

1 **ORDR**

2 DAVID ROGER  
3 Clark County District Attorney  
4 Nevada Bar #002781  
5 SONIA V. JIMENEZ  
6 Chief Deputy District Attorney  
7 Nevada Bar #008818  
8 200 Lewis Avenue  
9 Las Vegas, NV 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff  
12  
13  
14

FILED

JUN 7 11 40 AM '10

*[Signature]*  
CLERK COURT

8 DISTRICT COURT  
9 CLARK COUNTY, NEVADA

10 In the Matter of the True Bill Returned by )  
11 the Clark County Grand Jury on May 4, )  
12 2010, at approximately 11:45 am )  
13 )  
14 )

Case No. C264268  
Dept No. II

15 ORDER UNSEALING CASE

16  
17 Upon the Ex Parte Application of the State of Nevada, by DAVID ROGER, District  
18 Attorney, through SONIA V. JIMENEZ, Chief Deputy District Attorney, that the matter  
19 previously sealed pursuant to NRS 172.245(4) be unsealed.

20 DATED this 7th day of June, 2010.

21 **LINDA MARIE BELL**

22 DISTRICT JUDGE

23 DAVID ROGER  
24 DISTRICT ATTORNEY  
25 Nevada Bar #002781

26 *[Signature: Sonia V. Jimenez]*  
27 SONIA V. JIMENEZ  
28 Chief Deputy District Attorney  
Nevada Bar #008818

1 IND

2 DAVID ROGER  
3 Clark County District Attorney  
4 Nevada Bar #002781  
5 SONIA V. JIMENEZ  
6 Chief Deputy District Attorney  
7 Nevada Bar #008818  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA,

11 Plaintiff,

12 -vs-

13 RICHARD ALLEN, aka,  
14 Richard B. Allen, aka Rick  
15 MATTHEW BONELLI, aka,  
16 Matthew James Bonelli, aka Breaker,  
17 STUART CANTARA, aka,  
18 Stuart William Cantara, aka Stu #1566058,  
19 ERIC CHILDERS, aka Red #1992489,  
20 AARON FREEMAN, aka,  
21 Aaron Anthony Freeman, aka Bumper  
22 #1453890,  
23 JAMES HEALEY, aka,  
24 James Preston Healey, aka Rocky  
25 #1787794,  
26 LARRY JOHNSON, aka,  
27 Larry Steven Johnson, aka Revolver  
28 TIMOTHY KOICH, aka,  
Timothy John Koich, aka Hawk  
#1148623,  
THOMAS MANDERFELD, aka,  
Thomas Ross Manderfeld, aka Tomcat  
#2505199,  
THOMAS POWERS, aka,  
Thomas Ed Powers, aka Wizard  
#2673349,  
RONALD RUTAN, aka,  
Ronald William Rutan, aka Rowdy Ron  
JOHN STEWART, aka,  
John Michael Stewart, aka Thug  
#1980300,

Defendant(s).

FILED

MAY 4 2 54 PM '10

*Ann L. Johnson*  
CLERK OF THE COURT

Case No. C264268  
Dept. No. II

SEALED

INDICTMENT

1 STATE OF NEVADA        }  
2 COUNTY OF CLARK        } ss.

3       The Defendant(s) above named, accused by the Clark County Grand Jury of the  
4 crimes of CONSPIRACY TO COMMIT MURDER WITH THE INTENT TO PROMOTE,  
5 FURTHER, OR ASSIST A CRIMINAL GANG (Felony - NRS 199.480, 200.210, 200.230,  
6 193.168, 193.169); CONSPIRACY TO COMMIT ROBBERY WITH THE INTENT TO  
7 PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG (Felony - NRS 199.480,  
8 200.380, 193.168, 193.169); ATTEMPT MURDER WITH USE OF A DEADLY WEAPON  
9 WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG  
10 (Felony - NRS 200.010, 200.030, 193.330, 193.165, 193.168, 193.169); BATTERY WITH  
11 USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM  
12 WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG  
13 (Felony - NRS 200.481.2e, 193.168, 193.169); and ROBBERY WITH USE OF A DEADLY  
14 WEAPON WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL  
15 GANG (Felony - NRS 200.380, 193.165, 193.168, 193.169), committed at and within the  
16 County of Clark, State of Nevada, on or about the 7th day of June, 2009, as follows:

17 COUNT 1 - CONSPIRACY TO COMMIT MURDER WITH THE INTENT TO  
18 PROMOTE, FURTHER OR ASSIST A CRIMINAL GANG

19       did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit of,  
20 at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
21 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
22 which has as one of its common activities engaging in felonious criminal activities other than  
23 the conduct which constitutes the primary offense, and the defendants with specific intent to  
24 promote, further, or assist the activities of the above said gang, did then and there meet with  
25 each other and between themselves, and each of them with the other, wilfully, unlawfully,  
26 and feloniously conspire and agree to commit a crime, to-wit: murder, and in furtherance of  
27 said conspiracy, Defendants did commit the acts as set forth in Counts 3 and/or 4, said acts  
28 being incorporated by this reference as though fully set forth herein.

1 COUNT 2 - CONSPIRACY TO COMMIT ROBBERY WITH THE INTENT TO  
2 PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

3 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit of,  
4 at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
5 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
6 which has as one of its common activities engaging in felonious criminal activities other than  
7 the conduct which constitutes the primary offense, and the defendants with specific intent to  
8 promote, further, or assist the activities of the above said gang, did then and there meet with  
9 each other and between themselves, and each of them with the other, wilfully, unlawfully,  
10 and feloniously conspire and agree to commit a crime, to-wit: robbery, and in furtherance of  
11 said conspiracy, Defendants did commit the acts as set forth in Counts 9 and/or 10, said acts  
12 being incorporated by this reference as though fully set forth herein.

13 COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON WITH  
14 THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

15 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
16 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
17 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
18 which has as one of its common activities engaging in felonious criminal activities other than  
19 the conduct which constitutes the primary offense, and the defendants with specific intent to  
20 promote, further, or assist the activities of the above said gang, did then and there, without  
21 authority of law, and malice aforethought, willfully and feloniously attempt to kill KADELL  
22 McCLOUD, a human being, with a deadly weapon, to-wit: a knife and/or sharp object  
23 and/or a flashlight, by stabbing him with a knife or sharp object and/or striking him with  
24 their hands and/or a flashlight and/or by kicking and/or stomping him, said Defendants being  
25 responsible under one or more of the following principles of criminal liability, to-wit: (1) by  
26 each Defendant committing the acts constituting the offense; and/or (2) by conspiring with  
27 each other to commit the offense, with the specific intent that the crime occur, whereby each  
28 is vicariously liable for the foreseeable acts of the others made in furtherance of the

1 conspiracy and/or (3) by said Defendants aiding or abetting each other in the commission of  
2 the crime by counseling, encouraging, commanding or procuring the others to commit the  
3 offense, with the specific intent that the crime occur, by one or more of their number  
4 stabbing KADELL McCLOUD with a knife and/or sharp object and/or kicking and/or  
5 stomping and/or striking the said KADELL McCLOUD with their hands and/or a flashlight,  
6 while others of their number were stabbing at ANDREW RODRIGUEZ with knife or sharp  
7 object and/or kicking and/or stomping and/or striking ANDREW RODRIGUEZ with their  
8 hands and/or a flashlight, in an effort to take from KADELL McCLOUD and ANDREW  
9 RODRIGUEZ the motorcycle club vest each was wearing.

10 COUNT 4 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON WITH  
11 THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

12 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
13 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
14 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
15 which has as one of its common activities engaging in felonious criminal activities other than  
16 the conduct which constitutes the primary offense, and the defendants with specific intent to  
17 promote, further, or assist the activities of the above said gang, did then and there, without  
18 authority of law, and malice aforethought, willfully and feloniously attempt to kill  
19 ANDREW RODRIGUEZ, a human being, with a deadly weapon, to-wit: a knife and/or  
20 sharp object and/or a flashlight, by stabbing at him with a knife or sharp object and/or  
21 striking him with their hands and/or a flashlight and/or by kicking and/or stomping him, said  
22 Defendants being responsible under one or more of the following principles of criminal  
23 liability, to-wit: (1) by each Defendant committing the acts constituting the offense; and/or  
24 (2) by conspiring with each other to commit the offense, with the specific intent that the  
25 crime occur, whereby each is vicariously liable for the foreseeable acts of the others made in  
26 furtherance of the conspiracy and/or (3) by said Defendants aiding or abetting each other in  
27 the commission of the crime by counseling, encouraging, commanding or procuring the  
28 others to commit the offense, with the specific intent that the crime occur, by one or more of

1 their number stabbing at ANDREW RODRIGUEZ with a knife or sharp object and/or  
2 kicking and/or stomping and/or striking ANDREW RODRIGUEZ with their hands and/or a  
3 flashlight while others of their number were stabbing KADELL McCLOUD with a knife  
4 and/or sharp object and/or kicking and/or stomping and/or striking the said KADELL  
5 McCLOUD with their hands and/or a flashlight, in an effort to take from KADELL  
6 McCLOUD and ANDREW RODRIGUEZ the motorcycle club vest each was wearing.

7 COUNT 5 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN  
8 SUBSTANTIAL BODILY HARM WITH THE INTENT TO PROMOTE,  
FURTHER, OR ASSIST A CRIMINAL GANG

9 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
10 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
11 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
12 which has as one of its common activities engaging in felonious criminal activities other than  
13 the conduct which constitutes the primary offense, and the defendants with specific intent to  
14 promote, further, or assist the activities of the above said gang, did then and there use force  
15 or violence upon the person of another, to-wit: KADELL McCLOUD, with a deadly  
16 weapon, to-wit: a knife and/or sharp object and/or flashlight, by stabbing him with a knife or  
17 sharp object and/or striking him with their hands and/or a flashlight and/or by kicking and/or  
18 stomping him, resulting in substantial bodily harm to the said KADELL McCLOUD, said  
19 Defendants being responsible under one or more of the following principles of criminal  
20 liability, to-wit: (1) by each Defendant committing the acts constituting the offense; and/or  
21 (2) by conspiring with each other to commit the offense whereby each is vicariously liable  
22 for the foreseeable acts of the others made in furtherance of the conspiracy and/or (3) by said  
23 Defendants aiding or abetting each other in the commission of the crime by counseling  
24 encouraging, commanding or procuring the others to commit the offense, by one or more of  
25 their number stabbing KADELL McCLOUD with a knife and/or sharp object and/or kicking  
26 and/or stomping and/or striking the said KADELL McCLOUD with their hands and/or a  
27 flashlight, while others of their number were stabbing at ANDREW RODRIGUEZ with a  
28 knife or sharp object and/or kicking and/or stomping and/or striking ANDREW

1 RODRIGUEZ with their hands and/or a flashlight, in an effort to take from KADELL  
2 McCLOUD and ANDREW RODRIGUEZ the motorcycle club vest each was wearing.

3 COUNT 6 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN  
4 SUBSTANTIAL BODILY HARM WITH THE INTENT TO PROMOTE,  
FURTHER, OR ASSIST A CRIMINAL GANG

5 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
6 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
7 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
8 which has as one of its common activities engaging in felonious criminal activities other than  
9 the conduct which constitutes the primary offense, and the defendants with specific intent to  
10 promote, further, or assist the activities of the above said gang, did then and there use force  
11 or violence upon the person of another, to-wit: ANDREW RODRIGUEZ, with a deadly  
12 weapon, to-wit: a knife and/or sharp object and/or a flashlight, by stabbing at him with a  
13 knife or sharp object and/or striking him with their hands and/or a flashlight and/or by  
14 kicking and/or stomping him, resulting in substantial bodily harm to the said ANDREW  
15 RODRIGUEZ, said Defendants being responsible under one or more of the following  
16 principles of criminal liability, to-wit: (1) by each Defendant committing the acts  
17 constituting the offense; and/or (2) by conspiring with each other to commit the offense  
18 whereby each is vicariously liable for the foreseeable acts of the others made in furtherance  
19 of the conspiracy and/or (3) by said Defendants aiding or abetting each other in the  
20 commission of the crime by counseling, encouraging, commanding or procuring the others to  
21 commit the offense, by one or more of their number stabbing at ANDREW RODRIGUEZ  
22 with a knife and/or sharp object and/or kicking and/or stomping and/or striking ANDREW  
23 RODRIGUEZ with their hands and/or a flashlight while others of their number were  
24 stabbing KADELL McCLOUD with a knife and/or sharp object and/or kicking and/or  
25 stomping and/or striking the said KADELL McCLOUD with their hands and/or a flashlight,  
26 in an effort to take from KADELL McCLOUD and ANDREW RODRIGUEZ the  
27 motorcycle club vest each was wearing.

28 ///

1 COUNT 7 - ROBBERY WITH USE OF A DEADLY WEAPON WITH THE  
2 INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

3 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
4 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
5 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
6 which has as one of its common activities engaging in felonious criminal activities other than  
7 the conduct which constitutes the primary offense, and the defendants with specific intent to  
8 promote, further, or assist the activities of the above said gang, did then and there take  
9 personal property, to-wit: a leather vest, from the person of KADELL McCLOUD, or in his  
10 presence, by means of force or violence or fear of injury to, and without the consent and  
11 against the will of the said KADELL McCLOUD, one or more of the defendants using a  
12 deadly weapon, to-wit: a knife and/or sharp object and/or a flashlight, during the commission  
13 of said crime, said Defendants being responsible under one or more of the following  
14 principles of criminal liability, to-wit: (1) by each Defendant committing the acts  
15 constituting the offense; and/or (2) by conspiring with each other to commit offense whereby  
16 each is vicariously liable for the foreseeable acts of the other made in furtherance of the  
17 conspiracy and/or (3) by said Defendants aiding or abetting each other in the commission of  
18 the crime by counseling, encouraging, commanding or procuring the others to commit the  
19 offense, by one or more of their number stabbing KADELL McCLOUD with a knife and/or  
20 sharp object and/or kicking and/or stomping and/or striking the said KADELL McCLOUD  
21 with their hands and/or a flashlight, while others of their number were stabbing at ANDREW  
22 RODRIGUEZ with a knife or sharp object and/or kicking and/or stomping and/or striking  
23 ANDREW RODRIGUEZ with their hands and/or a flashlight, in an effort to take from  
24 KADELL McCLOUD and ANDREW RODRIGUEZ the motorcycle club vest each was  
25 wearing.

26 ///

27 ///

28 ///



1 COUNT 8 - ROBBERY WITH USE OF A DEADLY WEAPON WITH THE  
2 INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

3 did then and there wilfully, unlawfully, feloniously, and knowingly, for the benefit  
4 of, at the direction of, or in affiliation with, a criminal gang, to wit: BANDIDOS OUTLAW  
5 MOTORCYCLE GANG and/or DOWN AND DIRTY OUTLAW MOTORCYCLE GANG,  
6 which has as one of its common activities engaging in felonious criminal activities other than  
7 the conduct which constitutes the primary offense, and the defendants with specific intent to  
8 promote, further, or assist the activities of the above said gang, did then and there take  
9 personal property, to-wit: a leather vest and/or keys and/or cell phone, from the person of  
10 ANDREW RODRIGUEZ, or in his presence, by means of force or violence or fear of injury  
11 to, and without the consent and against the will of the said ANDREW RODRIGUEZ, one or  
12 more of the defendants using a deadly weapon, to-wit: a knife and/or sharp object and/or a  
13 flashlight, during the commission of said crime, said Defendants being responsible under one  
14 or more of the following principles of criminal liability, to-wit: (1) by each Defendant  
15 committing the acts constituting the offense; and/or (2) by conspiring with each other to  
16 commit the offense whereby each is vicariously liable for the foreseeable acts of the others  
17 made in furtherance of the conspiracy and/or (3) by said Defendants aiding or abetting each  
18 other in the commission of the crime by counseling, encouraging, commanding or procuring  
19 the others to commit the offense, by one or more of their number stabbing at ANDREW  
20 RODRIGUEZ with a knife and/or sharp object and/or kicking and/or stomping and/or

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///


27 ///

28 ///

1 striking ANDREW RODRIGUEZ with their hands and/or a flashlight while others of their  
2 number were stabbing KADELL McCLOUD with a knife and/or sharp object and/or kicking  
3 and/or stomping and/or striking the said KADELL McCLOUD with their hands and/or a  
4 flashlight, in an effort to take from KADELL McCLOUD and ANDREW RODRIGUEZ the  
5 motorcycle club vest each was wearing.

6 DATED this 4 day of May, 2010.

7  
8 DAVID ROGER  
DISTRICT ATTORNEY  
9 Nevada Bar #002781

10 BY   
11 SONIA V. JIMENEZ  
12 Chief Deputy District Attorney  
13 Nevada Bar #008818

14 ENDORSEMENT: A True Bill

15   
16 \_\_\_\_\_  
17 Foreperson, Clark County Grand Jury  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Names of witnesses testifying before the Grand Jury:

ARBOREEN, D., LVMPD #7533

CALDWELL, S., LVMPD #6079

COWART, JOSHUA, c/o CCDA, 200 Lewis Ave, LV, NV

DELZER, K., LVMPD #6841

DICARO, I., LVMPD #9005

FIESELMAN, D., LVMPD #5257

GAGLIARDI, J., LVMPD #6609

GIBSON, C., LVMPD #14009

GROBERSKI, D., LVMPD #8643

HAECKER, DENNIS, c/o CCDA, 200 Lewis Ave, LV, NV

HAMBLIN, K., LVMPD #3821

HANCOCK, L., LVMPD #7083

HARDIN, ERIK, c/o CCDA, 200 Lewis Ave, LV, NV

HUBER, T., c/o CCDA, 200 Lewis Ave, LV, NV

IVINS, Z., LVMPD #8265

KOMMEL-BERNSTEIN, J., LVMPD #9045

LANDERMAN, AARON, c/o CCDA, 200 Lewis Ave, LV, NV

MCCLOUD, KADELL, c/o CCDA, 200 Lewis Ave, LV, NV

MCDERMOTT, A., LVMPD #7537

ONEILL, T., LVMPD #6067

OSWALD, MICHAEL, c/o CCDA, 200 Lewis Ave, LV, NV

PAULETTE, K., LVMPD #8805

ROBERTS, N., LVMPD #6644

RODRIGUEZ, ANDREW, c/o CCDA, 200 Lewis Ave, LV, NV

STANTON, A., LVMPD #4717

TWIGGER, K., LVMPD #9060

UBBENS, A., LVMPD #13119

1 WILKINS, DAVID, c/o CCDA, 200 Lewis Ave, LV, NV

2 WOOSNAM, J., LVMPD #6236

3  
4  
5 Additional witnesses known to the District Attorney at time of filing the Indictment:

6 ABRAHAM, D., LVMPD #9877

7 BRINKERHOFF, DALLEEN, c/o CCDA, 200 Lewis Ave, LV, NV

8 BRUNING, N. P., LVMPD #8540

9 COLACURCI, C., LVMPD #12897

10 CONTRERAS, C., LVMPD #12971

11 CUSTODIAN OF RECORDS, CCDC

12 CUSTODIAN OF RECORDS, LVMPD COMMUNICATION

13 CUSTODIAN OF RECORDS, LVMPD RECORDS

14 CUSTODIAN OF RECORDS, HDC

15 CUSTODIAN OF RECORDS, HPD COMMUNICATIONS

16 CUSTODIAN OF RECORDS, HPD RECORDS

17 DARR, J., LVMPD #3741

18 DUCAS, J., LVMPD #7296

19 FLYNN, D., LVMPD #3028

20 GOODRUM, S., LVMPD #9812

21 GRAMMAS, K., LVMPD #7808

22 HOPSON, B., LVMPD #8906

23 JONES, MARTHA, c/o CCDA, 200 Lewis Ave, LV, NV

24 MARAMONTES, M., LVMPD #9813

25 MARTIN, J., LVMPD #5270

26 MCCONNELL, K., LVMPD #13336

27 PAZOS, E., LVMPD #6817

28 RAY, J., NLV PD #1886

1 SAMPLES, L., LVMPD #9354  
2 SCHUMAKER, S., LVMPD #9076  
3 SEEKATZ, W., HPD #1078  
4 SMITH, L., LVMPD #3571  
5 SMITH, RUSSELL, c/o CCDA, 200 Lewis Ave, LV, NV  
6 STAHELI, C., LVMPD #9705  
7 SZUKIEWICZ, J., LVMPD #5411  
8 WEST, RICHARD, c/o CCDA, 200 Lewis Ave, LV, NV  
9 YARPHEL, S., LVMPD #10034

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27 09AGJ153A-L/10F04570A-L/sam  
28 LVMPD EV# 0906070128  
(TK10)