

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

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

23 COUNT 1 - CONSPIRACY TO COMMIT A CRIME

24 Defendants and one or more uncharged confederates, did then and there meet with  
25 each other and between themselves, and each of them with the other, wilfully and unlawfully  
26 conspire and agree to commit a crime, to-wit: burglary and/or assault and/or assault with use  
27 of a deadly weapon, and in furtherance of said conspiracy, Defendants and/or their  
28 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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1 All of which is contrary to the form, force and effect of Statutes in such cases made  
2 and provided and against the peace and dignity of the State of Nevada. Said Complainant  
3 makes this declaration subject to the penalty of perjury.

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