



1 **IND**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 PAMELA WECKERLY
6 Chief Deputy District Attorney
7 Nevada Bar #006163
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-21-356205-1,-2

11 -vs-

DEPT NO: X

12 SIERRA HALSETH, #8539581
13 AARON GUERRERO, #8441965

14 Defendant(s).

INDICTMENT

15 STATE OF NEVADA)
16 COUNTY OF CLARK) ss.

17 The Defendant(s) above named, SIERRA HALSETH, AARON GUERRERO, accused
18 by the Clark County Grand Jury of the crime(s) of CONSPIRACY TO COMMIT MURDER
19 (Category B Felony – NRS 200.010, 200.030, 199.480 – NOC 50038); MURDER WITH USE
20 OF A DEADLY WEAPON (Category A Felony - NRS 200.010, 200.030, 193.165 - NOC
21 50001); FIRST DEGREE ARSON (Category B Felony - NRS 205.010 - NOC 50414);
22 FRAUDULENT USE OF CREDIT OR DEBIT CARD (Category D Felony - NRS 205.760(1)
23 - NOC 50796); CONSPIRACY TO COMMIT ROBBERY (Category B Felony - NRS
24 200.380, 199.480 - NOC 50147) and ROBBERY WITH USE OF A DEADLY WEAPON
25 (Category B Felony - NRS 200.380, 193.165 - NOC 50138), committed at and within the
26 County of Clark, State of Nevada, on or about the 9th day of April, 2021, as follows:

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1 COUNT 1- CONSPIRACY TO COMMIT MURDER

2 did willfully, unlawfully, and feloniously conspire with each other to commit murder,
3 by the Defendants and/or other unknown individuals committing the acts as set forth in Count
4 2, said acts being incorporated by this reference as though fully set forth herein.

5 COUNT 2 – MURDER WITH USE OF A DEADLY WEAPON (open)

6 did willfully, unlawfully, feloniously and with malice aforethought, kill DANIEL
7 HALSETH, a human being, with use of a deadly weapon, to wit: a knife, by stabbing into the
8 body of DANIEL HALSETH with said knife, the said killing having been (1) willful,
9 deliberate and premeditated and/or (2) occurred during the perpetration of or attempted
10 perpetration of a ROBBERY, the Defendant(s) being criminally liable under one or more of
11 the following principles of criminal liability, to wit: (1) by directly committing this crime;
12 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
13 be committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise
14 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this
15 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or
16 conspiring by Defendants acting in concert throughout.

17 COUNT 3 – FIRST DEGREE ARSON

18 did willfully, unlawfully, maliciously, and feloniously set fire to, burn, and/or cause to
19 be burned, a certain house, located at 8417 Dunphy Court, Las Vegas, Clark County, Nevada,
20 owned by DANIEL HALSETH, by use of open flame and flammable and/or combustible
21 materials, and/or by manner and means unknown, the Defendant(s) being criminally liable
22 under one or more of the following principles of criminal liability, to wit: (1) by directly
23 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
24 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,
25 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a
26 conspiracy to commit this crime, with the intent that this crime be committed, Defendants
27 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 4 – FRAUDULENT USE OF CREDIT OR DEBIT CARD

2 did then and there willfully, unlawfully, feloniously, and with intent to defraud, use a
3 debit card, issued in the name of DANIEL HALSETH, the Defendants presenting the said
4 debit or credit card to Bank of America, located at Fort Apache and Sahara, Clark County,
5 Nevada, to obtain money, goods, property, services or anything of value, to wit: U.S. currency,
6 the Defendant(s) not being the cardholder, nor being authorized by the cardholder to use said
7 card or card number, the Defendant(s) being criminally liable under one or more of the
8 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
9 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
10 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise
11 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this
12 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or
13 conspiring by Defendants acting in concert throughout.

14 COUNT 5 – FRAUDULENT USE OF CREDIT OR DEBIT CARD

15 did then and there willfully, unlawfully, feloniously, and with intent to defraud, use a
16 debit card, issued in the name of DANIEL HALSETH, the Defendants presenting the said
17 debit or credit card to Chase Bank, located at 8580 W. Desert Inn, Clark County, Nevada, to
18 obtain money, goods, property, services or anything of value, to wit: ((bkStateActs)), the
19 Defendant((bkS1)) not being the cardholder, nor being authorized by the cardholder to use
20 said card or card number, the Defendant(s) being criminally liable under one or more of the
21 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
22 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
23 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise
24 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this
25 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or
26 conspiring by Defendants acting in concert throughout.

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1 COUNT 6 – FRAUDULENT USE OF CREDIT OR DEBIT CARD

2 did then and there willfully, unlawfully, feloniously, and with intent to defraud, use a
3 debit card, issued in the name of Daniel Halseth, the Defendant((bkS)) presenting the said
4 debit or credit card to ((bkMerchantName)), located at ((bkMerchantAddress)), Clark County,
5 Nevada, to obtain money, goods, property, services or anything of value, to wit: U.S. currency,
6 the Defendant(s) not being the cardholder, nor being authorized by the cardholder to use said
7 card or card number, the Defendant(s) being criminally liable under one or more of the
8 following principles of criminal liability, to wit: (1) by directly committing this crime; and/or
9 (2) by aiding or abetting in the commission of this crime, with the intent that this crime be
10 committed, by counseling, encouraging, hiring, commanding, inducing and/or otherwise
11 procuring the other to commit the crime; and/or (3) pursuant to a conspiracy to commit this
12 crime, with the intent that this crime be committed, Defendants aiding or abetting and/or
13 conspiring by Defendants acting in concert throughout.

14 COUNT 7 – FRAUDULENT USE OF CREDIT OR DEBIT CARD

15 did then and there willfully, unlawfully, feloniously, and with intent to defraud, use a
16 debit card, issued in the name of DANIEL HALSETH, the Defendant SIERRA HALSETH
17 presenting the said debit or credit card to Winco Foods, located at 7501 W. Washington, Las
18 Vegas, Clark County, Nevada, to obtain money, goods, property, services or anything of value,
19 to wit: Chlorox Bleach and orange juice, the Defendant not being the cardholder, nor being
20 authorized by the cardholder to use said card or card number, the Defendant(s) being
21 criminally liable under one or more of the following principles of criminal liability, to wit: (1)
22 by directly committing this crime; and/or (2) by aiding or abetting in the commission of this
23 crime, with the intent that this crime be committed, by counseling, encouraging, hiring,
24 commanding, inducing and/or otherwise procuring the other to commit the crime; and/or (3)
25 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed,
26 Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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1 COUNT 8 – CONSPIRACY TO COMMIT ROBBERY

2 did willfully, unlawfully, and feloniously conspire with each other to commit robbery,
3 by the Defendants and/or other unknown co-conspirators committing the acts as set forth in
4 Count 9, said acts being incorporated by this reference as though rully set forth herein.

5 COUNT 9 – ROBBERY WITH USE OF A DEADLY WEAPON

6 did willfully, unlawfully, and feloniously take personal property, to wit: 2016 Nissan
7 Sentra, Nevada License 775N71 and/or U.S. currency and/or debit cards from the person of
8 DANIEL HALSETH, or in his presence, without the consent and against the will of DANIEL
9 HALSETH, by means of force or violence or fear of injury, immediate or future, to his person,
10 defendant using force or fear to obtain or retain possession of the property, to prevent or
11 overcome resistance to the taking of the property, and/or to facilitate escape, with use of a
12 deadly weapon, to wit: a knife or unknown sharp object, the Defendant(s) being criminally
13 liable under one or more of the following principles of criminal liability, to wit: (1) by directly
14 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
15 the intent that this crime be committed, by counseling, encouraging, hiring, commanding,
16 inducing and/or otherwise procuring the other to commit the crime; and/or (3) pursuant to a
17 conspiracy to commit this crime, with the intent that this crime be committed, Defendants
18 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

19 DATED this 20th day of May, 2021.

20 STEVEN B. WOLFSON
21 Clark County District Attorney
22 Nevada Bar #001565

23 BY /s/ PAMELA WECKERLY
24 PAMELA WECKERLY
25 Chief Deputy District Attorney
26 Nevada Bar #006163

27 ENDORSEMENT: A True Bill

28 /s/ Kenneth Dickinson
Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 HALSETH, BOGDANA – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

3 HALSETH, CHRISTINE – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

4 HOCKING, MATTHEW – LVMPD

5 HODSON, BRECK – LVMPD

6 NEWMAN, PEGGY – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

7 NUNU, FAAFETAL – WINCO FOODS

8 OSBORN, ANDREW – LV FIRE AND RESCUE

9 SOMMERVILLE, KARI – c/o CCDA, 200 Lewis Avenue, LV, NV 89101

10
11 Additional Witnesses known to the District Attorney at time of filing the Indictment:

12 CUSTODIAN OF RECORDS - CCDC

13 CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS

14 CUSTODIAN OF RECORDS - LVMPD RECORDS

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26 19CGJ204A-B/21CR017595/ed-GJ

27 LVMPD EV# 210400038697

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