

1 JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP

2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA,)

4 Plaintiff,)

5 -vs-)

6 PRENTICE MARSHALL #2722969,)
7 SAUL WILLIAMS, aka,)
8 Saul Williams Jr. #2681928,)
9 QUADRAE SCOTT #2722984,)
10 ADRIAN PENA #2722977,)
11 EMMITT FERGUSON #2722985,)

12 Defendants.)

CASE NO: 09FN2794A-E

DEPT NO: 2

CRIMINAL COMPLAINT

13 The Defendants above named having committed the crimes of CONSPIRACY TO
14 COMMIT ROBBERY AND WITH THE INTENT TO PROMOTE, FURTHER OR ASSIST
15 A CRIMINAL GANG (Felony - NRS 193.168, 193.169, 199.480, 200.380); BURGLARY
16 WHILE IN POSSESSION OF A FIREARM AND WITH THE INTENT TO PROMOTE,
17 FURTHER OR ASSIST A CRIMINAL GANG (Felony - NRS 193.168, 193.169, 205.060);
18 ATTEMPT ROBBERY WITH USE OF A DEADLY WEAPON AND WITH THE INTENT
19 TO PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG (Felony - NRS 193.168,
20 193.169, 200.380, 193.330, 193.165); MURDER WITH USE OF A DEADLY WEAPON
21 AND WITH THE INTENT TO PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG
22 (Felony - NRS 193.168, 193.169, 200.010, 200.030, 193.165) and ACCESSORY TO
23 MURDER AND WITH THE INTENT TO PROMOTE, FURTHER OR ASSIST A
24 CRIMINAL GANG (Felony - NRS 193.168, 193.169, 195.030, 195.040, 200.010, 200.030),
25 in the manner following, to-wit: That the said Defendants, on or between November 9, 2009
26 and November 22, 2009, at and within the County of Clark, State of Nevada,

27 COUNT 1 – CONSPIRACY TO COMMIT ROBBERY AND WITH THE INTENT TO
28 PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG

Defendants PRENTICE MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr.,
QUADRAE SCOTT and ADRIAN PENA did, on or about November 19, 2009, then and

1 there wilfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of,
2 or in affiliation with, a criminal gang, to-wit: WOOD STREET GANG, which has as one of
3 its common activities, engaging in felonious criminal activities, other than the conduct which
4 constitutes the primary offense, and the defendant with specific intent to promote, further, or
5 assist the activities of the above-said gang, then and there meet with each other and between
6 themselves, and each of them with the other, wilfully, unlawfully, and feloniously conspire
7 and agree to commit a crime, to-wit: Robbery, and in furtherance of said conspiracy,
8 defendants did commit the acts as set forth in Counts 2-4, said acts being incorporated by
9 this reference as though fully set forth herein.

10 COUNT 2 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND WITH THE
11 INTENT TO PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG

12 Defendants PRENTICE MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr.,
13 QUADRAE SCOTT and ADRIAN PENA did, on or about November 19, 2009, then and
14 there wilfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of,
15 or in affiliation with, a criminal gang, to-wit: WOOD STREET GANG, which has as one of
16 its common activities, engaging in felonious criminal activities, other than the conduct which
17 constitutes the primary offense, and the defendant with specific intent to promote, further, or
18 assist the activities of the above-said gang, did then and there wilfully, unlawfully, and
19 feloniously enter, while in possession of a firearm, with intent to commit assault and/or
20 battery and/or larceny or any felony, to-wit: robbery, that certain building occupied by
21 TREVOR NETTLETON and DANIELLE NETTLETON, located at 1110 Emerald Stone,
22 North Las Vegas, Clark County, Nevada, the defendants being responsible under one or
23 more of the following principles of criminal liability, to wit: (1) by the defendants
24 conspiring to commit the offense of burglary and/or robbery whereby the defendants
25 are each vicariously liable for the acts of the other conspirator which are intended by
26 the defendant and/or (2) the defendants aiding or abetting in the commission of the
27 crime by accompanying each other to the crime scene where defendant ADRIAN
28 PENA acted as a lookout and get away driver and provided a firearm to be used in the

1 crime, defendant QUADRAE SCOTT acted as a lookout, defendant PRENTICE
2 MARSHALL, armed with a firearm, and defendant SAUL WILLIAMS, aka, Saul
3 Williams, Jr. approached and entered the garage at 1110 Emerald Stone occupied by
4 TREVOR NETTLETON and DANIELLE NETTLETON.

5 COUNT 3 – ATTEMPT ROBBERY AND WITH THE INTENT TO PROMOTE,
6 FURTHER OR ASSIST A CRIMINAL GANG

7 Defendants PRENTICE MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr.,
8 QUADRAE SCOTT and ADRIAN PENA did, on or about November 19, 2009, then and
9 there wilfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of,
10 or in affiliation with, a criminal gang, to-wit: WOOD STREET GANG, which has as one of
11 its common activities, engaging in felonious criminal activities, other than the conduct which
12 constitutes the primary offense, and the defendant with specific intent to promote, further, or
13 assist the activities of the above-said gang, did then and there wilfully, unlawfully and
14 feloniously attempt to take personal property, from the person of TREVOR NETTLETON,
15 or in his presence, by means of force or violence, or fear of injury to, and without the
16 consent and against the will of the said TREVOR NETTLETON, defendants using a deadly
17 weapon, to-wit: a firearm, during the commission of said crime, the defendants being
18 responsible under one or more of the following principles of criminal liability, to wit: (1) by
19 the defendants conspiring to commit the offense of robbery whereby the defendants are each
20 vicariously liable for the reasonably foreseeable acts of the other conspirator when the acts
21 were in furtherance of the conspiracy and/or (2) the defendants aiding or abetting in the
22 commission of the crime by accompanying each other to the crime scene where defendant
23 ADRIAN PENA acted as a lookout and get away driver and provided a firearm to be used in
24 the crime, defendant QUADRAE SCOTT acted as a lookout, defendant PRENTICE
25 MARSHALL, armed with a firearm, and defendant SAUL WILLIAMS, aka, Saul Williams,
26 Jr. approached and contacted TREVOR NETTLETON in an attempt to rob TREVOR
27 NETTLETON, the defendants encouraged one another throughout by actions and words, the
28 defendants acted in concert throughout each with the intent to commit robbery.

1 COUNT 4 – MURDER WITH USE OF A DEADLY WEAPON AND WITH THE INTENT
2 TO PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG

3 Defendants PRENTICE MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr.,
4 QUADRAE SCOTT and ADRIAN PENA did, on or about November 19, 2009, then and
5 there wilfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of,
6 or in affiliation with, a criminal gang, to-wit: WOOD STREET GANG, which has as one of
7 its common activities, engaging in felonious criminal activities, other than the conduct which
8 constitutes the primary offense, and the defendant with specific intent to promote, further, or
9 assist the activities of the above-said gang, did then and there wilfully, feloniously, without
10 authority of law, and with premeditation and deliberation, and with malice aforethought, kill
11 TREVOR NETTLETON, a human being, in the following manner, to-wit: by shooting at
12 and into the body of TREVOR NETTLETON, with a firearm, the actions of defendants
13 resulting in the death of the said TREVOR NETTLETON, the said killing having been (1)
14 done with premeditation and deliberation and/or (2) committed during the perpetration or
15 attempted perpetration of robbery and/or burglary and/or kidnapping, the said defendants
16 being responsible under one or more of the following principles of criminal liability, to-wit;
17 (1) by directly committing the act and/or (2) by the defendants conspiring to commit
18 burglary, robbery, killing or kidnapping whereby each is vicariously liable for the reasonably
19 foreseeable general intent crimes of the other made in furtherance of the conspiracy as well
20 as all crimes specifically intended by the defendant and/or (3) the defendants aiding or
21 abetting in the commission of a robbery and/or burglary and/or kidnapping and/or killing by
22 accompanying each other to the crime scene where defendant ADRIAN PENA acted as a
23 lookout and get away driver and provided a firearm to be used in the crime of robbery and/or
24 burglary and/or kidnapping, defendant QUADRAE SCOTT acted as a lookout, defendant
25 PRENTICE MARSHALL armed with a firearm and defendant SAUL WILLIAMS, aka,
26 Saul Williams, Jr. approached and contacted TREVOR NETTLETON in an attempt to
27 commit robbery and/or burglary and/or kidnapping of TREVOR NETTLETON during
28 which time defendant PRENTICE MARSHALL shot at and into the body of TREVOR

1 NETTLETON with a firearm resulting in the death of TREVOR NETTLETON, the
2 defendants encouraged one another throughout by actions and words, the defendants acted in
3 concert throughout each with the intent to commit robbery and/or burglary and/or
4 kidnapping.

5 COUNT 5 – ACCESSORY TO MURDER AND WITH THE INTENT TO PROMOTE,
6 FURTHER OR ASSIST A CRIMINAL GANG

7 Defendant EMMITT FERGUSON did, on or between November 19, 2009 and
8 November 22, 2009, then and there wilfully, unlawfully, feloniously, and knowingly, for the
9 benefit of, at the direction of, or in affiliation with, a criminal gang, to-wit: WOOD
10 STREET GANG, which has as one of its common activities, engaging in felonious criminal
11 activities, other than the conduct which constitutes the primary offense, and the defendant
12 with specific intent to promote, further, or assist the activities of the above-said gang, did
13 then and there wilfully, unlawfully and feloniously harbor, conceal, or aid PRENTICE
14 MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr., QUADRAE SCOTT and
15 ADRIAN PENA, with the intent that the said PRENTICE MARSHALL, SAUL
16 WILLIAMS, aka, Saul Williams Jr., QUADRAE SCOTT and ADRIAN PENA might avoid
17 or escape arrest, trial, conviction, or punishment, having knowledge that the said PRENTICE
18 MARSHALL, SAUL WILLIAMS, aka, Saul Williams Jr., QUADRAE SCOTT and
19 ADRIAN PENA had committed a felony, to-wit: Murder, and were liable to arrest
20 therefore; the crime was committed as follows: the defendant moved one or more firearms
21 from a room in a residence at 1113 Cliffbrook Hedge and hid the said firearm or firearms in
22 the attic of the same residence, knowing the firearm or firearms had been used in a murder,
23 said crime being done to assist PRENTICE MARSHALL, SAUL WILLIAMS, aka, Saul
24 Williams Jr., QUADRAE SCOTT and ADRIAN PENA from being charged or convicted of
25 Murder.

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1 All of which is contrary to the form, force and effect of Statutes in such cases made
2 and provided and against the peace and dignity of the State of Nevada. Said Complainant
3 makes this declaration subject to the penalty of perjury.
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