

**FILED**  
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*Alan P. ...*  
CLERK OF THE COURT

1 **IND**  
2 DAVID ROGER  
3 Clark County District Attorney  
4 Nevada Bar #002781  
5 ROY L. NELSON III  
6 Chief Deputy District Attorney  
7 Nevada Bar #007842  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

8 DISTRICT COURT  
9 CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA, )  
11 Plaintiff, )  
12 -vs- )  
13 LEONARD HUNT, aka )  
14 Leonard Thomas Hunt #1307365, )  
15 JOVAN CARTER, aka )  
16 Jovan Machel Carter #1967203, )  
17 ABDUL SHAKIR, #1670403, )  
18 DAVID TODD HAYES, aka )  
19 Nelvin Ware, #1222791 )  
20 Defendant(s). )

Case No. C265556  
Dept. No. XXIII

INDICTMENT

19 STATE OF NEVADA )  
20 COUNTY OF CLARK ) ss.

21 The Defendant(s) above named, LEONARD HUNT, aka Leonard Thomas Hunt,  
22 JOVAN CARTER, aka Jovan Machel Carter, ABDUL SHAKIR, and DAVID TODD  
23 HAYES, aka Nelvin Ware, accused by the Clark County Grand Jury of the crime(s) of  
24 CONSPIRACY TO COMMIT ROBBERY (Felony - NRS 199.480, 200.380); BURGLARY  
25 WHILE IN POSSESSION OF A FIREARM AND/OR A DEADLY WEAPON (Felony -  
26 NRS 205.060); FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON  
27 (Felony - NRS 200.310, 200.320, 193.165); ROBBERY WITH USE OF A DEADLY  
28 WEAPON (Felony - NRS 200.380, 193.165); POSSESSION OF FIREARM BY EX-

1 FELON (Felony - NRS 202.360); CONSPIRACY TO COMMIT KIDNAPPING (Felony -  
2 NRS 199.480, 200.310, 200.320); INVASION OF THE HOME (Felony - NRS 205.067);  
3 BURGLARY (Felony - NRS 205.060); GRAND LARCENY (Felony - NRS 205.220,  
4 205.222); BATTERY WITH USE OF A DEADLY WEAPON (Felony - NRS 200.481);  
5 POSSESSION OF SHORT BARRELED SHOTGUN (Felony - NRS 202.275);  
6 TRAFFICKING IN CONTROLLED SUBSTANCE (Felony - NRS 453.3385);  
7 POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO SELL (Felony -  
8 NRS 453.337); POSSESSION OF CONTROLLED SUBSTANCE (Felony - NRS 453.336);  
9 POSSESSION OF STOLEN PROPERTY (Felony - NRS 205.275); ATTEMPT ROBBERY  
10 WITH USE OF A DEADLY WEAPON (Felony - NRS 200.380, 193.165, 193.330) and  
11 ATTEMPT MURDER WITH USE OF A DEADLY WEAPON (Felony - NRS 193.330,  
12 200.030) committed at and within the County of Clark, State of Nevada, on or between  
13 January 14, 2010, and April 20, 2010, as follows:

14 COUNT 1 – CONSPIRACY TO COMMIT ROBBERY

15 On or about March 5, 2010, Defendant ABDUL SHAKIR did then and there meet  
16 with another unidentified coconspirator and between themselves, and each of them with the  
17 other, wilfully, unlawfully, and feloniously conspire and agree to commit a crime, to-wit:  
18 robbery, and in furtherance of said conspiracy, Defendant did commit the acts as set forth in  
19 Counts 2, 3, 4, 5 and 6, said acts being incorporated by this reference as though fully set  
20 forth herein.

21 COUNT 2 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND/OR A  
22 DEADLY WEAPON

23 On or about March 5, 2010, Defendant ABDUL SHAKIR did then and there wilfully,  
24 unlawfully, and feloniously enter, while in possession of a firearm, with intent to commit  
25 larceny and/or a felony, to-wit: robbery, that certain building occupied by GABRIELLE  
26 EMILIEN and/or ANGELA MEREDITH, located at 7001 West Charleston Boulevard,  
27 Apartment No. 1062, Las Vegas, Clark County, Nevada; the Defendant being responsible  
28 under one or more of the following principles of criminal liability, to-wit: (1) by the

1 Defendant directly committing the crime; and/or (2) the Defendant aiding or abetting his  
2 unidentified coconspirator in the commission of the crime by the Defendant accompanying  
3 his unidentified coconspirator to the crime scene and/or the Defendant or his unidentified  
4 coconspirator acting as looking and/or the Defendant or his unidentified coconspirator  
5 entering the residence and/or by the Defendant and his unidentified coconspirator leaving the  
6 crime scene together, the Defendant acting with the intent to commit burglary; and/or (3)  
7 pursuant to a conspiracy to commit this crime.

8 COUNT 3 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

9 On or about March 5, 2010, Defendant ABDUL SHAKIR did wilfully, unlawfully,  
10 feloniously, and without authority of law, seize, confine, inveigle, entice, decoy, abduct,  
11 conceal, kidnap, or carry away GABRIELLE EMILIEN, a human being, with the intent to  
12 hold or detain the said GABRIELLE EMILIEN against her will, and without her consent, for  
13 the purpose of robbery, said Defendant using a deadly weapon, to-wit: a firearm, during the  
14 commission of the said crime; the Defendant being responsible under one or more of the  
15 following principles of criminal liability, to-wit: (1) by the Defendant directly committing  
16 the crime; and/or (2) the Defendant aiding or abetting his unidentified coconspirator in the  
17 commission of the crime by the Defendant accompanying his unidentified coconspirator to  
18 the crime scene and/or the Defendant or his unidentified coconspirator acting as looking  
19 and/or the Defendant or his unidentified coconspirator entering the residence and/or by the  
20 Defendant or his unidentified coconspirator being armed with a firearm and/or by the  
21 Defendant or his unidentified coconspirator forcing the said GABRIELLE EMILIEN into  
22 her residence and/or by the Defendant or his unidentified coconspirator forcing the said  
23 GABRIELLE EMILIEN into a closet and/or the Defendant and his unidentified  
24 coconspirator leaving the crime scene together, the Defendant acting with the intent to  
25 commit kidnapping; and/or (3) pursuant to a conspiracy to commit this crime.

26 COUNT 4 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

27 On or about March 5, 2010, Defendant ABDUL SHAKIR did wilfully, unlawfully,  
28 feloniously, and without authority of law, seize, confine, inveigle, entice, decoy, abduct,

1 conceal, kidnap, or carry away ANGELA MEREDITH, a human being, with the intent to  
2 hold or detain the said ANGELA MEREDITH against her will, and without her consent, for  
3 the purpose of robbery, said Defendant using a deadly weapon, to-wit: a firearm, during the  
4 commission of the said crime; the Defendant being responsible under one or more of the  
5 following principles of criminal liability, to-wit: (1) by the Defendant directly committing  
6 the crime; and/or (2) the Defendant aiding or abetting his unidentified coconspirator in the  
7 commission of the crime by the Defendant accompanying his unidentified coconspirator to  
8 the crime scene and/or the Defendant or his unidentified coconspirator acting as looking  
9 and/or the Defendant or his unidentified coconspirator entering the residence and/or by the  
10 Defendant or his unidentified coconspirator being armed with a firearm and/or by the  
11 Defendant or his unidentified coconspirator forcing the said ANGELA MEREDITH into a  
12 closet and/or the Defendant and his unidentified coconspirator leaving the crime scene  
13 together, the Defendant acting with the intent to commit kidnapping; and/or (3) pursuant to a  
14 conspiracy to commit this crime.

15 COUNT 5 - ROBBERY WITH USE OF A DEADLY WEAPON

16 On or about March 5, 2010, Defendant ABDUL SHAKIR did then and there  
17 wilfully, unlawfully, and feloniously take personal property, to-wit: a television, X-Box,  
18 camera and lawful money of the United States, from the person of GABRIELLE EMILIEN,  
19 or in her presence, by means of force or violence or fear of injury to, and without the consent  
20 and against the will of the said GABRIELLE EMILIEN, said Defendant using a deadly  
21 weapon, to-wit: a firearm, during the commission of said crime; the Defendant being  
22 responsible under one or more of the following principles of criminal liability, to-wit: (1) by  
23 the Defendant directly committing the crime; and/or (2) the Defendant aiding or abetting his  
24 unidentified coconspirator in the commission of the crime by the Defendant accompanying  
25 his unidentified coconspirator to the crime scene and/or the Defendant or his unidentified  
26 coconspirator acting as looking and/or the Defendant or his unidentified coconspirator  
27 entering the residence and/or by the Defendant or his unidentified coconspirator being armed  
28 with a firearm and/or by the Defendant or his unidentified coconspirator taking a television,

1 X-Box, camera and lawful money of the United States, from the person of GABRIELLE  
2 EMILIEN, and/or the Defendant and his unidentified coconspirator leaving the crime scene  
3 together, the Defendant acting with the intent to commit robbery; and/or (3) pursuant to a  
4 conspiracy to commit this crime.

5 COUNT 6 - ROBBERY WITH USE OF A DEADLY WEAPON

6 On or about March 5, 2010, Defendant ABDUL SHAKIR did then and there wilfully,  
7 unlawfully, and feloniously take personal property, to-wit: a television, X-Box, camera and  
8 lawful money of the United States, from the person of ANGELA MEREDITH, or in her  
9 presence, by means of force or violence or fear of injury to, and without the consent and  
10 against the will of the said ANGELA MEREDITH, said Defendant using a deadly weapon,  
11 to-wit: a firearm, during the commission of said crime; the Defendant being responsible  
12 under one or more of the following principles of criminal liability, to-wit: (1) by the  
13 Defendant directly committing the crime; and/or (2) the Defendant aiding or abetting his  
14 unidentified coconspirator in the commission of the crime by the Defendant accompanying  
15 his unidentified coconspirator to the crime scene and/or the Defendant or his unidentified  
16 coconspirator acting as looking and/or the Defendant or his unidentified coconspirator  
17 entering the residence and/or by the Defendant or his unidentified coconspirator being armed  
18 with a firearm and/or by the Defendant or his unidentified coconspirator taking a television,  
19 X-Box, camera and lawful money of the United States, from the person of ANGELA  
20 MEREDITH, and/or the Defendant and his unidentified coconspirator leaving the crime  
21 scene together, the Defendant acting with the intent to commit robbery; and/or (3) pursuant  
22 to a conspiracy to commit this crime.

23 COUNT 7 - POSSESSION OF FIREARM BY EX-FELON

24 On or about March 5, 2010, Defendant ABDUL SHAKIR did then and there  
25 wilfully, unlawfully, and feloniously own or have in his possession, or under his control, a  
26 weapon, to-wit: a firearm, the said ABDUL SHAKIR being an ex-felon, having in 2001,  
27 been convicted of Robbery with Use of a Deadly Weapon and Grand Larceny, felonies under  
28 the laws of the State of Nevada.

1 COUNT 8 - CONSPIRACY TO COMMIT KIDNAPPING

2 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
3 then and there meet between themselves and/or with an unidentified co-conspirator and  
4 between themselves, and each of them with the other, wilfully, unlawfully, and feloniously  
5 conspire and agree to commit a crime, to-wit: Kidnapping, and in furtherance of said  
6 conspiracy, Defendants did commit the acts as set forth in Counts 11 and 12, said acts being  
7 incorporated by this reference as though fully set forth herein.

8 COUNT 9 - CONSPIRACY TO COMMIT ROBBERY

9 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
10 then and there meet between themselves and/or with an unidentified co-conspirator and  
11 between themselves, and each of them with the other, wilfully, unlawfully, and feloniously  
12 conspire and agree to commit a crime, to-wit: Robbery, and in furtherance of said  
13 conspiracy, Defendant did commit the acts as set forth in Counts 13 and 14, said acts being  
14 incorporated by this reference as though fully set forth herein.

15 COUNT 10 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND/OR A  
16 DEADLY WEAPON

17 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
18 then and there wilfully, unlawfully, and feloniously enter with intent to commit larceny  
19 and/or a felony, to-wit: robbery and/or kidnapping, that certain building occupied by  
20 ALEXANDRA OJEDA, located at 10275 West Tropical Parkway, Las Vegas, Clark County,  
21 Nevada, the Defendant did possess and/or gain possession of a deadly weapon consisting of  
22 a firearm during the commission of the crime and/or before leaving the structure; the  
23 Defendants being responsible under one or more of the following principles of criminal  
24 liability, to-wit: (1) by the defendants directly committing the crime; and/or (2) the  
25 Defendants aiding or abetting each other in the commission of the crime by the Defendants  
26 accompanying each other to the crime scene and/or the Defendants or his unidentified  
27 coconspirator acting as looking and/or the Defendants or his unidentified coconspirator  
28 entering the residence and/or the Defendants and his unidentified coconspirator leaving the

1 crime scene together, the Defendants acting with the intent to commit burglary; and/or (3)  
2 pursuant to a conspiracy to commit this crime.

3 COUNT 11 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

4 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
5 wilfully, unlawfully, feloniously, and without authority of law, seize, confine, inveigle,  
6 entice, decoy, abduct, conceal, kidnap, or carry away ALEXANDRA OJEDA, a human  
7 being, with the intent to hold or detain the said ALEXANDRA OJEDA against her will, and  
8 without her consent, for the purpose of committing robbery, said Defendants using a deadly  
9 weapon, to-wit: a firearm, during the commission of said crime; the Defendants being  
10 responsible under one or more of the following principles of criminal liability, to-wit: (1) by  
11 the defendants directly committing the crime; and/or (2) the Defendants aiding or abetting  
12 each other in the commission of the crime by the Defendants accompanying each other to the  
13 crime scene and/or the Defendants or his unidentified coconspirator acting as looking and/or  
14 the Defendants or his unidentified coconspirator entering the residence and/or by the  
15 Defendants or his unidentified coconspirator being armed with a firearm and/or by the  
16 Defendants or his unidentified coconspirator forcing the said ALEXANDRA OJEDA to exit  
17 her vehicle and enter her residence and/or the Defendants and his unidentified coconspirator  
18 leaving the crime scene together, the Defendants acting with the intent to commit  
19 kidnapping; and/or (3) pursuant to a conspiracy to commit this crime.

20 COUNT 12 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

21 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
22 wilfully, unlawfully, feloniously, and without authority of law, seize, confine, inveigle,  
23 entice, decoy, abduct, conceal, kidnap, or carry away RYAN DAVID, a human being, with  
24 the intent to hold or detain the said RYAN DAVID against his will, and without his consent,  
25 for the purpose of committing robbery, said Defendants using a deadly weapon, to-wit: a  
26 firearm, during the commission of said crime; the Defendants being responsible under one or  
27 more of the following principles of criminal liability, to-wit: (1) by the defendants directly  
28 committing the crime; and/or (2) the Defendants aiding or abetting each other in the

1 commission of the crime by the Defendants accompanying each other to the crime scene  
2 and/or the Defendants or his unidentified coconspirator acting as looking and/or the  
3 Defendants or his unidentified coconspirator entering the residence and/or by the Defendants  
4 or his unidentified coconspirator being armed with a firearm and/or by the Defendants or his  
5 unidentified coconspirator forcing the said RYAN DAVID to exit the vehicle and enter the  
6 residence and/or the Defendants or his unidentified coconspirator forcing the said RYAN  
7 DAVID to lie on the bed and/or the Defendants or his unidentified coconspirator tying up the  
8 said RYAN DAVID and/or the Defendants and his unidentified coconspirator leaving the  
9 crime scene together, the Defendants acting with the intent to commit kidnapping; and/or (3)  
10 pursuant to a conspiracy to commit this crime.

11 COUNT 13 - ROBBERY WITH USE OF A DEADLY WEAPON

12 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
13 then and there wilfully, unlawfully, and feloniously take personal property, to-wit: money  
14 and/or clothes, from the person of ALEXANDRA OJEDA, or in her presence, by means of  
15 force or violence or fear of injury to, and without the consent and against the will of the said  
16 ALEXANDRA OJEDA, said Defendants using a deadly weapon, to-wit: a firearm, during  
17 the commission of said crime; the Defendants being responsible under one or more of the  
18 following principles of criminal liability, to-wit: (1) by the Defendants directly committing  
19 the crime; and/or (2) the Defendants aiding or abetting his unidentified coconspirator in the  
20 commission of the crime by the Defendants accompanying his unidentified coconspirator to  
21 the crime scene and/or the Defendants or his unidentified coconspirator acting as looking  
22 and/or the Defendants or his unidentified coconspirator entering the residence and/or by the  
23 Defendants or his unidentified coconspirator being armed with a firearm and/or by the  
24 Defendants or his unidentified coconspirator taking a purse and contents and/or lawful  
25 money of the United States from the person of ALEXANDRA OJEDA, and/or the  
26 Defendants and his unidentified coconspirator leaving the crime scene together, the  
27 Defendants acting with the intent to commit robbery; and/or (3) pursuant to a conspiracy to  
28 commit this crime.



1 COUNT 14 – ATTEMPT ROBBERY WITH USE OF A DEADLY WEAPON

2 On or about March 8, 2010, Defendants DAVID HAYES and ABDUL SHAKIR did  
3 then and there wilfully, unlawfully, and feloniously attempt to take personal property, to-wit:  
4 money, from the person of RYAN DAVID, or in his presence, by means of force or violence  
5 or fear of injury to, and without the consent and against the will of the said RYAN DAVID,  
6 said Defendants using a deadly weapon, to-wit: a firearm, during the commission of said  
7 crime; the Defendants being responsible under one or more of the following principles of  
8 criminal liability, to-wit: (1) by the defendants directly committing the crime; and/or (2) the  
9 Defendants aiding or abetting his unidentified coconspirator in the commission of the crime  
10 by the Defendants accompanying his unidentified coconspirator to the crime scene and/or the  
11 Defendants or his unidentified coconspirator acting as looking and/or the Defendants or his  
12 unidentified coconspirator entering the residence and/or by the Defendants or his  
13 unidentified coconspirator being armed with a firearm and/or by the Defendants or his  
14 unidentified coconspirator taking lawful money of the United States from the person of  
15 RYAN DAVID, and/or the Defendants and his unidentified coconspirator leaving the crime  
16 scene together, the Defendants acting with the intent to commit robbery; and/or (3) pursuant  
17 to a conspiracy to commit this crime.

18 COUNT 15 - POSSESSION OF FIREARM BY EX-FELON

19 On or about March 8, 2010, Defendant DAVID HAYES did then and there wilfully,  
20 unlawfully, and feloniously own or have in his possession, or under his control, a weapon,  
21 to-wit: a firearm, the said Defendant being an ex-felon, having in 2003, been convicted of  
22 Robbery with use of a Deadly Weapon, in Case No. C188145, in the Eighth Judicial District  
23 Court, Clark County, a felony under the laws of the State of Nevada.

24 COUNT 16 - INVASION OF THE HOME

25 On or about April 15, 2010, Defendants LEONARD HUNT and JAVON CARTER  
26 did then and there wilfully, unlawfully, and feloniously forcibly enter an inhabited dwelling,  
27 to-wit: 4291 West Rochelle Avenue, Las Vegas, Clark County, Nevada, without permission  
28 of the owner, resident, or lawful occupant, to-wit: CHERYL PAYNE; the Defendants being

1 responsible under one or more of the following principles of criminal liability, to-wit: (1) by  
2 the defendants directly committing the crime; and/or (2) the Defendants aiding or abetting  
3 each other in the commission of the crime by the Defendants accompanying each other to the  
4 crime scene and/or one or more of the Defendants acting as looking and/or one or more of  
5 the Defendants breaking the glass on the door and/or one or more of the Defendants entering  
6 the residence and removing property and/or by the Defendants leaving the crime scene  
7 together, each Defendant acting with the intent to commit home invasion; and/or (3)  
8 pursuant to a conspiracy to commit this crime.

9 COUNT 17 - BURGLARY

10 On or about April 15, 2010, Defendants LEONARD HUNT and JAVON CARTER  
11 did then and there wilfully, unlawfully, and feloniously enter, with intent to commit larceny,  
12 that certain building occupied by CHERYL PAYNE, located at 4291 West Rochelle, Las  
13 Vegas, Clark County, Nevada; the Defendants being responsible under one or more of the  
14 following principles of criminal liability, to-wit: (1) by the defendants directly committing  
15 the crime; and/or (2) the Defendants aiding or abetting each other in the commission of the  
16 crime by the Defendants accompanying each other to the crime scene and/or one or more of  
17 the Defendants acting as looking and/or one or more of the Defendants entering the  
18 residence and removing property and/or by the Defendants leaving the crime scene together,  
19 each Defendant acting with the intent to commit burglary; and/or (3) pursuant to a  
20 conspiracy to commit this crime.

21 COUNT 18 - GRAND LARCENY

22 On or about April 15, 2010, Defendants LEONARD HUNT and JAVON CARTER  
23 did then and there wilfully, unlawfully, and feloniously with intent to deprive the owner  
24 permanently thereof, steal, take, carry, lead or drive away property owned by CHERYL  
25 PAYNE, having a value of \$2,500.00, or more, to-wit: a television and miscellaneous items;  
26 the Defendants being responsible under one or more of the following principles of criminal  
27 liability, to-wit: (1) by the Defendants directly committing the crime; and/or (2) the  
28 Defendants aiding or abetting each other in the commission of the crime where one or more

1 of the Defendants arrived at the scene together and/or one or more of the Defendants acted as  
2 lookout and one or more of the Defendants removing a television and miscellaneous items;  
3 and/or (3) pursuant to a conspiracy to commit this crime.

4 COUNT 19 – BATTERY WITH USE OF A DEADLY WEAPON

5 On or about April 15, 2010, Defendant LEONARD HUNT, aka, Leonard Thomas  
6 Hunt, did wilfully, unlawfully, and feloniously use force and/or violence upon the person of  
7 another to-wit: Detective DUCAS, with use of a deadly weapon to-wit: a vehicle; by said  
8 Defendant driving a vehicle into the LAS VEGAS METROPOLITAN POLICE  
9 DEPARTMENT vehicle driven and/or occupied by Detective DUCAS.

10 COUNT 20 – BATTERY WITH USE OF A DEADLY WEAPON

11 On or about April 15, 2010, Defendant LEONARD HUNT, aka, Leonard Thomas  
12 Hunt, did wilfully, unlawfully, and feloniously use force and/or violence upon the person of  
13 another to-wit: Detective BECK, with use of a deadly weapon to-wit: a vehicle; by said  
14 Defendant driving a vehicle into the LAS VEGAS METROPOLITAN POLICE  
15 DEPARTMENT vehicle driven and/or occupied by Detective BECK.

16 COUNT 21 – POSSESSION OF FIREARM BY EX-FELON

17 On or about April 15, 2010, Defendant LEONARD HUNT, aka, Leonard Thomas  
18 Hunt, did then and there wilfully, unlawfully, and feloniously own or have in his possession,  
19 or under his control, a weapon, to-wit: a High Point .40 caliber handgun, bearing Serial No.  
20 X786490, the said Defendant being an ex-felon, having in 2003, been convicted of Burglary  
21 and having in 2007, been convicted of Robbery with use of a Deadly Weapon and Burglary  
22 while in Possession of a Deadly weapon, felonies under the laws of the State of Nevada.

23 COUNT 22 - POSSESSION OF FIREARM BY EX-FELON

24 On or about April 15, 2010, Defendant JAVON CARTER did then and there  
25 wilfully, unlawfully, and feloniously own or have in his possession, or under his control, a  
26 weapon, to-wit: a Smith & Wesson revolver, the said JOVAN MACHEL CARTER being an  
27 ex-felon, having in 2007, been convicted of attempt to commit larceny from the person, Case  
28 No. C236586, in the Eighth Judicial District Court, Clark County, Nevada, a felony under

1 the laws of the State of Nevada.

2 COUNT 23 - POSSESSION OF FIREARM BY EX-FELON

3 On or about April 15, 2010, Defendant JAVON CARTER did then and there  
4 wilfully, unlawfully, and feloniously own or have in his possession, or under his control, a  
5 weapon, to-wit: a Harrington & Richards 16 gauge shotgun, the said JOVAN MACHEL  
6 CARTER being an ex-felon, having in 2007, been convicted of attempt to commit larceny  
7 from the person, Case No. C236586, in the Eighth Judicial District Court, Clark County,  
8 Nevada, a felony under the laws of the State of Nevada.

9 COUNT 24 - POSSESSION OF SHORT BARRELED SHOTGUN

10 On or about April 15, 2010, Defendant JAVON CARTER did then and there wilfully,  
11 unlawfully, and feloniously possess a short barreled shotgun having a barrel less than 18  
12 inches in length, to-wit: a Harrington & Richards 16 gauge shotgun, with a barrel  
13 approximately 12.5 inches long and overall length of 21 inches.

14 COUNT 25 - TRAFFICKING IN CONTROLLED SUBSTANCE

15 On or about April 15, 2010, Defendant JAVON CARTER did then and there wilfully,  
16 unlawfully, feloniously, knowingly, or intentionally possess, either actually or  
17 constructively, 28 grams, or more, to-wit: approximately 34.5 grams of Cocaine, or any  
18 mixture of substance consisting of approximately 34.5 grams containing the controlled  
19 substance Cocaine.

20 COUNT 26 - POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO SELL

21 On or about April 15, 2010, JAVON CARTER did then and there wilfully,  
22 unlawfully, feloniously, knowingly, and intentionally possess, for the purpose of sale, a  
23 controlled substance, to-wit: Marijuana.

24 COUNT 27 - POSSESSION OF CONTROLLED SUBSTANCE WITH INTENT TO SELL

25 On or about April 15, 2010, JAVON CARTER did then and there wilfully,  
26 unlawfully, feloniously, knowingly, and intentionally possess, for the purpose of sale, a  
27 controlled substance, to-wit: Oxycodone.

28 ///

1 COUNT 28 - POSSESSION OF CONTROLLED SUBSTANCE

2 On or about April 15, 2010, JAVON CARTER did then and there wilfully,  
3 unlawfully, feloniously, knowingly, and intentionally possess a controlled substance, to-wit:  
4 Marijuana, over one (1) ounce.

5 COUNT 29 - POSSESSION OF STOLEN PROPERTY

6 On or about March 20, 2010, ABDUL SHAKIR did wilfully, unlawfully, and  
7 feloniously, for his own gain, possess property of a value of \$250.00, or more, lawful money  
8 of the United States, wrongfully taken from MICHAEL VANVOORHIS, to-wit: a gold  
9 wedding band, which Defendant knew, or had reason to believe, had been stolen.

10 COUNT 30 - BURGLARY

11 On or about March 20, 2010, ABDUL SHAKIR did then and there wilfully,  
12 unlawfully, and feloniously enter, with intent to obtain money under false pretenses, that  
13 certain building occupied by SUPER PAWN, located at 4635 West Flamingo Road, Las  
14 Vegas, Clark County, Nevada.

15 COUNT 31 - CONSPIRACY TO COMMIT ROBBERY

16 On or about January 14, 2010, Defendants DAVID HAYES and LEONARD HUNT  
17 did then and there meet with one another and between themselves, and each of them with the  
18 other, wilfully, unlawfully, and feloniously conspire and agree to commit a crime, to-wit:  
19 robbery, and in furtherance of said conspiracy, Defendants did commit the acts as set forth in  
20 Counts 32, 33, and 34 said acts being incorporated by this reference as though fully set forth  
21 herein.

22 COUNT 32 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND/OR A  
23 DEADLY WEAPON

24 On or about January 14, 2010, Defendants DAVID HAYES and LEONARD HUNT  
25 did then and there wilfully, unlawfully, and feloniously enter, while in possession of a  
26 firearm, with intent to commit larceny and/or a felony, to-wit: robbery, that certain building  
27 occupied by KRISTINE NITE and/or ROBERT POST, located at 696 Jewel Tower Street,  
28 Las Vegas, Clark County, Nevada; the Defendants being responsible under one or more of

1 the following principles of criminal liability, to-wit: (1) by the Defendants directly  
2 committing the crime; and/or (2) the Defendants aiding or abetting themselves in the  
3 commission of the crime by the Defendants accompanying themselves to the crime scene  
4 and/or the Defendants acting as looking and/or the Defendants entering the residence and/or  
5 by the Defendants leaving the crime scene together, the Defendants acting with the intent to  
6 commit burglary; and/or (3) pursuant to a conspiracy to commit this crime.

7 COUNT 33 – ROBBERY WITH USE OF A DEADLY WEAPON

8 On or about January 14, 2010, Defendants DAVID HAYES and LEONARD HUNT  
9 did then and there wilfully, unlawfully, and feloniously take personal property, to-wit: a  
10 watch and/or necklace and/or make-up bag, from the person of KRISTINE NITE, or in her  
11 presence, by means of force or violence or fear of injury to, and without the consent and  
12 against the will of the said KRISTINE NITE, said Defendants using a deadly weapon, to-wit:  
13 a firearm, during the commission of said crime; the Defendants being responsible under one  
14 or more of the following principles of criminal liability, to-wit: (1) by the Defendants  
15 directly committing the crime; and/or (2) the Defendants aiding or abetting themselves in the  
16 commission of the crime by the Defendants accompanying themselves to the crime scene  
17 and/or the Defendants acting as looking and/or the Defendants entering the residence and/or  
18 by the Defendants being armed with a firearm and/or by the Defendants taking a watch  
19 and/or necklace and/or make-up bag, from the person of KRISTINE NITE or in her  
20 presence, and/or the Defendants leaving the crime scene together, the Defendants acting with  
21 the intent to commit robbery; and/or (3) pursuant to a conspiracy to commit this crime.

22 COUNT 34 – ATTEMPT ROBBERY WITH USE OF A DEADLY WEAPON

23 On or about January 14, 2010, Defendants DAVID HAYES and LEONARD HUNT  
24 did then and there wilfully, unlawfully, and feloniously attempt to take personal property, to-  
25 wit: lawful money of the United States, from the person of ROBERT POST, or in his  
26 presence, by means of force or violence or fear of injury to, and without the consent and  
27 against the will of the said ROBERT POST, said Defendants using a deadly weapon, to-wit:  
28 a firearm, during the commission of said crime; the Defendants being responsible under one

1 or more of the following principles of criminal liability, to-wit: (1) by the Defendants  
2 directly committing the crime; and/or (2) the Defendants aiding or abetting themselves in the  
3 commission of the crime by the Defendants accompanying themselves to the crime scene  
4 and/or the Defendants acting as look-outs and/or the Defendants entering the residence  
5 and/or by the Defendants being armed with a firearm and/or by the Defendants attempting to  
6 take lawful money of the United States, from the person of ROBERT POST, and/or the  
7 Defendants leaving the crime scene together, the Defendants acting with the intent to commit  
8 robbery; and/or (3) pursuant to a conspiracy to commit this crime.

9 COUNT 35 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND/OR A  
10 DEADLY WEAPON

11 On or about January 20, 2010, Defendant LEONARD HUNT did then and there  
12 wilfully, unlawfully, and feloniously enter, while in possession of a firearm, with intent to  
13 commit larceny and/or a felony, to-wit: robbery, that certain building occupied by LISA  
14 CHONG and/or MIGUEL MORFIN and/or FAITH MORFIN, located at 9325 W. Desert Inn  
15 Road, Las Vegas, Clark County, Nevada.

16 COUNT 36 – ROBBERY WITH USE OF A DEADLY WEAPON

17 On or about January 20, 2010, Defendant LEONARD HUNT did then and there  
18 wilfully, unlawfully, and feloniously take personal property, to-wit: purse and contents  
19 and/or earrings, from the person of LISA CHONG, or in her presence, by means of force or  
20 violence or fear of injury to, and without the consent and against the will of the said LISA  
21 CHONG, said Defendant using a deadly weapon, to-wit: a firearm, during the commission of  
22 said crime.

23 COUNT 37 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

24 On or about January 20, 2010, Defendant LEONARD HUNT did wilfully,  
25 unlawfully, feloniously, and without authority of law, seize, confine, inveigle, entice, decoy,  
26 abduct, conceal, kidnap, or carry away LISA CHONG, a human being, with the intent to  
27 hold or detain the said LISA CHONG against her will, and without her consent, for the  
28 purpose of committing robbery, said Defendant using a deadly weapon, to-wit: a firearm,

1 during the commission of said crime.

2 COUNT 38 – ROBBERY WITH USE OF A DEADLY WEAPON

3 On or about January 20, 2010, Defendant LEONARD HUNT did then and there  
4 wilfully, unlawfully, and feloniously take personal property, to-wit: diamond rings and/or  
5 lawful money of the United States, from the person of FAITH MORFIN, or in her presence,  
6 by means of force or violence or fear of injury to, and without the consent and against the  
7 will of the said FAITH MORFIN, said Defendant using a deadly weapon, to-wit: a firearm,  
8 during the commission of said crime.

9 COUNT 39 – ROBBERY WITH USE OF A DEADLY WEAPON

10 On or about January 20, 2010, Defendant LEONARD HUNT did then and there  
11 wilfully, unlawfully, and feloniously take personal property, to-wit: Rolex watch and/or  
12 lawful money of the United States, from the person of MIGUEL MORFIN, or in his  
13 presence, by means of force or violence or fear of injury to, and without the consent and  
14 against the will of the said MIGUEL MORFIN, said Defendant using a deadly weapon, to-  
15 wit: a firearm, during the commission of said crime.

16 COUNT 40 – POSSESSION OF FIREARM BY EX-FELON

17 On or about January 20, 2010, Defendant LEONARD HUNT, aka, Leonard Thomas  
18 Hunt, did then and there wilfully, unlawfully, and feloniously own or have in his possession,  
19 or under his control, a weapon, to-wit: a firearm, the said Defendant being an ex-felon,  
20 having in 2003, been convicted of Burglary and having in 2007, been convicted of Robbery  
21 with use of a Deadly Weapon and Burglary while in Possession of a Deadly weapon,  
22 felonies under the laws of the State of Nevada.

23 COUNT 41 – ATTEMPT ROBBERY WITH USE OF A DEADLY WEAPON

24 On or about January 26, 2010, Defendant LEONARD HUNT did then and there  
25 wilfully, unlawfully, and feloniously attempt to take personal property, to-wit: a purse and/or  
26 lawful money of the United States, from the person of AMBER BARNUM, or in her  
27 presence, by means of force or violence or fear of injury to, and without the consent and

28 ///



1 against the will of the said AMBER BARNUM, said Defendant using a deadly weapon, to-  
2 wit: a firearm, during the commission of said crime.

3 COUNT 42 - BATTERY WITH USE OF A DEADLY WEAPON

4 On or about January 26, 2010, LEONARD HUNT did then and there willfully,  
5 unlawfully, and feloniously use force or violence upon the person of another, to-wit:  
6 DAVID RESNER, with use of a deadly weapon, to-wit: a firearm; by striking said DAVID  
7 RESNER in the head with said firearm.

8 COUNT 43 - BURGLARY WHILE IN POSSESSION OF A FIREARM AND/OR A  
9 DEADLY WEAPON

10 On or about March 31, 2010, Defendant LEONARD HUNT did then and there  
11 wilfully, unlawfully, and feloniously enter, while in possession of a firearm, with intent to  
12 commit larceny and/or a felony, to-wit: robbery, that certain building occupied by  
13 CHRISTOPHER HARRIS, located at 8605 Queens Brook Court, Las Vegas, Clark County,  
14 Nevada; the Defendant being responsible under one or more of the following principles of  
15 criminal liability, to-wit: (1) by the Defendant directly committing the crime; and/or (2) the  
16 Defendant aiding or abetting his unidentified coconspirator in the commission of the crime  
17 by the Defendant accompanying his unidentified coconspirator to the crime scene and/or the  
18 Defendant or his unidentified coconspirator acting as looking and/or the Defendant or his  
19 unidentified coconspirator entering the residence and/or by the Defendant and his  
20 unidentified coconspirator leaving the crime scene together, the Defendant acting with the  
21 intent to commit burglary; and/or (3) pursuant to a conspiracy to commit this crime.

22 COUNT 44 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

23 On or about March 31, 2010, LEONARD HUNT did then and there, without authority  
24 of law, and with malice aforethought, and express malice, willfully and feloniously attempt  
25 to kill CHRISTOPHER HARRIS, a human being, by shooting at and into the body of the  
26 said CHRISTOPHER HARRIS, with a deadly weapon, to-wit: a firearm.

27 ///

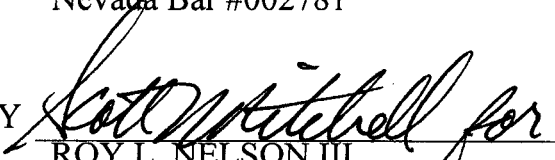
28 ///

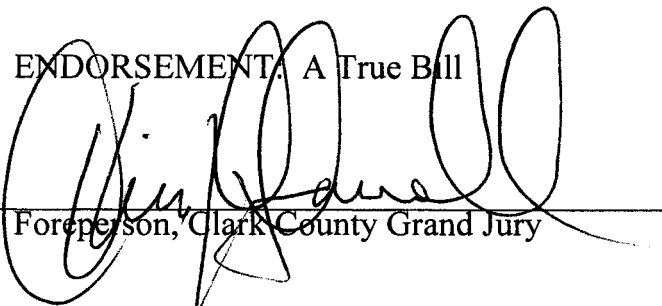
1 COUNT 45 - ROBBERY WITH USE OF A DEADLY WEAPON

2 On or about March 31, 2010, Defendant LEONARD HUNT did then and there  
3 wilfully, unlawfully, and feloniously take personal property, to-wit: Visa credit cards and/or  
4 car keys, from the person of CHRISTOPHER HARRIS, or in his presence, by means of  
5 force or violence or fear of injury to, and without the consent and against the will of the said  
6 CHRISTOPHER HARRIS, said Defendant using a deadly weapon, to-wit: a firearm, during  
7 the commission of said crime; the Defendant being responsible under one or more of the  
8 following principles of criminal liability, to-wit: (1) by the Defendant directly committing  
9 the crime; and/or (2) the Defendant aiding or abetting his unidentified coconspirator in the  
10 commission of the crime by the Defendant accompanying his unidentified coconspirator to  
11 the crime scene and/or the Defendant or his unidentified coconspirator acting as looking  
12 and/or the Defendant or his unidentified coconspirator entering the residence and/or by the  
13 Defendant or his unidentified coconspirator being armed with a firearm and/or by the  
14 Defendant or his unidentified coconspirator taking Visa credit cards and/or car keys, from  
15 the person of CHRISTOPHER HARRIS or in his presence, and/or the Defendant and his  
16 unidentified coconspirator leaving the crime scene together, the Defendant acting with the  
17 intent to commit robbery; and/or (3) pursuant to a conspiracy to commit this crime.

18 DATED this 22<sup>nd</sup> day of June, 2010.

19  
20 DAVID ROGER  
21 DISTRICT ATTORNEY  
22 Nevada Bar #002781

23 BY   
24 ROY L. NELSON III  
25 Chief Deputy District Attorney  
26 Nevada Bar #007842

27 ENDORSEMENT: A True Bill  
28   
Foreperson, Clark County Grand Jury

1 Names of witnesses testifying before the Grand Jury:  
2 BARNUM, AMBER, c/o CCDA, 200 Lewis Ave, LV, NV  
3 BECK, S., LVMPD #6275  
4 CHONG, LISA, c/o CCDA, 200 Lewis Ave, LV, NV  
5 COLLINS, C., LVMPD  
6 COLLINS, E., LVMPD #3698  
7 COWMAN, P., LVMPD #9809  
8 DAVID, RYAN, c/o CCDA, 200 Lewis Ave, LV, NV  
9 DEAN, CRAIG, c/o CCDA, 200 Lewis Ave, LV, NV  
10 DUCAS, J., LVMPD #7296  
11 EMILIEN, GABRIELLE, c/o CCDA, 200 Lewis Ave, LV, NV  
12 HARRIS, CHRISTOPHER, c/o CCDA, 200 Lewis Ave, LV, NV  
13 HIRSCHI, K., LVMPD #7174  
14 LORSON, K., JR., LVMPD #5746  
15 MEREDITH, ANGELA, c/o CCDA, 200 Lewis Ave, LV, NV  
16 MORFIN, FAITH, c/o CCDA, 200 Lewis Ave, LV, NV  
17 MORFIN, MIGUEL, c/o CCDA, 200 Lewis Ave, LV, NV  
18 MOSES, D., LVMPD  
19 OJEDA, ALEXANDRA, c/o CCDA, 200 Lewis Ave, LV, NV  
20 PAYNE, CHERYL, c/o CCDA, 200 Lewis Ave, LV, NV  
21 POST, ROBERT, c/o CCDA, 200 Lewis Ave, LV, NV  
22 RISNER, DAVID, c/o CCDA, 200 Lewis Ave, LV, NV  
23 TURNER, L., LVMPD #6015  
24 VANVOORHIS, MICHAEL, c/o CCDA, 200 Lewis Ave, LV, NV  
25 ZIROS, P., LVMPD #4239  
26 ///  
27 ///  
28 ///

1 Additional witnesses known to the District Attorney at time of filing the Indictment:

2 BEVERIDGE, J., LVMPD #6707

3 CHATMAN, I., SR., LVMPD #6255

4 CORD, T., LVMPD #5584

5 CUSTODIAN OF RECORDS, CCDC

6 CUSTODIAN OF RECORDS, LVMPD COMMUNICATIONS

7 CUSTODIAN OF RECORDS, LVMPD RECORDS

8 CUSTODIAN OF RECORDS, SUPER PAWN

9 EMBRY, C., LVMPD #6223

10 GONZALES, A., LVMPD #9202

11 GRAMMAS, K., LVMPD #7808

12 HART, R., LVMPD #7527

13 KAVON, S., LVMPD #4131

14 PIRIH, C., LVMPD #6023

15 SIWY, J., LVMPD #3698

16 SPIOTTO, L., LVMPD #4774

17 STOUT, E., LVMPD #4550

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27 10AGJ010A-D/10F07120A-D/sam

28 LVMPD EV# 1004143488

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