

ADAM PAUL LAXALT
Attorney General



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
100 North Carson Street
Carson City, Nevada 89701

J. BRIN GIBSON
First Assistant Attorney General

NICHOLAS A. TRUTANICH
Chief of Staff

KETAN D. BHIRUD
General Counsel

July 6, 2018

Via U.S. Mail

Joey Gilbert
Joey Gilbert Law
201 West Liberty Street, Ste. 210
Reno, NV 89501

Re: Storey County Sheriff Gerald Antinoro

Dear Mr. Gilbert:

This responds to your correspondence, on behalf of your clients Don Roger Norman and Lance Gilman, asking this office to investigate allegations of sexual harassment against Storey County Sheriff Gerald Antinoro.

In January of 2014, the Attorney General's Office (AGO) received its first sexual harassment complaint regarding Sheriff Antinoro. At that time, then-Attorney General Catherine Cortez Masto declined to investigate because the AGO lacks jurisdiction to investigate sexual harassment claims. Instead, the complainant was referred to the Storey County Human Resources Division and the AGO matter was summarily closed. *See* February 24, 2014, Chief of Investigations Letter, at Exhibit 1. While we agree with the prior administration's conclusion that the AGO generally does not investigate sexual harassment, Attorney General Laxalt believed it important to determine whether sexual offenses constituting crimes, as opposed to civil wrongs, had been committed. Accordingly, as soon as we received your first letter, Attorney General Laxalt—who wanted to ensure the safety of any potential victims—ordered senior investigators and attorneys in our office to thoroughly review the records and work with the FBI to determine whether sufficient allegations existed that could rise to the level of criminal activity, thereby meriting further investigation by this office. After reviewing the records and pushing for greater detail (*see, e.g.*, May 7, 2018, Chief of Investigations Email, at Exhibit 2), we determined sufficient allegations existed to commence an investigation. To date, we estimate that our investigators and attorneys have spent several hundred hours on this investigation with an eye on ensuring not only that any potential crimes were investigated, but that they were investigated in a manner that ensured any potential victims were not re-victimized.

Background

On April 6, 2018, the AGO received your first letter requesting an investigation into Sheriff Antinoro, as well as hundreds of pages of deposition transcripts and

exhibits attached to your letter. The AGO's Investigations Division shared those materials with the FBI. It also independently reviewed them to determine whether to initiate a criminal investigation. As your initial letter related to civil, rather than criminal, conduct, the AGO's Chief of Investigations responded by asking you to provide specific criminal allegations.

After you submitted your responses, the AGO identified and assigned investigators and prosecutors with sex-offense experience to this matter. Those chosen investigators also had the necessary experience to interview potential survivors of sexual violence. After being assigned to the investigation, those staff members conducted a thorough review of over one thousand pages of deposition transcripts and other documentary evidence collected from other state agencies and state and federal courts.

After completing their document review, the investigation team identified five potential victims of sexual offenses, including possible sexual assault, sexual coercion, and sex trafficking. The AGO conducted four interviews with the identified potential sexual offense victims and attempted to interview a fifth possible victim without success. *See* AGO Reports of Investigation, at Exhibit 3. The investigation team reached out to the identified potential sexual offense survivors to ensure that they understood that there was a safe place to seek redress. Of course, our ability to investigate is limited by the willingness of potential victims to cooperate with the investigation, as well as the need to avoid re-victimizing a survivor or providing a false hope of meritorious prosecution where there is none (like, for example, where a case falls outside of the statute of limitations). Indeed, several of the women we spoke to were very upset that false accusations were made concerning their private sex lives and made it very clear that they did not appreciate the unwanted attention brought on by people with a personal agenda rather than any concern for their wellbeing. Accordingly, to shield the witnesses from additional, unwanted public attention, the AGO will not identify any interviewed witness by name.

Although our investigation did not result in findings of criminal offenses within the statute of limitations, other options are available for your client:

- The Nevada Division of Investigations (NDI), through the Department of Public Safety, provides the necessary mechanism to handle investigations in which law enforcement agencies, such as the Storey County Sheriff's Office, do not have the political separation to conduct sensitive investigations into elected or governmental officials. Any future allegations of criminal conduct by Sheriff Antinoro or other officials in Storey County should be referred to the NDI.
- To the extent that you believe, as you alleged in your initial letter, that the Storey County Sheriff has committed civil rights violations, the United States Department of Justice has the authority to seek civil remedies in cases where law enforcement agencies have policies or practices that foster a pattern of misconduct by employees. *See* 42 U.S.C. § 14141 (re-codified at 34 U.S.C. § 12601).

- Similarly, both the Equal Employment Opportunity Commission and the Nevada Equal Rights Commission investigate allegations of sex discrimination and harassment in the workplace.
- As your client, Lance Gilman, a Storey County Commissioner, is no doubt aware, the Storey County Commission would be an appropriate body to initiate investigations into allegations of sexual misconduct by county employees and officials, including in the Sheriff's Office.
- Finally, you, your client, the Storey County Commission, or any other interested party may bring a civil action pursuing the Sheriff's removal from office for malfeasance under NRS 283.440.

Potential Sexual Offenses Investigated by this Office

Your June 2018 letters ask this office to investigate Sheriff Antinoro for an alleged sexual assault, identified as a "gang rape." AGO investigators identified and located the potential sexual assault victim, and conducted an interview with the FBI at the Reno FBI office to ensure her safety and wellbeing. During the interview, the witness unequivocally denied that she was the victim of sexual assault or any other sexual misconduct and noted that her private and consensual life choices were being misconstrued. Moreover, the witness noted that the allegations of sexual assault naming her as the victim, as outlined in your request for investigation, were destructive to her reputation and family and caused her harassment by the public including vandalism of her car. Based on the interview of this witness, the AGO investigation team closed its investigation into this allegation of sexual assault.

You also asked the AGO to prosecute a sexual assault that allegedly occurred in 2006. Consistent with its primary jurisdiction over such claims, the Sparks Police Department (SPD) previously investigated these allegations. Its investigation was closed in early 2014. *See* SPD Reports of Investigation, at Exhibit 4. Additionally, as referenced in the attached report, the SPD detective assigned to the matter notified the prior Attorney General's Office of the sexual assault allegations. Former Attorney General Masto elected not to pursue an investigation into the alleged sexual assault. Moreover, you acknowledge that the conduct occurred well outside of the governing statute of limitations. In your June 4, 2018 letter, you claim that the statute of limitations is a non-jurisdictional, affirmative defense. However, you fail to recognize that the State's burden of proof as to the statute of limitations is still governed by a preponderance of the evidence. *See Dozier v. State*, 124 Nev. 125 (2008). The State would not be able to meet this burden and pursuit of criminal charges would be fruitless and provide the named alleged victim false hope for a successful prosecution and potentially reopen wounds from her past.

The records submitted with your request for investigation also presented possible charges of sex trafficking, pandering, or sexual coercion against Sheriff Antinoro arising out of allegations that a possible victim was paid for engaging in sexual acts with other men, with or without the use of force, threats, or

intimidation. The AGO investigation team interviewed the potential victim who stated that she was not the victim of any sexual offenses.¹

The records reviewed by the AGO investigation team presented another possible instance of misconduct. AGO investigators located and interviewed the possible victim who stated that Sheriff Antinoro never committed any acts of sexual misconduct against her.

The same records also presented possible instances of attempted sex assault, attempted sex trafficking, and attempted sexual coercion for conduct related to Sheriff Antinoro allegedly arranging or attempting to coerce the alleged victim into engaging in sexual acts with multiple men against her will. In investigating these allegations, AGO investigators made multiple attempts to contact the alleged victim, including several phone calls and visits to the home address they identified as the alleged victim's through state agency records. The investigators have not been successful in making direct contact with the possible victim. However, should the witness reach out to the AGO in the future, the AGO will meet with her to ensure that she is safe and has not been the victim of a crime.

Finally, based on its review of your request for investigation and supporting documents, the AGO investigation team identified three additional persons of interest who could have been the victims of sexual offenses committed by Sheriff Antinoro. The AGO investigation team requested records from state agencies, the Storey County Board of Commissioners, and state and federal courts to determine whether Sheriff Antinoro's alleged conduct related to those persons of interest rose above civil claims of sexual harassment. The AGO's review of those records revealed that the alleged conduct, even if it occurred and was verified, did not rise to the level of criminal conduct. As such, the investigation team, in consultation with the assigned prosecutor, elected not to interview the three persons of interest for the reasons stated above.

Potential Perjury

You also request that the AGO investigate several instances of perjury allegedly committed during ongoing civil litigation. Because the civil depositions occurred in Reno, local law enforcement in Washoe County have primary jurisdiction over any corresponding perjury investigations. Moreover, the request is based simply on differences between Sheriff Antinoro's testimony and the testimony of other individuals in a civil case. Beyond the fact that the AGO does not have primary jurisdiction to investigate and prosecute your perjury allegations, it is neither appropriate nor possible for the AGO to investigate every incident of inconsistent testimony from two different witnesses in a civil case. Indeed, this is the nature of civil cases. There are inevitably disputes as to the facts with conflicting testimony. To the best of my knowledge, the AGO has never pursued a criminal investigation based on inconsistent testimony in an ongoing civil case. If the civil litigation ultimately produces sufficient evidentiary support to prove criminal perjury beyond a

¹ Moreover, the witness stated that the conduct ceased in 2010. As such, any possible charge of pandering would be barred by the statute of limitations.

Page 5
July 6, 2018

reasonable doubt, the case should be referred to the Washoe County District Attorneys' Office to exercise its primary jurisdiction.

If you would like any further assistance concerning the potential avenues for redress outlined in the bullet points above, the AGO is available to discuss. Otherwise, at this time, we consider the investigation closed.

Sincerely,

/s/ Jeffrey H. Segal /s/

Jeffrey H. Segal

Bureau Chief, Bureau of Criminal
Justice

EXHIBIT 1



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL

100 North Carson Street
Carson City, Nevada 89701-4717

CATHERINE CORTEZ MASTO
Attorney General

KEITH G. MUNRO
Assistant Attorney General

GREGORY M. SMITH
Chief of Staff

February 24, 2014

[REDACTED]
[REDACTED]
Dear Ms. [REDACTED]

I am responding to a letter received in our Public Integrity Unit. Your letter refers to actions regarding Sheriff Antinoro, Sgt. Tony Dosen and Sgt. Ken Quirk. After careful review of your submission I strongly recommend that you seek assistance from the Storey County Human Resources Division. This office has no jurisdiction to investigate sexual harassment.

The Office of the Attorney General represents State agencies, boards and commissions, and by statute we are unable to provide legal advice or assistance to private citizens; therefore we cannot intervene on your behalf.

If you feel you need legal assistance from a Nevada attorney, you may wish to contact the Nevada Lawyer Referral service offered by the state bar at 1-800-789-5747.

Thank you for contacting our office.

Sincerely,

CATHERINE CORTEZ MASTO
Attorney General

By:


Dale Liebherr
Chief of Investigations

EXHIBIT 2

From: Roland D. Swanson II
Sent: Monday, May 7, 2018 5:16 PM
To: 'Roger'
Cc: Joey Gilbert; Vanessa Cervantes; Roland D. Swanson II
Subject: RE: T/C Follow up - re: Sheriff Antinoro

Mr. O'Donnell,

It was nice speaking to you recently about the April 5, 2018, letter submitted by your client, Don Roger Norman. Although the letter made allegations regarding potentially improper conduct by Sheriff Gerald Antinoro, the majority of those allegations relate to civil—rather than criminal—conduct. Additionally—as best we can tell from trying to piece together the facts in the letter—your client's statements regarding alleged crimes relate to conduct for which the statute of limitations has run. Although the letter contained concerning allegations, it appears not to have been drafted by a lawyer and does not contain any citation to specific criminal statutes that you or your client believe were violated. As the letter was leaked to the press, it appears to have been written more for sensationalism than to help with an actual investigation. That being said, we are open to investigating any actual criminal conduct if you can provide us with a letter that is tailored towards a law enforcement investigation. Accordingly, if you believe that crimes were committed, please provide us with another letter that specifically (1) states which criminal statutes you believe were violated, (2) identifies when you believe those statutes were violated, and (3) provides a brief statement of the facts constituting the violation.

As we are still waiting for you to provide this additional information, we consider your complaint an open matter. We look forward to receiving an updated letter that addresses these issues.

Thank you.

Rod

Roland D. Swanson, II
Chief of Investigations
Nevada Office of the Attorney General
555 East Washington Avenue, Suite 3900
Las Vegas, NV 89101
W: 702-486-3781
C: 702-275-4213
Fax: 702-486-3768
Email: rswanson@ag.nv.gov



From: Roger [mailto:roger@joeygilbertlaw.com]
Sent: Monday, May 07, 2018 10:54 AM
To: Roland D. Swanson II
Cc: Joey Gilbert ; Vanessa Cervantes
Subject: [BULK] T/C Follow up - re: Sheriff Antinoro

Mr. Swanson,

I am emailing to follow up on our recent telephone conversation regarding the complaint sent to your office by Mr. Don Roger Norman on April 5, 2018.

Thank you for taking the time to discuss this with me; I know you are busy and I truly appreciate you making the effort to discuss this with me.

As I understand it based on what you told me, you and several others from your office, including prosecutors and investigators, have read through the depositions forwarded to you and have found no criminal actions within the statute of limitations. As such, you consider the matter to be closed unless further information makes its way to your office.

You have talked with Mr. Stewart Handte about a different matter, and this matter came up tangentially. He has been advised to let your office know if there is any further information he has with respect to this.

Finally, as you consider this matter closed absent further information, you would prefer to talk to Mr. Don Roger Norman only after any further information alleging criminal actions inside the statute of limitations has been forwarded to your office under a new complaint.

I believe that this accurately summarizes our conversation, but please feel free to correct or supplement my summary if you feel as if I have mischaracterized or forgotten anything.

cc-ed on this email are Mr. Gilbert and his assistant, Vanessa.

Again, thank you for taking the time to talk with me about this today.

Sincerely,

Roger O'Donnell

EXHIBIT 3



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Interview of [REDACTED] (PROTECT IDENTITY)

On 06/12/2018 at approximately 1415 hours, I conducted an interview with [REDACTED], D.O.B. [REDACTED], at the Federal Bureau of Investigation, (FBI) Reno office, located at 980 Sandhill Road, Reno, NV 89521. FBI Special Agent Brian Keeney (Keeney) monitored the interview and operated the audio and visual recording equipment (Note – Following this interview, Keeney informed me the FBI recording equipment failed and the data was unrecoverable).

In summary, I explained to [REDACTED] that the FBI office was the safest and most confidential location for the interview and my objective was to ensure her privacy and safety. [REDACTED] stated she understood the interview would be recorded but wished her name and the details of the interview to remain confidential. I assured [REDACTED] I would do my best to ensure her privacy was protected, and that my primary purpose was to determine her status and welfare as an alleged victim of sexual assault involving Storey County Sheriff Gerald Antinoro (Antinoro).

[REDACTED] stated she was not a victim of sexual assault and the allegations were false. [REDACTED] stated she still had a good relationship with Antinoro. [REDACTED] said she dated Antinoro starting in 2009 and they were engaged to be married. She said in 2015 they ultimately decided to separate and go different directions. [REDACTED] described Antinoro as a man of “integrity” and “110% aboveboard”. Moreover, she added that he was a “by the book guy”, “ethical” and “black and white”. [REDACTED] stated she still speaks with Antinoro from time to time and they remain on good terms.

During the course of the interview, I showed [REDACTED] a request for investigation letter from “Joey Gilbert Law” (Exhibit^A) which prompted our investigation and I asked her to review certain portions (Pages 6-9) of that letter which allege she was gang raped “by a group of guys that he (Antinoro) set up”. [REDACTED] said the allegations were false and were nothing more than her sex life “being twisted by rumors”. [REDACTED] stated her sex life with [REDACTED] was personal and it was nobody’s business. [REDACTED] described the allegations outlined in the letters as false and destructive to her reputation and family.

[REDACTED] stated she was recently served civil papers to attend a deposition on 06/15/2018 in reference to Melanie Keener’s sexual harassment case against Antinoro. [REDACTED] said the entire situation makes her feel like she is being harassed and her reputation is being harmed by all of the slanderous stories that contain her name.

Matter No. 11801-2792
By: S. Bidondo, Sup. Criminal Investigator
Dictated/Typed: 06/12/2018



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Interview of [REDACTED] (PROTECT IDENTITY)

Near the conclusion of the interview, [REDACTED] advised that she recently discovered someone had written "whore" on the rear window of her vehicle while it was parked in the driveway to her residence. I advised her to call the Carson City Sheriff's department in the event that it happens again.

The interview was concluded and we escorted [REDACTED] to her vehicle. She thanked us for ensuring she was safe.

End of Interview

Exhibits

^A June 4, 2018 Request for Investigation letter from Joey Gilbert Law (10 pages)

Matter No. 11801-2792
By: S. Bidondo, Sup. Criminal Investigator
Dictated/Typed: 06/12/2018



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: [REDACTED]

On June 28, 2018, State of Nevada Office of the Attorney General Investigators Henry Schlumpf and Bethany Young interviewed [REDACTED], date of birth [REDACTED], Social Security Account Number [REDACTED], cellular [REDACTED], at her residence, [REDACTED]. After being advised of the identity of the interviewing investigators and the purpose of the interview, [REDACTED] provided the following information:

[REDACTED] first married Gerald Antinoro in 1993. They divorced in 2003, at which time [REDACTED] moved from West Wendover, Nevada, to Las Vegas. Antinoro, who'd been working at the West Wendover Police Department, followed her to Las Vegas, where they remarried after being divorced for 40 days. Antinoro began a new job in Las Vegas, with the Transportation Authority. In 2004 or 2005 he accepted a job with the Storey County Sheriff's Department, and moved there. [REDACTED] and Antinoro divorced for the second time in 2010. They remained in contact, and still talk to this day. Antinoro still pays spousal support to [REDACTED].

[REDACTED] She was not forced or coerced into doing this, she did it consensually, [REDACTED]. [REDACTED] has never been the victim of human trafficking or sexual assault.

[REDACTED] recently received a subpoena to be deposed at the offices of the Flangas Dalacas Las Group. She called Antinoro to find out what the subpoena was about, and he started to explain but she cut him off by telling him she decided she didn't want to know. [REDACTED] complied with the subpoena and attended the deposition at 10:00 a.m. on June 11, 2018, but she refused to answer any of the attorney's questions regarding her sex life.

[REDACTED] promised her continued support in the investigation, and provided her cellular telephone number should additional questioning be necessary.

Matter No. 11801-2792
By: Henry Schlumpf
Dictated/Typed: Henry Schlumpf 06/29/2018



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Telephonic Interview of [REDACTED] 7/2/18

On 7/2/18 at approximately 0950 hours, I attempted to contact [REDACTED], "[REDACTED]," via telephone, ([REDACTED]) [REDACTED]. [REDACTED] was one of several individuals identified to be interviewed reference this case.

This telephone number was selected as the most current based on a TLO search. When I called the number listed above I was sent directly to a voicemail box. It is unknown if this is [REDACTED] number or not because it was a computer generated voice stating I reached ([REDACTED]) [REDACTED]. I left a voice message stating who I am, that I am trying to reach [REDACTED], and requested a call back to my office number.

Internet research indicates that [REDACTED] and her husband, former Chief Deputy [REDACTED], "[REDACTED]," of the Storey County Sheriff's Office, moved out of state to the [REDACTED], Colorado area and may be affiliated with [REDACTED], [REDACTED], [REDACTED], CO (Exhibit^A).

I was provided a specific set of questions to ask [REDACTED] should she agree to be interviewed.

- 1) Antinoro allegedly made sexual passes at her;
- 2) Antinoro allegedly tried to "get her and [REDACTED] ([REDACTED]) to have a sexual encounter;"
- 3) Dates of alleged acts;
- 4) Sexual passes = any force or threats?;
- 5) Any knowledge of [REDACTED] making statements to her regarding the gang-rape which [REDACTED] denied happened (Referenced in Keener letter on page 2).

On 7/2/18 at approximately 1006 hours, I received a return phone call from [REDACTED]. The following is a summary of that conversation which is not verbatim or chronological:

Interview of [REDACTED]

[REDACTED] asked what this investigation was about, so I told her the Nevada Attorney General's Office, "AGO," received a formal complaint in which there were allegations that Sheriff Gerald Antinoro, "Jerry," was reported to have sexually harassed and/or sexually assaulted various individuals, or possibly coerced them in a sexual way. I told her I was not sure how the complaint was actually filed with the AGO, but some of the allegations are from Melanie Keener, "Melanie," possibly through a third party. I explained that [REDACTED] name came up during the investigation and I just wanted to find out what she knew about these allegations, and she agreed to voluntarily speak with me. [REDACTED] was on her cellphone and driving, so she told me she pulled off the side of the road to talk to me.

She and Melanie have been friends [REDACTED]

///

Matter No. 11801-2792

By: C. Cluckey

Dictated/Typed: 7/2/18



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Telephonic Interview of [REDACTED] 7/2/18

[REDACTED] told me that Jerry never made any sexual passes at her, nor did he try to get [REDACTED] and [REDACTED] to have a sexual encounter together. [REDACTED] continued to say that the only time Jerry touched her ([REDACTED]) physically was during one of her birthday parties. There were approximately (40) attendees at this birthday party and everyone, including [REDACTED] children, gave her birthday spankings. [REDACTED] does not consider that to be a sexually motivated action on Jerry's part.

[REDACTED] also admitted to being friends with [REDACTED] during the time [REDACTED] was dating Jerry. [REDACTED] said she was set-up on a blind date with [REDACTED], by Melanie, approximately five to six years ago. [REDACTED] never told [REDACTED] she was "gang-raped." Instead, [REDACTED] offered the following explanation:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- As far as [REDACTED] is aware of, no gang-rape of [REDACTED] occurred.

Speculation about Melanie's Statements in Her Complaint

I asked [REDACTED], since she and Melanie have been lifelong friends, why she thought Melanie would say these things happened in a complaint if they didn't actually happen. Melanie told me about two weeks prior to Melanie leaving the Storey County Sheriff's Office, "SCSO," they spoke on the phone and Melanie shared with [REDACTED] concern about her job at SCSO.

[REDACTED]

[REDACTED]

///

Matter No. 11801-2792
By: C. Cluckey
Dictated/Typed: 7/2/18



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Telephonic Interview of [REDACTED] 7/2/18

[I would later perform internet research on [REDACTED] and found a few news stories about the case. I attached those news stories as (Exhibit^B).]

[REDACTED] said this is her own personal opinion, but she believes that Melanie filed the sexual harassment case against [REDACTED].

[REDACTED]

[REDACTED] told me her husband, [REDACTED], was good friends with [REDACTED], "[REDACTED]," while they worked for [REDACTED]. [REDACTED] is also godfather to [REDACTED] daughter. [REDACTED] introduced [REDACTED] locally and that's how [REDACTED] got hired at SCSO after leaving [REDACTED].

[REDACTED] went on to say that it was interesting that [REDACTED] is at the center of every complaint filed against Jerry.

[REDACTED] Current Location

[REDACTED] told me she and [REDACTED] were thinking about moving up to Colorado to become part owners of a restaurant there, but since they have [REDACTED] they could not afford to buy into that restaurant right now. They are still currently living at [REDACTED].

I thanked [REDACTED] for her time and the interview concluded at approximately 1031 hours.

End of report.

Exhibits

^A Facebook search results for [REDACTED]

^B News articles RE: [REDACTED] homicide investigation

Matter No. 11801-2792
By: C. Cluckey
Dictated/Typed: 7/2/18



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: Attempts Made to Contact [REDACTED]

On 6/25/18 at 0800 hours, I met with Supervisory Investigator Scott Bidondo, "Bidondo," at the Reno Attorney General's Office. We located a possible address for [REDACTED], "[REDACTED]," DOB [REDACTED], as [REDACTED]. Bidondo and I drove to that location in an attempt to locate [REDACTED] for an interview. On arrival there were no vehicles in the driveway and no answer at the front door. We located another possible residence at [REDACTED]. On arrival I knocked on the front door, but again there was no answer.

At approximately 1123 hours I located a possible cell phone number for [REDACTED], ([REDACTED]) [REDACTED]. I placed a call to that number, which she did not answer, but was sent to a voicemail wherein a female voice stated the name [REDACTED]. I left a voice message introducing myself and asked that [REDACTED] call me back, then provided her my office and cell phone numbers.

In addition, Bidondo ran [REDACTED] name through the Employment Securities Division, "ESD," which would indicate if she was gainfully employed and receiving wages from that employment. ESD indicated [REDACTED] is not currently receiving an income from employment.

On 6/28/18 at approximately 0905 hours, I faxed a request to the Department of Health and Human Services, Division of Welfare and Supportive Services, Investigations & Recovery Specialist, Office of Investigations & Recovery, Central Office, "Welfare," at (775) 684-8765 (Exhibit^A).

On 6/28/18 at approximately 0956 hours, I received a faxed response from Welfare indicating [REDACTED] is receiving benefits and currently resides at [REDACTED] (Exhibit^B), which was the first residence checked on 6/25/18.

On 6/28/18 at approximately 1445 hours, Supervisory Investigator David O'Hara, "O'Hara," and I attempted contact with [REDACTED] at [REDACTED], again. There was a white full sized van parked in the driveway, whose registration came back to a company in Reno. I knocked on the door multiple times and there was no answer. I wrote my cell phone number on the back of a business card and left that card on the front door requesting a callback.

As of this report I have not received any return phone calls from [REDACTED], nor any return phone calls as a result of leaving my business card at the house on [REDACTED].

End of report.

Exhibits

^A Request to DHHS Welfare for [REDACTED] address

^B Welfare Records Received ([REDACTED])

Matter No. 11801-2792

By: C.Cluckey

Dictated/Typed: 6/28/18



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
INVESTIGATIONS DIVISION

REPORT OF INFORMATION

Re: 11801-2792 Attempted contact with [REDACTED]

On July 6, 2018, at 0956 hours, I went to the last known address for [REDACTED], [REDACTED], [REDACTED] in an attempt to interview [REDACTED] in reference to this case.

I knocked on the front door several times with no response. The living room curtains were open and I was able to see partially inside the residence. I did not hear or observe anyone in the residence. The residence appears to be occupied. The white full sized Ford van that was parked in the driveway when Investigator Cluckey and I were at the residence on June 28, 2018, was gone.

No further action taken. End of report.

Matter No. _____
By: _____
Dictated/Typed: _____

EXHIBIT

A

Date/Time : JUN-28-2018 06:59AM THU
Model Name : Dc11 B2375dnl Mono XFP
Service Tag : 4Z5X4Y1
Host Name : DEL30CDA7AC7643

No	Name/Number	StartTime	Time	Mode	Page	Result
526	96848765	06-28 06:58AM	00:58	G3	002/002	OK

ADAM WISE CONTACT
Lawyer General



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
110 North Carson Street
Carson City, Nevada 89601

J. BRUNNEN
Clerk of the Supreme Court
REMOVALS, BRITAIN
KELLY B. BRIDG
Clerk of the Court

**FAX TRANSMITTAL MEMORANDUM
CONFIDENTIAL & SENSITIVE**

MATERIAL

TO: Investigation & Recruits Specialist, Office of Investigations & Recruits,
Central Office DATE: 052418
FAX #: [REDACTED] TIME FAXED: 06:58 AM
FROM: Investigator Casey Cheley PHONE: [REDACTED]
SUBJECT: Law Enforcement Reason for Client Information
REMARKS: SEE ATTACHMENT

This fax consists of 2 pages, including this cover sheet. If you have any difficulties with this transmission, please telephone the number above. Thank you.

The information contained on this facsimile message and any and all attachments are the property of the Nevada Office of the Attorney General, and are strictly confidential and non-public. The information contained herein is intended only for the use of the designated recipient named above. If the reader of this message is not the intended recipient, or the recipient agent, responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication, or the taking of any action in reliance on the information is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

ADAM PAUL LAXALT
Attorney General



STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL
100 North Carson Street
Carson City, Nevada 89701

J. BRIN GIBSON
First Assistant Attorney General

NICHOLAS A. TRUTANICH
Chief of Staff

KETAN D. BHIRUD
General Counsel

FAX TRANSMITTAL MEMORANDUM
CONFIDENTIAL & SENSITIVE

MATERIAL

TO: Investigations & Recovery Specialist, Office of Investigations & Recovery,
Central Office DATE: 06/28/18

FAX #: [REDACTED] TIME FAXED: 09:05 AM

FROM: Investigator Corey Cluckey PHONE: [REDACTED]

SUBJECT: Law Enforcement Request for Client Information

REMARKS: SEE ATTACHMENT

This fax consists of 2 pages, including this cover sheet. If you have any difficulties with this transmission, please telephone the number above. Thank you.

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STATE OF NEVADA
 DEPARTMENT OF HEALTH AND HUMAN SERVICES
 DIVISION OF WELFARE AND SUPPORTIVE SERVICES
 Office of Investigations and Recovery
 1470 College Parkway
 Carson City, Nevada 89706-7924
 (775) 684-0577 Fax (775) 684-8765

****** LAW ENFORCEMENT REQUEST FAX SHEET ******
Submit with Cover Sheet on Agency Letterhead with Return Fax Number

DATE: 06 - 28 - 2018

SUBJECT OF TRANSMISSION: LAW ENFORCEMENT REQUEST FOR CLIENT INFORMATION

NUMBER OF PAGES TRANSMITTED, INCLUDING COVER SHEET: 2

SENT TO: INVESTIGATIONS & RECOVERY SPECIALIST, OFFICE OF INVESTIGATIONS & RECOVERY, CENTRAL OFFICE

AT FAX NUMBER: (775) 684-8765

REQUEST FOR INFORMATION (completed by requestor)

I am a federal, state or local law enforcement officer working for the Nevada Attorney General's Office
Name of the Organization

100 N. Carson St., Carson City, NV 89406 775 - 684 - 1220
Business Mailing Address Telephone Number

I request you provide me with information about [REDACTED]
Client's Name, SSN and DOB

Specifically their - last known address; social security number; photographic identification.

Under penalty of perjury, I affirm the above-named individual is fleeing to avoid prosecution, custody or questioning for a felony offense; OR is in violation of a condition of their parole or probation associated with a felony conviction; OR has information, which is necessary for this department to accomplish an official duty related to a felony offense.

Corey J. Cluckey, CRIMINAL INVESTIGATOR, (775) 684-1220
Print Name Title Telephone Number of individual making the Request

[Signature] 6/28/18
Signature and Date

REQUEST DISPOSITION (completed by DWSS I&R staff)

- | | | |
|-----------------------------------|-----------------|---|
| <input type="checkbox"/> Approved | Release: | <input type="checkbox"/> Address Information |
| <input type="checkbox"/> Denied | | <input type="checkbox"/> Social Security Number |
| | | <input type="checkbox"/> Photographic I.D. |

Approved and to DWSS released to Requestor

Investigations & Recovery specialist and date

EXHIBIT

B

BRIAN SANDOVAL
Governor



DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF WELFARE AND SUPPORTIVE SERVICES

JUN 28 2018

RICHARD WHITLEY, MS
Director

STEVE H. FISHER
Administrator

DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF WELFARE AND SUPPORTIVE SERVICES
1470 College Parkway
Carson City, NV, 89706
Telephone (775) 684-0500 • Fax (775) 684-8765
<http://dwss.nv.gov>

Date: 6/28/18

To: Corey Cluekey
[REDACTED]

From: Sara Suttle
Program Officer
Office: 775-684-8758 Fax: 775-684-8765

of Pages Sent: 2
(Including Cover Sheet)

Subject: Law Enforcement Request

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Cory J. Cluckey, CRIMINAL INVESTIGATOR, (775) 684-1220 [Signature] 6/28/18
Printed Name, Title, Telephone Number of Individual making the Request Signature and Date

REQUEST DISPOSITION (completed by DWSS I&R staff)

Approved Denied

Release: Address Information Social Security Number Photographic I.D.

[REDACTED] [Signature] 6-28-18
Address and/or SSN released to Requestor Investigations & Recovery Specialist and Date

EXHIBIT 4

Sparks Police Department: Controlled Document - DO NOT DUPLICATE!

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SPARKS POLICE DEPARTMENT
Supplemental or Continuation Report

Type of Report: Sexual Assault

Case: [REDACTED]

Date/Time of Supplement: 4-21-14 @ 1700 hrs.

Detective: GALLOP #047

Approving Supervisor: TRELEN 004

Date: 4-22-14

Details of Supplement

This case will not be investigated further because the date range the alleged Sexual Assault occurred (between 4-1-06 and 9-20-06) is beyond the statute of limitations. This case was generated and investigated based upon the allegation that a Sexual Assault had taken place in Sparks, Nevada. The date range the alleged Sexual Assault occurred within was not known until my interview with victim, Daisey DUKE. The victim was provided a pseudo name because the victim fears retaliation for disclosing the incident.

Follow-up

On or about 3-3-14, I spoke with [REDACTED], the Sheriff of Mineral County, Nevada regarding Gerald ANTINORO. I called [REDACTED] because in Mid-January, [REDACTED] had contacted SPD Sgt. Charlie ALT regarding this case, and I wanted to determine if [REDACTED] had any pertinent information. [REDACTED] does not have any firsthand knowledge regarding this case, nor does he have information about any potential witnesses. [REDACTED] told me he had contacted the Nevada Attorney General's Office regarding ANTINORO and another incident involving a female.

On or about 3-6-14, I spoke with investigator Dale LEBER of the Nevada Attorney General's (AG) office in Reno, Nevada. The purpose of my call to LEBER was to determine if relevant information pertaining to this case had been reported to the AG's office by anyone. According to LEBER, a female had contacted his office regarding possible sexual harassment in Storey County, but that alleged incident did not occur within Sparks PD jurisdiction.

Additional Details

I have attached a corrected copy of the original report.

Case Disposition

Closed, Admin Closure.