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FILED IN OPEN COURT

STEVEN D. GRIERSON

CLERK OF THE COURT

MAR 14 2018

BY,

DULCE MARIE ROMEA, DEPUTY

DISTRICT COURT

CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff(s),

vs.

PATRICK JAMES DUFFY, aka James Patrick
Duffy

Defendant.

Case No. C-18-330565-1

Dept. No. XXIII

INDICTMENT

Defendant, PATRICK JAMES DUFFY, above named, is accused by the Grand Jury of having committed the following offenses:

MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125; OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463; and PERJURY, a category "D" felony in violation of NRS 199.145.

All of the acts alleged herein have been committed or consummated on or between May 26, 2016, and June 1, 2016, by the above-named Defendant, executed in whole or in part within the County of Clark, State of Nevada, in the following manner:

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COUNT 1
MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION
Category "D" Felony - NRS 205.125

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Clay Abajian, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

COUNT 2
MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION
Category "D" Felony - NRS 205.125

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Debra Allison Copening, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

COUNT 3
MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION
Category "D" Felony - NRS 205.125

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Nicole Veater, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125.

COUNT 4
MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION
Category "D" Felony - NRS 205.125

On or about May 28, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Fluer Abajian, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION, a category "D" felony in violation of NRS 205.125

1 **COUNT 5**
2 **MISCONDUCT IN SIGNING, FILING, OR ALTERING PETITION**
3 **Category "D" Felony - NRS 205.125**

4 On or about May 26, 2016, Defendant PATRICK JAMES DUFFY, in the County of Clark,
5 State of Nevada, without lawful authority, willfully signed the name of another person, to-wit: Stuart
6 Scott Veaudry, to a petition, to-wit: the Nevada Green Party Political Party Ballot Access Petition;

7 All of which constitutes the crime of MISCONDUCT IN SIGNING, FILING, OR ALTERING
8 PETITION, a category "D" felony in violation of NRS 205.125.

9 **COUNT 6**
10 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
11 **Category "B" Felony - NRS 205.463**

12 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
13 authority, knowingly obtained and used personal identifying information of another person for an
14 unlawful purpose, to wit:

15 On or about May 28, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and
16 used the personal identifying information of Clay Abajian, to-wit: Clay Abajian's address and
17 signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 1, incorporated by
18 reference as though fully set forth herein;

19 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
20 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

21 **COUNT 7**
22 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
23 **Category "B" Felony - NRS 205.463**

24 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
25 authority, knowingly obtained and used personal identifying information of another person for an
26 unlawful purpose, to wit:

27 On or about May 27, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and used the
28 personal identifying information of Debra Allison Copening, to-wit: Debra Allison Copening's
address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 2,
incorporated by reference as though fully set forth herein;

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1 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
2 INFOMRATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

3 **COUNT 8**
4 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
5 **Category "B" Felony - NRS 205.463**

6 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
7 authority, knowingly obtained and used personal identifying information of another person for an
8 unlawful purpose, to wit:

9 On or about May 27, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and
10 used the personal identifying information of Nicole Veater, to-wit: Nicole Veater's address and
11 signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 3, incorporated by
12 reference as though fully set forth herein;

13 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
14 INFOMRATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

15 **COUNT 9**
16 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
17 **Category "B" Felony - NRS 205.463**

18 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
19 authority, knowingly obtained and used personal identifying information of another person for an
20 unlawful purpose, to wit:

21 On or about May 28, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and
22 used the personal identifying information of Fluer Abajian, to-wit: Fluer Abajian's address and
23 signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 4, incorporated by
24 reference as though fully set forth herein;

25 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
26 INFOMRATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

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1 **COUNT 10**
2 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
3 **Category "B" Felony - NRS 205.463**

4 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
5 authority, knowingly obtained and used personal identifying information of another person for an
6 unlawful purpose, to wit:

7 On or about May 26, 2016, Defendant PATRICK JAMES DUFFY knowingly obtained and
8 used the personal identifying information of Stuart Scott Veaudry, to-wit: Stuart Scott Veaudry's
9 address and signature, for an unlawful purpose, to-wit: to commit the acts alleged in Count 5,
10 incorporated by reference as though fully set forth herein;

11 All of which constitutes the crime of OBTAINING AND USING PERSONAL IDENTIFYING
12 INFORMATION OF ANOTHER, a category "B" felony in violation of NRS 205.463.

13 **COUNT 11**
14 **PERJURY**
15 **Category "D" Felony - NRS 199.145**

16 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
17 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

18 On or about May 26, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely
19 declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election
20 ballot access contained signatures affixed in his presence, knowing that statement to be false, which
21 statement was material to the filing in question;

22 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
23 199.145.

24 **COUNT 12**
25 **PERJURY**
26 **Category "D" Felony - NRS 199.145**

27 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
28 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

On or about May 27, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely
declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election
ballot access contained signatures affixed in his presence, knowing that statement to be false, which

1 statement was material to the filing in question;

2 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
3 199.145.

4 **COUNT 13**

5 **PERJURY**

6 **Category "D" Felony - NRS 199.145**

7 Defendant PATRICK JAMES DUFFY, in the County of Clark, State of Nevada, without lawful
8 authority, willfully made a false statement in a declaration made under penalty of perjury, to wit:

9 On or about May 28, 2016, Defendant PATRICK JAMES DUFFY willfully and falsely
10 declared, under penalty of perjury, that a petition to qualify the Nevada Green Party for general election
11 ballot access contained signatures affixed in his presence, knowing that statement to be false, which
12 statement was material to the filing in question;

13 All of which constitutes the crime of PERJURY, a category "D" felony in violation of NRS
14 199.145.

15 DATED this 13 day of, 2017.

16 SUBMITTED BY

17 ADAM PAUL LAXALT
18 Attorney General

19 By: 

20 Daniel Westmeyer
21 Senior Deputy Attorney General
22 Nevada Bar No. 10273
23 *Attorneys for the State of Nevada*

24 ENDORSEMENT: A True Bill

25 By: 

26 Foreperson, Clark County Grand Jury
27 GJ # 17AGJJ16X
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WITNESSES

1. Jamie Osburn
c/o Office of the Nevada Secretary of State, Suite 5200
555 E Washington Avenue
Las Vegas, NV 89101-1068

2. Richard Wade
c/o Clark County Registrar of Voters
965 Trade Drive
North Las Vegas, NV 89030

3. Clay Abajian
8353 Snowmass Drive
Las Vegas, NV 89128

4. Debra Allison Copening
1821 Montvale Court
Las Vegas, NV 89134

5. Nicole Veater
2201 Bonnie Brae Avenue
Las Vegas, NV 89102

6. Fleur Abajian
8353 Snowmass Drive
Las Vegas, NV 89128

7. Stuart Scott Veaudry
9421 Sundial Drive
Las Vegas, NV 89134

8. Loretta Riccardelli
1381 East University Avenue #311
Las Vegas, NV 89119