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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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