

Attorney General's Office  
555 E. Washington, Suite 3900  
Las Vegas, NV 89101

1 CATHERINE CORTEZ MASTO  
Attorney General  
2 By: ADAM L. WOODRUM  
Deputy Attorney General  
3 Nevada Bar No. 10284  
Bureau of Criminal Justice  
4 555 E Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101-1068  
5 P: (702) 486-3904  
F: (702) 486-2377  
6 E-mail: jresch@ag.nv.gov  
Attorney for Plaintiff STATE OF NEVADA  
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FILED

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JUSTICE COURT  
LAS VEGAS NEVADA  
BY RC DEPUTY

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

10 THE STATE OF NEVADA, )  
11 Plaintiff, )  
12 vs. )  
13 ARTHUR GERALD JONES, )  
14 )  
15 Defendant. )  
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CASE NO.: 11F12552X  
DEPT NO.: 2

CRIMINAL COMPLAINT

17 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of  
18 Nevada, by and through Deputy Attorney General ADAM L. WOODRUM, complains and  
19 charges the above named defendant, **ARTHUR GERALD JONES**, with having committed the  
20 following offenses within the County of Clark, State of Nevada, contrary to the form, force and  
21 effect of the statutes made and provided, and against the peace and dignity of the State of  
22 Nevada: BURGLARY (NRS 205.060), OBTAINING AND USING PERSONAL IDENTIFYING  
23 INFORMATION OF ANOTHER PERSON TO HARM OR IMPERSONATE PERSON, TO  
24 OBTAIN CERTAIN NONPUBLIC RECORDS OR FOR OTHER UNLAWFUL PURPOSE (NRS  
25 205.463), POSSESSION OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION  
26 TO ESTABLISH FALSE STATUS OR IDENTITY (NRS 205.465), FRAUD IN CONNECTION  
27 WITH APPLICATION FOR LICENSE OR IDENTIFICATION CARD (NRS 483.530), all  
28 committed within the County of Clark, State of Nevada, as follows:

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**COUNT ONE**  
**BURGLARY**  
**(Category "B" Felony – NRS 205.060)**

That the defendant, did willfully, and unlawfully, by day or night, enter a building with the intent to commit any felony, to wit: That on or about May 19, 2008, the defendant entered a building of Nevada Department of Motor Vehicles, 1399 American Pacific Dr., Henderson, NV 89074, with the intent to commit the felony crime(s) of Possession Of Document Or Personal Identifying Information To Establish False Status Or Identity and/or Fraud In Connection With Application For License Or Identification Card as set forth more fully below, or another felony therein, all with the purpose of fraudulently obtaining a Nevada Drivers License in the name of Joseph Richard Sandelli, using the social security number belonging to Clifton Goodenough.

**COUNT TWO**  
**OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER PERSON TO HARM OR IMPERSONATE PERSON, TO OBTAIN CERTAIN NONPUBLIC RECORDS OR FOR OTHER UNLAWFUL PURPOSE**  
**(Category "B" Felony – NRS 205.463)**

Defendant knowingly obtained personal identifying information of another person, and with the intent to commit an unlawful act used the personal identifying information for any unlawful purpose, including, without limitation, to obtain credit, a good, a service or anything of value in the name of that other person, to wit: That on or about May 19, 2008, in or near the location of the Nevada Department of Motor Vehicles, 1399 American Pacific Dr., Henderson, NV 89074, Defendant, having obtained personal identifying information of Clifton Goodenough, a social security number, used the information for an unlawful purpose as more fully described in Count(s) Three, and/or Four herein.

**COUNT THREE**  
**POSSESSION OR SALE OF DOCUMENT OR PERSONAL IDENTIFYING INFORMATION TO ESTABLISH FALSE STATUS OR IDENTITY**  
**(Category "E" Felony – NRS 205.465)**

The Defendant unlawfully possessed, sold or transferred any document or personal identifying information for the purpose of establishing a false status, occupation, membership,

1 license or identity for himself or any other person, to wit: That on or about May 19, 2008, in or  
2 near the location of the Nevada Department of Motor Vehicles, 1399 American Pacific Dr.  
3 Henderson, NV 89074, the Defendant possessed documents containing personal identifying  
4 information of Joseph Richard Sandelli, with the purpose of fraudulently obtaining a Nevada  
5 Drivers License in the name of Joseph Richard Sandelli, using the social security number  
6 belonging to Clifton Goodenough.

7 **COUNT FOUR**  
8 **FRAUD IN CONNECTION WITH APPLICATION FOR LICENSE OR IDENTIFICATION**  
9 **CARD**  
10 **(Category "E" FELONY – NRS 483.530)**

11 That the defendant, did knowingly, willfully, and unlawfully, use a false or fictitious  
12 name in any application for a driver's license or identification card, or knowingly made a false  
13 statement or knowingly conceal a material fact, or otherwise commit a fraud in any such  
14 application, to wit: That on or about May 19, 2008, in or near the location of the Nevada  
15 Department of Motor Vehicles, 1399 American Pacific Dr., Henderson, NV 89074, the  
16 defendant made false statements and/or falsely represented his name, date of birth, social  
17 security number, and/or other personal identifying information, in a written application for a  
18 Nevada Drivers License.

19 Complainant knows said crimes occurred and that the defendant ARTHUR GERALD  
20 JONES committed the same based upon the following: because the complainant is a Deputy  
21 Attorney General, and is in possession of an Affidavit made by Doug Staubs, known to the  
22 complainant to be an investigator for the State of Nevada, Department of Motor Vehicles,  
23 Compliance Enforcement Division. A copy of said affidavit is attached to this complaint and is  
24 hereby incorporated by reference herein for the limited purpose of securing a warrant for the  
25 arrest of the defendant. Complainant makes this declaration subject to the penalty of perjury.

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1 All of which is contrary to the form, force and effect of statutes in such cases made and  
2 provided against the peace and dignity of the State of Nevada.

3 DATED this 15 day of July, 2011.

4 CATHERINE CORTEZ MASTO  
5 Attorney General

6  
7 By: 

8 ADAM L. WOODRUM  
9 Deputy Attorney General  
10 Bureau of Criminal Justice  
11 (702) 486-3904  
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STATE OF NEVADA  
DEPARTMENT OF MOTOR VEHICLES  
COMPLIANCE ENFORCEMENT DIVISION

A F F I D A V I T  
(N.R.S. 171.106)

Case: 2012SI66832

STATE OF NEVADA        )  
                                  )  
COUNTY OF CLARK     )        ss. **ARTHUR GERALD JONES**

I, Doug Staubs., being first duly sworn, deposes and says:

That he is an Investigator with the Department of Motor Vehicles (DMV), Compliance Enforcement Division (CED), being so employed for a period of three years with the DMV, CED, assigned to investigate the crimes of NRS 483.530, NRS 205-463 (1), NRS 205.465 (1) and, NRS 205.060 (1) committed on or about May 19, 2008, which investigation has developed Arthur Gerald Jones as the perpetrator thereof.

On May 19, 2008, Arthur Gerald Jones (Suspect) entered the Department of Motor Vehicles (DMV), Henderson Office located at 1399 American Pacific Dr, Henderson, NV 89074. Suspect identified himself to DMV Tech Rebecca Donham as Joseph Richard Sandelli (Victim #1). Suspect requested to renew NVDL 2600312786, a DMV record in the name Joseph Richard Sandelli, DOB 07-28-1938, SSN (issued to Clifton Goodenough – Victim #2). Suspect provided expiring NVDL containing Victim #1's PII and his photo as proof of identification. Suspect completed a DMV Application with Victim #1 & #2 PII, signing Victim #1's name to it as well as to the DMV Data Card and DMV Customer Confirmation Copy. Suspect proceeded to the DMV Photo Area where he had his photo taken to be placed on the renewed NVDL, signing Victim #1's name below his image. DMV issued Suspect renewed NVDL 2600312786 containing V#1's PII and Suspect's image. Suspect conducted no other DMV transactions on this date, entering the building with intent of committing the felonies associated with identity theft.

On July 5, 2012, Special Agent (SA) Mike Stuto with the Office of the Inspector General, Social Security Administration (SSA) contacted Reporting Investigator (RI) Staubs with DMV's Compliance Enforcement Division (CED). SA informed RI that he was investigating a person named Arthur Gerald Jones (Suspect) for using Social Security Number (SSN) :                    which belonged to Clifton Goodenough (V#2). SA advised RI that Suspect assumed a false identity as Joseph Richard Sandelli, establishing a NVDL in that name. SA cited his case number #VEG-11-000270.

SA said that research of SSN [redacted] (belonging to Suspect) revealed that this SSN was issued to Suspect in October, 1953 when Suspect was 15 years old. Earnings were posted between 1953 through 1978 with no earnings after 1978. SSA records indicated a date of death of May 1979 which was posted on 12-30-1987 (eight years after death). SSA records indicated a total of approximately \$47,000.00 was paid to his spouse and children in survivor benefits.

SA said that he interviewed Suspect who advised him his true name is Arthur Gerald Jones, DOB 07-28-1938 and SSN [redacted]. Suspect said he lived in Highland Park, Illinois, was married with three young children and had a seat on the Chicago Board of Trade (CBT) as a commodities trader. Suspect said that due to a trading mistake he made, he was forced to sell his seat to pay the debt, losing his job. Suspect said that because of his unemployment and troubled marriage, he decided to leave his family. Suspect said he left in 1979 without telling anyone and has to date made no contact with anyone from his past.

Suspect said that prior to leaving Illinois; he contacted a business friend at a building across from the Chicago Board of Trade. Suspect paid his friend \$800.00 to establish a fake identity. Suspect said he was given an Illinois Driver's License, social security card (SSC) with SSN [redacted] and Illinois Birth Certificate, each bearing the name "Joseph Richard Sandelli". The License and birth certificate listed his DOB as 07-28-1938.

Suspect advised SA that he left Chicago in 1979, lived in Florida for about a year then moved to California. Suspect said he settled in Las Vegas in 1988 where he currently lives, working at Rampart Casino's Sports Book. Suspect claims he changed his identity to get a fresh start.

SA contacted Suspect former wife, Joanne Esplin. Joanne advised SA that she was married to Arthur Jones for 17 years and had three children with him. Joanne verified that Suspect held a seat on CBT as a commodities trader. She said that six months prior to his disappearance, he lost his job on the CBT, selling his seat to pay off personal gambling debts, citing an example that Suspect had once bet \$30,000 on a basketball game. Joanne said Suspect forged her name to obtain a second mortgage on their home in an ongoing attempt to pay his gambling debts. Joanne was unaware of any debt related problems at his work. Joanne said she believed Suspect had ties with the "mob" in Chicago, possibly delivering money and running errands for them.

Joanne said that on May 11, 1979, the day Suspect disappeared; he appeared very nervous and asked a neighbor to accompany him on an errand he needed to run. He advised the neighbor to simply wait in the car when they reach the destination. The neighbor declined and Suspect left on his own to run the errand. Joanne said that was the last time she saw or heard from him.

SA contacted the FBI who investigated Suspect's disappearance. SA was advised that they focused their investigation on the organized crime aspect of the case. Phone records indicated Suspect made numerous calls to Las Vegas, Nevada. FBI believed Suspect was associated with organized crime figures.

Suspect was officially declared dead on 05-30-1986 by the Circuit Court of the 19<sup>th</sup> Judicial District in Lake County, Illinois. His date of death was listed as May 11, 1979, the date he disappeared.

RI conducted a criminal history check on Arthur Gerald Jones and Joseph Richard Sandelli. The check on Jones revealed no record. The check on Sandelli listed Sandelli as an alias for "Richard Lage". DOB 07-26-1938. The criminal record began with the first arrest on 09-18-1979 as Richard Lage in Boca Raton, Florida for larceny. FBI Fingerprint #893512V1 was established at this time. Suspect was subsequently arrested on 03-02-80 & 04-02-80 in Naples, Florida and again on 04-10-80 in Palm Beach, Florida.

Fingerprints reveal Suspect was next arrested in Santa Barbara, CA on 10-30-80 as Richard Sanders, DOB 07-31-1940. He was arrested as Sanders on 06-29-81 in Santa Barbara, 09-19-86 in Los Angeles and 12-15-86 in Westminster, CA.

FBI fingerprints indicate Suspect was next arrested in Henderson, NV on 05-27-1992 as Joseph Richard Sandelli, DOB 07-28-1938.

Based on SA Stuto's investigation which includes Suspect's admission of his true identity as the same Arthur Gerald Jones who was reported missing on 05-11-1979 and ultimately declared dead and criminal record searches conducted with FBI fingerprints, RI concluded Suspect's true identity as Arthur Gerald Jones.

RI concluded that Suspect voluntarily left his family and friend in 1979, possibly fleeing the mob, with intent of changing his identity and starting a new life under an assumed identity. In doing so, Suspect used various names, DOB's and SSN to avoid ever being found. Suspect settled in Las Vegas, NV in 1988 using the false identity of Joseph Richard Sandelli, DOB 07-28-1938, SSN: . Suspect established NVDL 2600312786 containing the false identity, maintaining it through 07-28-2012 with his last transaction occurring at Henderson DMV on 05-19-2008.

In light of Suspect's established pattern and ability to flee and change his identity, RI considers him a flight risk and wishes to take him into custody as soon as possible.

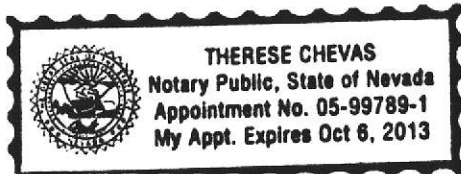
Wherefore, affiant prays that an **Arrest Warrant** be issue for Gerald Arthur Jones on the charges of violating NRS 483.530 (Felony) Providing false information in connection with application for license or identification card, NRS 205.463 (1) (Felony) Obtaining or using personal identifying information of another to cause harm or for any unlawful purpose, NRS 205.465 (1) (Felony) Possession or sale of document or personal identifying information to establish false status or identity, NRS 205.060 (1) (Felony) Burglary with intent to commit a felony.

State of Nevada  
County of Clark

AFFIANT



Subscribed and sworn to before me this 14th day of July, 2011.



Notary Public in and for said State and County