

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Oct 15 2021 08:09 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

VALENTINA MONEE KNIGHT,
Appellant(s),

vs.

THE STATE OF NEVADA,
Respondent(s),

Case No: C-15-309123-2

Docket No: 83534

RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT
VALENTINA KNIGHT # 1228728,
PROPER PERSON
4370 SMILEY RD.
LAS VEGAS, NV 89115

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

I N D E X

<u>VOLUME:</u>	<u>PAGE NUMBER:</u>
1	1 - 240
2	241 - 480
3	481 - 529

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
2	08/30/2021	AFFIDAVIT	436 - 436
2	09/28/2021	AMENDED INFORMATION	458 - 459
3	10/04/2021	AMENDED NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER	485 - 495
2	03/17/2020	APPLICATION TO PROCEED INFORMA PAUPERIS (CONFIDENTIAL)	241 - 249
1	10/27/2015	BAIL BOND	92 - 96
1	01/31/2018	BENCH WARRANT	232 - 232
2	09/22/2021	CASE APPEAL STATEMENT	456 - 457
3	10/15/2021	CERTIFICATION OF COPY AND TRANSMITTAL OF RECORD	
1	09/01/2015	CRIMINAL BINDOVER (CONFIDENTIAL)	1 - 71
2	09/10/2020	CRIMINAL ORDER TO STATISTICALLY CLOSE CASE	276 - 276
1	12/19/2016	DEFENDANTS MOTION TO COMPEL PERSONNEL FILES PURSUANT TO MILKE V. RYAN	167 - 175
2	09/20/2021	DESIGNATION OF RECORD ON APPEAL	440 - 442
3	10/15/2021	DISTRICT COURT MINUTES	503 - 529
3	10/15/2021	DOCUMENTARY EXHIBITS (UNFILED)	499 - 502
2	09/29/2021	FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER	463 - 472
1	01/04/2017	GUILTY PLEA AGREEMENT	188 - 195
1	09/02/2015	INFORMATION	72 - 73
1	12/22/2016	JOINT MOTION TO SUPPRESS	176 - 183
1	05/01/2017	JUDGMENT OF CONVICTION (PLEA OF GUILTY)	226 - 229
2	03/17/2020	MOTION FOR APPOINTMENT OF COUNSEL	266 - 269

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
2	03/17/2020	MOTION TO AMEND JUDGMENT OF CONVICTION	254 - 257
2	07/28/2021	MOTION TO AMEND JUDGMENT OF CONVICTION TO INCLUDE JAIL TIME CREDITS	355 - 363
2	08/30/2021	MOTION TO AMEND JUDGMENT OF CONVICTION TO INCLUDE JAIL TIME CREDITS	418 - 434
2	07/08/2021	MOTION TO CHANGE ADDRESS OF PETITIONER	350 - 353
2	06/02/2021	MOTION TO CORRECT AN ILLEGAL SENTENCE	297 - 307
2	08/12/2021	MOTION TO ISSUE TRANSPORT ORDER	380 - 384
2	06/22/2021	MOTION TO ORDER PETITIONERS PRESENCE AT THE HEARING CURRENTLY SCHEDULED FOR THE 23RD DAY OF JUNE 2021.	346 - 349
1	10/01/2015	MOTION TO PLACE ON CALENDAR FOR RELEASE FROM HOUSE ARREST	87 - 91
1	04/24/2017	MOTION TO PLACE ON CALENDAR TO REQUEST RECONSIDERATION OF REVOCATION OF PROBATION	222 - 225
1	12/06/2019	MOTION TO PLACE ON CALENDAR TO WITHDRAW AS ATTORNEY OF RECORD	233 - 237
2	09/22/2021	MOTION TO RECONSIDER MOTION TO CORRECT AN ILLEGAL SENTENCE	443 - 455
2	03/17/2020	MOTION TO WITHDRAW COUNSEL	250 - 253
2	09/20/2021	NOTICE OF APPEAL	437 - 439
2	08/06/2021	NOTICE OF CHANGE OF ADDRESS	377 - 379
2	10/01/2021	NOTICE OF CHANGE OF CASE NUMBER AND DEPARTMENT REASSIGNMENT	473 - 473
1	09/29/2015	NOTICE OF CONFLICT WAIVER	82 - 86
2	10/04/2021	NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS	474 - 480

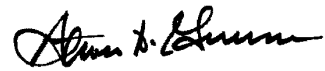
I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
		OF LAW AND ORDER (CONTINUED)	
3	10/04/2021	NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER (CONTINUATION)	481 - 484
1	12/06/2019	NOTICE OF HEARING	238 - 238
1	11/23/2016	NOTICE OF MOTION AND MOTION TO REVOKE BAIL AND REMAND DEFENDANTS WITHOUT BAIL	99 - 166
2	04/08/2020	NOTICE OF RESCHEDULING OF HEARING	272 - 273
2	06/15/2020	ORDER DENYING DEFENDANT'S MOTION TO AMEND JUDGMENT AND APPOINTMENT OF COUNSEL AND GRANTING DEFENDANT'S MOTION TO WITHDRAW COUNSEL	274 - 275
2	09/29/2021	ORDER DENYING WITHOUT PREJUDICE DEFENDANT'S MOTION TO CORRECT AN ILLEGAL SENTENCE	460 - 462
3	10/06/2021	ORDER FOR PRODUCTION OF INMATE VALENTINA MONEE KNIGHT, BAC #1228728	496 - 498
1	01/17/2020	ORDER FOR REVOCATION OF PROBATION AND AMENDED JUDGMENT OF CONVICTION	239 - 240
2	04/09/2021	ORDER FOR TRANSCRIPT	277 - 278
2	04/19/2021	ORDER FOR TRANSCRIPT	279 - 280
2	08/19/2021	PETITIONER'S RESPONSE TO STATE'S OPPOSITION TO CORRECT ILLEGAL SENTENCE	385 - 417
1	02/16/2017	PRESENTENCE INVESTIGATION REPORT (UNFILED) CONFIDENTIAL	196 - 203
1	06/01/2017	PROBATION AGREEMENT AND RULES ORDER ADMITTING DEFENDANT TO PROBATION AND FIXING THE TERMS THEREOF	230 - 231
2	06/07/2021	REPLY TO DISTRICT ATTORNEY'S RESPONSE TO PETITIONERS MOTION FOR WRIT OF HABEAS CORPUS	310 - 345

I N D E X

<u>VOL</u>	<u>DATE</u>	<u>PLEADING</u>	<u>PAGE NUMBER:</u>
2	03/17/2020	REQUEST FOR SUBMISSION OF MOTION	258 - 259
2	03/17/2020	REQUEST FOR SUBMISSION OF MOTION	260 - 261
2	03/17/2020	REQUEST FOR SUBMISSION OF MOTION	262 - 263
2	06/07/2021	REQUEST FOR SUBMISSION OF MOTION	308 - 309
2	07/28/2021	REQUEST FOR SUBMISSION OF MOTION	354 - 354
2	08/30/2021	REQUEST FOR SUBMISSION OF MOTION	435 - 435
1	03/10/2017	SENTENCING MEMORANDUM	204 - 221
2	07/29/2021	STATE'S OPPOSITION TO DEFENDANT'S MOTION TO CORRECT ILLEGAL SENTENCE	364 - 376
1	12/29/2016	STATE'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL PERSONNEL FILES PURSUANT TO MILKE V. RYAN	184 - 187
1	09/15/2015	TRANSCRIPT OF HEARING HELD ON AUGUST 31, 2015	74 - 81
2	04/20/2021	TRANSCRIPT OF HEARING HELD ON JANUARY 4, 2017	281 - 296
2	03/17/2020	UNSIGNED DOCUMENT(S) - ORDER APPOINTING COUNSEL	265 - 265
2	03/17/2020	UNSIGNED DOCUMENT(S) - ORDER TO PROCEED IN FORMA PAUPERIS (CONFIDENTIAL)	270 - 271
2	03/17/2020	UNSIGNED DOCUMENT(S) - ORDER TO WITHDRAW COUNSEL	264 - 264
1	05/03/2016	WRITTEN ACKNOWLEDGEMENT	98 - 98
1	04/12/2016	WRITTEN ACKNOWLEDGMENT	97 - 97

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



CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

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

9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-15-309123-2

11 -vs-

DEPT NO: XIX

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

INFORMATION

Defendant.

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

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

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

26 ///

27 ///

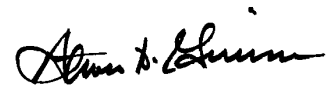
28 ///

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

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

6 BY N. Demonte
7 NOREEN DEMONTE
8 Chief Deputy District Attorney
9 Nevada Bar #08213
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 15F06822B /mlb/L-2
28 LVMPD EV#1505044592
(TK3)



CLERK OF THE COURT

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

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

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

-oOo-

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

REPORTER'S TRANSCRIPT
OF
UNCONDITIONAL WAIVER OF PRELIMINARY HEARING

BEFORE THE HON. JANIECE MARSHALL
JUSTICE OF THE PEACE

MONDAY, AUGUST 31, 2015

APPEARANCES:

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

For the Defendants: JOHN M. TURCO, ESQ.

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

CHERYL GARDNER, RPR-RMR, CCR 230

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

2 -oOo-

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

8 MR. TURCO: Yes, Judge.

9 THE COURT: Waive reading?

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

12 THE COURT: Are you representing both.

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

16 THE COURT: Dioubate.

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

21 MS. DeMONTE: It's the same.

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

24 DEFENDANT DIOUBATE: Yes.

25 THE COURT: He spoke to you about

CHERYL GARDNER, RPR-RMR, CCR 230

1 waiving your right to a preliminary hearing.

2 DEFENDANT DIOUBATE: Yes.

3 THE COURT: All right.

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

13 MS. DeMONTE: That's correct.

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

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

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

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

CHERYL GARDNER, RPR-RMR, CCR 230

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

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

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

10 DEFENDANT KNIGHT: Yes.

11 THE COURT: Sir.

12 DEFENDANT DIOUBATE: Yes.

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

15 MS. DeMONTE: Yes.

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

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

25 DEFENDANT KNIGHT: Yes.

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

3 DEFENDANT DIOUBATE: Yes.

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

10 DEFENDANT KNIGHT: Yes.

11 DEFENDANT DIOUBATE: Yes.

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

15 DEFENDANT KNIGHT: Yes, ma'am.

16 DEFENDANT DIOUBATE: Yes.

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

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

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

CHERYL GARDNER, RPR-RMR, CCR 230

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

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

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CHERYL GARDNER, RPR-RMR, CCR 230

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

AFFIRMATION

Pursuant to NRS 239B.030:

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

Dated this 16th day of September,
2015.

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

CHERYL GARDNER, RPR-RMR, CCR 230

1 REPORTER'S CERTIFICATE

2

3 State of Nevada)
4 County of Clark) ss

5

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

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

19

20

21

22

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

24

25

CHERYL GARDNER, RPR-RMR, CCR 230

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

ORIGINAL

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

SEP 29 2015

BY, Kristen Brown
KRISTEN BROWN, DEPUTY

NOT

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

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,
Plaintiff,

vs.

VALENTINA KNIGHT &
MOUSTAPHA DIOUBATE,
Defendants.

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

NOTICE OF CONFLICT WAIVER

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

DATED this 22th day of September, 2015.

Respectfully Submitted by:

[Signature]

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

C-15-309123-2
NOTC
Notice
4491434



MEMORANDUM

I.

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

THE PARIENTE LAW FIRM, P.C.



MICHAEL D. PARIENTE, ESQ.

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

DECLARATION OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF CLARK)

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

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

1
2 more than one defendant.

- 3 3. Your declarant believes that both defendants understand the risks of
4 having one lawyer represent them both.
5 4. Your declarant is an Attorney at Law duly licensed to practice in all
6 courts in the State of Nevada;
7
8 2. Your declarant is the Attorney of record for the Defendant herein;

9 FURTHER YOUR DECLARANT SAYETH NAUGHT.

10
11 
12

13 MICHAEL D. PARIENTE, ESQ.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WRITTEN WAIVER OF CONFLICT

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

W I T N E S S E T H :

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

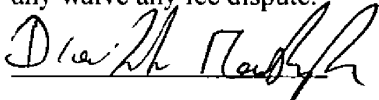
WHEREAS, Valentina Knight is an individual residing in the State of New York; and

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

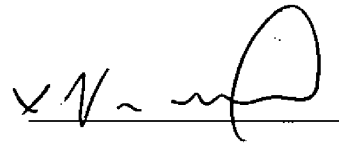
WHEREAS, MICHAEL D. PARIENTE, ESQ., has advised Dioubate Moustapha and Valentina Knight that a conflict of interest may arise between the parties by virtue of them being in an adverse position to each other during the course of the criminal proceedings; and

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

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



Moustapha Dioubate



Valentina Knight

Exhibit D-1

1
2 **ROC**
3 **THE PARIENTE LAW FIRM, P.C.**
4 **MICHAEL D. PARIENTE, ESQ.**
5 Nevada State Bar No. 9469
6 3960 Howard Hughes Parkway
7 Suite 615
8 Las Vegas, Nevada 89169
9 (702) 966-5310
10 Attorney for Defendant

11
12
13 **EIGHTH JUDICIAL DISTRICT COURT**
14 **CLARK COUNTY, NEVADA**

15 **STATE OF NEVADA,**
16
17 **Plaintiff,**

18 **vs.**

19 **VALENTINA KNIGHT & MOUSTAPHA**
20 **DIOUBATE,**
21
22 **Defendants.**

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

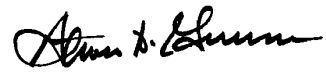
23 **NOTICE OF CONFLICT WAIVER**

24 **RECEIPT OF COPY**

25
26 **RECEIPT OF COPY of the NOTICE OF CONFLICT WAIVER is hereby**
27 **acknowledged this ____ day of September, 2015.**

28
DISTRICT ATTORNEY'S OFFICE:

DISTRICT ATTORNEY
200 Lewis Ave.
Las Vegas, NV 89101



CLERK OF THE COURT

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

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,
11 Plaintiff,

12 vs.

13 VALENTINA KNIGHT &
14 MOUSTAPHA DIOUBATE,
15 Defendants.

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

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

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

19 DATED this 30th day of September, 2015.

20 Respectfully Submitted by:



21 MICHAEL D. PARIENTE, ESQ.
22 Nevada Bar No.: 9469
23 3960 Howard Hughes, Suite 615
24 Las Vegas, Nevada 89169

NOTICE OF MOTION

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the ¹² day of Oct, 2015, at 8 : 3 0 a at m. of said day, in Department of said Court.



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

MEMORANDUM

I.

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

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

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

1 whether or not defendants in general should be released or detained on house arrest.
2
3 He does indicate that if he had serious concerns about their release from house arrest,
4 or if they were not in substantial compliance, he would oppose their release. However,
5 since they are in substantial compliance, he is taking no position and invites the Court
6 to call him directly should the Court have any questions for him.
7

8 Both Ms. Knight and Mr. Dioubate have retained Defense Counsel to represent
9 them in the District Court and not just for the pending motion for them to be released
10 on house arrest. They recognize their release on house arrest is entirely within the
11 District Court's discretion and respectfully request that they be allowed to return to
12 Houston to be with their children and families. They will appear at all future court
13 dates.
14

15 Respectfully submitted,

16 THE PARIENTE LAW FIRM, P.C.

17 

18 MICHAEL D. PARIENTE, ESQ.
19 Nevada Bar No.: 9469
20 3960 Howard Hughes Pkwy
21 Suite 615
22 Las Vegas, NV 89169
23 Attorney for Defendant
24
25
26
27
28

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

DECLARATION OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF CLARK)

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

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

FURTHER YOUR DECLARANT SAYETH NAUGHT.



MICHAEL D. PARIENTE, ESQ.

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

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,
Plaintiff,
vs.

VALENTINA KNIGHT & MOUSTAPHA
DIOUBATE,
Defendants.

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

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

RECEIPT OF COPY

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

DISTRICT ATTORNEY'S OFFICE:

DISTRICT ATTORNEY
200 Lewis Ave.
Las Vegas, NV 89101

7018909

BAIL BONDS

In the District

Court, County of Clark, State of Nevada.

STATE OF NEVADA

Bail Bond No. IS 100K

(Power of attorney with this number must be attached)

2015 OCT 07 10:52
CLERK OF THE COURT

vs.

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

Know all men by these presents:

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

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

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

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

Signed and sealed this 16th day of October, 2015

Angelita M. Montenegro
Attorney in fact (signature)

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

Approved this _____ day of _____, 20____

Larry P. Powell Jr.
LARRY P. POWELL JR.
Notary Public, State of Nevada
Appointment No. 11-4242-1
My Appt. Expires Jan 13, 2019

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

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

C-15-309123-2
BAB
Bail Bond
4497655



RECEIVED
OCT 27 2015
CLERK OF THE COURT

5

Only the original Power of Attorney
will bind this Surety.

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

POWER
NUMBER IS100K-48282

THIS POWER VOID IF NOT USED BY:

January 31, 2016

POWER AMOUNT \$

100,000

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

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

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

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

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

Defendant Knight, Valentina M D.O.B. _____

Case # 15-309123-2 Appearance Date _____

Offense Burglary (1st), Intent to utter fals bill / note / check (1st ct),
poss 70 info for false stat / occup / lic / 70, poss declares 70
to commit forgery
C fel

Court County Clark

Court City Las Vegas Court State NV Div./Dept. District

If rewrite, give orig. power # _____ ☐ Increase ☐ Decrease

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

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

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

Francis Mitterhoff, Chairman of the Board

Norman Konvitz, Secretary



NOT VALID FOR
IMMIGRATION



Form# IF1.0100 (9/06)

ORIGINAL

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

Only the original Power of Attorney
will bind this Surety.

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

POWER
NUMBER IS100K-48282

POWER VOID DATE: January 31, 2013

POWER AMOUNT \$ 100,000

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

Bond Amt \$ 100,000.00 Date Executed 1/10/2013

Defendant Knight, Valentina M DOB

Case # C-15-314123-2 Appearance Date

Offense

Court County

Court City Court State Div./Dept.

If rewrite, give orig. power # ☐ Increase ☐ Decrease

Executing Agent Signature/If applicable, add your COURT assigned Agent #

COURT USE ONLY

Discharge Date:

Clerk Signature:

AGENT INITIALS



02123078

4 0 2 3 0 *

Form# IFI.0100 (9/06)

DISCHARGE COPY

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


CLERK OF THE COURT

1 **ACK**
2 Michael D. Pariente
3 The Pariente Law Firm, P.C.
4 3960 Howard Hughes Parkway
5 Suite 615
6 Las Vegas, NV 89169
7 (702) 966-5310
8 Attorney for Defendant

9
10
11 **EIGHTH JUDICIAL DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 **STATE OF NEVADA,**
14
15 Plaintiff,

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

16 vs.

17 **VALENTINA KNIGHT &**
18 **MOUSTAPHA DIOUBATE,**
19 Defendants.

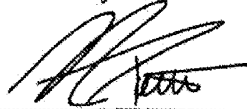
20
21 **WRITTEN ACKNOWLEDGMENT**

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

25 DATED this 29th day of March, 2016.

26 
27 Valentina Knight

28 Submitted by:


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



CLERK OF THE COURT

1 ACK
2 Michael D. Pariente
3 The Pariente Law Firm, P.C.
4 3960 Howard Hughes Parkway
5 Suite 615
6 Las Vegas, NV 89169
7 (702) 966-5310
8 Attorney for Defendant

8 EIGHTH JUDICIAL DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 STATE OF NEVADA,
11 Plaintiff,

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

12 vs.

13 VALENTINA KNIGHT &
14 MOUSTAPHA DIOUBATE,
15 Defendants.

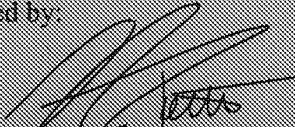
16 WRITTEN ACKNOWLEDGMENT

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

20 DATED this 01 day of April, 2016.

21 
22 Valentina Knight

23 Submitted by:

24 
25 Michael D. Pariente, Esq.
26 Nevada Bar No.: 9469
27 Attorney for Defendant
28

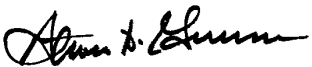
PARIENTE LAW FIRM, P.C.

3960 Howard Hughes Parkway, Suite 615

Las Vegas, NV 89169

PHONE: (702) 966-5310 | FAX: (702) 963-7055

WWW.PAIENTELAW.COM



CLERK OF THE COURT

MOT

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
NOREEN DEMONTE
Chief Deputy District Attorney
Nevada Bar #8213
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MOUSTAPHA DIOUBATE,
#7018908,
VALENTINIA KNIGHT,
#7018909

Defendants.

CASE NO: C-15-309123-2

DEPT NO: XIX

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

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

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

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

///

///

///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18

DATED this 20th day of November, 2016.

BY NOREEN DEMONTE
Chief Deputy District Attorney
Nevada Bar #8213

STATEMENT OF THE CASE

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

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

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

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

11 ARGUMENT

12 NRS 178.488(4) provides that:

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

15 NRS 178.499 provides that:

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

18 NRS 178.487 provides that:

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

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

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


1 of custody.

2 **CONCLUSION**

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

8
9 DATED this 23rd day of November, 2016.

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

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

17 **CERTIFICATE OF ELECTRONIC FILING**

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

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

23 
24 Secretary for the District Attorney's Office
25
26
27
28

15F06822A/mlb/L-2


		Glendale Police Department		Incident Report			
		Incident: Fraud - Impersonate/Identity Theft					
		Incident Report Number: 16-013206		Between: Date - Time		And/At: Date-Time 11/18/16 15:24	
		Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217					
CFS Code-1: 2604		CFS Code-2: 4899		CFS Code-3:			
CFS Code-5:		CFS Code-6:		CFS Code-7:			
CFS Code-4: Offense Code-4:		CFS Code-8:		CFS Code-9:			
RP		Name (Last, First, Middle) Langdon, Angela M		DOB: 08/27/1979			
Address: (Address, City, State, Zip) 1400 N Newman Rd, Racine, WI, 53406		Home Phone Number		Race/Sex W/F			
Employer		Work Phone Number (262) 619-2322		Cell Phone Number			
Employer Address		V		Name (Last, First, Middle) Lowe, Jazmin Kenny			
DOB: 04/20/1977		Race/Sex W/F		Home Phone Number			
Address: (Address, City, State, Zip) 5110 Spring Dr, Killeen, TX, 76542		Work Phone Number		Cell Phone Number (254) 371-0918			
Employer		Employer Address		SUMMARY			
<p>Adult female and male arrested at Educator's Credit Union regarding an identity theft. Subjects TOT GLPD, booked, and transported to Milw. Co. CJF on charges.</p>							
Suspect		Vehicle Information: (Year, Make, Model, Style, Color) 2017, Cadillac, Sedan					
License Number: 957YZY		State: WI		Expiration Year: 16			
VIN: 1G8AR53X8HD129810		Insurance Company:		NCIC#			
Other Vehicle Information:		Reporting Officer(s): Doss, Carrie					
Payroll Number: 748		Payroll Number:		Report Date: 11/19/2016			
Time Received: 15:24:15		Time Cleared: 16:19:28		Unit(s) Assigned: 748, 762, 788, 724			
Pages: 1 OF 5		Reviewed by: 7wbutl					
Payroll Number: 710		Copy To					

EXHIBIT "1"

Glendale Police Department**Continuation**

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

NAMES**Witness-1**

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

Arrested-1

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

Booking#: 16-001295

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

Witness-2

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

Mentioned in Report

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

Business-1

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

Business-2

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

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

Glendale Police Department		Continuation																									
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53211	Incident Date: 11/18/2016																									
<p>Arrested-2</p> <p>Knight, Valentina Monee B/F-29 of 1563A S 3rd St, Milwaukee, WI, 53204</p> <p>DOB: 06/13/1987</p> <p>HT: 503 WT: 142 Hair: Black</p> <p>Eyes: Brown</p> <p>Cell Phone: (414) 807-1225</p> <p>Booking#: 16-001294</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Case#</th> <th style="text-align: left;">Charge</th> <th style="text-align: left;">Description</th> <th style="text-align: right;">Ct</th> </tr> </thead> <tbody> <tr> <td colspan="4"><hr/></td> </tr> <tr> <td>16-013206</td> <td>943.201(2)</td> <td>Unuth Use of Individual's ID</td> <td style="text-align: right;">1</td> </tr> </tbody> </table> <p>Booking#: 16-001297</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Case#</th> <th style="text-align: left;">Charge</th> <th style="text-align: left;">Description</th> <th style="text-align: right;">Ct</th> </tr> </thead> <tbody> <tr> <td colspan="4"><hr/></td> </tr> <tr> <td>16-013206</td> <td>943.201(2)</td> <td>Unuth Use of Individual's ID</td> <td style="text-align: right;">1</td> </tr> </tbody> </table> <p>-----</p>				Case#	Charge	Description	Ct	<hr/>				16-013206	943.201(2)	Unuth Use of Individual's ID	1	Case#	Charge	Description	Ct	<hr/>				16-013206	943.201(2)	Unuth Use of Individual's ID	1
Case#	Charge	Description	Ct																								
<hr/>																											
16-013206	943.201(2)	Unuth Use of Individual's ID	1																								
Case#	Charge	Description	Ct																								
<hr/>																											
16-013206	943.201(2)	Unuth Use of Individual's ID	1																								
Reporting Officer(s): Doss, Carrie		ID Number 748	ID Number 																								
		Pages: 3 of 5																									

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

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

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

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>VEHICLE</p> <p>Tow</p> <p>Year: 2017 Make: Cadillac Style: Sedan Plate#: 957YZY-WI Vin#: 1G6AR5SX9H0129810</p> <p>-----</p>			
Reporting Officer(s): Wall, Adam		ID Number 726	ID Number Pages: 2 of 4

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>NARRATIVE</p> <p>16-013206 Day Shift Detective Wall Supplement Report</p> <p>On Friday, 11/18/16, at about 3:24 P.M., GLPD squads were advised of a fraud complaint at Educator's Credit Union, 7139 N. Port Washington Rd. See Detective Costigan's report for incident details.</p> <p>I was advised that the suspects involved, later identified as Valentina M. KNIGHT, F/B 06/13/87, and Moustapha DIOUBATE, M/B 03/12/88, were arrested for their involvement in the fraud. KNIGHT and DIOUBATE arrived at the business in a black 2017 Cadillac CTS (Bearing WI reg. #957YZY). The Cadillac was towed to the GLPD shortly after their arrest. I was asked to contact the owner of the Cadillac, EAN Holdings LLC, to help determine whose name was on the rental agreement.</p> <p>At about 5:00 P.M., I made telephone contact with Enterprise Branch Manager Matthew A. LIBERACKI, M/W 10/17/89. I advised LIBERACKI of my request and he advised that the Cadillac was rented from the Milwaukee Airport Enterprise, on 11/12/16, by Valentina M. KNIGHT. According to LIBERACKI, KNIGHT was to return the Cadillac on 12/03/16. LIBERACKI stated that KNIGHT presented identification and used a credit card as payment for the rental. LIBERACKI advised that he did not have access to any further information regarding the rental agreement.</p> <p>At about 5:45 P.M., I removed KNIGHT from her temporary holding cell. I presented to KNIGHT a GLPD Consent to Search form, completed for consent to search the 2017 Cadillac. KNIGHT advised that she understood the form, and stated that she would not be consenting to a search of the Cadillac. I then used the Morpho identification unit to confirm KNIGHT's identity. KNIGHT initially refused to follow my instructions on providing her right, and left, index fingers. KNIGHT stated that she wanted a lawyer. I advised her that the unit was only used to confirm her identity. KNIGHT then provided her index fingers and the Morpho unit confirmed KNIGHT's identity. I then returned KNIGHT to the temporary holding cell. I advised Detectives Purtell and Costigan that KNIGHT did not consent to the search of the Cadillac. A search warrant will be requested on Saturday, 11/19/16.</p> <p>At about 6:00 P.M., I removed DIOUBATE from his temporary holding cell. I then obtained DIOUBATE's fingerprints, to later transmit them to the FBI for identification purposes. DIOUBATE possessed no valid identification, which included a false IL Picture ID of a Michael L. RICHARDSON, M/B 03/08/90. The IL Picture ID included DIOUBATE's photograph. Using the Morpho unit, I obtained</p>			
Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 3 Of 4

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
<p>DIOUBATE's index fingerprints, however I was advised that DIOUBATE's fingerprints had never been obtained by a WI agency and did not receive a positive identification. At about 6:26 P.M., I faxed DIOUBATE's 10 print card to the FBI Identification Department, to assist with positively identifying DIOUBATE. I was later advised that the FBI did not receive a full copy of DIOUBATE's fingerprint card. On Saturday, 11/19/16, at about 7:56 A.M., I re-faxed DIOUBATE's fingerprint card to the FBI.</p> <p>Submitted By:</p> <p>Detective Adam R. Wall</p>			
Reporting Officer(s)	ID Number	ID Number	Pages
Wall, Adam	726		4 of 4

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

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>NARRATIVE</p> <p>16-013206 Victim Complaint Detective Purtell #722</p> <p>On Friday, 11/18/16 at approx. 1PM, I was contacted by Angela Langdon, a security director at Educators Credit Union. Angela informed me that they had a suspect trying to obtain an unsecured loan using a false identity. Angela said that a person identifying herself as 'Jazmin Lowe' had come to an Educators CU branch and presented a Maryland ID and the social security number of the true Jazmin Lowe to obtain a loan. Angela had contacted the true Jazmin Lowe, who resides in Texas and whose social security number begins with '606', the same social security number provided by the suspect. Jazmin Lowe informed Angela that she did not consent to anyone using her personal information to obtain anything from Educators Credit Union or any other financial institution. Angela informed me that Educators Credit Union was attempting to get this suspect to come to their Glendale Branch so the suspect could be arrested. I advised Angela to have the branch manager call for Police if this suspect returned to their branch.</p> <p>At approx. 3:24PM, Educator's Credit Union called North Shore Dispatch requesting police for the fraud suspect having returned to their location. I confirmed with dispatch that they were reporting the suspect using the name Jazmin Lowe is the suspect at the CU. Dispatch confirmed with the branch manager that it was that suspect. I then called Angela Langdon and confirmed with Angela that Educators CU wanted the suspect arrested for fraud and she stated that they did. I then advised the responding officers that the suspect should be arrested for Fraud. PO Guse and PO Doss arrived on scene and placed Valentina M. KNIGHT (F/B, 06/13/87) and Moustapha DIOUBATE (M/B, 03/12/88) into custody for Fraud-PTAC/Obstructing, see their narrative for details.</p> <p>At approx. 3:45PM, I received a phone call from Jazmin M. LOWE (F/H, 04/20/77) at 254-371-0918. I had left a message for LOWE to call me regarding her being the victim of ID Theft. LOWE informed me she resides in Texas and did not consent to anyone using her personal information to obtain money or credit. LOWE informed me that earlier that day, at approx. 11AM, she received a phone call from an investigator from a 'Summit bank or credit union'. She was advised that someone was at one of their locations attempting to secure a loan in LOWE's name. The woman had presented a Maryland ID with Jazmin LOWE information and had presented LOWE's social security number. Summit employees became suspicious and when the investigator reviewed the credit report information for LOWE, he learned that LOWE resided in Texas, not Maryland. LOWE was also told that the suspect was a black female and that she exited the Summit branch before police could be notified. LOWE was informed that the suspect had presented 'DynCorp' pay stubs for LOWE, which is the business that LOWE currently works for. LOWE had no</p>			
Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 2 Of 3

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>idea how someone could have obtained that information about her. After learning about his attempted identity theft, LOWE began checking her credit through 'Credit Karma' and learned numerous credit inquiries had been made on her credit that day. LOWE began to call the businesses, banks and credit unions that had been reported on her credit history. That is when LOWE was put in contact with Angela Langdon at Educators Credit Union. Angela was advised by LOWE that whoever was trying to obtain money or credit in her name were providing fraudulent information and it was done without LOWE's consent.</p> <p>LOWE again informed me that she did not consent to anyone using her personal information and LOWE wanted to pursue criminal charges against anyone involved in this activity.</p> <p>Submitted by, Detective Purtell #722</p>			
Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 3 Of 3

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:
<p>NARRATIVE</p> <p>16-013206 PO C. DOSS Supplement</p> <p>On Fri., 11-18-16 at approx. 3:24 p.m., PO Guse and I were dispatched to Educator's Credit Union, 7139 N. Port Washington Rd., for a fraud complaint. Dispatch advised that a f/b suspect in the credit union was attempting to commit a fraud. A m/b suspect was waiting in the east parking lot in a black Cadillac, license #957YZY/WI. A check of the license plate showed that the vehicle was a rental vehicle from Enterprise Rent-a-Car.</p> <p>Upon our arrival, the f/b suspect was exiting the credit union. The suspect matched the description given by employees to dispatch of a f/b with green colored hair, wearing a tan hat, and a blue jacket. I pulled up in my fully marked GLPD squad car, behind the suspect vehicle, and activated my emergency lights. PO Guse made contact with the female suspect and I approached the suspect vehicle.</p> <p>I could see a m/b subject seated in the passenger seat of the vehicle and he was holding onto a brown leather-like wallet and a cellphone. I asked the subject to put down the items, several times, and to put his hands on the dashboard of the vehicle. The male subject did not do as he was told and continued to hold onto the items, asking why he was being stopped and why we had stopped his "girlfriend." I asked him his girlfriend's name and he said he didn't know her name and then asked me what name she gave to me. I asked the subject as to how he didn't know his girlfriend's name, but he just kept asking why they were being stopped. I continued to monitor the subject while PO Guse took the female suspect into custody and placed her in the rear of my squad. I then had Guse approach the passenger side of the suspect vehicle and have the male suspect exit the vehicle.</p> <p>The male subject continued to be uncooperative, not putting down his phone or wallet, and continued to ask why we were questioning him. I advised the subject that he was currently being detained regarding a fraud investigation and handcuffed him (dl). The subject refused to cooperate with officers as we asked him to let go of his phone and wallet, to identify himself and the female subject, and answer as to their business at the credit union.</p> <p>Based upon the information from the credit union, I advised the male subject that he was under arrest for fraud. I searched the suspect,</p>			
Reporting Officer(s): Doss, Carrie	Payroll Number: 748	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 4

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>subsequent to his arrest, and located numerous credit cards in several names, both male and female, in the subject's pants pockets and the wallet that he had refused to put down. I also located what came out to be \$1260.00 in cash from the subject's pants pockets and his wallet, as well as a State of IL driver's license, in yet another name, in his front right pants pocket.</p> <p>Upon going through the cards later, at the PD, I found the names and cards were as follows:</p> <p>Bank of America VISA debit 4117 7339 7481 7221 in the name of Moustapha Dioubate</p> <p>Bank of America MasterCard debit 5312 6600 0430 8246 in the name of Moustapha Dioubate</p> <p>Capitol One MasterCard 5178 0575 0459 2853 in the name of Moustapha Dioubate</p> <p>Western Union MasterCard debit 5292 6365 2750 2279 in the name of Moustapha Dioubate</p> <p>Bank of America MasterCard 5524 3301 6025 9054 in the name of Moustapha Dioubate</p> <p>Citibank MasterCard 5262 1960 8108 7105 in the name of Moustapha Dioubate</p> <p>Bank of America VISA Business debit card 4135 7445 0691 6587 in the name of M&V Fast Efficient with a sub-name of Moustapha Dioubate</p> <p>Citibank CitiBusiness MasterCard 5571 2711 0721 0499 in the name of M&V Fast Efficient Truck with a sub-name of Moustapha Dioubate</p> <p>Fleet-Tech Transportation Services (Control) card 999011 180083 776100 in the name of M&V Fast Efficient Tru, Milwaukee WI, Customer Control ID Card</p> <p>Fleet-Tech Transportation Services (Purchase card) 180083 776100 001004 in the name of M&V Fast Efficient Trucking LLC, Milwaukee, WI</p> <p>Bank of America VISA debit 4744 7801 3843 8924 in the name of Mohamed Conde</p> <p>Bank of America VISA debit 4744 7801 3904 0596 in the name of Laura Banks</p> <p>Bank of America VISA debit 4744 8900 8489 6528 in the name of Valentina Monee Knight</p> <p>State of Illinois photo ID card in the name of Michael L. Richardson, m/b 03-08-90, DL#2635-5290-070R</p> <p>An HSBC card with no name or number on it, but with the magnetic strip across the front of the card and what appeared to be a security chip affixed to the back of the card</p> <p>A Bank of America VISA card with no name or number on the front of the card, but what appeared to be one magnetic strip over another on the back of the card. The information on the back of the card was not "centered" and some</p>			
Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Page: 2 Of 4

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>of the wording appeared to be cut off or not printed on the card properly.</p> <p>It appeared that these last two cards were "blanks" that were poorly made.</p> <p>I turned over the male subject to PO Galbraith for transport to the GLPD, but kept possession of the credit cards, ID's, and money, as possible evidence.</p> <p>I advised Det. Costigan of the investigation up to that point. He advised he was going to investigate the fraud and requested I contact Leader Towing to tow the suspect vehicle to the GLPD as evidence. PO Galbraith and I transported the male and female suspects, respectively, to the GLPD, while PO Guse stood by with the vehicle as it was towed back to the GLPD.</p> <p>While I was transporting the female suspect to the GLPD, she asked why we had arrested "Moustapha". I recognized the name from several of the credit cards found on the male subject. One of the credit cards found on the male suspect was in the name of Valentina Knight. PO Guse later advised me that the female subject had given that as her name when he first approached her at the bank.</p> <p>At the GLPD PO Galbraith placed the male suspect in a secure holding cell and I placed the female suspect in a secure holding cell, as well. The female suspect verbally identified herself, to me, as Valentina M. KNIGHT, f/b 06-13-1987, but refused to provide any more information.</p> <p>I ran a check of KNIGHT and found she has a valid State of WI driver's license. The photo on file for KNIGHT appeared to be the suspect in custody. A check of KNIGHT'S CIBR record showed previous arrests in WI, including Glendale, however, her last WI arrest was in 2009. Based upon the crime KNIGHT was allegedly committing, I ran a III record for KNIGHT and found additional arrests for her in the State of Nevada. I turned over this information to the Detective Bureau.</p> <p>I then checked the recovered credit cards that "Moustapha" had in his possession and found he listed a last name of DIOUBATE. I ran an Accurint.com check for "Moustapha Dioubate" and found what appeared to be only one listed throughout the US, but using several different Social Security numbers, and with addresses in Glendale, WI at 2870 W. Mill Rd., #E, as well as in New York and Nevada. When officers first approached DIOUBATE, he kept stating that he didn't know what was happening and that he had just gotten here from New York. This subject showed a date of birth of 03-12-88.</p> <p>I ran a check of DIOUBATE through WI with negative results, however, he came back with a driver's license in New York, as well as a III record from</p>			
Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 3 Of 4

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date 11/18/2016	
<p>New York and Nevada. I turned over this information to the Det. Bureau, as well.</p> <p>Upon doing a further search on KNIGHT through our local database, I found that KNIGHT had a previous contact through Brown Deer PD in 2013 and she showed an address of 2870 W. Mill Rd., #E; one of the same addresses on file for DIOUBATE.</p> <p>I turned over all of the recovered money, credit cards, and ID's found on DIOUBATE to Det. Furtell.</p> <p>All of these cards were later scanned and the copy attached, electronically, to this case file.</p> <p>Submitted by, PO Carrie J. Doss</p>			
Reporting Officer(s): Doss, Carrie	ID Number 748	ID Number	Pages: 4 Of 4

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:
PROPERTY LIST			
Seq#	Reason	Make/Model	Description/Serial#
=====			
16-003266			
1	EVI		Louie Vuitton brown purse
			1.000
			\$0.00
			[Recovered]
2	EVI		\$734.35
			1.000
			\$734.35
			[Recovered]
3	EVI		Maryland DL LOWE info,
			KNIGHT's photo
			1.000
			\$0.00
			[Recovered]
4	EVI		Educators CU Visa Debit
			card- LOWE
			1.000
			\$0.00
			[Recovered]
5	EVI		Chase Freedom Visa CC LOWE
			1.000
			\$0.00
			[Recovered]
6	EVI		Educators CU business cards
			and Account # card
			1.000
			\$0.00
			[Recovered]
7	EVI		Visa Debit Card Laura Banks
			1.000
			\$0.00
			[Recovered]
8	EVI		Target Receipt Nikita
			Parsons for \$500 REDcard CC
			1.000
			\$0.00
			[Recovered]
9	EVI		Educators CU Transaction
			ticket LOWE name signed
			1.000
			\$0.00
			[Recovered]
10	EVI		Rental Agreement-
			Residential- LOWE at 7705
			Glenbrook Dr
			1.000
			\$0.00
			[Recovered]
Reporting Officer(s): Purtell, Scott		Payroll Number: 722	Report Date: 11/18/2016
Reviewed by: 7dhaff	Payroll Number: 705	Copy To:	Page: 1 Of 3

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>NARRATIVE</p> <p>16-013206 Evidence Recovery Detective Purtell #722</p> <p>On Friday, 11/18/16 at approx. 4PM, PO Guse informed me he recovered a brown purse from Valentine M. KNIGHT (F/B, 06/13/87) when he placed her into custody. During a search of the purse incident to KNIGHT arrest, PO Guse located documents with the name 'Jazmin Lowe' on them. I am aware that Jazmin Lowe is the victim in this identity theft investigation and I know that documents with Jazmin Lowe's personal information on them would be evidence of the crime of Identity Theft. The purse was transported to GPD with the recovered vehicle, a 2017 black Cadillac 4DR CTS, with WI plate 957YZY. The vehicle was determined to be a rental car from Enterprise which had been rented by KNIGHT.</p> <p>At the station, I conducted a search of the brown Louis Vuitton purse and recovered the items in the attached property record. Recovered from the purse of note:</p> <ul style="list-style-type: none"> •Maryland Driver's License in the name of Jazmin Lowe with KNIGHT's photo •An Educators Credit Union Visa Debt card #4535 9800 0690 8684 in the name of Jazmin M Lowe •Chase Freedom Unlimited Visa card #4266 8414 8708 1265 in the name of Jazmin Lowe •A Visa Debit Card #4744 7801 4085 4357 in the name of 'Laura Banks'. •Target store receipt for the purchase of a Redcard credit Card in the name of Nikita Parsons •Educators Credit Union documents with the name 'Jazmin Lowe' on them •A Rental Agreement with the name 'Jazmin Lowe' on it •\$734.35 in cash <p>All of the above items were inventoried as evidence, see attached property sheet for a more detailed list.</p> <p>Submitted by, Detective Purtell #722</p>			
Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 3 Of 3

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:
<p>NAMES</p> <p>Employee-1 Pierquet, Terra L W/F-28 of 321 E Oklahoma Ave, Milwaukee, WI, 53207 DOB: 08/23/1988 Cell Phone: (920) 680-6226</p> <p>Employee-2 Kuczynski, Christine E W/F-28 of 3449 S Kansas Ave, Milwaukee, WI, 53207 DOB: 03/22/1988 Cell Phone: (414) 322-5534</p> <p>-----</p>			
Reporting Officer(s): Costigan, Patrick	Payroll Number: 724	Payroll Number:	Report Date: 11/18/2016
Reviewed by: 7wbutl	Payroll Number: 710	Copy To:	Page: 1 Of 6

Glendale Police Department		Continuation																																																			
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016																																																			
<p>PROPERTY LIST</p> <table border="1"> <thead> <tr> <th>Seq#</th> <th>Reason</th> <th>Make/Model</th> <th>Description/Serial#</th> <th>Quan/Value</th> </tr> </thead> <tbody> <tr> <td colspan="5">=====</td> </tr> <tr> <td>16-003263</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>EVI</td> <td></td> <td>Documents from Educators</td> <td>1.000</td> </tr> <tr> <td></td> <td></td> <td></td> <td>credit union were VALENTINA</td> <td>\$0.00</td> </tr> <tr> <td></td> <td></td> <td></td> <td>KNIGHT opened accounts and</td> <td>[Recovered]</td> </tr> <tr> <td></td> <td></td> <td></td> <td>attempted to obtain a</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>credit card in the name of</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>JAZMIN LOWE.</td> <td></td> </tr> <tr> <td colspan="5">-----</td> </tr> </tbody> </table>				Seq#	Reason	Make/Model	Description/Serial#	Quan/Value	=====					16-003263					1	EVI		Documents from Educators	1.000				credit union were VALENTINA	\$0.00				KNIGHT opened accounts and	[Recovered]				attempted to obtain a					credit card in the name of					JAZMIN LOWE.		-----				
Seq#	Reason	Make/Model	Description/Serial#	Quan/Value																																																	
=====																																																					
16-003263																																																					
1	EVI		Documents from Educators	1.000																																																	
			credit union were VALENTINA	\$0.00																																																	
			KNIGHT opened accounts and	[Recovered]																																																	
			attempted to obtain a																																																		
			credit card in the name of																																																		
			JAZMIN LOWE.																																																		

Reporting Officer(s): Costigan, Patrick	ID Number 724	ID Number	Page: 2 Of 6																																																		

Glendale Police Department

Continuation

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

NARRATIVE

16-013206

Employee Statement

Detective Costigan #724

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

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

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

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

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

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

Reporting Officer(s): Costigan, Patrick	ID Number 724	ID Number	Page: 3 OF 6
--	------------------	-----------	-----------------

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
<p>53224. The suspect was then required to show proof of employment, she did so by providing a pay stub bearing the company name Dynocorp International LLC out of Fort Worth Texas. The employee name on the pay stub was JAZMIN LOWE 7705 W. Glenbrook Dr. Milwaukee, WI. After receiving all of this verification, PIERQUET states that she physically provided the suspect an Educators Debit card in the name of JAZMIN M. LOWE. As a conditional requirement, the suspect was required to carry a \$5 balance on the accounts, she did so by depositing \$5 into each. At the end of the account opening process, the suspect was required to sign verifying all of the information was accurate. The suspect signed in the electronic box verifying she was in fact JAZMIN LOWE and that all the information was correct.</p> <p>Next, PIERQUET states that she and the suspect began to review the credit card application. PIERQUET explained that the suspect filled out the credit card application online on 11/15/16, and was only now coming in to obtain the actual card. While looking over the application, PIERQUET states that she became suspicious for the following reasons:</p> <ul style="list-style-type: none"> - PIERQUET reviewed the suspects credit history and learned that she has about 40 lines of open credit through various credit card companies and businesses. - She added that the available balance the suspect had was just over \$90,000. - There were many instances where the suspects credit history was run, an indicator of suspicious activity. - Its seemed suspicious to PIERQUET that LOWE insisted on receiving a \$20,000 balance when she had over \$90,000 of available balance. <p>Due to these irregularities, PIERQUET felt this may be an identity theft circumstance and wanted to check with a supervisor before processing the credit card application. PIERQUET told the suspect to provide her with a telephone number and she would call when the credit approval was finished and she could come in and obtain her credit card. The suspect provided a number of #312-956-5356.</p> <p>PIERQUET states that she provided this information to her supervisor, CHRISTINE E. KUCZYNSKI, F/W 03/22/88 who in turn contacted Security Director ANGELA LANGDON.</p> <p>PIERQUET states that at LANGDON'S request, she called the suspect and told her the credit card application was finished and approved and she could come in to retrieve her card. The suspect came in and was arrested by Glendale officers.</p> <p>PIERQUET provided me with numerous documents involving this identity theft incident which I later scanned into this case and inventoried:</p> <ul style="list-style-type: none"> -The Dynacorp payroll stub in the name of JAZMIN LOWE -The credit report that was run by Educators in the name of JAZMIN LOWE bearing a SS beginning in #606. -Verification of account information that the suspect signed JAZMIN LOWE. 			
Reporting Officer(s): Costigan, Patrick		ID Number 724	Pages: 4 OF 6

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date 11/18/2016	
<p>-Membership application filled out by the suspect bearing the name JAZMIN M. LOWE providing a telephone number of #312-956-5356. (This being the same number the suspect gave as her own when being called back into the CU)</p> <p>-On line loan application that the suspect admitted filling out bearing the name JAZMINE LOWE.</p> <p>At the GLPD, using the morpho fingerprint unit, I positively identified the female suspect in this case to be VALENTINA MONEE KNIGHT, F/B 06/13/87. The male did not register on the morpho unit and verbally identified himself as MOUSTAPHA DIOUBATE, M/B 03/12/88. DIOUBATE has an extensive criminal record in both New York and Nevada. Due to him not having a WI driving record, criminal history or identification, his fingerprint card was faxed to the FBI for possible identification. (This name was later confirmed by the F.B.I.)</p> <p>When asked, both subject denied my request for an interview.</p> <p>Upon checking GLPD records, I learned that VALENTINA KNIGHT is associated with a prior Glendale fraud case #16-007824. On 07/11/16 at 7:40pm, KNIGHT and MOUSTAPHA DIOUBATE were registered to room #118 at the Holiday Inn located at 4700 N. Port Washington Rd. Glendale. During that incident, a subject called the police and hotel and stated that the occupants of that room purchased their stay through an internet site using their identity. The subjects were identified and removed from the property. It was determined that a police agency in Texas was investigating the identity theft for the booking of the room.</p> <p>At about 6pm, I made telephone contact with the guest services employee at the Holiday Inn, she confirmed that DIOUBATE and KNIGHT were registered to that room on 07/10/16 and 07/11/16. Due to a report not being generated, the case notes were printed and scanned to this case.</p> <p>Upon reviewing some of DIOUBATE'S belongings, I observed an Ill ID card bearing his picture but in the name, MICHAEL L. RICHARDSON, 03/08/90 with an address of 730 W. Lake St. Apt 174 Chicago, IL 60661. Upon checking Accurant, an investigative website, I learned that there is a subject by the name of MICHAEL RICHARDSON that was born in 1990 that holds an address of 7236 S. Paxton Ave #1 Chicago. There is no telephone number associated with this entry.</p> <p>DIOUBATE and KNIGHT were transported to the CJF. On Monday 11/21/16, the following charges will be sought:</p> <p>KNIGHT- Unauthorized use of personal identifying information Forgery of Financial Transaction Card</p> <p>DIOUBATE- Unauthorized use of personal identifying information</p>			
Reporting Officer(s) Costigan, Patrick	ID Number 724	ID Number	Page: 5 Of 6

Glendale Police Department		Continuation			
Incident Report Number 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016			
<p>Forgery of Financial Transaction card Obstructing an Officer</p> <p>Submitted by,</p> <p>Det. Patrick Costigan #724</p>					
Reporting Officer(s): Costigan, Patrick		ID Number 724	<td>ID Number</td> <td>Pages: 6 OF 6</td>	ID Number	Pages: 6 OF 6

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

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 5323	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1:	New CFS Code - 1:	New CFS Code - 2:
PROPERTY LIST			
Seq#	Reason	Make/Model	Description/Serial#
=====			
16-003269			
1	EVI		6 credit cards in the name of Moustapha Dioubate
			6.000 \$0.00 [Recovered]
2	EVI		Two M&V Fast Efficient cards
			2.000 \$0.00 [Recovered]
3	EVI		Bank of America CC Laura Banks
			1.000 \$0.00 [Recovered]
4	EVI		Bank of America KNIGHT Visa CC
			1.000 \$0.00 [Recovered]
5	EVI		2 blank Credit cards
			2.000 \$0.00 [Recovered]
16-003270			
1	EVI		\$1268 Cash
			1.000 \$1268.00 [Recovered]
2	EVI	Alcaltel	Alcatal black Cell phone, A571VL
			2ACCJB027
			1.000 \$0.00 [Recovered]
16-003272			
1	EVI		IL Drivers License Michael L. Richardson w/ Dioubate's photo
			1.000 \$0.00 [Recovered]
2	EVI		1 Visa Debit, 1 MasterCard Debit Dioubate
			1.000 \$0.00 [Recovered]
3	EVI		Visa Debit card Mohamed Conde
			1.000 \$0.00 [Recovered]

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

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
<p>NARRATIVE</p> <p>16-013206 DIOUBATE Evidence Detective Purtell #722</p> <p>On 11/18/16 at approx. 4:30PM, the following items were turned over to me by PO Doss at GPD as evidence recovered from the suspect later identified as Mustopha DIOUBATE (M/B, 03/12/88) which were recovered incident to his arrest. I photographed these items and inventoried them as evidence:</p> <ul style="list-style-type: none"> •\$1268 Cash •Alcatel 'one touch' black cell phone, model A571VL, FCC ID 2ACCB027 •Western Union MasterCard, Moustapha Dioubate, #5292 6365 2750 2279 •Bank of America MasterCard Moustapha Dioubate, #5524 3301 6025 9054 •CitiPhone Bank MasterCard, Moustapha Dioubate, #5262 1960 8108 70 15 •CitiBusiness MasterCard, Moustapha Dioubate, #5571 2711 0721 0499 •Capitol One MasterCard, Moustapha Dioubate, #5178 0575 0459 2853 •Bank of America Visa, Moustapha Dioubate- N&Y Fast Efficient, #4135 7445 0691 6587 •FTS Purchase Card, M&V Fast Efficient Trucking LLC, #180083 776100 001004 •FTS Control, M&V Fast Efficient Tru, #999011 180083 776100 •HSBC credit card blank, no information •Bank of America Visa Blank- no information •Bank of America Visa Debit card, Valentina Monee Knight, #4744 8900 8489 6528 •Bank of America Visa Debit card, Laura Banks, #4744 7801 3904 0596 •Bank of America Visa Debit card, Mohamed Conde #4744 7801 3843 8924 •Bank of America Visa Debit card, Moustapha Dioubate, #4117 7339 7481 7221 •Bank of America MasterCard, Moustapha Dioubate, #5312 6600 0430 8246 •IL ID Card for Michael Richardson, 730 W. Lake St in Chicago, with DIOUBATE's photo <p>The above items were placed in a secure evidence locker, see attached property sheet for details.</p> <p>Submitted by, Detective Purtell #722</p>			
Reporting Officer(s): Purtell, Scott	ID Number 722	ID Number	Pages: 2 Of 2

Glendale Police Department		Supplementary Report		
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd,BLDG, Glendale, WI, 53217		Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:	
OTHER NAMES				
<p>Knight, Valentina Mones B/F-29 of 1563A S 3rd St, Milwaukee,WI,53204 DOB: 06/13/1987 HT: 504 WT: 142 Hair: Black Eyes: Brown Cell Phone:(414) 807-1225</p> <p>Enterprise Rent-A-Car-Glendale of 5932 N Green Bay Ave,B LDG;GL Glendale,WI,53209 Home Phone:(414) 540-7100</p>				
<div style="border: 1px dashed black; height: 200px; width: 100%;"></div>				
Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/19/2016	
Reviewed by:	Payroll Number:	Copy To:	Page: 1 OF 11	

Glendale Police Department

Continuation

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

PROPERTY LIST

Seq#	Reason	Make/Model	Description/Serial#	Quantity/Value
16-003273				
1	EVI		Piece of Wells Fargo mail addressed to Valentina Knight	1.000 \$0.00 [Recovered]
2	EVI		Piece of Bank of America mail addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
3	EVI		Piece of mail from Storage Mart addressed to Laura Banks	1.000 \$0.00 [Recovered]
4	EVI		Piece of mail from Bank of America addressed to Nikita	1.000 \$0.00 [Recovered]
5	EVI		\$100 bill for JB's	1.000 \$0.00 [Recovered]
6	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
7	EVI		Mail from Bank of America	1.000 \$0.00 [Recovered]
8	EVI		Mail from Citi addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
9	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
10			Walmart Sales receipt from Brown Deer 11/02/16	1.000 \$0.00 [Recovered]

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Page: 2 Of 11
-------------------------------------	------------------	-----------	------------------

Glendale Police Department

Continuation

Incident Report Number		Incident Location	Incident Date
16-013206		7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016
11	EVI	Educators Credit Union Withdrawal Receipt for Nikita Parsons	1.000 \$0.00 [Recovered]
12	EVI	Parking placard for Milwaukee College Prep Loh Rowe North Campus #565	1.000 \$0.00 [Recovered]
13	EVI	2.98 in US Currency	1.000 \$2.98 [Recovered]
14	EVI	Mail from Bank of America addressed to Laura M. Banks	1.000 \$0.00 [Recovered]
15	EVI	WI paper I.D. for Valentia M. Knight F/B Laura M. Banks	1.000 \$0.00 [Recovered]
16	EVI	Wyndham Rewards Visa card assigned to Nikita Parsons 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
17	EVI	Wyndham Rewards Visa card assigned to Laura M. Banks 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
18	EVI	Chase Freedom Visa assigned to Nikita Parsons 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
19	EVI	Chase Freedom Visa assigned to Valentia Knight 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
20	EVI	Chase Freedom Visa assigned to Brandon Lowe 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
21	EVI	South Carolina DL with the name of Laura M. Banks f/b 03/12/89, with Knight's photo. 185967942	1.000 \$0.00 [Recovered]
22	EVI	New York State DL for a Nikita Parsons F/B 04/24/91, with Knight's	1.000 \$0.00 [Recovered]
Reporting Officer(s):		ID Number	ID Number
Wall, Adam		726	
		Pages:	
		3 Of 11	

Glendale Police Department

Continuation

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

23	EVI	photo. 612 715 834	Bank of America Visa Debit Card 4744 8100 7046 2515	1.000 \$0.00 [Recovered]
24	EVI	Bank of America Visa Debit card 4744 8100 7046 2523	1.000 \$0.00 [Recovered]	
25	EVI	Chase Sapphire Visa card assigned to Valena M Knight 4147 2022 8110 4582	1.000 \$0.00 [Recovered] [Recovered]	
26	EVI	Capital One Visa card 5178 0592 1043	1.000 \$0.00 [Recovered]	
27	EVI	Editors Credit Union debit card with account	1.000 \$0.00 [Recovered] [Recovered]	
28	EVI	Gucci Brown and black leather purse	1.000 \$0.00 [Recovered]	
29	EVI	HP Silver laptop 8CG63404	1.000 \$0.00 [Recovered]	
30	EVI	Alcatel One Touch cell	1.000 \$0.00 [Recovered]	
31	EVI	Misc. power cords and chargers	1.000 \$0.00 [Recovered]	
32	EVI	3 blank checks for M&V Fast Efficient Trucking LLC. #s 1010, 1011, 1012	3.000 \$0.00 [Recovered]	
33	EVI	4 UPS shipping receipts to various New York City	4.000 \$0.00	

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 4 Of 11
-------------------------------------	------------------	-----------	-------------------

Glendale Police Department			Continuation	
Incident Report Number	Incident Location	Incident Date		
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016		
34	EVI	Sandisk	locations. Sandisk 16gb thumbdrive	[Recovered] 1.000 \$0.00 [Recovered]
35	EVI		2 keys for unknown lock mechanism	2.000 \$0.00 [Recovered]
36	EVI		Gold cell phone backing	1.000 \$0.00 [Recovered]
37	EVI		Pink sticky note with address Lowe 606014 211 N. Main Bay Ave Glendale WI 53039	1.000 \$0.00 [Recovered]
38	EVI		414-540-1422 Transaction from 11/11/16 at Wells Fargo Store #0001311 for with Mawal	1.000 \$0.00 [Recovered]
39	EVI	Logitech	Logitech computer	1.000 \$0.00 [Recovered]
40	SAF		12.000 chain with Akira Exclusive cards card	1.000 \$0.00 [Recovered]
41	SAF	2017 Cadillac CTS	2017 Cadillac CTS 4dr black 1G6AR5SK100119810	1.000 \$30000.00 [Recovered]
42	EVI	Sharper Image	Sharper Image w/ misc. amount of men's clothing/shoes. Baggage claim ticket shows Michael L. Richardson	1.000 \$0.00 [Recovered]
43	EVI		A blue binder that contained a large amount of misc. paperwork, related to M&V Fast Efficient Trucking.	1.000 \$0.00 [Recovered]
44			Credit Card magnetic strip encoder	1.000 \$0.00 [Recovered]
Reporting Officer(s):		ID Number	ID Number	Pages:
Wall, Adam		726		5 Of 11

Glendale Police Department

Continuation

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

45	EVI	HP	Damaged Black HP laptop CND6162WMG	1.000 \$0.00 [Recovered]
46	EVI		Certified mail addressed to Midwest Conde Pain Management Dr. Mohamed Conde MD	1.000 \$0.00 [Recovered]
47	EVI		Receipt from Akira Bayshore from 10/28/16 purchase made by Antina Knight using MC ending 3210	1.000 \$0.00 [Recovered]
48	EVI	Swiss Alps	Grey Swiss Alps suitcase w/ misc. clothing paperwork for Fast Efficient, New York	1.000 \$0.00 [Recovered]
49	EVI		Permit Commercial for Moustapha Di #813 712 977	1.000 \$0.00 [Recovered]
50	EVI		Parking permit for 6th St	1.000 \$0.00 [Recovered]
51	EVI		Lease Agreement paperwork for rental Antina Knight	1.000 \$0.00 [Recovered]
52	EVI		Entertainment confirmation form for Moustapha Di 10/18/16 to 11/14/16 purchased with a MC ending	1.000 \$0.00 [Recovered]
53	EVI		Lease Agreement/Bill for a 2006 BMW 330i for \$3000	1.000 \$0.00 [Recovered]
54	EVI		10 pages of false employment pay stubs for Jazmin Lowe and Nikita Parsons	10.000 \$0.00 [Recovered]
55	EVI		Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]
56	EVI	Apple	Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 6 Of 11
-------------------------------------	------------------	-----------	-------------------

Glendale Police Department

Continuation

Incident Report Number		Incident Location:		Incident Date:	
16-013206		7139 N Port Washington Rd, BLDG, Glendale, WI, 5321		11/18/2016	
57	EVI	Samsung SM-J100VPP UD	Blue Samsung Galaxy J1 A3LSMJ100VPP FCC ID #	1.000 \$0.00 [Recovered]	
58	EVI	Motorola	White Motorola cell phone	1.000 \$0.00 [Recovered]	
59	EVI	LG LG-VS425PP	Black LG cell phone 607VTINV0684567	1.000 \$0.00 [Recovered]	
60	EVI	Apple	Apple Laptop	1.000 \$0.00 [Recovered]	
61	EVI		Numerous charging cables, cords, wifi puck	1.000 \$0.00 [Recovered]	
62	EVI		Items found in the center	2.000 \$0.00 [Recovered]	
63	EVI		Residential Rental Agreement written for Jazmin Lowe	1.000 \$0.00 [Recovered]	
64	EVI		Residential Rental Agreement started on Jazmin Lowe	1.000 \$0.00 [Recovered]	
65	EVI		Residential Rental Agreement for Jazmin Lowe on	1.000 \$0.00 [Recovered]	
66	EVI		4 pages of fake employee pay stubs for Nikita Parsons and Jazmin Lowe	4.000 \$0.00 [Recovered]	
67	EVI		Unused packet of residential rental forms	1.000 \$0.00 [Recovered]	
68	EVI		Multi colored suit case with baggage claim tag for Michael L. Richardson, containing women and men's	1.000 \$0.00 [Recovered]	
Reporting Officer(s):		ID Number		Page:	
Wall, Adam		726		7 Of 11	

Glendale Police Department

Continuation

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

69	EVI	Brother	clothing. Brother personal fax machine	1.000 \$0.00 [discovered]
70	EVI		Large amount of misc. paperwork, most pertaining to M&V Fast Efficient Trucking	1.000 \$0.00 [discovered]

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 8 Of 11
-------------------------------------	------------------	-----------	-------------------

Glendale Police Department

Continuation

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

NARRATIVE

16-013206
Early Shift
Detective Wall
Supplement Report

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

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

The front driver's door (pocket):

- Mail from Wells Fargo. Addressed to Valerie Knight of 2025 Dr. Martin Luther King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Storage Mart. Addressed to Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Sales Invoice for JB's Furniture purchase made by Nikita Parsons on 11/17/16. Addressed for 3332 W. Donna Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. ML King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
- Receipt for purchase made at Walmart, in Brown Deer, WI, on 11/09/16 for two separate money orders, \$1000 (serial number #20683866939) and \$675 (serial number #20683866939).
- Withdrawal slip from Educators Credit Union, Park Place Office, on

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 9 Of 11
-------------------------------------	------------------	-----------	-------------------

Glendale Police Department

Continuation

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

11/17/16, for \$5.00. The account listed to a Nikita Parsons.

- Parking placard (#565) for Milwaukee College Prep Lola Rowe North Campus.
- \$2.98 in U.S. Currency, coins.

Center console compartment (underneath radio):

- Mail from Bank of America. Addressed to Laura Banks of 3800 MLK Dr. Milwaukee, WI 53212.
- WI Paper ID of Valentina M. Knight, F/B 06/13/87. ID #K523-8738-7713-09. ID contained Knight's photograph.
- Wyndham Rewards Visa card (#48689513 3269 8494) issued to Nikita P. Parsons.
- Wyndham Rewards Visa card (#4868 9513 3269 8486) issued to Laura M. Parsons.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Nikita P. Parsons.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Valentina Knight.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Jazmin Lowe. (All three Chase Freedom Visa cards share the same account number.)
- South Carolina D.L. of Laura M. Banks, F/B 06/13/87. The D.L. contained Knight's photograph. DL #185967942.
- New York State D.L. of Nikita Parsons, F/B 06/13/87. The D.L. contained Knight's photograph. D.L. #612 715 834.
- Bank of America Visa Debit Card (#4744 8100 7046 2521) issued to Nikita P. Parsons.
- Bank of America Visa Debit Card (#4744 8100 7046 2521) issued to Valentina Knight.
- Chase Sapphire Visa Card (#4142 8100 7046 2521) issued to Valentina M. Knight.
- Capital One MasterCard (#5178 4321 1043 5421) issued to Valentina Knight.
- Educators Credit Union pamphlet for account #123456789.

Front passenger seat floor:

- Brown and Tan Gucci purse.
- Silver HP laptop (EVA-19CG63404B).
- Black Alcatel One Touch cell phone.
- Misc. power cords and chargers.
- Three (3) blank checks for M&V Fast Efficient Trucking LLC (check #'s 1010, 1011 & 1012).
- Four (4) business cards for various New York City locations.
- Sandisk 16GB USB drive.
- Two (2) keys with brown locking mechanism.
- The back of a silver flip cell phone.
- A pink sticky note with address: Lowe 606014733 6811 N Green Bay Ave Glendale, WI 53209 4142 8100 7046 2521 written on it.
- Transfer slip from 11/17/16 at Wells Fargo Store (#0001311) for \$400 withdrawal.
- A black Logitech computer mouse.
- A black key chain with Akira Exclusive rewards card.

Front passenger seat:

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 10 Of 11
-------------------------------------	------------------	-----------	--------------------

Glendale Police Department

Continuation

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

- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Gold Apple iPhone S (FCC ID #BCG-E2944A).
- Blue Samsung Galaxy J1 (S/N #A3LSMJ100VPP) cell phone.
- White Motorola cell phone.
- Black Verizon LG 4GLTE cell phone (S/N #507VTNV0684567).
- Gold Apple Laptop
- Numerous chargers, power cords, WiFi puck.

DRAFT

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 11 Of 11
-------------------------------------	------------------	-----------	--------------------

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

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

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53233	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1 :	New CFS Code - 2:
<p>NARRATIVE</p> <p>16-013206 Follow up Det. Costigan</p> <p>Upon checking Accurint, a Law Enforcement investigative website, I searched for the name, MOHAMED CONDE.</p> <p>I learned that there is a MOHAMED CONDE 06/21/86, that resides at 2025 N. Dr. Martin Luther King JR. Dr. This is the same address that is listed for another potential victim in this case. Once again, this is a commercial self storage building and not a private residence.</p> <p>A search was conducted on one other potential victim in this case; LAURA M. BANKS. This search provided no results as the parameters are too vague.</p> <p>Submitted by,</p> <p>Det. Patrick Costigan #724</p>			
Reporting Officer(s): Costigan, Patrick	Payroll Number: 724	Payroll Number:	Report Date: 11/19/2016
Reviewed by: 71slam	Payroll Number: 712	Copy To:	Page: 1 Of 1

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

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:
OTHER NAMES Knight, Valentina Monee B/F-29 of 1563A S 3rd St, Milwaukee, WI, 53204 DOB: 06/13/1987 HT: 504 WT: 142 Hair: Black Eyes: Brown Cell Phone: (414) 807-1225 Enterprise Rent-A-Car-Glendale of 5932 N Green Bay Ave, B LDG; GL Glendale, WI, 53209 Home Phone: (414) 540-7100			
<div style="font-size: 100px; opacity: 0.5; transform: rotate(-45deg); position: absolute; top: 50%; left: 50%;">DRAFT</div>			
Reporting Officer(s): Wall, Adam	Payroll Number: 726	Payroll Number:	Report Date: 11/19/2016
Reviewed by:	Payroll Number:	Copy To:	Page: 1 of 13

Glendale Police Department			Continuation	
Incident Report Number	Incident Location	Incident Date		
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016		
PROPERTY LIST				
Seq#	Reason	Make/Model	Description/Serial#	Quan/Value
=====				
16-003273				
1	EVI		Piece of Wells Fargo mail addressed to Valentina M Knight	1.000 \$0.00 [Recovered]
2	EVI		Piece of Bank of America mail addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
3	EVI		Piece of mail from Stovall Mart addressed to Laura Banks	1.000 \$0.00 [Recovered]
4	EVI		Piece of mail from Bank of America addressed to Laura Banks	1.000 \$0.00 [Recovered]
5	EVI		Sales invoice for JB's Furniture Store for Nikita Johnson	1.000 \$0.00 [Recovered]
6	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
7	EVI		Mail from Bank of America	1.000 \$0.00 [Recovered]
8	EVI		Mail from Citi addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
9	EVI		Mail from Bank of America addressed to Mohamed Conde	1.000 \$0.00 [Recovered]
10			Walmart Sales receipt from Brown Deer 11/02/16	1.000 \$0.00 [Recovered]
Reporting Officer(s):		ID Number	ID Number	Page(s)
Wall, Adam		726		2 Of 13

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
11	EVI	Educators Credit Union Withdrawal Receipt for Nikita Parsons	1.000 \$0.00 [Recovered]
12	EVI	Parking placard for Milwaukee College Prep Lohmeyer Rowe North Campus #565	1.000 \$0.00 [Recovered]
13	EVI	2.98 in US Currency	1.000 \$2.98 [Recovered]
14	EVI	Mail from Bank of America addressed to Laura Banks	1.000 \$0.00 [Recovered]
15	EVI	WI paper ID for Valentina M. Knight F/B 03/12/89, with Knight's photo	1.000 \$0.00 [Recovered]
16	EVI	Wyndham Rewards Visa card assigned to Nikita Parsons 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
17	EVI	Wyndham Rewards Visa card assigned to Laura M. Banks 4868 9513 3269 8486	1.000 \$0.00 [Recovered]
18	EVI	Chase Freedom Visa assigned to Nikita Parsons 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
19	EVI	Chase Freedom Visa assigned to Valentina Knight 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
20	EVI	Chase Freedom Visa assigned to Mazan Lowe 4266 8414 8708 1265	1.000 \$0.00 [Recovered]
21	EVI	South Carolina DL with the name of Laura M. Banks f/b 03/12/89, with Knight's photo. 185967942	1.000 \$0.00 [Recovered]
22	EVI	New York State DL for a Nikita Parsons F/B 04/24/91, with Knight's	1.000 \$0.00 [Recovered]
Reporting Officer(s): Wall, Adam		ID Number 726	Pages: 3 of 13

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
23	EVI	photo. 612 715 834 Bank of America Visa Debit Card 4744 8100 7046 2515	1.000 \$0.00 [Recovered]
24	EVI	Bank of America Visa Debit card 4744 8100 7046 2523	1.000 \$0.00 [Recovered]
25	EVI	Chase Sapphire Visa card assigned to Vanessa M Knight 4147 2022 8003 4682	1.000 \$0.00 [Recovered] [Recovered]
26	EVI	Capital One MasterCard 5178 0592 1049 5146	1.000 \$0.00 [Recovered]
27	EVI	Easttown Credit Union checking account 320004	1.000 \$0.00 [Recovered] [Recovered]
28	EVI	Gucci Brown and Tan Gucci purse	1.000 \$0.00 [Recovered]
29	EVI	HP Silver HP Laptop 8CG63404BV	1.000 \$0.00 [Recovered]
30	EVI	Alcatel Black Alcatel One Touch cell phone	1.000 \$0.00 [Recovered]
31	EVI	Misc. power cords and chargers	1.000 \$0.00 [Recovered]
32	EVI	3 blank checks for M&V Fast Efficient Trucking LLC. #'s 1010, 1011, 1012	3.000 \$0.00 [Recovered]
33	EVI	4 UPS shipping receipts to various New York City	4.000 \$0.00
Reporting Officer(s): Wall, Adam		ID Number 726	Page(s) 4 OF 13

Glendale Police Department			Continuation	
Incident Report Number	Incident Location		Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321		11/18/2016	
34	EVI	Sandisk	locations. Sandisk 16gb thumbdrive	[Recovered] 1.000 \$0.00
35	EVI		2 keys for unknown locking mechanism	[Recovered] 2.000 \$0.00
36	EVI		Gold cell phone backing	[Recovered] 1.000 \$0.00
37	EVI		Pink sticky note with 9-amin Lowe 606014746 8111 N. Green Bay Ave Glendale, WI 53209 414-540-1424 written on it	[Recovered] 1.000 \$0.00
38	EVI		Transaction receipt from 11/11/16 at Wells Fargo Store #0001311 for \$100 with withdrawal	[Recovered] 1.000 \$0.00
39	EVI	Logitech	Red/Black Logitech computer mouse	[Recovered] 1.000 \$0.00
40	SAF		1 key on chain with Akira Exclusive Rewards card	[Recovered] 1.000 \$0.00
41	SAF	2017 Cadillac CTS	2017 Cadillac CTS 4dr black 1G6AR5SX8H0129810	[Recovered] 1.000 \$30000.00
42	EVI	Sharper Image	Sharper Image Sumbag w/ misc. amount of men's clothing/shoes. Baggage claim ticket shows Michael L. Richardson	[Recovered] 1.000 \$0.00
43	EVI		blue binder that contained a large amount of misc. paperwork, related to M&V Fast Efficient Trucking.	[Recovered] 1.000 \$0.00
44			Credit Card magnetic strip encoder	[Recovered] 1.000 \$0.00
Reporting Officer(s): Wall, Adam			ID Number 726	Pages: 5 Of 13

Glendale Police Department			Continuation	
Incident Report Number	Incident Location	Incident Date		
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016		
45	EVI HP	Damaged Black HP laptop CND6162WMG	1.000 \$0.00 [Recovered]	
46	EVI	Certified mail addressed to Midwest Conde Pain Management Dr. Mohamed Conde MD	1.000 \$0.00 [Recovered]	
47	EVI	Receipt from Akira Bayshore from 10/23/16 purchase made by Valentina Knight using MC ending 3210	1.000 \$0.00 [Recovered]	
48	EVI Swiss Alps	Grey Swiss Alps suitcase w/ misc. clothing and paperwork for Fast Efficient Traveling	1.000 \$0.00 [Recovered]	
49	EVI	New York State Driver Permit Commercial Driver for Moustapha Diabate #813 712 977	1.000 \$0.00 [Recovered]	
50	EVI	Permitting permit for David 6601 S 20th St	1.000 \$0.00 [Recovered]	
51	EVI	Enterprise Rental agreement paperwork for car rented by Valentina Knight	1.000 \$0.00 [Recovered]	
52	EVI	Enterprise Rental confirmation form for Moustapha Diabate for 10/18/16 to 11/14/16 purchased with a MC ending 2054	1.000 \$0.00 [Recovered]	
53	EVI	Used Vehicle Agreement/Bill of Sale for a 2006 BMW 330i for \$3000	1.000 \$0.00 [Recovered]	
54	EVI	9 pages of false employment pay stubs for Jazmin Lowe and Nikita Parsons	10.000 \$0.00 [Recovered]	
55	EVI	Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]	
56	EVI Apple	Gold Apple iPhone S FCC ID #BCG-E2944A	1.000 \$0.00 [Recovered]	
Reporting Officer(s):		ID Number	ID Number	Pages
Wall, Adam		726		6 of 13

Glendale Police Department				Continuation	
Incident Report Number		Incident Location		Incident Date	
16-013206		7139 N Port Washington Rd, BLDG, Glendale, WI, 5321		11/18/2016	
57	EVI	Samsung SM-J100VPP UD	Blue Samsung Galaxy J1 A3LSMJ100VPP FCC ID #	1.000 \$0.00 [Recovered]	
58	EVI	Motorola	White Motorola cell phone	1.000 \$0.00 [Recovered]	
59	EVI	LG LG-VS425PP	Black LG cell phone 607VTNV0684567	1.000 \$0.00 [Recovered]	
60	EVI	Apple	Apple Laptop	1.000 \$0.00 [Recovered]	
61	EVI		Numerous charging power cords, wifi puck	1.000 \$0.00 [Recovered]	
62	EVI		Two needles found in the two holders of the center console	2.000 \$0.00 [Recovered]	
63	EVI		Residential Rental Agreement written for Jazmin Banks	1.000 \$0.00 [Recovered]	
64	EVI		Residential Rental Agreement started for Jazmin Lowe	1.000 \$0.00 [Recovered]	
65	EVI		Residential Rental Agreement signed Jazmin Lowe on 12/02/15	1.000 \$0.00 [Recovered]	
66	EVI		4 pages of fake employee pay stubs for Nikita Parsons and Jazmin Lowe	4.000 \$0.00 [Recovered]	
67	EVI		Unused packet of residential rental forms	1.000 \$0.00 [Recovered]	
68	EVI		Multi colored suit case with baggage claim tag for Michael L. Richardson, containing women and men's	1.000 \$0.00 [Recovered]	
Reporting Officer(s): Wall, Adam				ID Number 726	Pages: 7 OF 13

Glendale Police Department		Continuation	
Incident Report Number	Incident Location	Incident Date	
16-013206	7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	11/18/2016	
69	EVI	Brother	clothing. Brother personal fax machine 1.000 50.00 [Recovered]
70	EVI		Large amount of misc. 1.000 paperwork, most pertaining to M&V Fast Efficient 50.00 Trucking [Recovered]
<div style="transform: rotate(-45deg); font-size: 100px; opacity: 0.5;">DRAFT</div>			
Reporting Officer(s):		ID Number	Page:
Wall, Adam		726	8 Of 13

Glendale Police Department

Continuation

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

NARRATIVE

16-013206
Early Shift
Detective Wall
Supplement Report

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

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

The Front Driver's Door (pocket):

- Mail from Wells Fargo. Addressed to Valentina M. Knight of 2025 Dr. Martin Luther King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Storage Mart. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr. Milwaukee, WI 53212
- Sales Invoice from JB's Furniture. Purchase made by Nikita Parsons on 11/17/16. Address shown for Parsons was 1000 W. Donna Dr. Milwaukee, WI 53212. A Chase Visa card, ending 1265 was used.
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 ML King Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. ML King Dr. Milwaukee, WI 53212
- Mail from Citi MasterCard. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212
- Mail from Bank of America. Addressed to Mohamed Conde of 2025 N. MLK Dr. Milwaukee, WI 53212

Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Page: 9 Of 13
-------------------------------------	------------------	-----------	------------------

Glendale Police Department

Continuation

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

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

Center Console Compartment (underneath radio):

- Mail from Bank of America. Addressed to Laura Banks of 2025 N. MLK Dr., Milwaukee, WI 53212.
- WI Paper ID of Valentina M. Knight, F/B 06/13/87. The ID contained Knight's photograph. ID #K523-8738-7713-09.
- Wyndham Rewards Visa card (#48689513 3269 8494) issued to Nikita P. Parsons. Security code #901.
- Wyndham Rewards Visa card (#4868 9513 3269 8494) issued to Laura M. Banks. Security code #579.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Nikita P. Parsons. Security code #542.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Valentina Knight. Security code #542.
- Chase Freedom Visa card (#4266 8414 8708 1265) issued to Jarmin Lowe. Security Code #542. (All three Chase Freedom Visa cards share the same account number).
- South Carolina D.L. of Laura M. Banks, F/B 03/17/89. The D.L. contained Knight's photograph. DL #185967942.
- New York State D.L. of Nikita Parsons, F/B 06/24/91. The D.L. contained Knight's photograph. D.L. #612 715 834.
- Bank of America Visa Debit Card (#4744 8100 7046 2515). Security code #118.
- Bank of America Visa Debit Card (#4744 8100 7046 2523). Security code #660.
- Chase Sapphire Visa Card (#4147 2022 8113 4682) issued to Valentina M. Knight. Security code #033.
- Capital One MasterCard (#5178 0592 4043 5146) issued to Valentina Knight. Security code #770.
- Educators Credit Union Bank of America account #340804.

Front Passenger Seat Floor:

- Brown and Tan Gucci purse.
- Silver Hampton (S/N #0855404SV).
- Black plastic one touch cell phone.
- Miscellaneous cables and chargers.
- Three (3) blank checks for M&V Fast Efficient Trucking LLC (check #'s 1010, 1011 & 1012).
- Four (4) UPS shipping receipts to various New York City locations. Shipped 11/15/16, 11/16/16, and 11/17/16 (x2).
- Sandisk 16GB thumb drive.

Reporting Officer(s):
Wall, Adam

ID Number
726

ID Number

Page:
10 Of 13

Glendale Police Department

Continuation

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

-Four (4) pages of doctored employment pay stubs. Six (6) pay stub copies for a Nikita Parsons of 3164 N. 39th St. in Milwaukee, WI 53206.. Pay stubs from Silver Spring Neighborhood Center School of 5460 N. 64th St. in Milwaukee, WI 53255. Two (2) pay stub copies for a Jazmin Lowe of 7705 W. Glenbrook Dr in Milwaukee, WI 53224. Pay stubs from DynCorp International, LLC. 13500 W. Highway Pkwy in Fort Worth, TX 76177.

-Residential Rental Agreement form with a signature of Jazmin Lowe on the bottom. Purportedly signed on 12/02/15 for a property on 7705 W. Glenbrook Dr in Milwaukee, WI 53224.

-Residential Rental Agreement form partially filled out, with the name Jazmin Lowe written as the tenant. The rest of the form is blank.

-Residential Rental Agreement form with Laura Banks as the landlord of 3164 N. 39th St. in Milwaukee, WI 53206. Form purportedly signed on 02/01/16.

-Opened package of blank Residential Rental Agreement forms. The forms were made by Wisconsin Legal Blank Co., LLC. (Related to the receipt located in the cup holder, for a purchase made at Wisconsin Legal Blank Co., LLC).

Rear Driver's Side Seat:

-Multi-colored suit case, with baggage claim tag for Michael L. Richardson.

-Misc. women's and men's clothing. Most of the items still had the sales tags attached.

-Brother personal fax machine.

-Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.

Trunk:

-Unopened certified mail addressed to Midwest Trade Pain Management Dr. Mohamed Conde MD of 2025 N. MLK Dr. Milwaukee, WI 53212.

-Sales Receipt from Akira Antiques, on 10/23/16, for a \$162.74 sale. The purchase was made with a Mastercard, ending #3210, identifying the purchaser as Valentina Knight.

-Gray Swiss Alps suitcase.

-Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.

-Misc. clothing. Most of the items still had the sales tags attached.

-New York State Learning Permit Commercial #813 712 977 for Moustapha Dioubate. The permit has Dioubate's photo attached.

-Silver Sharp Image suitcase with baggage claim tag for Michael L. Richardson.

-Large amount of misc. paperwork. A majority is related to M&V Fast Efficient Trucking.

-Large amount of clothing and shoes. Most of the items still had the sales tags attached.

-Black Credit Card Magnetic Strip Encoder (#MSR605).

-Black HP Laptop (S/N#CND616WMG).

After recovering the above items from the Cadillac, when appropriate, I scanned a copy of the items into this report. The Cadillac was then placed into the GLPD impound lot and secured. Enterprise was contacted and advised that the

Reporting Officer(s):
Wall, Adam

ID Number
726

ID Number

Pages:
12 Of 13

Glendale Police Department		Continuation	
Incident Report Number 16-013206	Incident Location 7139 N Port Washington Rd, BLDG, Glendale, WI, 5321	Incident Date: 11/18/2016	
<p>Cadillac was available for pickup, after payment of the tow bill. The tow bill was scanned to this report.</p> <p>Submitted By: Detective Adam R. Wall</p> <p>DRAFT</p>			
Reporting Officer(s): Wall, Adam	ID Number 726	ID Number	Pages: 13 Of 13

Glendale Police Department		Supplementary Report	
Incident Report Number: 16-013206.	Incident Location: 7139 N Port Washington Rd, BLDG, Glendale, WI, 53217	Incident Date: 11/18/2016	
New Incident:	Original CFS Code - 1: 2604	New CFS Code - 1:	New CFS Code - 2:
<p>NARRATIVE</p> <p>16-013206 Det Bryan C Bichler</p> <p>On Monday, 11-21-2016 I notified Enterprise Manager Matthew Libersack that the 2017 Cadillac was available for release upon payment of the tow bill. He advised he would make arrangements for the vehicle to be retrieved by N.A.S Towing.</p> <p>At 2:15pm I spoke with Enterprise Risk Coordinator Corey Wesell (262 544 8330 ext 212) regarding the rental contract for the 2017 Cadillac involved in this incident. Wesell confirmed that the vehicle was rented on 11/12/2016 at 7:05pm at the Airport location of Enterprise, 5300 S Howell Ave under the name Valentina Knight. Knight has four rental profiles with Enterprise. Two are flagged as Do Not Rent, two are not. The profile Knight used to rent this vehicle was not flagged. It showed the correct date of birth, 06-13-87 and driver's license number (K523-8738-7713-08). The address on this particular profile was 2870 W Mill Rd apt B, Milwaukee (acutally a Glendale address). Payment was made with a VISA card (#4147 12022 8113 4682) that was swiped at the Enterprise location. The card was in the name Valentina Knight.</p> <p>Original documents are available if a court order is produced.</p> <p>BCB-728</p>			
Reporting Officer(s): Bichler, Bryan	Payroll Number: 728	Payroll Number:	Report Date: 11/21/2016
Reviewed by:	Payroll Number:	Copy To:	Page: 1 OF 1

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2016ML027672

Court Case No.:

vs.

CRIMINAL COMPLAINT

DIIOUBATE, MOUSTAPHA
10964 143RD STREET
JAMAICA, NY 11435
DOB: 03/12/1988

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

Defendants,

For Official Use

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

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

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

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

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

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

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

EXHIBIT "2"

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Probable Cause:

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

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

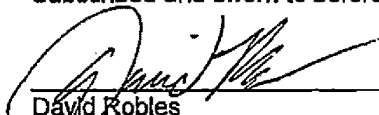
6. Pierquet said she became suspicious of the credit card application and sought a supervisor's approval before processing the application. Pierquet advised defendant Knight would be contacted by phone when the approval was completed – defendant Knight provided a cell phone number. Later, defendant Knight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

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

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

****End of Complaint****

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


David Robles
Assistant District Attorney
1009608


Complaining Witness

ORIGINAL

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

SEP 29 2015

BY Kristen Brown
KRISTEN BROWN DEPUTY

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

DISTRICT COURT
CLARK COUNTY, NEVADA

C-15-309123-1
AINF
Amended Information
4481400



9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-15-309123-1

11 -vs-

DEPT NO: XIX

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

AMENDED
INFORMATION

Defendant.

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

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

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

28 ///

8

WA2015F06822115F06822-AINF-(DIOUBATE_MOUSTAPHA)-001.DOCX


CLERK OF THE COURT

1 MOT
2 THE PARIENTE LAW FIRM, P.C.
3 MICHAEL D. PARIENTE, ESQ.
4 Nevada Bar No. 9469
5 3960 Howard Hughes Parkway, Suite 615
6 Las Vegas, Nevada 89169
7 (702) 966-5310
8 Attorney for Defendant

9 EIGHTH JUDICIAL DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,
12 Plaintiff,

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

13 vs.

14 MOUSTAPHA DIOUBATE &
15 VALENTINA KNIGHT,
16 Defendants.

17 Date of Hearing: _____


18 Time of Hearing: _____

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

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

27 DATED this 19 day of December, 2016.
28

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


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


NOTICE OF MOTION

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

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

Respectfully submitted,


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

MEMORANDUM OF POINTS AND AUTHORITIES

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

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

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

I. ISSUE

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

II. RULE OF LAW

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

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

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

16
17 The Ninth Circuit Court of Appeals in *Milke* reaffirmed established precedent
18 that a prosecutor must turn over any evidence helpful to the defense:
19

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

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

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

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

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

Milke at 1019.

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

needs to cross-examine the law enforcement personnel.

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

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

III. APPLICATION OF LAW TO FACTS

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

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

IV. CONCLUSION

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

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

9
10 DATED this 19 day of December, 2016.

11 Respectfully submitted,

12
13
14 

15 MICHAEL D. PARIENTE, ESQ.
16 Nevada Bar No.: 9469
17 3960 Howard Hughes, Suite 615
18 Las Vegas, Nevada 89169
19
20
21
22
23
24
25
26
27
28


DECLARATION OF COUNSEL

STATE OF NEVADA)
COUNTY OF CLARK)

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

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

FURTHER YOUR AFFIANT SAYETH NAUGHT.


MICHAEL D. PARIENTE, ESQ.

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

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,
Plaintiff,

vs.

MOUSTAPHA DIOUBATE &
VALENTINA KNIGHT,
Defendants.

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

RECEIPT OF COPY

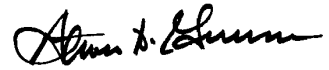
RECEIPT OF COPY of the DEFENDANT'S MOTION TO COMPEL

PERSONNEL FILES PURSUANT TO MILKE V. RYAN is hereby acknowledged

this ____ day of _____, 2016.

DISTRICT ATTORNEY'S OFFICE:

DISTRICT ATTORNEY
200 Lewis Ave.
Las Vegas, NV 89101



CLERK OF THE COURT

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

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

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

vs.

VALENTINA KNIGHT &
MOUSTAPHA DIOUBATE,

Defendants.

JOINT MOTION TO SUPPRESS

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

DATED this 22nd day of December, 2016.

Respectfully submitted,



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

NOTICE OF MOTION

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the 11 day of January, 2017, at 8:30am 2018, at m. of said day, in Department of said Court.



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

MEMORANDUM

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

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

I. ISSUE

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

II. APPLICABLE LAW

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

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

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

Id. at 2398, 649.

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

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

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

Id. at 2401, 656.

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

III. APPLICATION OF LAW TO FACTS

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

1 not mimic that done by the Bellagio Hotel and Casino security guards -- and in fact
2
3 proceeded to use the United States Secret Service website and the handheld scanner
4 after they developed probable cause -- the credit cards seized without a warrant must
5 be suppressed.
6

7 **IV. CONCLUSION**

8
9 The Court must suppress the seized credit cards and derivative evidence
10 obtained in violation of the Fourth Amendment of the United States Constitution and
11 in violation of the Constitution of the State of Nevada.
12

13 Respectfully submitted,

14 

15 MICHAEL D. PARIENTE, ESQ.
16 Nevada Bar No.: 9469
17 3960 Howard Hughes, Suite 615
18 Las Vegas, Nevada 89169
19
20
21
22
23
24
25
26
27
28

DECLARATION OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF CLARK)

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

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

FURTHER YOUR DECLARANT SAYETH NAUGHT.



MICHAEL D. PARIENTE, ESQ.

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

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,
Plaintiff,

vs.

VALENTINA KNIGHT &
MOUSTAPHA DIOUBATE,
Defendants.

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

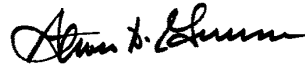
JOINT MOTION TO SUPPRESS

RECEIPT OF COPY

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

DISTRICT ATTORNEY'S OFFICE:

DISTRICT ATTORNEY
200 Lewis Ave.
Las Vegas, NV 89101



CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10
11 Plaintiff,

12 -vs-

13 MOUSTAPHA DIOUBATE,
14 #7018908;
15 VANELTINA KNIGHT,
16 #7018909

17 Defendants.

CASE NO: C-15-309123-2

DEPT NO: XIX

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

20 DATE OF HEARING: 1/11/2017
21 TIME OF HEARING: 8:00 AM

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

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

//

//

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

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

21
22
23
24
25
26
27
28

2

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

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

14 **CONCLUSION**

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

17 DATED this 29th day of December, 2016.

18 Respectfully submitted,

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

22 BY N. Demonte
23 NOREEN DEMONTE
24 Chief Deputy District Attorney
25 Nevada Bar #8213
26
27
28

//

//

//

//

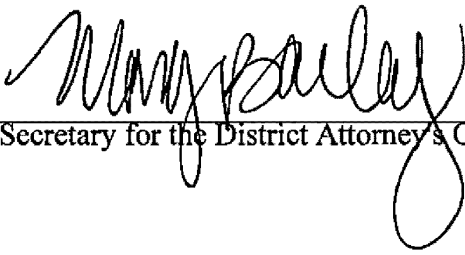
//

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

CERTIFICATE OF ELECTRONIC FILING

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

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


Secretary for the District Attorney's Office

15F06822B/ND/mlb/L-2

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

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

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

DISTRICT COURT
CLARK COUNTY, NEVADA

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



9 **THE STATE OF NEVADA,**

10 **Plaintiff,**

11 **-vs-**

12 **VALENTINA MONEE KNIGHT**
13 **#7018909**

14 **Defendant.**

CASE NO: C-15-309123-2

DEPT NO: XIX

15 **GUILTY PLEA AGREEMENT**

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

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

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

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

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

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

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

8 CONSEQUENCES OF THE PLEA

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

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

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

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

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

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

1 and may receive a higher sentencing range.

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

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

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

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

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

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

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

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

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

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

4 WAIVER OF RIGHTS

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

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

21 VOLUNTARINESS OF PLEA

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

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

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

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

1 thoroughly explained to me by my attorney.

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

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

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

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

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

13 January 2017

14 
15 VALENTINA MONEE KNIGHT
Defendant

16 AGREED TO BY:

17
18 
19 NOREEN DEMONTE
Chief Deputy District Attorney
20 Nevada Bar #08213

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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

CERTIFICATE OF COUNSEL:

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

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

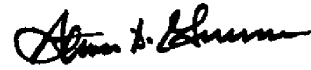
Moreover, I have explained that regardless of what Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

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

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

January 2017


ATTORNEY FOR DEFENDANT


CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

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

9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-15-309123-2

11 -vs-

DEPT NO: XIX

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

INFORMATION

Defendant.

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

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

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

26 ///

27 ///

28 ///

EXHIBIT " + "

W:\2015F06822\15F06822-INFM-(KNIGHT_VALENTIA)-001.DOCX

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

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

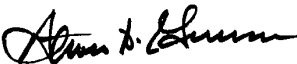
6 BY N. Demonte
7 NOREEN DEMONTE
8 Chief Deputy District Attorney
9 Nevada Bar #08213
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 15F06822B /mlb/L-2
28 LVMPD EV#1505044592
(TK3)

THIS SEALED
DOCUMENT,
NUMBERED PAGE(S)
196 - 203
WILL FOLLOW VIA
U.S. MAIL

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

Electronically Filed
03/10/2017 03:09:15 PM


CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

VALENTINA KNIGHT,

Defendant.


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

SENTENCING MEMORANDUM

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

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

DATED this 10th day of March, 2017.


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

NOTICE OF MEMORANDUM

TO: STATE OF NEVADA, Plaintiff

TO: DISTRICT ATTORNEY, Attorney for Plaintiff

YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the above and foregoing Motion on for hearing before the Court at the Courtroom of the above-entitled Court on the 15th day of March, 2017, at _____ m. of said day, in Department 19 of said Court.



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

I.

FACTS

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

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

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

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

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

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

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

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

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

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

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

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


13
14
15 **II.**

16 **CONCLUSION**

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

19
20 DATED this 10th day of March, 2017.

21 Respectfully submitted,

22
23
24 
25 MICHAEL D. PARIENTE, ESQ.
26 Nevada Bar No.: 9469
27 3960 Howard Hughes, Suite 615
28 Las Vegas, Nevada 89169

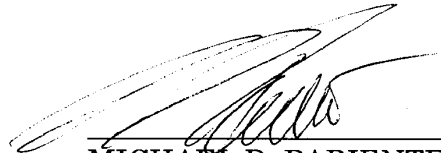
DECLARATION OF COUNSEL

STATE OF NEVADA)
)
COUNTY OF CLARK)

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

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

FURTHER YOUR AFFIANT SAYETH NAUGHT.



MICHAEL D. PARIENTE, ESQ.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

APPENDIX

Good day your Honor.

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

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

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

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

Sincerely,

Glenn M. Gamm

2/5/17

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

Yours truly, Sharita
Stewart

On Behalf of Ms. Valentina M. Knight

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

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

Sincerely, David Macklin
D. Macklin

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

Elhadi

To Whom this May concern:

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

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

Michela Connors

To: Your Honor,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thanks,
Sharell Knight

P.S.

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



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

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

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

VALENTINA KNIGHT,

Defendant.

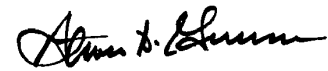
Case No.: **C-15-309123-2**
Dept No.: **19**

RECEIPT OF COPY

RECEIPT OF COPY of the Defendant's **SENTENCING MEMORANDUM** is
hereby acknowledged this ____ day of _____, 2017.

DISTRICT ATTORNEY'S OFFICE:

DISTRICT ATTORNEY
200 Lewis Ave.
Las Vegas, NV 89101



CLERK OF THE COURT

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

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA
8

9 STATE OF NEVADA,

10 Plaintiff,

11 vs.

12 VALENTINA KNIGHT,

13 Defendant.
14

CASE NO.: C-15-309123-2

DEPT NO.: XIX

DATE OF HEARING:
TIME OF HEARING:

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

17 COMES NOW, James C. Gallo Jr., Esq., on behalf of the Defendant, VALENTINA
18 KNIGHT, and hereby moves this Honorable Court for an Order to place on calendar to request
19 reconsideration of revocation of probation.
20
21
22
23
24
25
26
27
28

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


NOTICE OF MOTION

TO: DISTRICT ATTORNEY, Attorneys for Plaintiff

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

DATED this 24 day of April, 2017.

Respectfully Submitted:


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

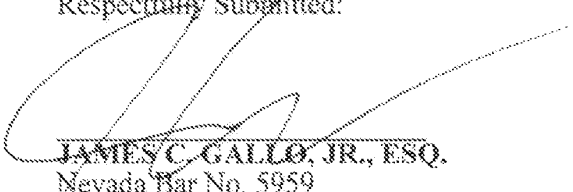
ARGUMENT

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

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

DATED this 24 day of April, 2017.

Respectfully Submitted:


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

CERTIFICATE OF SERVICE

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

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

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

Cynthia Capps
Employee of Gallo Law Office

Steven D. Grierson

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

**DISTRICT COURT
CLARK COUNTY, NEVADA**

THE STATE OF NEVADA,

Plaintiff,

-vs-

CASE NO: C-15-309123-2

VALENTINA MONEE KNIGHT,
#7018909

DEPT NO: XIX

Defendant.

**JUDGMENT OF CONVICTION
(PLEA OF GUILTY)**

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

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

///

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

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

3 Comply with standard probation conditions as follows;

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

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

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

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

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

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

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

28 ///

- 1 8. Directives and Conduct: You shall follow the directives of the Division of Parole and
2 Probation and your conduct shall justify the opportunity granted to you by this community
3 supervision.
- 4 9. Laws: You shall comply with all municipal, county, state, and federal laws and ordinances.
- 5 10. Out-of-State Travel: You shall not leave the state without first obtaining written permission
6 from the Division of Parole and Probation.
- 7 11. Employment/Program: You shall seek and maintain legal employment, or maintain a
8 program approved by the Division of Parole and Probation and not change such employment
9 or program without first obtaining permission. All terminations of employment or program
10 shall be immediately reported to the Division.
- 11 12. Financial Obligation: You shall pay fees, fines, and restitution on a schedule approved by
12 the Division of Parole and Probation. Any excess monies paid will be applied to any other
13 outstanding fees, fines, and/or restitution, even if it is discovered after your discharge.
- 14 SPECIAL CONDITIONS:
- 15 1. Abide by any curfew imposed by probation officer.
- 16 2. Complete a substance abuse evaluation and any recommended case plan.
- 17 3. Complete an impulse control evaluation and any recommended case plan.
- 18 4. Satisfy any/all outstanding warrants within the first sixty (60) days of probation.
- 19 5. Pay \$557.76 restitution in monthly installments to be determined by P & P based on income
20 verification; to be paid joint/severally with co-defendant.
- 21 6. No gambling or entry into any gaming establishment unless employed therein.
- 22 7. Provide P & P with a full and complete financial disclosure.
- 23 8. Pay \$5,000.00 Fine.
- 24 ///
- 25 ///
- 26 ///
- 27 ///
- 28 ///

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

3 DATED this 25th day of April, 2017.

4
5 Will 16/17
DISTRICT JUDGE
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

15F06822B/mlb/L-2

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

Filed 6/1/2017 12:46 PM

Steven D. Grierson

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

Criminal Case No. C-15-309123-2

THE STATE OF NEVADA Plaintiff,

vs.

KNIGHT, Valentina Monee

Defendant

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

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

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

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

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

William B. Kephart
District Judge William B. Kephart

AGREEMENT BY PROBATIONER

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

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

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

APPROVED: C. Pollack 5/18/17

PROBATION AGREEMENT SPECIAL CONDITIONS ADDENDUM

File # V17-3052

Criminal Case No. C-15-309123-2

KNIGHT, Valentina Monee

Defendant

Standard Conditions: Refer to attached Probation Agreement and Rules

Special Conditions of your probation:

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

AGREEMENT BY PROBATIONER

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


Probationer Valentina Monee Knight/Date

APPROVED:  5/18/17

ah

Steven D. Grierson

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

THE STATE OF NEVADA,

Plaintiff

vs.

KNIGHT, VALENTINA MONEE

Defendant

Case No. C-15-309123-2

Department No. XIX

BENCH WARRANT

TO ANY LAW ENFORCEMENT OFFICERS:

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

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

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

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

JAN 26 2018
ONDINA AMOS

William D. Kephart
William D. Kephart, District Judge

Proof of Service

Date Served _____

By _____

Agency _____



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

DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

VALENTINA MONEE KNIGHT,

Defendant.

CASE NO.: C-15-309123-2

DEPT. NO.: XIX

MOTION TO PLACE ON CALENDAR TO WITHDRAW AS ATTORNEY OF RECORD

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

Respectfully Submitted:

/s/ James C. Gallo

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

I.

NOTICE OF MOTION

TO: DISTRICT ATTORNEY, Attorney for Plaintiff:

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

Respectfully Submitted:

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

II.

POINTS AND AUTHORITIES

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

III.

CONCLUSION

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

Respectfully Submitted:

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

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

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

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

6 1) That I am an attorney duly licensed to practice in the State of Nevada;

7 2) That Affiant is presently Counsel of record for VALENTINA MONEE KNIGHT in the
8 above-entitled action;

9 3) That the attorney/client relationship has broken down between Counsel and
10 VALENTINA MONEE KNIGHT.

11 4) Counsel mailed a copy of this Motion to VALENTINA MONEE KNIGHT, at his last
12 known address and at her current location: VALENTINA MONEE KNIGHT, I.D. # 07018909,
13 C/O CCDC, 330 S. Casino Center Blvd., Las Vegas, NV 89101.

14
15
16
17 /S/ James C. Gallo
18 JAMES C. GALLO, JR., ESQ.

CERTIFICATE OF SERVICE

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

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

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

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

/S/ Cynthia Capps
Employee of Gallo Law Office

DISTRICT COURT
CLARK COUNTY, NEVADA



State of Nevada
vs
Valentina Knight

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

NOTICE OF HEARING

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

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

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

STEVEN D. GRIERSON, CEO/Clerk of the Court

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

CERTIFICATE OF SERVICE

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

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



1 AJOC

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

VALENTINA MONEE KNIGHT
#7018909

Defendant.

CASE NO. C-15-309123-2

DEPT. NO. XIX

ORDER FOR REVOCATION OF PROBATION AND
AMENDED JUDGMENT OF CONVICTION

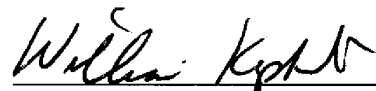

The Defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime of BURGLARY (Category B Felony) in violation of NRS 205.060; thereafter, on the 12th day of April, 2017, the Defendant was present in court for sentencing with counsel, wherein the Court did adjudge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

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

1 Defendant appeared in court with counsel MICHAEL W. SANFT, ESQ., and pursuant to a
2 probation violation hearing/proceeding and good cause appearing to amend the Judgment of
3 Conviction,
4

5 IT IS HEREBY ORDERED that the probation previously granted to the Defendant is
6 REVOKED; in addition to the original fees, fines and assessments COURT orders \$148.51
7 Extradition Fees, IT IS FURTHER ORDERED that the original sentence is imposed as follows:
8 a MAXIMUM of ONE HUNDRED TWENTY (120) MONTHS with a MINIMUM parole
9 eligibility of FORTY-EIGHT (48) MONTHS in the Nevada Department of Corrections (NDC);
10 with TWO HUNDRED NINETY-SIX (296) DAYS credit for time served.
11

12 DATED this 16th day of January, 2020.

13
14 
15 WILLIAM D. KEPHART
16 DISTRICT COURT JUDGE 
17
18
19
20
21
22
23
24
25
26
27
28