally's?

24

A Yes.

13:10:41

25

Q Okay. And during those communications with

13:10:46 1 Metro, were you tasked with essentially obtaining  
2 different surveillance videos within a certain time  
3 frame?

4 A Yes.

13:10:58 5 Q Okay. As part of developing the suspects,  
6 what did you do?

7 A Normally what happens is once a crime  
8 occurs we investigate it. Now, if they're using credit  
9 cards, so we can obtain video, we'll reach out and try  
13:11:16 10 to get the individual who is using the credit card to  
11 get a description, that way we can backtrack it and  
12 start looking through surveillance to see if we can see  
13 those individuals going in and out of the hotel towers.

14 Q Okay. In this case were you dealing with  
13:11:30 15 stolen credit cards that were used?

16 A Yes.

17 Q Were you able to go to those businesses and  
18 obtain those surveillance videos?

19 A I was able to obtain a picture. The videos  
13:11:42 20 go with Metro. They're the ones that pick up the video.

21 Q Okay. And after doing this were you  
22 essentially able to narrow your search with the video  
23 surveillance?

24 A Yes.

13:11:52 25 Q Because at this point you had a specific

13:11:54 1 time frame you were looking for?

2 A Yes.

3 Q Based upon what time the credit cards were  
4 stolen?

13:12:00 5 A Correct.

6 Q And you're familiar with the surveillance  
7 video at the Paris Hotel; is that correct?

8 A Yes.

9 Q Okay. And you have access to those video  
13:12:11 10 surveillance systems?

11 A Yes.

12 Q And that's both, excuse me, at the Paris  
13 and Harrah's?

14 A Yes.

13:12:17 15 Q Okay. The surveillance system at Paris, is  
16 it constantly streaming or is it motion activated?

17 A Constantly streaming.

18 Q What about at Harrah's?

19 A Same thing, constantly streaming.

13:12:37 20 Q Okay. And to the best of your knowledge on  
21 the date and times in question, so I believe for the  
22 Paris it was August 16th and August 24th, or excuse me,  
23 August 16th and August 21st, and for Harrah's it was  
24 August 6th and August 23rd, to the best of your

13:12:54 25 knowledge was the surveillance video displaying the

13:12:59 1 correct date and time on those videos?

2 A Yes.

3 Q Okay. And is that accurate to the best of  
4 your knowledge?

13:13:05 5 A Yes.

6 Q Okay. Showing you what's been marked as  
7 Grand Jury Exhibit Numbers 29, 54 and 55, go ahead and  
8 take a look at those.

9 A This one's going to be surveillance from  
13:13:28 10 Harrah's.

11 Q Okay.

12 A This one's going to be from Paris on 8-16  
13 and Paris on 8-21.

14 Q Okay. And did you have the opportunity to  
13:13:40 15 review that video surveillance before testifying today?

16 A Yes.

17 Q Okay. And is your initial on every single  
18 one of those discs?

19 A Yes.

13:13:49 20 Q Okay. And when you watched that video, so  
21 we have the two different videos from Paris and the  
22 video from Harrah's and it looks like the dates from  
23 Paris were August 16th, August 21st, and Harrah's was  
24 August 23rd, the videos fairly and accurately depict  
13:14:09 25 those properties on those dates and times?

13:14:11 1 A Yes.

2 MS. COLE: Brief indulgence. We've got a

3 lot of video going. Approaching the witness with Grand

4 Jury Exhibit 57, 56 and 55.

13:14:59 5 BY MS. COLE:

6 Q Are those still photographs of the Paris

7 video surveillance on August 16th?

8 A Yes.

9 Q And those are still photographs of the

13:15:12 10 video surveillance that you viewed?

11 A Yes.

12 Q Okay. And what is depicted in those

13 stills?

14 A That is going into the hotel rooming area,

13:15:22 15 the hotel towers.

16 Q Okay. And what other areas?

17 A One's an exit door.

18 Q And is there another one?

19 A And one is going to be the hallway going to

13:15:33 20 the elevators. So you've got the elevator foyer and

21 then it goes up to the elevators.

22 Q Okay. And is there any individual depicted

23 in those photos?

24 A Yes.

13:15:43 25 Q Can you describe the individuals?

13:15:44 1 A Female named Vaneshia Oliver and a male  
2 Darrell Clark.

3 Q Okay. And can you describe what they're  
4 wearing to the best of your ability? I know these are  
13:15:57 5 black and white and we haven't played the video.

6 A Vaneshia --

7 Q And if you'll just refer to them as the  
8 male and the female suspect.

9 A Oh, I'm sorry. Okay, the female has white  
13:16:08 10 tennis shoes, a black bag with white stripes on the side  
11 and a C on the bag and a ball cap if I remember right.  
12 And the male is wearing a white shirt, shorts and a ball  
13 cap.

14 Q Okay. And I'm now showing you Grand Jury  
13:16:25 15 Exhibits 59, 80, 79, 78, 77, 76, 75, 74, 73, 72, 71, 70,  
16 69, 68, 67, 66, 65, 64, 63, 62, 61 and 60. Can you go  
17 ahead and tell me if those are still photographs from  
18 the video surveillance at the Paris on August 21st, the  
19 video surveillance that you viewed? And I'm going to  
13:17:17 20 publish Grand Jury Exhibit Number 57, Grand Jury Exhibit  
21 Number 56 and Grand Jury Exhibit Number 55.

22 A Yes.

23 Q Okay. So those are stills of the video  
24 surveillance from the Paris on August 21st?

13:17:59 25 A Yes.

13:18:00 1 Q And will you go ahead, and we'll just take  
2 a couple of these, looking at Grand Jury Exhibit  
3 Number 60, can you describe what's depicted in that  
4 photo?

13:18:09 5 A A male wearing a red shirt and pants,  
6 female wearing a white top, shorts, going in towards,  
7 heading towards the rooming area. It's like a little  
8 mall area over there at the Paris.

13:18:24 9 Q Okay. And showing you Grand Jury Exhibit  
10 Number 63, will you articulate what's depicted in that  
11 photo?

12 A The female leaving the area.

13 Q Okay. And what specific area?

13:18:39 14 A Almost like the mall area that goes towards  
15 the rooming area.

16 Q Okay. And showing you Grand Jury Exhibit  
17 Number 66, can you tell the members of the Grand Jury  
18 what's depicted in that photo?

13:18:51 19 A That is a camera inside the elevator that  
20 goes up to the rooming area.

21 Q Okay. And who's depicted in that photo?

22 A The female.

23 Q And can you tell what she's wearing? Does  
24 she have shorts or pants on?

13:19:01 25 A White shirt, shorts, and a bag with the

13:19:04 1 white on the side with an emblem on the side.

2 Q Okay. And can you make out what that

3 emblem is?

4 A It's a C.

13:19:13 5 Q Okay. Showing you Grand Jury Exhibit

6 Number 67, can you state what's depicted in that photo?

7 A Inside the elevator once again with the

8 female and then the male.

9 Q Okay. Grand Jury Exhibit Number 61, can

13:19:32 10 you state what's depicted in that photo?

11 A That's going into the rooming area, like

12 the little mall area.

13 Q Okay. And are there any individuals of

14 relevance that are depicted in that photo?

13:19:44 15 A The male with the red shirt, jeans, white

16 shoes.

17 Q Okay. Does he have a hat on?

18 A Yes, and a hat.

19 Q Okay. And I'm going to publish these for

13:20:00 20 you guys. And again, these are all from August 21st,

21 correct, at the Paris?

22 A Yes.

23 Q Okay. Publishing Grand Jury Exhibit

24 Number 61, that was the male you were describing and

13:20:21 25 that's the entryway? Sir?

13:20:25 1 A Yes.

2 Q Okay. And Grand Jury Number 67, this is

3 the elevator?

4 A Yes.

13:20:33 5 Q Grand Jury Exhibit Number 66, this is the

6 female?

7 A Yes.

8 Q Grand Jury Exhibit Number 60?

9 A Male and female.

13:20:48 10 Q Okay. And that's again, what do you

11 describe that area at the Paris?

12 A That's headed into the rooming area, like

13 the mall area going towards the rooms.

14 Q Okay. And for the record I'm publishing

13:21:10 15 Grand Jury Exhibit 54. This is the video from the Paris

16 on 8-16. Okay, sir, so what are we looking at right

17 here? Is this that same entrance area?

18 THE REPORTER: You have to switch it over.

19 MS. COLE: Okay, there we go.

13:22:17 20 BY MS. COLE:

21 Q Okay, sir, what are we looking at right

22 here?

23 (Video playing.)

24 A That's over at the Paris. That's going to

13:22:23 25 be coming out of the elevator area.

13:22:26 1 Q Okay. And who's depicted right there?

2 A The female with a black purse and the white

3 on the side.

4 Q Okay. And who's depicted right here?

13:22:43 5 A There's the male with the white T-shirt and

6 shorts.

7 Q Okay. And what part of the hotel is this?

8 A This is still exiting from the rooming

9 area. It looks now they're going towards --

13:23:15 10 Q And looking at the individual in the white

11 shirt, is that the male suspect that's depicted right

12 there?

13 A Yes.

14 Q And is there anybody of note depicted in

13:23:48 15 this still?

16 A Yeah, the female.

17 Q Is she right there?

18 A Yes.

19 Q Is this the elevator bank?

13:24:26 20 A Yes.

21 Q And who's depicted here?

22 A The female.

23 Q And is that that bag you were referring to

24 earlier?

13:24:34 25 A Yes.

13:24:35 1 Q Okay. And that's the bag that you  
2 indicated had a C emblem on it?

3 A Yes.

4 Q And who are we looking at right here?

13:24:52 5 A There's the male.

6 Q And what is he wearing?

7 A White shirt, ball cap.

8 Q Does that also appear to be a white ball  
9 cap?

13:25:05 10 A Yes.

11 Q And he just entered the elevator?

12 A Yes.

13 Q What are we looking at right here?

14 A That's inside the elevator.

13:25:32 15 Q And who is depicted in this still?

16 A The male.

17 Q And what did we just see happen right  
18 there?

19 A He departed the elevator in the rooming  
13:26:02 20 area.

21 Q And who just walked on the elevator right  
22 now?

23 A The female.

13:26:14 24 Q And is she wearing the same clothing and  
25 has the same bag that she had throughout this video

13:26:16 1 surveillance?

2 A Yes.

3 Q And this is all taking place on  
4 August 16th, correct?

13:26:20 5 A Correct.

6 Q Essentially this is a compilation of both  
7 the suspects and their movements around the property on  
8 the 16th?

9 A Yes.

13:26:38 10 Q So it's safe to say this spans several  
11 hours even though it's condensed into just a couple of  
12 minutes?

13 A Yes.

14 Q And again what's being depicted here?

13:26:56 15 A There's the male.

16 Q And what is the male wearing?

17 A White shirt, white ball cap, shorts.

18 Q And that's the same clothing he's been  
19 wearing throughout the duration of the 16th when spotted  
13:27:16 20 in the Paris?

21 A Yes.

22 Q What part of the hotel are we looking at  
23 right here?

24 A I'm sorry, say it again.

13:27:40 25 Q What part of the hotel are we looking at

13:27:42 1 right here?

2 A Just outside of the rooming areas after you  
3 leave the elevator to go to the mall area.

13:27:51 4 Q And who is depicted in the center of the  
5 screen in the white shirt?

6 A The male.

7 Q And who's depicted right there?

8 A The female.

13:28:19 9 Q And is she in the same clothing that she's  
10 been wearing throughout the day on the 16th?

11 A Yes.

12 Q All right. I'm going to stop it right  
13 there.

14 BY MS. DUNN:

13:28:53 15 Q All right. Good morning, sir. I'm showing  
16 what has been marked as Grand Jury Exhibit Number 29.  
17 Do you recognize this?

18 A Yes.

19 Q What is that?

13:29:01 20 A That's a copy of video from Harrah's.

21 Q Is that from August 23rd?

22 A Yes.

23 Q And did you have a chance to review this  
24 video before court?

13:29:08 25 A Yes.

13:29:09 1 Q How do you recognize it to be the same  
2 video that you reviewed?

3 A My initials are on it.

4 Q Okay. And is this a fair and accurate  
13:29:19 5 depiction of the video surveillance from August 23rd  
6 from Harrah's?

7 A Yes.

8 Q And I'm going to show you Grand Jury  
9 Exhibits 18 and 30 through 51. Can you please flip  
13:29:31 10 through these and let me know if they are accurate  
11 depictions of still photos taken from that video?

12 A Yes.

13 Q Thank you. I'm now showing you what's been  
14 marked as Grand Jury Exhibit 28. Can you tell me what  
13:30:22 15 that is?

16 A That is heading towards our elevators.

17 Q And what day was that photo taken?

18 A It's blurry.

19 Q It is blurry. If I told you it was  
13:30:39 20 August 6th would that sound correct to you?

21 A Yes.

22 Q Do you see that there on the bottom now,  
23 the 6th?

24 A Yes.

13:30:46 25 Q Okay. And you said for Exhibit 28 that

13:30:49 1 it's heading towards the elevators. Where do those  
2 elevators lead?

3 A Rooming area.

4 Q Is there anything else that those elevators  
13:30:56 5 go to?

6 A There used to be a spa on the second floor.  
7 They've done some remodeling.

8 Q Okay. Now, Exhibit Number 30, where was  
9 this picture taken?

13:31:12 10 A Outside of the elevator banks in the  
11 casino.

12 Q 31, where is this one?

13 A Outside the elevator banks.

14 Q Where do those elevators lead?

13:31:25 15 A Rooming area.

16 Q 32, where's that?

17 A Casino floor.

18 Q 33?

19 A Heading into the room elevators for the  
13:31:32 20 rooming area.

21 Q 34?

22 A Headed out of the elevator bank from the  
23 rooming area.

24 Q 35?

13:31:40 25 A Headed into the elevator banks in the

13:31:44 1 rooming area.

2 Q 36?

3 A The front porte-cochere.

4 Q The front porte what, I'm sorry?

13:31:49 5 A Porte-cochere, like where the guests get

6 dropped off and valet.

7 Q 37?

8 A The front porte-cochere.

9 Q 38?

13:31:59 10 A That's the casino area.

11 Q 39?

12 A That is headed to the rooming area.

13 Q And the people depicted in the picture, do

14 they appear to be coming from the rooming area or going

13:32:13 15 to the rooming area?

16 A They appear to be leaving the rooming area.

17 Q Number 40?

18 A That is headed towards our north doors.

19 Q Number 41?

13:32:22 20 A Another shot heading towards the north

21 doors.

22 Q 42?

23 A Another shot headed towards our north

24 doors.

13:32:29 25 Q 43?

13:32:30 1 A That's headed into the rooming area.  
2 Q 44?  
3 A That is the elevator banks going to the  
4 rooming area.  
13:32:39 5 Q 45?  
6 A That's the elevator banks coming or going  
7 into or coming out of the elevator area.  
8 Q And where do those elevators lead?  
9 A To the hotel rooms.  
13:32:52 10 Q Number 46?  
11 A Picture going into the elevator banks going  
12 up to the rooming area.  
13 Q 47?  
14 A That is the elevator banks coming out of  
13:33:02 15 the rooming area.  
16 Q 48?  
17 A That is just outside our north doors.  
18 Q 49?  
19 A Outside our north doors.  
13:33:12 20 Q 50?  
21 A Just outside our north doors.  
22 Q And 51?  
23 A The front porte-cochere.  
24 Q And now I'm going to ask you, you can  
13:33:25 25 approach closer if you want, can you tell me the

13:33:27 1 timestamp on Exhibit 48?

2 A 22:35 and 55 seconds.

3 Q And can you tell me the timestamp on 49?

4 A 22:36 and 08 seconds.

13:33:38 5 Q Now, you said that these are both out of  
6 the north doors, correct?

7 A Yes.

8 Q Okay. And then can you tell me the  
9 timestamp on 50?

13:33:46 10 A 22:36 and 11 seconds.

11 Q And I believe you said this is also out of  
12 the north doors, correct?

13 A Yes.

14 Q So comparing Exhibit Number 49 to 50, if  
13:33:58 15 the person were headed in this direction as this man is  
16 in Number 49 and they continued in that direction, and  
17 by this man I mean the person in the light-colored shirt  
18 wearing a backpack, if they continued in that same  
19 direction would they end up where the person in the  
13:34:14 20 light-colored shirt wearing the backpack is in Exhibit  
21 Number 50?

22 A Yes.

23 Q Okay. Thank you.

24 MS. COLE: Do any members of the Grand Jury  
13:34:25 25 have any questions for this witness?

13:34:28

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

13:34:2813:34:28

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

14 Do you understand this admonition?

13:35:00

15 THE WITNESS: Yes.

16 THE FOREPERSON: Thank you and you're  
17 excused.

18 THE WITNESS: Thank you.

19 MS. COLE: All right. The State calls Gary  
20 Krusinski and he's going to be testifying via  
21 audio/visual.

13:35:12

22 (Grand Jury was at ease.)

23 MS. COLE: Gary, can you hear us?

24 THE WITNESS: Yep. Thank you.

13:37:16

25 MS. COLE: Okay. You're going to be sworn

13:37:17 1 in.

2 THE WITNESS: Okay.

3 THE FOREPERSON: Please raise your right  
4 hand.

13:37:27 5 You do solemnly swear that the testimony  
6 that you're about to give upon the investigation now  
7 pending before this Grand Jury shall be the truth, the  
8 whole truth, and nothing but the truth, so help you God?

9 THE WITNESS: I do.

13:37:35 10 THE FOREPERSON: You are advised that you  
11 are here today to give testimony in the investigation  
12 pertaining to the offenses of conspiracy to commit  
13 larceny, conspiracy to commit burglary, residential  
14 burglary, invasion of the home, burglary of a business,  
13:09:03 15 theft, fraudulent use of credit or debit card, attempt  
16 fraudulent use of credit or debit card, robbery,  
17 coercion, theft, possession of document or personal  
18 identifying information, possession of credit or debit  
19 card without cardholder's consent, possession of  
13:09:24 20 burglary tools, carrying a concealed firearm or other  
21 deadly weapon, ownership or possession of a firearm by  
22 prohibited person involving Vaneshia Oliver and Darrell  
23 Clark.

24 Do you understand this advisement?

13:38:36 25 THE WITNESS: I do.

13:38:37 1 THE FOREPERSON: Please state your first  
2 and last name and spell both for the record.

3 THE WITNESS: Gary Krusinski, G-A-R-Y  
4 K-R-U-S-I-N-S-K-I.

13:38:54 5 GARY KRUSINSKI,  
6 having been first duly sworn by the Foreperson of the  
7 Grand Jury to testify to the truth, the whole truth  
8 and nothing but the truth, testified as follows:

13:38:54 10 EXAMINATION

11 BY MS. COLE:

12 Q Good morning, Gary. Where are you  
13 currently residing?

14 A 5854 Queens Highway, Parma Heights, Ohio.

13:39:11 15 Q Okay. And you filled out this witness  
16 declaration for Grand Jury testimony through the use of  
17 audio/visual technology, correct?

18 A That is correct.

19 Q And that's been marked as Exhibit 4. And  
13:39:22 20 you understand that you are subject to the laws of the  
21 State of Nevada by testifying via audio/visual, correct?

22 A Correct.

23 Q And you do understand that you're under  
24 oath?

13:39:35 25 A Yes.

13:39:35 1 Q Okay. Directing your attention to  
2 August 14th of this year, 2020, did you travel to Las  
3 Vegas?  
4 A I did.

13:39:46 5 Q And what were the dates that you were here?  
6 A I was there August 14th and I checked out  
7 the 18th later in the evening, took the Red Eye back.

8 Q And, sir, if you could just speak up.  
9 Because you're testifying via audio/visual we just want  
10 to make sure we can hear you.

11 A All right.

12 Q And you resided, while you were in Las  
13 Vegas from the 14th through the 18th, you stayed at the  
14 Paris Hotel located at 3655 South Las Vegas Boulevard  
15 here in Clark County, Nevada?

13:40:22 16 A Yes.

17 Q Okay. And that was in room number 2198P?  
18 A That is correct.

19 Q Okay. And did anybody come with you to  
13:40:39 20 this Las Vegas trip that stayed in your room with you?  
21 A No, I was alone.

22 Q Okay. And did anyone have permission to  
23 enter your room during the duration of your hotel stay?  
24 A No, absolutely not.

13:40:56 25 Q There wasn't any friends or acquaintances

13:40:58 1 that you had met that you had allowed into your room  
2 from the time period of the 14th through the 18th?

3 A No one.

4 Q So directing your attention to specifically  
13:41:09 5 the night of August 16th through the morning of  
6 August 17th around 1:00 a.m., is that approximately when  
7 you arrived back to your room?

8 A It is, yes.

9 Q And when you entered your room did you  
13:41:21 10 notice anything significant?

11 A Well, before I went into the room I noticed  
12 that the door had been, there's a little chip right  
13 where the lock was, I did notice that, and when I opened  
14 up the door I seen that things were --

13:41:40 15 THE REPORTER: I'm sorry, I'm having  
16 trouble with the last, what he said.

17 BY MS. COLE:

18 Q Okay. Can you repeat that?

19 A Well, when I opened up the door things  
13:41:54 20 were, you could tell somebody rifled through my room,  
21 somebody had been through my bags, things were laying on  
22 the ground, yeah, and things were missing.

23 Q Okay. And specifically did you notice some  
24 damage to your door?

13:42:15 25 A I did. Right before I opened the door I

13:42:19 1 noticed that the little chip, well, I could see a white  
2 spot, it's a black door, and there was a white spot  
3 right where you would, you know, pry the door open.

4 Q Okay. And right now I'm looking at Grand  
13:42:33 5 Jury Exhibits 81, 82, 83, 84, 85, 86, 87, 88, 89, 90,  
6 91. They're a series of about ten to 11 photos. Did  
7 you have access to look at those before your testimony  
8 today?

9 A Yeah, I had printed them on -- that's my  
13:43:03 10 door, that's my room number, yeah, that's that chip, I  
11 seen that, and on a few of them, the ones that aren't  
12 really close up I can't tell. Yeah, that's my door,  
13 that's my room.

14 Q Okay. And showing you what's been marked  
13:43:26 15 as Grand Jury Exhibit 82, do you recognize that?

16 A Well, what was that, 82?

17 Q Yes. Do you recognize that photo? Can you  
18 see what I'm showing you? Can you see the photo?

19 A No, I can't see what you're showing me.

13:43:49 20 Q Okay. So I sent you a series of photos  
21 when we had a pretrial yesterday; do you remember that?

22 A Yeah.

23 Q Okay. And there was a series of 11 photos,  
24 correct?

13:44:11 25 A Correct.

13:44:12 1 Q And you had an opportunity to review those  
2 photos?

3 A Absolutely, yes.

4 Q Okay. And in those photos was there damage  
13:44:22 5 to your door?

6 A Yes.

7 Q Okay. Can you describe the damage for the  
8 record?

9 A Okay. There was a chip away from where the  
13:44:37 10 doorjamb is right where the lock would be and when I  
11 came to the door I could see it plain as day. It was  
12 like it was peeled away. You could see the white of the  
13 wood and I said, oh, somebody tried to get into my room,  
14 you know.

13:44:58 15 Q Okay. And does it look like something that  
16 could have been done with someone's hand or a tool?

17 A Yeah, a knife or a crowbar or something of  
18 that nature that would jamb in there and slide that lock  
19 open.

13:45:19 20 Q Okay. And for the record I am showing you  
21 Grand Jury Exhibit Number 92. Can you see that?

22 A I see that, my headphones.

23 Q Okay. So you said you recognized these as  
24 your headphones?

13:45:40 25 A Yeah, that gold color -- I'm holding it up.

13:45:44 1 Can you see what I'm holding up? That's the picture.  
2 Those are, yeah, it was gold Bowers and Wilkins  
3 headphones, wireless.

4 Q Okay. And was that stolen from your hotel  
13:45:57 5 room that day?

6 A It was.

7 Q Okay. And what's the approximate value of  
8 those?

9 A Four hundred dollars.

13:46:06 10 Q Okay. And what other items did you have  
11 stolen from you?

12 A Maui Jim sunglasses, Big Kahuna style.  
13 Those were like \$350.

14 Q Okay.

13:46:21 15 A And I had some earbuds, they're clip  
16 earbuds. I'd wear those down by the pool. Those were  
17 \$130.

18 Q Okay. I'm going to stop you right there.  
19 You're breaking up a little bit.

13:46:39 20 A Okay.

21 Q Can you repeat that?

22 A Did you get the Maui Jims?

23 Q Yes. So you were talking about some  
24 headphones?

13:46:51 25 A Yeah, they're clips. They're wired

13:46:57 1 earbuds.

2 Q Okay. And approximately how much did those

3 cost?

4 A One hundred thirty dollars.

13:47:05 5 Q Okay. And anything else of significance

6 that was stolen?

7 A A Stingray wallet with my credit cards and

8 about \$500 cash. It's a wallet I use to travel, you

9 know, I just -- I don't like to pull out a bunch of

13:47:27 10 money so --

11 Q And again showing you what's been marked as

12 Grand Jury Exhibit Number 92, you recognize these as

13 your headphones that were taken?

14 A I do.

13:47:35 15 Q Okay. Did you also have some credit cards

16 that were stolen?

17 A Yes.

18 Q Okay. At any time in Las Vegas did you

19 make any transactions at a Sbarro Pizza?

13:47:52 20 A No.

21 Q Okay. What about at a 7-Eleven?

22 A No.

23 Q Okay. So on August 16th, 2020, you didn't

24 make any credit card transactions at a Sbarro or at a

13:48:10 25 7-Eleven?

13:48:11 1 A No.

2 Q Okay.

3 A The only time I used my credit card was at

4 the hotel front desk, that was it.

13:48:19 5 Q Okay. One of the items was stolen, you had

6 credit cards that were stolen, correct?

7 A Correct.

8 Q Okay. Was one of those an American Express

9 ending in 1004?

13:48:32 10 A Yes.

11 Q Okay. Was another one a Capital One Visa

12 ending in 0452?

13 A Yes.

14 Q Okay. And on August 16th you did not use

13:48:46 15 your Capital Visa credit card ending in 0452 at

16 7-Eleven?

17 A No.

18 Q And nobody had permission to use your card

19 on that date at 7-Eleven?

13:48:58 20 A Absolutely not.

21 Q And then in reference to your American

22 Express ending in 1004, you did not make a transaction

23 at Sbarro for \$20 on the 16th at 10:29 p.m.?

24 A No, I did not.

13:49:16 25 Q Okay. And nobody had your permission to do

13:49:18 1 that?

2 A Absolutely not, no.

3 MS. COLE: I have no further questions for  
4 this witness. Do any members of the Grand Jury have any  
13:49:29 5 questions?

6 THE FOREPERSON: Yes, go ahead.

7 BY A JUROR:

8 Q Did you have any housekeeping service go  
9 into your apartment while there?

13:49:42 10 A Could you repeat that question?

11 BY MS. COLE:

12 Q The question was did you have any  
13 housekeeping enter your room during --

14 A JUROR: During his stay.

13:49:52 15 BY MS. COLE:

16 Q During your stay. Did housekeeping enter  
17 your room during your stay?

18 A No, there was a note on the door and they  
19 told me at the front desk when you come in the hotel  
13:50:05 20 room is sanitized and then there will be no housekeeping  
21 until you check out. So no housekeeper, no.

22 A JUROR: All right. Thank you.

23 MS. COLE: Any other questions for this  
24 witness? Okay.

13:50:23 25 THE FOREPERSON: By law these proceedings

13:50:23 1 are secret and you are prohibited from disclosing to  
2 anyone anything that transpired before us including any  
3 evidence presented to the Grand Jury, any event  
4 occurring or a statement made in the presence of the  
13:50:23 5 Grand Jury or any information obtained by the Grand  
6 Jury.

7 Failure to comply with this admonition is a  
8 gross misdemeanor punishable up to 364 days in the Clark  
9 County Detention Center and a \$2,000 fine. In addition  
13:50:24 10 you may be held in contempt of court punishable by an  
11 additional \$500 fine and 25 days in the Clark County  
12 Detention Center.

13 Do you understand this admonition?

14 THE WITNESS: Yes, I do.

13:50:58 15 THE FOREPERSON: Thank you and you're  
16 excused.

17 MS. COLE: All right. And the State is now  
18 going to be calling Anna Salazar.

19 THE FOREPERSON: Please raise your right  
13:51:53 20 hand.

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

13:52:03 25 THE WITNESS: Yes.

13:52:03

1 THE FOREPERSON: Thank you.

2 You are advised that you are here today to

3 give testimony in the investigation pertaining to the

4 offenses of conspiracy to commit larceny, conspiracy to

13:08:56

5 commit burglary, residential burglary, invasion of the

6 home, burglary of a business, theft, fraudulent use of

7 credit or debit card, attempt fraudulent use of credit

8 or debit card, robbery, coercion, theft, possession of

9 document or personal identifying information, possession

13:09:18

10 of credit or debit card without cardholder's consent,

11 possession of burglary tools, carrying a concealed

12 firearm or other deadly weapon, ownership or possession

13 of a firearm by prohibited person involving Vaneshia

14 Oliver and Darrell Clark.

13:09:37

15 Do you understand this advisement?

16 THE WITNESS: Yes.

17 THE FOREPERSON: Please state your first

18 and last name and spell both for the record.

19 THE WITNESS: Anna, A-N-N-A, Salazar,

13:53:03

20 S-A-L-A-Z-A-R.

21 THE FOREPERSON: Thank you.

22 ANNA SALAZAR,

23 having been first duly sworn by the Foreperson of the

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

13:53:06

25 and nothing but the truth, testified as follows:

13:53:06

1 EXAMINATION

2 BY MS. COLE:

3 Q Good morning, Anna. Did you travel to Las  
4 Vegas on August 14th through 17th of 2020?

13:53:17

5 A Yes.

6 Q Okay. And you were staying at the Paris  
7 Hotel located at 3655 South Las Vegas Boulevard here in  
8 Clark County, Nevada?

9 A Correct.

13:53:26

10 Q And you were staying from August 14th to  
11 August 17th, 2020?

12 A Yes.

13 Q And was your room number room 2395?

14 A Yes.

13:53:37

15 Q Who did you come to Las Vegas with or  
16 should I say who was staying in your room with you?

17 A My friend Mary --

18 THE REPORTER: What's the last name? I  
19 didn't hear you.

20 THE WITNESS: Negrete (phonetic). Or it's  
21 Rice. She's married now.

22 BY MS. COLE:

23 Q Okay. Can you say that name one more time?

24 A Mary Rice, R-I-C-E.

13:53:58

25 Q Okay. So you and your friend Mary Rice

13:54:00 1 were staying in room 2395. Did anyone else have  
2 permission to enter your room during your stay besides  
3 you and Mary?

4 A No.

13:54:09 5 Q Do you have any friends or acquaintances  
6 that were there with you that were allowed access to  
7 your room?

8 A No.

13:54:19 9 Q Directing your attention to August 16th  
10 from the time frame of approximately 2:30 to 9:00 p.m.,  
11 were you in your room during that time frame?

12 A No.

13 Q Okay. When you got back to your room was  
14 it on the 16th or the 17th?

13:54:34 15 A The morning of the 17th.

16 Q Okay. So it was technically --

17 A The next day.

18 Q Okay. So you got back late?

13:54:46 19 A Well, we got back on the same night, the  
20 16th, but I didn't notice my things were missing until  
21 the 17th.

22 Q Okay. So you got back to your hotel room  
23 on the night of August 16th and do you recall what time  
24 you got back?

13:54:56 25 A Like between 9:00 and 10:00 o'clock at

13:54:59 1 night.

2 Q Okay. So there was a time frame of 2:30 to  
3 9:00 that you were not in your room?

4 A Correct.

13:55:04 5 Q Okay. And you said you didn't notice  
6 anything until the 17th?

7 A Uh-huh.

8 Q So can you describe what you mean by  
9 notice?

13:55:12 10 A So whenever I was getting ready to pack my  
11 stuff to take my flight out that morning I noticed my  
12 purse was missing, my friend stated her purse was  
13 missing and then that's when we called security.

14 Q Okay. And when you say things were  
13:55:28 15 missing, what items did you have that were missing?

16 A I had credit cards, I had my Prada purse, I  
17 had a Steve Madden bag, a necklace that went missing.

18 Q Okay. Your Prada purse, how much did that  
19 cost? What's the value of that?

13:55:47 20 A Approximately 1500.

21 Q Okay. And you also said that you had a  
22 necklace. Was that a Tiffany necklace?

23 A Correct.

24 Q And approximately how much did that cost?

13:55:56 25 A About 1800.

13:55:57 1 Q And then there was also a Steve Madden  
2 purse. What was the value of that item?

3 A Like \$60.

4 Q And did you notice any damage on your hotel  
13:56:07 5 room door?

6 A Yes.

7 Q Okay. Showing you what's been marked as  
8 Grand Jury Exhibits 94 through 102, can you take a look  
9 at those?

13:56:18 10 A Uh-huh.

11 Q Let me know when you're done.

12 A That's correct.

13 Q Okay. Do those photos fairly and  
14 accurately depict your door when you noticed there was  
13:56:58 15 some damage on the 17th?

16 A Yes.

17 Q Okay. And it's safe to say that this  
18 damage didn't exist before your room was entered  
19 unauthorized?

13:57:12 20 A Correct.

21 Q Okay. So that's Grand Jury Exhibit Number  
22 101. This is Grand Jury Exhibit Number 100. And what  
23 we're looking at right there is the lock to your door,  
24 correct?

13:57:29 25 A Yes.

13:57:33 1 Q Okay. And then showing you Grand Jury  
2 Exhibit Number 97, that's kind of another view of how  
3 your door looked on that day?  
4 A Yes.

13:57:42 5 Q Okay. And you said you noticed this the  
6 morning of the 17th?  
7 A Correct.

8 Q Okay. And you also mentioned that you had  
9 some cards stolen from your wallet?

13:57:52 10 A Uh-huh.

11 Q Okay. Was that specifically a Mastercard  
12 ending in 6788 and a Mastercard ending in 2975?

13 A I do know of one Mastercard. I can't  
14 remember the other one.

13:58:03 15 Q Okay. You remember when this happened you  
16 told the Detective, Detective Byrd, what was taken from  
17 you?

18 A Uh-huh.

19 Q Okay. And so if I told you that you told  
13:58:12 20 him that you had two different Mastercards, one ending  
21 in 6788 and one ending in 2975, would that be correct?

22 A Yes.

23 Q I know it's probably been a long time, you  
24 don't remember the exact numbers?

13:58:25 25 A Uh-huh.

13:58:26 1 Q But you recall having a conversation?  
2 A Yes, correct.  
3 Q And it was fresh when everything was in  
4 your mind?  
13:58:30 5 A Yes.  
6 Q Right after this incident occurred?  
7 A Yes.  
8 Q Okay. Did you use either one of those  
9 cards at an ARCO located on 209 East Flamingo on  
13:58:44 10 August 17th?  
11 A No.  
12 Q What about at a CVS on August 17th?  
13 A No.  
14 Q So you did not use your Mastercard ending  
13:58:53 15 in 6788 at an ARCO on August 17th at 12:04 a.m.?  
16 A No.  
17 Q And you did not use your Mastercard ending  
18 in 2975 at a CVS for 65.37 on August 17th?  
19 A No.  
13:59:08 20 Q While you were in Vegas did you ever even  
21 go to a CVS?  
22 A No.  
23 Q Did you ever even go to a gas station?  
24 A No.  
13:59:15 25 Q So safe to say that no one had your

13:59:17 1 permission to use your cards at those establishments?

2 A Correct.

3 MS. COLE: No further questions for this  
4 witness. Do any members of the Grand Jury have any  
13:59:24 5 questions?

6 THE FOREPERSON: By law these proceedings  
7 are secret and you are prohibited from disclosing to  
8 anyone anything that transpired before us including any  
9 evidence presented to the Grand Jury, any event  
13:59:27 10 occurring or a statement made in the presence of the  
11 Grand Jury or any information obtained by the Grand  
12 Jury.

13 Failure to comply with this admonition is a  
14 gross misdemeanor punishable up to 364 days in the Clark  
13:59:27 15 County Detention Center and a \$2,000 fine. In addition  
16 you may be held in contempt of court punishable by an  
17 additional \$500 fine and 25 days in the Clark County  
18 Detention Center.

19 Do you understand this admonition?

13:59:56 20 THE WITNESS: Yes.

21 THE FOREPERSON: Thank you and you're  
22 excused.

23 THE WITNESS: Thank you.

24 MS. DUNN: Walk through there and go sit  
14:00:32 25 over there in that blue chair.

14:00:33

1 THE WITNESS: Okay.

2 THE FOREPERSON: Please raise your right  
3 hand.

14:00:40

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

8 THE WITNESS: Yes.

13:08:49

9 THE FOREPERSON: You are advised that you  
10 are here today to give testimony in the investigation  
11 pertaining to the offenses of conspiracy to commit  
12 larceny, conspiracy to commit burglary, residential  
13 burglary, invasion of the home, burglary of a business,  
14 theft, fraudulent use of credit or debit card, attempt  
15 fraudulent use of credit or debit card, robbery,

13:09:07

16 coercion, theft, possession of document or personal  
17 identifying information, possession of credit or debit  
18 card without cardholder's consent, possession of  
19 burglary tools, carrying a concealed firearm or other  
20 deadly weapon, ownership or possession of a firearm by  
21 prohibited person involving Vaneshia Oliver and Darrell  
22 Clark.

13:09:26

23 Do you understand this advisement?

24 THE WITNESS: Yes.

14:01:39

25 THE FOREPERSON: Please state your first

14:01:39 1 and last name and spell both for the record.

2 THE WITNESS: Shawn Derrick, S-H-A-W-N  
3 D-E-R-R-I-C-K.

4 THE FOREPERSON: Thank you.

14:01:48 5 SHAWN DERRICK,  
6 having been first duly sworn by the Foreperson of the  
7 Grand Jury to testify to the truth, the whole truth  
8 and nothing but the truth, testified as follows:

14:01:48 10 EXAMINATION

11 BY MS. COLE:

12 Q Sir, where do you work?

13 A I work at ARCO/AM-PM at 209 East Flamingo.

14 Q And how long have you worked there?

14:01:57 15 A A little over a year.

16 Q And you're familiar with the video  
17 surveillance system there?

18 A Yes.

19 Q Is it a system that's constantly streaming  
14:02:05 20 or is it motion activated?

21 A It's constantly recording.

22 Q And you work specifically at the 209 East  
23 Flamingo location?

24 A Correct.

14:02:15 25 Q And that's here in Clark County, Nevada?

14:02:16

1 A Yes.

2 Q Okay. And on August 17th, to the best of  
3 your knowledge was the surveillance system working?

4 A Yes, it was.

14:02:28

5 Q And you had an opportunity to review that  
6 surveillance video before testifying today?

7 A Yes, I have.

8 Q Okay. And I'm showing you what's been  
9 marked as Grand Jury Exhibit Number 103. Is this the  
10 video that you reviewed prior to your testimony today?

14:02:39

11 A Yes, it has my initials on it.

12 Q Okay. Is that how you know that this is  
13 the video that you reviewed?

14 A Yes.

14:02:48

15 Q Okay. I'm going to show you now some  
16 stills from that surveillance video, and it looks like  
17 it's going to be Grand Jury Exhibits 105 through 116.  
18 Will you go ahead and take a look at those and let me  
19 know if those fairly and accurately depict what is  
20 portrayed on the video surveillance?

14:03:18

21 A Yes, they do.

22 Q Okay. And then I'm just going to put these  
23 up on the projector. Okay, sir, what are we looking at  
24 right here that's depicted?

14:03:43

25 A Looking at the clerk ringing up the

14:03:47 1 accused.

2 Q Okay. And when you say -- are you talking  
3 about the female?

4 A Yes.

14:03:52 5 Q Okay. And can you describe what she's  
6 wearing?

7 A Like a black and white outfit with straps  
8 on it or something.

9 Q Okay. And that's in reference to Grand  
14:04:02 10 Jury Exhibit Number 105. Looking at Grand Jury Exhibit  
11 Number 106, can you describe what's depicted there?

12 A She's over next to our beverages and over  
13 next to the chip aisle getting stuff.

14 Q Grand Jury Exhibit Number 109, what is  
14:04:24 15 depicted right here?

16 A It looks like when they came in the door.

17 Q Okay. And when you say they, can you  
18 describe the individuals that you see?

19 A The female and the male that was with her.

14:04:35 20 Q Okay. And what is the male wearing?

21 A The white shirt with the ball cap.

22 Q Okay. And what is he wearing again for the  
23 record?

24 A A white shirt and ball cap.

14:04:45 25 Q And that's at the entrance of the store

14:04:47 1 what we're looking at right now?

2 A Correct.

3 Q Okay. Showing you Grand Jury Exhibit  
4 Number 108, it looks like this is an aisle somewhat in  
14:04:54 5 the center of the store?

6 A Right. That's our candy aisle.

7 Q Okay. And who is depicted in that still?

8 A Both the female and the male suspect.

9 Q Okay. And again what are they wearing?

14:05:06 10 A The dark color with the white-stripe top  
11 and a white shirt on the male with a ball cap.

12 Q Okay. And again all these surveillance  
13 video stills fairly and accurately depict what is  
14 actually on the video surveillance that you viewed  
14:05:24 15 before testifying today?

16 A Correct.

17 Q Okay. Showing you what's been marked as  
18 Grand Jury Exhibit Number 104, can you tell me what  
19 we're looking at with this?

14:05:41 20 A This is an archived receipt that we printed  
21 for the police.

22 Q Okay. So essentially this is a receipt  
23 that's made in the ordinary course of your business at  
24 ARCO?

14:05:52 25 A Correct.

14:05:54 1 Q Okay. So meaning with every transaction  
2 that occurs there's a receipt that's created?  
3 A Into the computer system, yes.  
4 Q Okay. And the person that's essentially  
14:06:01 5 inputting that information into the computer system  
6 would be the cashier, correct?  
7 A Correct.  
8 Q Okay. It's a pretty routine action that  
9 takes place?  
14:06:09 10 A Yes.  
11 Q Almost like automatic?  
12 A Every receipt's automatically saved.  
13 Q Okay. And now this receipt was actually  
14 made at the time the event occurred?  
14:06:19 15 A This is a reprint from the archive of the  
16 system.  
17 Q And this is a copy of the exact original?  
18 A Correct.  
19 Q And so I know we're looking at a copy, but  
14:06:29 20 the information displayed was made at the time that the  
21 event occurred?  
22 A Correct.  
23 Q Okay. Now, this person that's essentially  
24 recording this is essentially ringing them up, right?  
14:06:43 25 A Right, he's doing their transaction.

14:06:45 1 Q Okay. And they're the person that actually  
2 records this information?

3 A Correct, as he scans it once he hits tender  
4 then it saves it to the computer in the office.

14:06:55 5 Q Okay. And they're essentially the person  
6 that is recording this information in realtime?

7 A Correct.

8 Q Okay. So in looking at this receipt, and  
9 I'm going to put it up on the projector so you can all  
14:07:07 10 see it, hopefully you can from that far away, can you  
11 see that or no?

12 A Yes, I can see the monitor.

13 Q Okay. So what day did this transaction  
14 take place on?

14:07:19 15 A It took place on August 17th.

16 Q Okay. And is that depicted in the top?

17 A Yes, it is.

18 Q Okay. And what time?

19 A At 12:04 a.m.

14:07:27 20 Q Okay. And again this is located at your  
21 ARCO on 209 East Flamingo here in Clark County, Nevada?

22 A Correct. That's designated by the store  
23 number on the far right, 42279.

24 Q Okay. That corresponds with your store  
14:07:42 25 number?

14:07:42 1 A Correct.

2 Q Okay. And I'm looking at the bottom. Is

3 that the total for the transaction?

4 A Yes, 32.68.

14:07:46 5 Q Okay. And is this the card that was used?

6 A Yes, Mastercard.

7 Q And is this the last four numbers of that

8 card?

9 A Yes.

14:07:53 10 Q And can you read those numbers into the

11 record?

12 A 6788.

13 Q All right.

14 No further questions for this witness.

14:08:04 15 THE FOREPERSON: Any questions?

16 By law these proceedings are secret and you

17 are prohibited from disclosing to anyone anything that

18 transpired before us including any evidence presented to

19 the Grand Jury, any event occurring or a statement made

14:08:04 20 in the presence of the Grand Jury or any information

21 obtained by the Grand Jury.

22 Failure to comply with this admonition is a

23 gross misdemeanor punishable up to 364 days in the Clark

24 County Detention Center and a \$2,000 fine. In addition

14:08:04 25 you may be held in contempt of court punishable by an

14:08:04 1 additional \$500 fine and 25 days in the Clark County  
2 Detention Center.

3 Do you understand this admonition?

4 THE WITNESS: Yes.

14:08:40 5 THE FOREPERSON: Thank you and you're  
6 excused.

7 THE WITNESS: Thank you.

8 MS. COLE: And the State is going to now  
9 call a custodian of record for CVS. I forgot her name.

14:08:59 10 MS. DUNN: Go through that entrance and go  
11 to the back and sit in that blue chair.

12 THE FOREPERSON: Stand up and raise your  
13 right hand.

14 You do solemnly swear that the testimony  
14:09:09 15 that you're about to give upon the investigation now  
16 pending before this Grand Jury shall be the truth, the  
17 whole truth, and nothing but the truth, so help you God?

18 THE WITNESS: Yes.

19 THE FOREPERSON: You are advised that you  
13:08:49 20 are here today to give testimony in the investigation  
21 pertaining to the offenses of conspiracy to commit  
22 larceny, conspiracy to commit burglary, residential  
23 burglary, invasion of the home, burglary of a business,  
24 theft, fraudulent use of credit or debit card, attempt  
13:09:07 25 fraudulent use of credit or debit card, robbery,

13:09:10 1 coercion, theft, possession of document or personal  
2 identifying information, possession of credit or debit  
3 card without cardholder's consent, possession of  
4 burglary tools, carrying a concealed firearm or other  
13:09:26 5 deadly weapon, ownership or possession of a firearm by  
6 prohibited person involving Vaneshia Oliver and Darrell  
7 Clark.

8 Do you understand this advisement?

9 THE WITNESS: Yes.

14:10:08 10 THE FOREPERSON: Please state your first  
11 and last name and spell both for the record.

12 THE WITNESS: Jennifer Mitchell,  
13 J-E-N-N-I-F-E-R M-I-T-C-H-E-L-L.

14 THE FOREPERSON: Thank you.

14:10:18 15 THE WITNESS: You're welcome.

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

14:10:18 20  
21 EXAMINATION

22 BY MS. COLE:

23 Q Good morning. Where do you work?

24 A CVS Pharmacy.

14:10:23 25 Q And how long have you worked there?

14:10:25 1 A Seventeen years.

2 Q And what's your position at CVS?

3 A Assistant manager.

4 Q Are you familiar with the video

14:10:30 5 surveillance system at the location of 3645 South Las

6 Vegas Boulevard?

7 A Yes.

8 Q Okay. And that's here in Clark County,

9 Nevada?

14:10:40 10 A Yes.

11 Q And that's where you currently work?

12 A Yes.

13 Q Is the video surveillance system constantly

14 streaming or is it motion activated?

14:10:48 15 A Constantly streaming.

16 Q And to the best of your knowledge on

17 August 17th at approximately 7:25 was the system

18 working?

19 A Yes.

14:10:56 20 Q And to the best of your knowledge your

21 system does display a date and timestamp, correct?

22 A Yes.

23 Q And to the best of your knowledge that's

24 accurate as well?

14:11:06 25 A Yes.

14:11:07 1 Q And you had an opportunity to review that  
2 video today; is that correct?

3 A Correct.

14:11:14 4 Q Okay. Showing you what's been marked as  
5 Grand Jury Exhibit Number 142, is this the video that  
6 you reviewed before testifying today?

7 A Yes.

8 Q Okay. And how do you recognize that?

9 A I signed it.

14:11:23 10 Q Okay. And you're looking at your initials  
11 on this CD?

12 A Yeah, they're right there.

13 Q And this is video surveillance of your  
14 store?

14:11:33 15 A Correct.

16 Q Okay. And I'm going to be publishing Grand  
17 Jury Exhibit Number 142. And again when you watched the  
18 video surveillance, is it a fair and accurate depiction  
19 of your store on this day?

14:11:49 20 A Yes.

21 Q Okay.

22 (Video playing.)

23 Q Okay. So what we're looking at, what view  
24 is this of your store?

14:12:19 25 A That's from the front entrance of the first

14:12:22 1 register.

2 Q Okay. And the female that's unloading her  
3 items, can you describe her?

14:12:38 4 A Black female, small frame, five, I don't  
5 know, six.

6 Q Are you able to tell what color of clothing  
7 she's wearing or if she's wearing shorts or pants?

8 A It looks like a jumper, jumpsuit-type  
9 thing.

14:12:50 10 Q Okay. And is it short or long?

11 A Long.

12 Q Does it cover her legs?

13 A Yes.

14:13:16 14 Q And is that her using her credit card on  
15 the reader?

16 A Yes.

14:14:02 17 Q Okay. And for the record I'm showing you  
18 what's been marked as Grand Jury Exhibit 145. Is that a  
19 still photo from the video surveillance that we just  
20 watched?

21 A Yes.

22 Q Okay. And that again also fairly and  
23 accurately depicts what was on the video surveillance?

24 A Yes.

14:14:13 25 Q Showing you what's been marked as Grand

14:14:16 1 Jury Exhibits 143 and 144, here's 143 and 144, and I'll  
2 approach. Again I'm approaching the witness with Grand  
3 Jury Exhibits 143 and 144. Do you recognize this?

4 A Yes.

14:14:36 5 Q Okay. And what is it?

6 A They are receipts from our CVS corporate  
7 office.

8 Q Okay. And how do you recognize that? Or  
9 should I say how do you know it's from CVS?

14:14:46 10 A Well, the CVS logo, one, and then just the  
11 items listed with the item number, just what it looks  
12 like.

13 Q Okay. And you've looked at receipts from  
14 CVS before?

14:14:59 15 A Yes.

16 Q Obviously in your capacity as assistant  
17 manager you know what they're supposed to look like?

18 A Yes.

14:15:08 19 Q Okay. And essentially because this is a  
20 receipt it's kept in the course of regularly conducted  
21 business activity?

22 A Yes.

23 Q Meaning with every transaction there's a  
24 receipt?

14:15:16 25 A Yes.

14:15:16 1 Q And that's what you've identified here.  
2 And fair to say it's kept in the usual regular course of  
3 business?

4 A Yes.

14:15:23 5 Q So there's going to be a receipt for every  
6 transaction, correct?

7 A Uh-huh.

8 Q And this receipt, the items that were  
9 inputted into this, who would be doing that, is that the  
14:15:34 10 cashier?

11 A The cashier.

12 Q Okay. And that's happening in realtime as  
13 the event's occurring?

14 A Correct.

14:15:41 15 Q Okay. Let's zoom out a little bit. So  
16 looking at Grand Jury Exhibit Number 144, are you able  
17 to see that? Are you able to see that?

18 A Yes, I'm sorry.

19 Q Can you tell me what's depicted at the top?

14:16:02 20 A The date.

21 Q Okay. And what's that date for the record?

22 A 8-17-2020.

23 Q Okay. And what time is that?

24 A You have to scoot it over a little bit.

14:16:11 25 7:25 p.m.

14:16:14 1 Q Okay. And in looking at these items, are  
2 these items that are typically sold at CVS?  
3 A Yes.

14:16:25 4 Q Okay. And in looking at this price you're  
5 familiar with the prices of different items that are  
6 sold?  
7 A Yes.

8 Q And that's accurate?  
9 A Yes.

14:16:31 10 Q Okay. Showing you Grand Jury Exhibit  
11 Number 143, at the bottom here what does that say right  
12 there?  
13 A Mastercard.

14:16:47 14 Q And is that the card that corresponds with  
15 this transaction?  
16 A Yes.

17 Q Okay. And looking at those numbers what is  
18 that?  
19 A The last four of the credit card that was  
14:16:52 20 used.  
21 Q Okay. And can you read those for the  
22 record?  
23 A 2975.

14:17:00 24 Q Okay. And the amount entered, can you read  
25 that?

14:17:00 1 A Sixty-five thirty-seven.

2 Q Okay. And again, all this information

3 comes from a receipt that's kept in the ordinary course

4 of business, correct?

14:17:09 5 A Correct.

6 Q And I believe you mentioned that this event

7 occurred on August 17th?

8 A Correct.

9 Q And would this be the time that this

14:17:20 10 transaction occurred as well?

11 A Yes.

12 Q Being 7:25 p.m.?

13 A Yes.

14 Q And this number corresponds with a cashier

14:17:26 15 that rang up this transaction?

16 A Yes.

17 Q And then here this item seems to be

18 displaying a transaction number?

19 A Yeah, every receipt has a transaction

14:17:34 20 number.

21 Q Okay. Is it kind of just to keep

22 everything organized?

23 A Yeah, that way we can look them up and find

24 them.

14:17:39 25 Q So this is a unique number to this specific

14:17:42 1 transaction?

2 A Correct.

3 Q Okay.

4 No further questions for this witness. Do

14:17:51 5 any members of the Grand Jury have any questions?

6 THE FOREPERSON: Any questions?

7 By law these proceedings are secret and you

8 are prohibited from disclosing to anyone anything that

9 transpired before us including any evidence presented to

14:17:54 10 the Grand Jury, any event occurring or a statement made

11 in the presence of the Grand Jury or any information

12 obtained by the Grand Jury.

13 Failure to comply with this admonition is a

14 gross misdemeanor punishable up to 364 days in the Clark

14:17:54 15 County Detention Center and a \$2,000 fine. In addition

16 you may be held in contempt of court punishable by an

17 additional \$500 fine and 25 days in the Clark County

18 Detention Center.

19 Do you understand this admonition?

14:18:26 20 THE WITNESS: Yes, I do.

21 THE FOREPERSON: Thank you and you're

22 excused.

23 THE WITNESS: Thank you.

24 MS. COLE: The State now calls Brooke

14:18:34 25 Bargholtz.