

1 JUSTICE COURT, LAS VEGAS TOWNSHIP

2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA,

4 Plaintiff,

5 -vs-

6 ORENTAL JAMES SIMPSON,
7 #2648927,
8 WALTER ALEXANDER,
9 #2648888,
10 CLARENCE STEWART,
11 #2648955,
12 MICHAEL MCCLINTON,
13 639531

14 Defendants

CASE NO: 07F19284A-D

DEPT NO: 9

CRIMINAL COMPLAINT

15 The Defendants above named having committed the crimes of CONSPIRACY TO
16 COMMIT A CRIME (Gross Misdemeanor - NRS 199.480); CONSPIRACY TO COMMIT
17 KIDNAPPING (Felony - NRS 199.480, 200.310, 200.320); CONSPIRACY TO COMMIT
18 ROBBERY (Felony - NRS 199.480, 200.380); FIRST DEGREE KIDNAPPING WITH USE
19 OF A DEADLY WEAPON (Felony - NRS 200.310, 200.320, 193.165); BURGLARY
20 WHILE IN POSSESSION OF A DEADLY WEAPON (Felony - NRS 205.060); ROBBERY
21 WITH USE OF A DEADLY WEAPON (Felony - NRS 200.380, 193.165); ASSAULT
22 WITH A DEADLY WEAPON (Felony - NRS 200.471) and COERCION WITH USE OF A
23 DEADLY WEAPON (Felony - NRS 207.190, 193.165), in the manner following, to-wit:
24 That the said Defendants, on or about the 13th day of September, 2007, at and within the
25 County of Clark, State of Nevada,

26 COUNT 1 - CONSPIRACY TO COMMIT A CRIME

27 Defendants and one or more uncharged confederates, did then and there meet with
28 each other and between themselves, and each of them with the other, wilfully and unlawfully
conspire and agree to commit a crime, to-wit: burglary and/or assault and/or assault with use
of a deadly weapon, and in furtherance of said conspiracy, Defendants and/or their
confederates did commit the acts as set forth in Counts 4, 9 & 10, said acts being

1 incorporated by this reference as though fully set forth herein.

2 COUNT 2 - CONSPIRACY TO COMMIT KIDNAPPING

3 Defendants and one or more uncharged confederates, did then and there meet with
4 each other and between themselves, and each of them with the other, wilfully, unlawfully,
5 and feloniously conspire and agree to commit a crime, to-wit: kidnapping, and in
6 furtherance of said conspiracy, Defendants and/or their confederates did commit the acts as
7 set forth in Counts 5 & 6, said acts being incorporated by this reference as though fully set
8 forth herein.

9 COUNT 3 - CONSPIRACY TO COMMIT ROBBERY

10 Defendants and one or more uncharged confederates, did then and there meet with
11 each other and between themselves, and each of them with the other, wilfully, unlawfully,
12 and feloniously conspire and agree to commit a crime, to-wit: robbery, and in furtherance of
13 said conspiracy, Defendants and/or their confederates did commit the acts as set forth in
14 Counts 7 & 8, said acts being incorporated by this reference as though fully set forth herein.

15 COUNT 4 - BURGLARY WHILE IN POSSESSION OF DEADLY WEAPON

16 Defendants did then and there wilfully, unlawfully, and feloniously enter, with intent
17 to commit assault and/or robbery and/or kidnapping, Room No. 1203, of the Palace Station
18 Hotel & Casino, located at 2411 West Sahara, Las Vegas, Clark County, Nevada, occupied
19 by BRUCE FROMONG and/or ALFRED BEARDSLEY, while in possession of one or
20 more handguns, the Defendants being criminally liable under one or more of the following
21 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
22 aiding or abetting one another and/or one or more of their confederates in the commission of
23 this crime with the intent that this crime be committed, by providing counsel and/or
24 encouragement, by Defendants having a confederate broker a deal wherein a buyer not
25 identified as the one of the Defendants was to come a hotel room for the purported purpose
26 of buying of certain items of "O. J. Simpson" and other sports memorabilia, and one or
27 more of the Defendants possessing handgun, and Defendants entering the room occupied by
28 BRUCE FROMONG and/or ALFRED BEARDSLEY intending to commit assault and/or

1 robbery; and/or, (3) pursuant to a conspiracy to commit this crime.

2 COUNT 5 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

3 Defendants did wilfully, unlawfully, feloniously, and without authority of law, seize,
4 confine, inveigle, entice, decoy, abduct, conceal, kidnap, or carry away BRUCE
5 FROMONG, a human being, with the intent to hold or detain the said BRUCE FROMONG
6 against his will, and without his consent, for the purpose of committing robbery, said
7 Defendants using a deadly weapon, to-wit: one or more handguns, during the commission of
8 said crime, the Defendants being criminally liable under one or more of the following
9 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
10 aiding or abetting one another and/or one or more of their confederates in the commission of
11 this crime with the intent that this crime be committed, by providing counsel and/or
12 encouragement, by Defendants having a confederate inveigle, entice, and/or decoy BRUCE
13 FROMONG to a hotel room under the pretext of brokering a deal wherein a buyer not
14 identified as one of the Defendants was to come to a hotel room for the purported purpose of
15 buying of certain items of "O. J. Simpson" and other sports memorabilia, and one or more of
16 the Defendants possessing, displaying and/or pointing a gun at BRUCE FROMONG and one
17 or more of the Defendants taking the property from BRUCE FROMONG, the Defendants
18 acting in concert throughout; and/or, (3) pursuant to a conspiracy to commit this crime.

19 COUNT 6 - FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON

20 Defendants did wilfully, unlawfully, feloniously, and without authority of law, seize,
21 confine, inveigle, entice, decoy, abduct, conceal, kidnap, or carry away ALFRED
22 BEARDSLEY, a human being, with the intent to hold or detain the said ALFRED
23 BEARDSLEY against his will, and without his consent, for the purpose of committing
24 robbery, said Defendants using a deadly weapon, to-wit: one or more handguns, during the
25 commission of said crime, the Defendants being criminally liable under one or more of the
26 following principles of criminal liability, to-wit: (1) by directly committing this crime;
27 and/or (2) by aiding or abetting one another and/or one or more of their confederates in the
28 commission of this crime with the intent that this crime be committed, by providing counsel

1 and/or encouragement, by Defendants having a confederate inveigle, entice, and/or decoy
2 ALFRED BEARDSLEY to a hotel room under the pretext of brokering a deal wherein a
3 buyer not identified as one of the Defendants was to come to a hotel room for the purported
4 purpose of buying of certain items of "O. J. Simpson" and other sports memorabilia, and one
5 or more of the Defendants possessing, displaying and/or pointing a gun at ALFRED
6 BEARDSLEY and one or more of the Defendants taking the property from ALFRED
7 BEARDSLEY, the Defendants acting in concert throughout; and/or, (3) pursuant to a
8 conspiracy to commit this crime.

9 COUNT 7 - ROBBERY WITH USE OF A DEADLY WEAPON

10 Defendants did then and there wilfully, unlawfully, and feloniously take personal
11 property, to-wit: "O. J. Simpson" and/or other sports memorabilia and/or a cellular
12 telephone, from the person of BRUCE FROMONG, or in his presence, by means of force or
13 violence or fear of injury to, and without the consent and against the will of the said BRUCE
14 FROMONG, said Defendants using a deadly weapon, to-wit: one or more handguns, during
15 the commission of said crime, the Defendants being criminally liable under one or more of
16 the following principles of criminal liability, to-wit: (1) by directly committing this crime;
17 and/or (2) by aiding or abetting one another and/or one or more of their confederates in the
18 commission of this crime with the intent that this crime be committed, by providing counsel
19 and/or encouragement, by Defendants having a confederate broker a deal wherein a buyer
20 not identified as one of the Defendants was to come to a hotel room for the purported
21 purpose of buying of certain items of "O. J. Simpson" and other sports memorabilia, and one
22 or more of the Defendants possessing, displaying and/or pointing a gun at BRUCE
23 FROMONG and one or more of the Defendants taking the property from BRUCE
24 FROMONG, the Defendants acting in concert throughout; and/or, (3) pursuant to a
25 conspiracy to commit this crime.

26 COUNT 8 - ROBBERY WITH USE OF A DEADLY WEAPON

27 Defendants did then and there wilfully, unlawfully, and feloniously take personal
28 property, to-wit: a baseball cap and/or sunglasses, from the person of ALFRED

1 BEARDSLEY, or in his presence, by means of force or violence or fear of injury to, and
2 without the consent and against the will of the said ALFRED BEARDSLEY, said
3 Defendants using a deadly weapon, to-wit: one or more handguns, during the commission of
4 said crime, the Defendants being criminally liable under one or more of the following
5 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
6 aiding or abetting one another and/or one or more of their confederates in the commission of
7 this crime with the intent that this crime be committed, by providing counsel and/or
8 encouragement, by Defendants having a confederate broker a deal wherein a buyer not
9 identified as one of the Defendants was to come to a hotel room for the purported purpose of
10 buying of certain items of "O. J. Simpson" and other sports memorabilia, and one or more of
11 the Defendants possessing, displaying and/or pointing a gun at ALFRED BEARDSLEY and
12 one or more of the Defendants taking the property from ALFRED BEARDSLEY, the
13 Defendants acting in concert throughout; and/or, (3) pursuant to a conspiracy to commit this
14 crime.

15 COUNT 9 - ASSAULT WITH A DEADLY WEAPON

16 Defendants did then and there wilfully, unlawfully, feloniously and intentionally
17 place another person, to-wit: BRUCE FROMONG, in reasonable apprehension of
18 immediate bodily harm with use of a deadly weapon, to-wit: one or more handguns, by
19 pointing one or more handguns at BRUCE FROMONG, the Defendants being criminally
20 liable under one or more of the following principles of criminal liability, to-wit: (1) by
21 directly committing this crime; and/or (2) by aiding or abetting one another and/or one or
22 more of their confederates in the commission of this crime with the intent that this crime be
23 committed, by providing counsel and/or encouragement, by Defendants having a confederate
24 broker a deal wherein a buyer not identified as one of the Defendants was to come to a hotel
25 room for the purported purpose of buying of certain items of "O. J. Simpson" and other
26 sports memorabilia, and one ore more or the Defendants possessing handgun, and
27 Defendants entering the room of BRUCE FROMONG, one or more of the Defendants
28 pointing a gun at BRUCE FROMONG, the Defendants acting in concert throughout; and/or

1 (3) pursuant to a conspiracy to commit this crime.

2 COUNT 10 - ASSAULT WITH A DEADLY WEAPON

3 Defendants did then and there wilfully, unlawfully, feloniously and intentionally
4 place another person, to-wit: ALFRED BEARDSLEY, in reasonable apprehension of
5 immediate bodily harm with use of a deadly weapon, to-wit: one or more handguns, by
6 pointing one ore more handguns at ALFRED BEARDSLEY, the Defendants being
7 criminally liable under one or more of the following principles of criminal liability, to-wit:
8 (1) by directly committing this crime; and/or (2) by aiding or abetting one another and/or one
9 or more of their confederates in the commission of this crime with the intent that this crime
10 be committed, by providing counsel and/or encouragement, by Defendants having a
11 confederate broker a deal wherein a buyer not identified as one of the Defendants was to
12 come to a hotel room for the purported purpose of buying of certain items of "O. J.
13 Simpson" and other sports memorabilia, and one ore more or the Defendants possessing
14 handgun, and Defendants entering the room of BRUCE FROMONG, one or more of the
15 Defendants pointing a gun at ALFRED BEARDSLEY, the Defendants acting in concert
16 throughout; and/or (3) pursuant to a conspiracy to commit this crime.

17 COUNT 11 - COERCION WITH USE OF A DEADLY WEAPON

18 Defendant ORENTAL JAMES SIMPSON, did then and there wilfully, unlawfully,
19 and feloniously use physical force, or the immediate threat of such force, against BRUCE
20 FROMONG, with intent to compel him to do, or abstain from doing, an act which he had a
21 right to do, or abstain from doing, with use of a deadly weapon, to-wit: one or more
22 handguns, by preventing BRUCE FROMONG from using his phone and/or call for help
23 and/or 911, by ripping it out of BRUCE FROMONG's hand and preventing him from using
24 his phone, one or more of his confederates possessing, displaying and/or pointing one or
25 more handguns.

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


9/18/2007

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