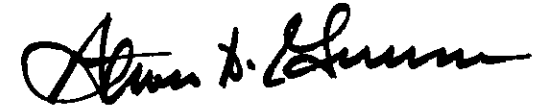


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CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

| | | |
|-------------------------|---|-------------------------|
| THE STATE OF NEVADA, |) | Case No.: C-11-277573-1 |
| |) | C-11-277573-2 |
| Plaintiff, |) | |
| |) | Dept. No.: V |
| vs. |) | |
| |) | |
| GARY RANDALL TRAFFORD, |) | |
| GERALDINE ANN SHEPPARD, |) | |
| aka Gerri Sheppard, |) | |
| |) | |
| Defendants. |) | |

**ADDITIONAL REPLY BRIEF IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS
AND IN SUPPORT OF RETURN TO DEFENDANTS' WRITS OF HABEAS CORPUS**

MEMORANDUM OF POINTS AND AUTHORITIES STATEMENT OF THE FACTS

The State reasserts and realleges the facts set forth in its prior pleadings.

STATEMENT OF THE CASE

After its initial review of the issues raised in the defendants' writs of habeas corpus and in their motions to dismiss, the Court reserved ruling and requested supplemental briefing on several issues raised. Specifically, the Court tentatively ruled that the defendants' argument for dismissal of the counts charged in the indictment based on a Statute of limitation argument was rejected. The Court, citing Nevada case law which expanded the interpretation of crimes committed in secret, disagreed with that basis for dismissal of the

1 indictment, but requested further briefing on two additional issues. Initially, the Court
2 requested direction with regard to the manner in which the indictment was plead. Secondly,
3 the Court requested research on the issue of whether the State had exceeded the
4 boundaries of fair dealing during the presentation of its case to the grand jury.

5 **ARGUMENT**

6 **THE INDICTMENT IS PROPERLY PLED OR IN THE ALTERNATIVE**

7 **MAY BE AMENDED**

8 In its tentative ruling on October 27, the Court expressed a concern about the
9 wording of the indictment. Specifically, the counts alleging OFFERING A FALSE
10 INSTRUMENT FOR FILING OR RECORDING in violation of NRS 239.330 and FALSE
11 CERTIFICATE TO CERTAIN INSTRUMENTS in violation of NRS 205.120, both of which
12 contain the term "forgery" were of concern to the Court. In particular, the Court found that
13 there could be no forgery if the person whose signature was signed had given consent.

14 An indictment is legally sufficient if the offense is clearly set forth in ordinary and
15 concise language. DePasquale v. State 106 Nev. 843, 803 P2d 218 (1990). A review of the
16 indictment demonstrates that the counts sought to be dismissed quote the language of the
17 statutes alleged to have been violated.

18
19 Each and every count asserting a violation of Offering a False Document for Filing or
20 Recording specifically sets forth verbatim the wording of NRS 239.330.

21 On or about (date), Defendant did, in the County of Clark State of
22 Nevada, then and there, knowingly and feloniously, cause to be offered for
23 filing in a public office, a false and/or forged instrument, which instrument, if
genuine, might be filed, registered or recorded in a public office under the law
of the State of Nevada, to wit:

24 On or about (date), Defendant, within Clark County, State of Nevada,
25 either directly or through an agent or employee, caused to be offered for filing,
26 a NOTICE OF DEFAULT AND ELECTION TO SELL UNDER DEED OF
TRUST, with the Office of the County Recorder of Clark County, Nevada dated
27 Said document was forged *in that it purported to be signed by defendant ,*
as the agent for the beneficiary of the property listed in said instrument, when
in truth and in fact Defendant did not sign said instrument, as Defendant well
28 knew.

The same issue statutory reference is found in the False Certification charge.

1 On or about (date), Defendant, within the County of Clark, State of
2 Nevada, did then and there plan, direct, and arrange to have a person
3 authorized to take proof or acknowledgement of an instrument which by law
4 may be recorded, willfully certify falsely that the execution of the instrument
was acknowledged by a party thereto or that the execution thereof was
proved, to wit:

5 On or about (date), Defendant planned, directed, and arranged to have
6 (Notary), a notary public appointed by the Nevada Secretary of State, and
7 authorized to take proof or acknowledgment of an instrument, to forge and
8 willfully certify falsely that the execution of this instrument was acknowledged
9 by her signature, on a document entitled NOTICE OF DEFAULT AND
ELECTION TO SELL UNDER DEED OF TRUST,... filed in the Office of the
Country Recorder of Clark County, Nevada (date), Defendants, within Clark
County, State of Nevada.

10 By the very wording of the pleading, the indictment sets forth specifically how the
11 defendants filed false documents. "(The Defendants) planned directed and arranged to
12 have (the notary) forge and willfully certify that the falsely that the execution of the
13 document was acknowledged by the notary's signature, which clearly is false.

14 The State has set forth a complete description of exactly how the defendants filed false
15 documents. To argue that the defendants have been denied their due process rights by
16 virtue of the use of the word "forge" is absurd, especially in light of the common usage of the
17 term to include the act of signing a name with the signee's authorization. The defendant's
18 argument that they have been prejudiced by the description set forth in the indictment has
19 no merit. The grand jury transcript is filled with the testimony of the notaries who indicated
20 that they had been instructed to sign the defendants' names and then notarize them. There
21 is no way that a reading of the indictment, along with the transcript could lead an individual
22 to a conclusion other than that the documents were false because of the fact that the person
23 whose signature was certifying the NOD was not the signer. As the Court pointed out in its
24 tentative ruling, simply removing the words "by forging" as surplusage would clarify the
25 charging document and remove any doubt as to the acts alleged to have constituted the
26 crimes.
27
28

1 Contrary to the defense argument, this in no way permits the State to change its
2 theory of the case; the facts to be proven at trial would remain the same. The Defendants'
3 contention that the State has changed its theory of the case has no merit. If it had been the
4 State's intention to charge the Defendants with forgery, the provisions of NRS 205.090 thru
5 205.110 would have been charged.

6 Moreover, Defendant Sheppard argues that a jurat may be false and that falsity does
7 not affect the legitimacy of the document. In other words, the defendants' position is that
8 they may falsify signatures on the acknowledgment attached to a document and the false
9 acknowledgment does not constitute a crime unless the body of the document constitutes a
10 crime. It should be remembered that these documents which directly affect ownership of
11 real property and they declare that the homeowners have been notified of their delinquency
12 in its entirety. The basis for the Defendants' assertion is a series of civil cases, which stand
13 for the proposition that an improperly acknowledged document still has legal import. A
14 review of these cases cited demonstrate that references are taken from a wholly different
15 context, mainly which a certificate of acknowledgment is not necessary for the document
16 itself, and further that the acknowledgment is not even a part of the document. The
17 defendants seek to justify their conduct based on dicta in wholly irrelevant civil matters from
18 other jurisdictions.

19 Obviously, the Defendants are requesting this Court to ignore the plain meaning of
20 the statutes under which the defendants are charged. NRS 239.330 and NRS 205.120 are
21 both clear in their intent that documents be properly notarized especially when they are filed
22 as an official document required for the involuntary transfer or taking of real estate. The
23 legislative intent is clear; obviously, the Clark County Recorder's office cannot obtain an
24 independent verification as to the identity of the signors of documents to be filed in their
25 office. As noted previously, once filed, subsequent transactions are based upon these
26 original documents. As such, they rely on the affirmations provided by the notaries that
27 certify that the proper parties have executed the documents. To assert that a faulty
28 acknowledgment on a physician's affidavit submitted to a screening panel is equivalent to

1 the necessity for accuracy in the involuntary transfer of real estate strains credulity. The
2 defendants' arguments should be rejected.

3 **THE EVIDENCE PRESENTED TO THE GRAND JURY IS RELEVANT AND DOES**
4 **NOT CONSTITUTE PROSECUTORIAL CONDUCT**

5 The Defendants next argue that the State intentionally withheld exculpatory from the
6 grand jury, and that this constitutes prosecutorial misconduct. Specifically, the Defendants
7 argue that the State misleads the jury into believing that the signatures were not authorized,
8 that the signings were a lawful practice and the NODs were valid and that the NODs were
9 legitimately issued to individuals who were delinquent on mortgage payments. Not only are
10 these assertions without factual basis, they have no legal significance.

11 The purpose of the grand jury has been described as follows: "to investigate possible
12 offenses and to act as an independent barrier which protects the innocent from oppressive
13 prosecution." Losavio v. Kikel, 187 Colo. 148, 529 P.2d 306, 310 (1974). It is also said that
14 the grand jury proceeding "is an ex parte investigation to determine whether a crime has
15 been committed and whether criminal proceedings should be instituted against any *463
16 person." State v. Bell, 60 Haw. 241, 589 P.2d 517, 519 (1979). Historically, the grand jury
17 has also been viewed as a safeguard in protecting citizens against unfounded criminal
18 prosecutions. Lane v. Second Judicial Dist., Washoe County 104 Nev. 427, 462-463, 760
19 P.2d 1245, 1268 (Nev., 1988).

20 These facts as alleged by the defendants, even if true, would have no bearing on the
21 outcome of the grand jury proceeding.

22 First and foremost, it is absolutely disingenuous for the defendants to argue that the
23 State withheld the fact that the signatures were authorized. The direct testimony of the
24 notaries indicates that they were expressly ordered to sign and notarize the defendant's
25 names on the NODs. Each notary told the grand jury just that and this fact was the basis of
26 the State's case. Further, to assert that the State has a duty to argue the defendants'
27
28

1 opinion that surrogate signing is a legal defense to filing false documents has no basis in
2 law.

3 In fact, Nevada law in this regard is absolutely contrary.

4 In Schuster v. Mosley, 123 Nev. 187, 160 P.3d 873 (2007) our Supreme
5 Court has held that the prosecutor has no independent, mandatory duty to
6 instruct the grand jury on legal significance of exculpatory evidence. In
7 Schuster, the defendant argued that obligating the State to present
8 exculpatory evidence to the grand jury without also requiring the State to
9 instruct the grand jury on the legal effect of such evidence is an absurdity. In
10 rejecting his argument, the Court held that the legislature did not intend to
11 expand the grand jury beyond its historical, traditional investigative and
12 accusatory function (Id. at 876). The Court's review of the statutory scheme
13 regulating the grand jury process revealed that the Legislature viewed the
14 primary role of the grand jury as investigative and accusatory. (See Hylar v.
15 Sheriff 93 Nev 561, 564, 571 p.2d 114, 116, Philips v. Sheriff 93 Nev 309, 487
16 p.2d 330) While pointing out that the grand jury is not an adjudicatory body,
17 the Schuster court stated

18 "Although Nevada law requires the State to present exculpatory
19 evidence to a grand jury, requiring the State to also instruct a grand jury on the
20 legal significance of exculpatory evidence simply does not comport with the
21 traditional investigative, accusatory role of a grand jury. Rather, the full
22 presentation and credibility of an accused's defense are matters reserved for
23 the adversarial process of trial...Absent explicit statutory authority, and in light
24 of the traditional view of the grand jury as an investigative, accusatory body,
25 rather than an adjudicative one, this court will not construe NRS 172.145 to
26 include such a duty."

27 The Court went on to refer to the holding in Sheriff v. Keeney 106 Nev
28 213, 791 P.2d 55, that "the grand jury may request advice and that the
prosecutor is authorized to explain matters of law." (see also In the Matter of
the Grand Jury of Sandoval County, Kerpan v. Sandoval County District
Attorney's Office 106 N.M. 764, 750 P.2d 464 (1988) where the court held that

1 the prosecutor is invested with wide discretion as to the selection and
2 presentation of evidence and since the function of the grand jury is to
3 investigate and not to adjudicate guilt or innocence, the target of the
4 investigation does not have a clear legal right to have the investigation
5 proceed in the same manner as a criminal trial with the full panoply of due
6 process rights)

7 (see also In the Matter of the Grand Jury of Sandoval County, Kerpan v.
8 Sandoval County District Attorney's Office 106 N.M. 764, 750 P.2d 464 (1988)
9 where the court held that the prosecutor is invested with wide discretion as to
10 the selection and presentation of evidence and since the function of the grand
11 jury is to investigate and not to adjudicate guilt or innocence, the target of the
12 investigation does not have a clear legal right to have the investigation
13 proceed in the same manner as a criminal trial with the full panoply of due
14 process rights)

15 Moreover, the defense, despite having been served with a MARCUM notice, did not
16 avail itself of the opportunity to submit evidence to establish this allegation. Nothing to
17 establish this purported legitimate business practice was submitted; nothing to establish the
18 legitimacy of the NODs was ever submitted to the State. The defendants' argument that the
19 State had a duty to present these arguments to the grand jury has no merit.

20 Additionally, the defendants argue that the State's presentation destroyed an
21 independent and informed grand jury. The defendants have presented nothing to support
22 this bald assertion. In addition to percipient witnesses, the State presented the testimony of
23 Romy Ashjian and John Shaffer, both of whom explained the difficulties they experienced by
24 virtue of the invalid Notice of Default executed by LSI, the same company that had filled the
25 NODs in the cases presented. The Defendants' employer, LPS was producing most of the
26 illegal documents filed with the Clark County Records' office, along with First American
27 National Default and Quality Loan Services, all clients of LPS.
28

1 The elements required to be proven by the State to establish that the NODs were
2 falsely notarized and filed with the Clark County Recorder's Office were clearly provided by
3 virtue of legal evidence submitted to the grand jury. The State did not mischaracterize the
4 defendant's actions as forgery. Although the term "forgery" was used, it was always used in
5 the context that the signatures on the documents were not those of the defendants, but that
6 they notaries had been ordered to fabricate them. The State's case rested entirely on the
7 notaries' testimony that both defendants authorized and directed the actions taken. To
8 assert that the State somehow tricked the grand jury into indicting the defendants for
9 otherwise legal actions is absurd. At no time did the State allege that the defendants forged
10 their own signatures; the forgery was ordering the notaries to falsely endorse the NODs as
11 having been signed by the defendants. The defendants were committing a crime and as
12 demonstrated to the grand jurors, they attempted to keep these actions a secret. The jurors
13 read and heard the testimony about the e-mail sent to the notaries requesting that a more
14 secure method of secreting the crime be employed. In light of the evidence presented, to
15 assert that the grand jurors could possibly be swayed into indicting where no crime had
16 been committed is meritless. The defendants have provided no basis for the Court to
17 believe in the existence of a reasonable probability that a different presentation to the grand
18 jury would have resulted in a dissimilar outcome. This standard has not been met.

21 Moreover, in order to dismiss this matter with prejudice, the Court must find that
22 extremely offensive circumstances exist in reference to the State's presentation. Only if this
23 is shown should the Court even address the need to deter the State's conduct, and this
24 remedy should be employed only if the need to deter this conduct outweighs the acts of the
25 individuals committing the crimes. In this case, the Clark County Recorder's Office has been
26 deluged with falsely notarized documents. Based on these activities, as well as the resultant
27 legislation enacted, which requires personal verification of documents to be filed, the
28

1 number of foreclosures in Clark County is virtually non-existent. The State submits that in
2 the interests of society dictate against dismissal with prejudice.

3 Moreover, the facts do not support the defendants' claim of a reasonable probability
4 of a different outcome absent the alleged misconduct. Again, the evidence presented
5 supports the indictment. Regardless of how the jurors interpreted the phrase "forgery", the
6 fact remains, the defendants actions resulted in false documents being filed with the Clark
7 County Recorder's Office.

8 **CONCLUSION**

9
10 Based upon the foregoing, the State respectfully requests that the Defendants' Writ
11 of Habeas Corpus and Motion to Dismiss be denied.

12 DATED this 26th day of November 2012

13 Submitted by:

14 CATHERINE CORTEZ MASTO
15 Attorney General

16 By: /s/ ROBERT GIUNTA
17 ROBERT GIUNTA
18 Senior Deputy Attorney General
19 Fraud Unit
20
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22
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28

CERTIFICATE OF SERVICE

I hereby certify that, on the 26th day of November, 2012, service of the **ADDITIONAL
REPLY BRIEF IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS AND IN
SUPPORT OF RETURN TO DEFENDANTS' WRITS OF HABEAS CORPUS** was made
this date by depositing a true and correct copy of the same for mailing, first class mail, at
Las Vegas, Nevada, or via facsimile, addressed as follows:

Via U.S. Mail and Fax to: (714) 338-2795

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/s/ Corinne Montana
An employee of the Office of the Attorney General

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FAX TRANSMITTAL MEMORANDUM

TO: KENNETH JULIAN, ESQ.
JUSTIN C JOHNSON, ESQ.

DATE: NOVEMBER 26, 2012

FAX #: (714) 338-2795

FROM: ROBERT GUINTA, SR DAG

PHONE: (702) 486-3455

SUBJECT: STATE vs GERALDINE ANN SHEPPARD - C-11-277573-2

REMARKS: INCLUDED: ADDITIONAL REPLY BRIEF IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS AND IN SUPPORT OF RETURN TO
DEFENDANTS' WRITS OF HABEAS CORPUS

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Thank you.

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STATE OF NEVADA

OFFICE OF THE ATTORNEY GENERAL

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Las Vegas, Nevada 89101-1608CATHERINE CORTEZ MASTO
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*Assistant Attorney General*GREGORY M. SMITH
*Chief of Staff***FAX TRANSMITTAL MEMORANDUM**

TO: LISA RASMUSSEN, ESQ. DATE: NOVEMBER 26, 2012

FAX #: (702) 489-6619

FROM: ROBERT GUINTA, SR DAG PHONE: (702) 486-3455

SUBJECT: STATE vs GERALDINE SHEPPARD - C-11-277573-2

REMARKS: INCLUDED: ADDITIONAL REPLY BRIEF IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS AND IN SUPPORT OF RETURN TO DEFENDANTS' WRITS OF HABEAS CORPUS

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TO: JOHN HUESTON, ESQ. DATE: NOVEMBER 26, 2012
ALEXANDER PORTER, ESQ.

FAX #: (310) 203-7199

FROM: ROBERT GUINTA, SR DAG PHONE: (702) 486-3455

SUBJECT: STATE vs GARY RANDALL TRAFFORD - C-11-277573-1

REMARKS: INCLUDED: ADDITIONAL REPLY BRIEF IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS AND IN SUPPORT OF RETURN TO DEFENDANTS' WRITS OF HABEAS CORPUS

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TO: KIRK LENHARD, ESQ.
ANTHONY DIRAIMONDO, ESQ.

DATE: NOVEMBER 26, 2012

FAX #: (702) 382-8135

FROM: ROBERT GUINTA, SR DAG

PHONE: (702) 486-3455

SUBJECT: STATE vs GARY RANDALL TRAFFORD - C-11-277573-1

REMARKS: INCLUDED: ADDITIONAL REPLY BRIEF IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS AND IN SUPPORT OF RETURN TO
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Thank you.