


1 AARON D. FORD (Bar No. 7704)
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5 *Attorney for the State of Nevada*

FILED
2024 DEC 10 PM 4:25
JUSTICE OF THE PEACE
BY 
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6
7 IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP
8 IN AND FOR CARSON CITY, STATE OF NEVADA

9 STATE OF NEVADA,

10 Plaintiff,

11 vs.

12 MICHAEL JAMES MCDONALD,
13 JAMES WALTER DEGRAFFENREID, III,
14 JESSE REED LAW,
15 SHAWN MICHAEL MEEHAN,
DURWARD JAMES HINDLE, III,
EILEEN A. RICE,

16 Defendants.

Case No. 24CR01624 IC 001
Dept. No.

17
18 **CRIMINAL COMPLAINT**

19 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
20 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
21 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
22 MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, with having
23 committed the crime of UTTERING FORGED INSTRUMENTS: FORGERY, a Category
24 "D" felony in violation of NRS 205.110.

25 All of the acts alleged herein have been committed or completed on or between
26 December 8, 2020, through December 22, 2020, by the above-named Defendants, within
27 Carson City, Nevada, in the following manner:

28 ///

1 **COUNT I**
2 **UTTERING FORGED INSTRUMENTS: FORGERY**
3 **Category "D" Felony - NRS 205.110**

4 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER
5 DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL MEEHAN, DURWARD
6 JAMES HINDLE, III, and EILEEN A. RICE, knowing the same to be forged or altered, and
7 with intent to defraud, uttered, offered, disposed of or put off as true, or had in his
8 possession with intent so to utter, offer, dispose of or put off, a forged writing, instrument
9 or other thing, the false making, forging or altering of which is punishable as forgery, to
10 wit: The Defendants uttered, offered, disposed of or put off as true a forged writing,
11 instrument or other thing titled, "CERTIFICATE OF THE VOTES OF THE 2020
12 ELECTORS FROM NEVADA" to the President of the United States Senate, and/or the
13 Archivist of the United States, and/or the Nevada Secretary of State, and/or the Chief
14 Judge of the District Court for the District of Nevada, with the intent to defraud, the
15 Defendants being criminally liable under one or more of the following principles of criminal
16 liability, to wit: (1) by directly committing this crime; and/or (2) pursuant to a conspiracy
17 to commit this crime, with the intent that this crime be committed.


18 All of which is contrary to the form, force and effect of the statutes in such cases
19 made and provided, and against the peace and dignity of the state of Nevada.

20 *The Complainant requests a Summons be issued at this time pursuant to*
21 *NRS 171.106.*

22 Said Complainant makes this declaration subject to the penalty of perjury.

23 DATED this 10th day of December 2024.

24
25 SUBMITTED BY:

26 
27 AARON D. FORD
28 Attorney General

1 AARON D. FORD (Bar No. 7704)
2 Attorney General
3 Office of the Attorney General
4 100 North Carson Street
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8 *Attorney for the State of Nevada*

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9 IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP
10 IN AND FOR CARSON CITY, STATE OF NEVADA

11 STATE OF NEVADA,

12 Plaintiff,

13 vs.

14 MICHAEL JAMES MCDONALD,
15 JAMES WALTER DEGRAFFENREID, III,
16 JESSE REED LAW,
17 SHAWN MICHAEL MEEHAN,
18 DURWARD JAMES HINDLE, III,
19 EILEEN A. RICE,

20 Defendants.

Case No. 24CR01624 IC 002

Dept. No.

21 **CRIMINAL COMPLAINT**

22 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
23 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
24 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
25 MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, with having
26 committed the crime of UTTERING FORGED INSTRUMENTS: FORGERY, a Category
27 "D" felony in violation of NRS 205.110.

28 All of the acts alleged herein have been committed or completed on or between
December 8, 2020, through December 22, 2020, by the above-named Defendants, within
Carson City, Nevada, in the following manner:

///

COUNT I
UTTERING FORGED INSTRUMENTS: FORGERY
Category "D" Felony - NRS 205.110

That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, knowing the same to be forged or altered, and with intent to defraud, uttered, offered, disposed of or put off as true, or had in his possession with intent so to utter, offer, dispose of or put off, a forged writing, instrument or other thing, the false making, forging or altering of which is punishable as forgery, to wit: The Defendants uttered, offered, disposed of or put off as true a forged writing, instrument or other thing titled, "CERTIFICATE OF THE VOTES OF THE 2020 ELECTORS FROM NEVADA" to the President of the United States Senate, and/or the Archivist of the United States, and/or the Nevada Secretary of State, and/or the Chief Judge of the District Court for the District of Nevada, with the intent to defraud, the Defendants being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed.

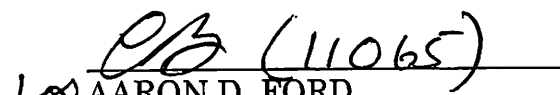
All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the state of Nevada.

The Complainant requests a Summons be issued at this time pursuant to NRS 171.106.

Said Complainant makes this declaration subject to the penalty of perjury.

DATED this 10th day of December 2024.

SUBMITTED BY:


for AARON D. FORD
Attorney General

1 AARON D. FORD (Bar No. 7704)
Attorney General
2 Office of the Attorney General
100 North Carson Street
3 Carson City, Nevada 89701
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5 *Attorney for the State of Nevada*

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7 IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP
8 IN AND FOR CARSON CITY, STATE OF NEVADA

9 STATE OF NEVADA,

10 Plaintiff,

11 vs.

12 MICHAEL JAMES MCDONALD,
13 JAMES WALTER DEGRAFFENREID, III,
14 JESSE REED LAW,
15 SHAWN MICHAEL MEEHAN,
DURWARD JAMES HINDLE, III,
EILEEN A. RICE,

16 Defendants.

Case No. 24CR016241C003

Dept. No.

17
18 **CRIMINAL COMPLAINT**

19 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
20 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
21 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
22 MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, with having
23 committed the crime of UTTERING FORGED INSTRUMENTS: FORGERY, a Category
24 "D" felony in violation of NRS 205.110.

25 All of the acts alleged herein have been committed or completed on or between
26 December 8, 2020, through December 22, 2020, by the above-named Defendants, within
27 Carson City, Nevada, in the following manner:

28 ///

1 COUNT I
2 **UTTERING FORGED INSTRUMENTS: FORGERY**
3 **Category "D" Felony - NRS 205.110**

4 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER
5 DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL MEEHAN, DURWARD
6 JAMES HINDLE, III, and EILEEN A. RICE, knowing the same to be forged or altered, and
7 with intent to defraud, uttered, offered, disposed of or put off as true, or had in his
8 possession with intent so to utter, offer, dispose of or put off, a forged writing, instrument
9 or other thing, the false making, forging or altering of which is punishable as forgery, to
10 wit: The Defendants uttered, offered, disposed of or put off as true a forged writing,
11 instrument or other thing titled, "CERTIFICATE OF THE VOTES OF THE 2020
12 ELECTORS FROM NEVADA" to the President of the United States Senate, and/or the
13 Archivist of the United States, and/or the Nevada Secretary of State, and/or the Chief
14 Judge of the District Court for the District of Nevada, with the intent to defraud, the
15 Defendants being criminally liable under one or more of the following principles of criminal
16 liability, to wit: (1) by directly committing this crime; and/or (2) pursuant to a conspiracy
17 to commit this crime, with the intent that this crime be committed.


18 All of which is contrary to the form, force and effect of the statutes in such cases
19 made and provided, and against the peace and dignity of the state of Nevada.

20 *The Complainant requests a Summons be issued at this time pursuant to*
21 *NRS 171.106.*

22 Said Complainant makes this declaration subject to the penalty of perjury.

23 DATED this 10th day of December 2024.

24
25 SUBMITTED BY:

26 
27 for AARON D. FORD
28 Attorney General

1 AARON D. FORD (Bar No. 7704)
Attorney General
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3 Carson City, Nevada 89701
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5 *Attorney for the State of Nevada*

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7 IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP
8 IN AND FOR CARSON CITY, STATE OF NEVADA

9 STATE OF NEVADA,
10
11 Plaintiff,
12 vs.
13 MICHAEL JAMES MCDONALD,
JAMES WALTER DEGRAFFENREID, III,
14 JESSE REED LAW,
SHAWN MICHAEL MEEHAN,
DURWARD JAMES HINDLE, III,
15 EILEEN A. RICE,
16 Defendants.

Case No. 24CR01624 IC 004
Dept. No.

18 **CRIMINAL COMPLAINT**

19 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
20 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
21 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
22 MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, with having
23 committed the crime of UTTERING FORGED INSTRUMENTS: FORGERY, a Category
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26 December 8, 2020, through December 22, 2020, by the above-named Defendants, within
27 Carson City, Nevada, in the following manner:

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COUNT I
UTTERING FORGED INSTRUMENTS: FORGERY
Category "D" Felony - NRS 205.110

That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, knowing the same to be forged or altered, and with intent to defraud, uttered, offered, disposed of or put off as true, or had in his possession with intent so to utter, offer, dispose of or put off, a forged writing, instrument or other thing, the false making, forging or altering of which is punishable as forgery, to wit: The Defendants uttered, offered, disposed of or put off as true a forged writing, instrument or other thing titled, "CERTIFICATE OF THE VOTES OF THE 2020 ELECTORS FROM NEVADA" to the President of the United States Senate, and/or the Archivist of the United States, and/or the Nevada Secretary of State, and/or the Chief Judge of the District Court for the District of Nevada, with the intent to defraud, the Defendants being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) pursuant to a conspiracy to commit this crime, with the intent that this crime be committed.

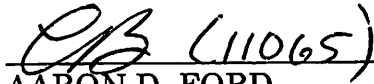
All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the state of Nevada.

The Complainant requests a Summons be issued at this time pursuant to NRS 171.106.

Said Complainant makes this declaration subject to the penalty of perjury.

DATED this 10th day of December 2024.

SUBMITTED BY:

for  (11065)
AARON D. FORD
Attorney General

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2 Attorney General
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11 vs.

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13 JAMES WALTER DEGRAFFENREID, III,
14 JESSE REED LAW,
15 SHAWN MICHAEL MEEHAN,
16 DURWARD JAMES HINDLE, III,
17 EILEEN A. RICE,

18 Defendants.

Case No. 24CR01624 IC005

Dept. No.

18 CRIMINAL COMPLAINT

19 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
20 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
21 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
22 MEEHAN, DURWARD JAMES HINDLE, III, and EILEEN A. RICE, with having
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1 COUNT I
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3 **Category "D" Felony - NRS 205.110**

4 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER
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22 Said Complainant makes this declaration subject to the penalty of perjury.

23 DATED this 10th day of December 2024.

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25 SUBMITTED BY:

26 
27 **AARON D. FORD**
28 Attorney General

1 AARON D. FORD (Bar No. 7704)
2 Attorney General
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8 Attorney for the State of Nevada

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13 vs.

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16 JESSE REED LAW,
17 SHAWN MICHAEL MEEHAN,
18 DURWARD JAMES HINDLE, III,
19 EILEEN A. RICE,

20 Defendants.

Case No. 24CC01624 IC 006

Dept. No.

21 CRIMINAL COMPLAINT

22 The undersigned, AARON D. FORD, Attorney General of the State of Nevada,
23 complains and charges the above-named defendants MICHAEL JAMES MCDONALD,
24 JAMES WALTER DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL
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3 **Category "D" Felony - NRS 205.110**

4 That the Defendants, MICHAEL JAMES MCDONALD, JAMES WALTER
5 DEGRAFFENREID, III, JESSE REED LAW, SHAWN MICHAEL MEEHAN, DURWARD
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21 *NRS 171.106.*

22 Said Complainant makes this declaration subject to the penalty of perjury.

23 DATED this 10th day of December 2024.

24
25 SUBMITTED BY:

26 *for*  (11065)
27 AARON D. FORD
28 Attorney General