

ORIGINAL

JUSTICE COURT, LAS VEGAS TOWNSHIP  
CLARK COUNTY, NEVADA

FILED IN OPEN

FILED  
October 24, 2007

MURRAY HALL  
COURT CLERK

THE STATE OF NEVADA,

Plaintiff,

-vs-

ORENTHAL JAMES SIMPSON,  
#2648927,  
CLARENCE STEWART,  
#2648955,  
MICHAEL MCCLINTON,  
#639531  
CHARLES EHRLICH, aka  
Charles Bruce Ehrlich

Defendants

CASE NO: 07F19284A, C, D, F

DEPT NO: 9

SECOND

AMENDED

CRIMINAL COMPLAINT

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

COUNT 1 - CONSPIRACY TO COMMIT A CRIME

Defendants, did then and there meet with each other and between themselves, and each of them with the other, wilfully and unlawfully conspire and agree to commit a crime, to-wit: coercion, burglary and/or assault, and in furtherance of said conspiracy, Defendants and/or their confederates did commit the acts as set forth in Counts 4, 9-12, said acts being

1 incorporated by this reference as though fully set forth herein, said conspiracy thereafter  
2 continuing for a period wherein said coconspirators performed affirmative acts of  
3 concealment to avoid detection, including the disposal and concealment of property taken,  
4 and attempts by Defendants ORENTAL JAMES SIMPSON and CLARENCE STEWART  
5 to persuade other conspirators to give false information regarding the presence and use of  
6 firearms during said crimes.

7 COUNT 2 - CONSPIRACY TO COMMIT KIDNAPPING

8 Defendants, did then and there meet with each other and between themselves, and  
9 each of them with the other, wilfully, unlawfully, and feloniously conspire and agree to  
10 commit a crime, to-wit: kidnapping, and in furtherance of said conspiracy, Defendants  
11 and/or their confederates did commit the acts as set forth in Counts 5 & 6, said acts being  
12 incorporated by this reference as though fully set forth herein, said conspiracy thereafter  
13 continuing for a period wherein said coconspirators performed affirmative acts of  
14 concealment to avoid detection, including the disposal and concealment of property taken,  
15 and attempts by Defendants ORENTAL JAMES SIMPSON and CLARENCE STEWART  
16 to persuade other conspirators to give false information regarding the presence and use of  
17 firearms during said crimes.

18 COUNT 3 - CONSPIRACY TO COMMIT ROBBERY

19 Defendants, did then and there meet with each other and between themselves, and  
20 each of them with the other, wilfully, unlawfully, and feloniously conspire and agree to  
21 commit a crime, to-wit: robbery, and in furtherance of said conspiracy, Defendants and/or  
22 their confederates did commit the acts as set forth in Counts 7 & 8, said acts being  
23 incorporated by this reference as though fully set forth herein, said conspiracy thereafter  
24 continuing for a period wherein said coconspirators performed affirmative acts of  
25 concealment to avoid detection, including the disposal and concealment of property taken,  
26 and attempts by Defendants ORENTAL JAMES SIMPSON and CLARENCE STEWART  
27 to persuade other conspirators to give false information regarding the presence and use of  
28 firearms during said crimes.

1 COUNT 4 - BURGLARY WHILE IN POSSESSION OF DEADLY WEAPON

2 Defendants did then and there wilfully, unlawfully, and feloniously enter, with intent  
3 to commit assault, robbery and/or kidnapping, the Palace Station Hotel & Casino, located at  
4 2411 West Sahara, Las Vegas, Clark County, Nevada, particularly Room No. 1203 therein,  
5 occupied by BRUCE FROMONG and/or ALFRED BEARDSLEY, while in possession of  
6 one or more firearms, the Defendants being criminally liable under one or more of the  
7 following principles of criminal liability, to-wit: (1) by directly committing said crime;  
8 and/or (2) by aiding or abetting one another and/or one or more confederates in the  
9 commission of said crime, by directly or indirectly, counseling or encouraging each other to  
10 commit said crime, and by encouraging, hiring, commanding, inducing or otherwise  
11 procuring THOMAS RICCIO to arrange a meeting with BRUCE FROMONG and ALFRED  
12 BEARDSLEY, for the feigned purpose of purchasing certain items of sports memorabilia  
13 autographed by O. J. Simpson and other sports memorabilia, and, thereafter, one or more of  
14 the Defendants possessing a firearm, and Defendants entering said room occupied by  
15 BRUCE FROMONG and/or ALFRED BEARDSLEY intending to commit assault, and/or  
16 robbery; and/or, (3) each defendant acting pursuant to a conspiracy to commit coercion,  
17 burglary, assault and/or robbery.

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

19 Defendants did wilfully, unlawfully, feloniously, and without authority of law, seize,  
20 confine, inveigle, entice, decoy, abduct, conceal, kidnap, or carry away BRUCE  
21 FROMONG, a human being, with the intent to hold or detain the said BRUCE FROMONG  
22 against his will, and without his consent, for the purpose of committing robbery, said  
23 Defendants using deadly weapons, to-wit: firearms, during the commission of said crime, the  
24 Defendants being criminally liable under one or more of the following principles of criminal  
25 liability, to-wit: (1) by directly committing said crime; and/or (2) by aiding or abetting one  
26 another and/or one or more confederates in the commission of said crime, by directly or  
27 indirectly, counseling or encouraging each other to commit said crime, and by encouraging,  
28 hiring, commanding, inducing or otherwise procuring THOMAS RICCIO to arrange a

1 meeting with BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned purpose of  
2 purchasing certain items of sports memorabilia autographed by O.J. Simpson and other  
3 sports memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or decoying  
4 BRUCE FROMONG to the Palace Station Hotel & Casino, particularly Room No. 1203  
5 therein, and one or more of the Defendants possessing, displaying and/or pointing a firearm  
6 at BRUCE FROMONG, Defendants using confinement, force, fear and threat of force to  
7 take property from BRUCE FROMONG, as set forth in COUNTS 7 & 8, the Defendants  
8 acting in concert throughout; and/or, (3) each defendant acting pursuant to a conspiracy to  
9 commit coercion, burglary, assault and/or robbery.

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

11 Defendants did wilfully, unlawfully, feloniously, and without authority of law, seize,  
12 confine, inveigle, entice, decoy, abduct, conceal, kidnap, or carry away ALBERT  
13 BEARDSLEY, a human being, with the intent to hold or detain the said ALBERT  
14 BEARDSLEY against his will, and without his consent, for the purpose of committing  
15 robbery, said Defendants using deadly weapons, to-wit: firearms, during the commission of  
16 said crime, the Defendants being criminally liable under one or more of the following  
17 principles of criminal liability, to-wit: (1) by directly committing said crime; and/or (2) by  
18 aiding or abetting one another and/or one or more confederates in the commission of said  
19 crime, by directly or indirectly, counseling or encouraging each other to commit said crime,  
20 and by encouraging, hiring, commanding, inducing or otherwise procuring THOMAS  
21 RICCIO to arrange a meeting with BRUCE FROMONG and ALFRED BEARDSLEY, for  
22 the feigned purpose of purchasing certain items of sports memorabilia autographed by O.J.  
23 Simpson and other sports memorabilia, and, thereafter, THOMAS RICCIO inveigling,  
24 enticing and/or decoying ALFRED BEARDSLEY to the Palace Station Hotel & Casino,  
25 particularly Room No. 1203 therein, and one or more of the Defendants possessing,  
26 displaying and/or pointing a firearm at ALFRED BEARDSLEY, Defendants using  
27 confinement, force, fear and threat of force to take property from ALFRED BEARDSLEY,  
28 as set forth in COUNTS 7 & 8, the Defendants acting in concert throughout; and/or, (3) each

1 defendant acting pursuant to a conspiracy to commit coercion, burglary, assault and/or  
2 robbery.

3 COUNT 7 - ROBBERY WITH USE OF A DEADLY WEAPON

4 Defendants did then and there wilfully, unlawfully, and feloniously take personal  
5 property, to-wit: sports memorabilia autographed by O. J. Simpson and/or other sports  
6 memorabilia and/or a cellular phone, from the person of BRUCE FROMONG, or in his  
7 presence, by means of force or violence or fear of injury to, and without the consent and  
8 against the will of the said BRUCE FROMONG, said Defendants using deadly weapons, to-  
9 wit: firearms, during the commission of said crime, the Defendants being criminally liable  
10 under one or more of the following principles of criminal liability, to-wit: (1) by directly  
11 committing this said crime; and/or (2) by aiding or abetting one another and/or one or more  
12 of their confederates in the commission of this said crime, by directly or indirectly,  
13 counseling or encouraging each other to commit said crime, and by encouraging, hiring,  
14 commanding, inducing or otherwise procuring THOMAS RICCIO to arrange a meeting with  
15 BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned purpose of purchasing  
16 certain items of sports memorabilia autographed by O. J. Simpson and other sports  
17 memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or decoying  
18 BRUCE FROMONG to the Palace Station Hotel & Casino, particularly Room No. 1203  
19 therein, and one or more of the Defendants possessing, displaying and/or pointing a firearm  
20 at BRUCE FROMONG, Defendants demanding said property and using confinement, force,  
21 fear and threat of force to take said property from BRUCE FROMONG, the Defendants  
22 acting in concert throughout; and/or, (3) each defendant acting pursuant to a conspiracy to  
23 commit coercion, burglary, assault and/or robbery.

24 COUNT 8 - ROBBERY WITH USE OF A DEADLY WEAPON

25 Defendants did then and there wilfully, unlawfully, and feloniously take personal  
26 property, to-wit: sports memorabilia autographed by O. J. Simpson and/or other sports  
27 memorabilia and/or a baseball cap and/or sunglasses, from the person of ALFRED  
28 BEARDSLEY, or in his presence, by means of force or violence or fear of injury to, and

1 without the consent and against the will of the said ALFRED BEARDSLEY, said  
2 Defendants using deadly weapons, to-wit: firearms, during the commission of said crime, the  
3 Defendants being criminally liable under one or more of the following principles of criminal  
4 liability, to-wit: (1) by directly committing this said crime; and/or (2) by aiding or abetting  
5 one another and/or one or more of their confederates in the commission of this said crime, by  
6 directly or indirectly, counseling or encouraging each other to commit said crime, and by  
7 encouraging, hiring, commanding, inducing or otherwise procuring THOMAS RICCIO to  
8 arrange a meeting with BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned  
9 purpose of purchasing certain items of sports memorabilia autographed by O. J. Simpson and  
10 other sports memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or  
11 decoying ALFRED BEARDSLEY to the Palace Station Hotel & Casino, particularly Room  
12 No. 1203 therein, and one or more of the Defendants possessing, displaying and/or pointing  
13 a firearm at ALFRED BEARDSLEY, Defendants demanding said property and using  
14 confinement, force, fear and threat of force to take said property from ALFRED  
15 BEARDSLEY, the Defendants acting in concert throughout; and/or, (3) each defendant  
16 acting pursuant to a conspiracy to commit coercion, burglary, assault and/or robbery.

17 COUNT 9 - ASSAULT WITH A DEADLY WEAPON

18 Defendants did then and there wilfully, unlawfully, feloniously and intentionally  
19 place another person, to-wit: BRUCE FROMONG, in reasonable apprehension of  
20 immediate bodily harm with use of a deadly weapon, to-wit: firearms, the Defendants being  
21 criminally liable under one or more of the following principles of criminal liability, to-wit:  
22 (1) by directly committing said crime; and/or (2) by aiding or abetting one another and/or  
23 one or more confederates in the commission of said crime, by directly or indirectly,  
24 counseling or encouraging each other to commit said crime, and by encouraging, hiring,  
25 commanding, inducing or otherwise procuring THOMAS RICCIO to arrange a meeting with  
26 BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned purpose of purchasing  
27 certain items of sports memorabilia autographed by O. J. Simpson and other sports  
28 memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or decoying

1 BRUCE FROMONG to the Palace Station Hotel & Casino, particularly Room No. 1203  
2 therein, and one or more of the Defendants possessing, displaying and/or pointing a firearm  
3 at BRUCE FROMONG, the Defendants confining, pushing, searching, and physically  
4 threatening BRUCE FROMONG and ALFRED BEARDSLEY, and acting in concert  
5 throughout; and/or (3) each defendant acting pursuant to a conspiracy to commit coercion,  
6 burglary, assault and/or robbery.

7 COUNT 10 - ASSAULT WITH A DEADLY WEAPON

8 Defendants did then and there wilfully, unlawfully, feloniously and intentionally  
9 place another person, to-wit: ALFRED BEARDSLEY, in reasonable apprehension of  
10 immediate bodily harm with use of a deadly weapon, to-wit: firearms, the Defendants being  
11 criminally liable under one or more of the following principles of criminal liability, to-wit:  
12 (1) by directly committing said crime; and/or (2) by aiding or abetting one another and/or  
13 one or more confederates in the commission of said crime, by directly or indirectly,  
14 counseling or encouraging each other to commit said crime, and by encouraging, hiring,  
15 commanding, inducing or otherwise procuring THOMAS RICCIO to arrange a meeting with  
16 BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned purpose of purchasing  
17 certain items of sports memorabilia autographed by O. J. Simpson and other sports  
18 memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or decoying  
19 ALFRED BEARDSLEY to the Palace Station Hotel & Casino, particularly Room No. 1203  
20 therein, and one or more of the Defendants possessing, displaying and/or pointing a firearm  
21 at ALFRED BEARDSLEY, the Defendants confining, pushing, searching, and physically  
22 threatening BRUCE FROMONG and ALFRED BEARDSLEY, and acting in concert  
23 throughout; and/or (3) each defendant acting pursuant to a conspiracy to commit coercion,  
24 burglary, assault and/or robbery.

25 COUNT 11 - COERCION WITH USE OF A DEADLY WEAPON

26 Defendants did then and there wilfully, unlawfully, and feloniously use physical  
27 force, or the immediate threat of such force, against BRUCE FROMONG, with intent to  
28 compel him to do, or abstain from doing, an act which he had a right to do, or abstain from

1 doing, or did deprive BRUCE FROMONG of a tool, implement or clothing, or hinder him in  
2 the use thereof, with use of a deadly weapon, to-wit: firearms, by preventing BRUCE  
3 FROMONG from using his phone and/or call for help and/or 911, and by taking it out of  
4 BRUCE FROMONG's hand and preventing him from using his phone, the Defendants being  
5 criminally liable under one or more of the following principles of criminal liability, to-wit:  
6 (1) by directly committing said crime; and/or (2) by aiding or abetting one another and/or  
7 one or more confederates in the commission of said crime, by directly or indirectly,  
8 counseling or encouraging each other to commit said crime, and by encouraging, hiring,  
9 commanding, inducing or otherwise procuring THOMAS RICCIO to arrange a meeting with  
10 BRUCE FROMONG and ALFRED BEARDSLEY, for the feigned purpose of purchasing  
11 certain items of sports memorabilia autographed by O. J. Simpson and other sports  
12 memorabilia, and, thereafter, THOMAS RICCIO inveigling, enticing and/or decoying  
13 BRUCE FROMONG to the Palace Station Hotel & Casino, particularly Room No. 1203  
14 therein, and one or more of the Defendants possessing, displaying and/or pointing a firearm  
15 at BRUCE FROMONG, the Defendants confining, pushing, searching, physically  
16 threatening and demanding property from BRUCE FROMONG, while taking said telephone  
17 the Defendants acting in concert throughout; and/or (3) each defendant acting pursuant to a  
18 conspiracy to commit coercion, burglary, assault and/or robbery.

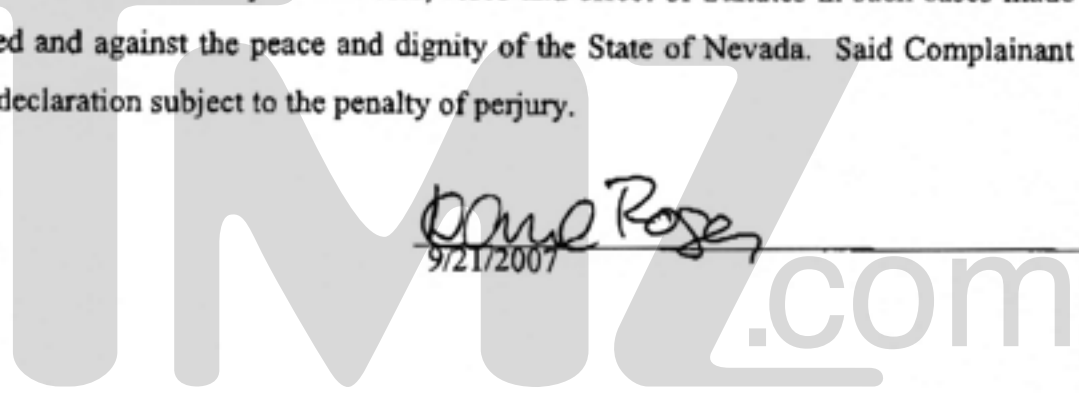
19 COUNT 12 - COERCION WITH USE OF A DEADLY WEAPON

20 Defendants did then and there wilfully, unlawfully, and feloniously use physical  
21 force, or the immediate threat of such force, against ALFRED BEARDSLEY, with intent to  
22 compel him to do, or abstain from doing, an act which he had a right to do, or abstain from  
23 doing, or did deprive ALFRED BEARDSLEY of a tool, implement or clothing, or hinder  
24 him in the use thereof, with use of a deadly weapon, to-wit: firearms, by taking his baseball  
25 cap and/or sunglasses, the Defendants being criminally liable under one or more of the  
26 following principles of criminal liability, to-wit: (1) by directly committing said crime;  
27 and/or (2) by aiding or abetting one another and/or one or more confederates in the  
28 commission of said crime, by directly or indirectly, counseling or encouraging each other to

1 commit said crime, and by encouraging, hiring, commanding, inducing or otherwise  
 2 procuring THOMAS RICCIO to arrange a meeting with BRUCE FROMONG and ALFRED  
 3 BEARDSLEY, for the feigned purpose of purchasing certain items of sports memorabilia  
 4 autographed by O. J. Simpson and other sports memorabilia, and, thereafter, THOMAS  
 5 RICCIO inveigling, enticing and/or decoying ALFRED BEARDSLEY to the Palace Station  
 6 Hotel & Casino, particularly Room No. 1203 therein, and one or more of the Defendants  
 7 possessing, displaying and/or pointing a firearm at ALFRED BEARDSLEY, the Defendants  
 8 confining, pushing, searching, physically threatening and demanding property from  
 9 ALFRED BEARDSLEY, while taking said baseball cap and/or sunglasses, the Defendants  
 10 acting in concert throughout; and/or (3) each defendant acting pursuant to a conspiracy to  
 11 commit coercion, burglary, assault and/or robbery.

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

15  
 16 *Donna Rose*  
 17 9/21/2007



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