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FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

MAY 11 2017

BY, _____
DULCE MARIE ROMEA, DEPUTY

16
17 DISTRICT COURT
18 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,
12 Plaintiff,
13 v.
14 STEPHEN GREGORY ZORITY,
15 Defendant.

Case No.: C-17-323438-1
Dept. No: II

16
17 INDICTMENT

18 The above-named defendant, STEPHEN GREGORY ZORITY, is accused by the Clark County
19 Grand Jury of the following crimes(s):

- 20 • COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF
21 VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a category "E" felony, in
22 violation of NRS 293.805 (five counts);
23 • PROHIBITED ACTS OF FIELD REGISTRARS, CLERKS, EMPLOYEES OR VOTER
24 REGISTRATION AGENCIES OR PERSONS ASSISTING VOTERS, a category "E" felony, in
25 violation of NRS 293.505 (one count); and
26 • VIOLATIONS OF LAWS GOVERNING ELECTIONS, a category "E" felony, in violation of
27 NRS 293.800 (one count),

28 in Clark County, State of Nevada as follows:

1 **COUNT 1**
2 **COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF VOTERS**
3 **OR VOTERS OF A PARTICULAR PARTY REGISTERED**
4 **Category "E" Felony - NRS 293.805**

5 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
6 either personally or through an agent acting at his direction, unlawfully provided compensation to another for
7 the other's registering of voters, with said compensation being based on (a) the total number of voters a person
8 registered, and/or (b) the total number of voters a person registered in a political party, to wit:

9 On or about April 9, 2016, Defendant, either personally or through an agent acting at his direction,
10 unlawfully provided Tina Parks with a \$25 gift card, with said compensation being based on the total number
11 of voters Parks registered in the Republican Party.

12 All of which constitutes the crime of COMPENSATION FOR REGISTRATION OF VOTERS
13 BASED UPON NUMBER OF VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a
14 category "E" felony, in violation NRS 293.805.

15 **COUNT 2**
16 **COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF VOTERS**
17 **OR VOTERS OF A PARTICULAR PARTY REGISTERED**
18 **Category "E" Felony - NRS 293.805**

19 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
20 either personally or through an agent acting at his direction, unlawfully provided compensation to another for
21 the other's registering of voters, with said compensation being based on (a) the total number of voters a person
22 registered, and/or (b) the total number of voters a person registered in a political party, to wit:

23 On or about May 5, 2016, Defendant, either personally or through an agent acting at his direction,
24 unlawfully provided Tina Parks with \$50, with said compensation being based on the total number of voters
25 Parks registered in the Republican Party.

26 All of which constitutes the crime of COMPENSATION FOR REGISTRATION OF VOTERS
27 BASED UPON NUMBER OF VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a
28 category "E" felony, in violation NRS 293.805.

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1 **COUNT 3**
2 **COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF VOTERS**
3 **OR VOTERS OF A PARTICULAR PARTY REGISTERED**
4 **Category "E" Felony - NRS 293.805**

5 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
6 either personally or through an agent acting at his direction, unlawfully provided compensation to another for
7 the other's registering of voters, with said compensation being based on (a) the total number of voters a person
8 registered, and/or (b) the total number of voters a person registered in a political party, to wit:

9 On or about May 17, 2016, Defendant, either personally or through an agent acting at his direction,
10 unlawfully provided Tina Parks with a Walmart gift card, with said compensation being based on the total
11 number of voters Parks registered in the Republican Party.

12 All of which constitutes the crime of COMPENSATION FOR REGISTRATION OF VOTERS
13 BASED UPON NUMBER OF VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a
14 category "E" felony, in violation NRS 293.805.

15 **COUNT 4**
16 **COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF VOTERS**
17 **OR VOTERS OF A PARTICULAR PARTY REGISTERED**
18 **Category "E" Felony - NRS 293.805**

19 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
20 either personally or through an agent acting at his direction, unlawfully provided compensation to another for
21 the other's registering of voters, with said compensation being based on (a) the total number of voters a person
22 registered, and/or (b) the total number of voters a person registered in a political party, to wit:

23 On or about June 2, 2016, Defendant, either personally or through an agent acting at his direction,
24 unlawfully provided Tina Parks with \$50, with said compensation being based on the total number of voters
25 Parks registered in the Republican Party.

26 All of which constitutes the crime of COMPENSATION FOR REGISTRATION OF VOTERS
27 BASED UPON NUMBER OF VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a
28 category "E" felony, in violation NRS 293.805.

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1 **COUNT 5**
2 **COMPENSATION FOR REGISTRATION OF VOTERS BASED UPON NUMBER OF VOTERS**
3 **OR VOTERS OF A PARTICULAR PARTY REGISTERED**
4 **Category "E" Felony - NRS 293.805**

5 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
6 either personally or through an agent acting at his direction, unlawfully provided compensation to another for
7 the other's registering of voters, with said compensation being based on (a) the total number of voters a person
8 registered, and/or (b) the total number of voters a person registered in a political party, to wit:

9 On or about July 15, 2016, Defendant, either personally or through an agent acting at his direction,
10 unlawfully provided Tina Parks with \$50, with said compensation being based on the total number of voters
11 Parks registered in the Republican Party.

12 All of which constitutes the crime of COMPENSATION FOR REGISTRATION OF VOTERS
13 BASED UPON NUMBER OF VOTERS OR VOTERS OF A PARTICULAR PARTY REGISTERED, a
14 category "E" felony, in violation NRS 293.805.

15 **COUNT 6**
16 **PROHIBITED ACTS OF FIELD REGISTRARS, CLERKS, EMPLOYEES OR VOTER**
17 **REGISTRATION AGENCIES OR PERSONS ASSISTING VOTERS**
18 **Category "E" Felony - NRS 293.505**

19 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
20 either personally or through an agent acting at his direction, after having provided an elector with a form for
21 the application to register to vote for the purpose of registering to vote, and having assisted the elector
22 completing said form, failed to enter his or her name on a duplicate copy or receipt retained by the voter upon
23 completion of the form, to wit:

24 On or about May 12, 2016, Defendant directed Tina Parks not to enter her name on duplicate
25 copies of forms for the application to register to vote for the purpose of registering to vote, or receipts,
26 retained by voters upon completion of said forms, despite the fact that Defendant knew that Parks had
27 provided the electors/voters with said forms and assisted the electors/voters in completing said forms.

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1 All of which constitutes the crime of PROHIBITED ACTS OF FIELD REGISTRARS, CLERKS,
2 EMPLOYEES OR VOTER REGISTRATION AGENCIES OR PERSONS ASSISTING VOTERS, a
3 category "E" felony, in violation NRS 293.505.

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5 **COUNT 7**
VIOLATIONS OF LAWS GOVERNING ELECTIONS
6 **Category "E" Felony - NRS 293.800**

7 That the Defendant, STEPHEN GREGORY ZORITY, in the County of Clark, State of Nevada,
8 either personally or through an agent acting at his direction, violated any of the provisions of the election laws
9 of this State or knowingly encouraged another person to violate those laws, to wit:

10 On or about May 12, 2016, Defendant, in violation of NRS 293.505, directed Tina Parks not to
11 enter her name on duplicate copies of forms for the application to register to vote for the purpose of
12 registering to vote, or receipts, retained by voters upon completion of said forms, despite the fact that
13 Defendant knew that Parks had provided the electors/voters with said forms and assisted the
14 electors/voters in completing said forms.

15 All of which constitutes the crime of VIOLATIONS OF LAWS GOVERNING ELECTIONS, a
16 category "E" felony, in violation NRS 293.800.

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

19 DATED this 16th day of May, 2017.

20 SUBMITTED BY
21 ADAM PAUL LAXALT
22 Attorney General

23 By: *Michael C. Kovac* #11108 for
24 Michael C. Kovac, Bar No. 11177
25 Senior Deputy Attorney General
26 Attorneys for the State of Nevada

27 ENDORSEMENT: A True Bill

28 By: *Jane Ryley*
Foreperson, Clark County Grand Jury
GJ#16BGJ103X