

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

01 RICHARD HOWARD (DOB: 01/12/1956),
aka RICHARD THOMAS HOWARD,
02 ROSE MAKEDA SWEENEY (DOB: 12/11/1975),
03 CHRISTOPHER JOSEPH WILLIAMS
(DOB: 05/02/1959),
04 KIRKLAND KAUZAVA WASHINGTON
(DOB: 07/29/1980),
05 HAROLD BENNETT (DOB: 04/17/1965),
06 LOUIS THOMAS WISE (DOB: 08/04/1982),
07 JAKARA FATI MARDIS (DOB: 05/17/1983),
08 NORMAN HALL (DOB: 11/01/1957), and
09 NICKEY DEMELVIN HUNTLEY
(DOB: 09/02/1974)

Defendant(s).

CASE NO. BA472537

**FELONY COMPLAINT
FOR ARREST WARRANT**

The undersigned is informed and believes that:

COUNT 1

On or between March 8, 2016 and May 5, 2016, in the County of Los Angeles, the crime of CIRCULATE INITIATIVE/PETITION W/FALSE NAMES, in violation of ELECTIONS CODE SECTION 18611, a Felony, was committed by RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS and NORMAN HALL, who circulated or caused to be circulated an initiative, referendum, or recall petition, knowing it to contain false, forged, or fictitious names.

COUNT 2

On or between March 8, 2016 and May 5, 2016, in the County of Los Angeles, the crime of USE FALSE/FICTITIOUS NAME ON PETITION, in violation of ELECTIONS CODE SECTION 18613, a Felony, was committed by RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS and NORMAN HALL, who caused another to subscribe a false name to an initiative, referendum, or recall petition.

* * * * *

COUNT 3

On or between March 8, 2016 and May 5, 2016, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSON, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS and NORMAN HALL, who knowingly and willfully caused or procured the completion of, in whole or in part, an affidavit of registration or a registration voter card, with the intention to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

* * * * *

COUNT 4

On or between March 8, 2016 and May 5, 2016, in the County of Los Angeles, the crime of VOTER FRAUD – REGISTER NONEXISTENT PERSON, in violation of ELECTIONS CODE SECTION 18102 was committed by RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS and NORMAN HALL, who knowingly registered a non-existent person, a person under a false name or address, or a person who is ineligible to register.

* * * * *

COUNT 5

On or between May 15, 2018 and May 17, 2018, in the County of Los Angeles, the crime of CIRCULATE INITIATIVE/PETITION W/FALSE NAMES, in violation of ELECTIONS CODE SECTION 18611, a Felony, was committed by HAROLD BENNETT, LOUIS THOMAS WISE and NICKEY DEMELVIN HUNTLEY, who circulated or caused to be circulated an initiative, referendum, or recall petition, knowing it to contain false, forged, or fictitious names.

* * * * *

COUNT 6

On or between May 15, 2018 and May 17, 2018, in the County of Los Angeles, the crime of USE FALSE/FICTITIOUS NAME ON PETITION, in violation of ELECTIONS CODE SECTION 18613, a Felony, was committed by HAROLD BENNETT, LOUIS THOMAS WISE and NICKEY DEMELVIN HUNTLEY, who caused another to subscribe a false name to an initiative, referendum, or recall petition.

* * * * *

COUNT 7

On or between May 15, 2018 and May 17, 2018, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSON, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by HAROLD BENNETT, LOUIS THOMAS WISE and NICKEY DEMELVIN HUNTLEY, who knowingly and willfully caused or procured the completion of, in whole or in part, an affidavit of registration or a registration voter card, with the intention to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

* * * * *

COUNT 8

On or between May 15, 2018 and May 17, 2018, in the County of Los Angeles, the crime of VOTER FRAUD – REGISTER NONEXISTENT PERSON, in violation of ELECTIONS CODE SECTION 18102 was committed by HAROLD BENNETT, LOUIS THOMAS WISE and NICKEY DEMELVIN HUNTLEY, who knowingly registered a non-existent person, a person under a false name or address, or a person who is ineligible to register.

* * * * *

COUNT 9

On or between September 19, 2018 and September 19, 2018, in the County of Los Angeles, the crime of CIRCULATE INITIATIVE/PETITION/ETC W/FALSE/ETC NAMES, in violation of ELECTIONS CODE SECTION 18611, a Felony, was committed by KIRKLAND KAUZAVA WASHINGTON, who circulated or caused to be circulated an initiative, referendum, or recall petition, knowing it to contain false, forged, or fictitious names.

* * * * *

COUNT 10

On or between September 18, 2018 and September 18, 2018, in the County of Los Angeles, the crime of USE FALSE/FICTITIOUS NAME ON PETITION/ETC, in violation of ELECTIONS CODE SECTION 18613, a Felony, was committed by KIRKLAND KAUZAVA WASHINGTON, who caused another to subscribe a false name to an initiative, referendum, or recall petition.

* * * * *

COUNT 11

On or between September 19, 2018 and September 19, 2018, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSON, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by KIRKLAND KAUZAVA WASHINGTON, who knowingly and willfully caused or procured the completion of, in whole or in part, an affidavit of registration or a registration voter card, with the intention to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

* * * * *

COUNT 12

On or between September 19, 2018 and September 19, 2018, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER NONEXISTENT PERSON, in violation of ELECTIONS CODE SECTION 18102 was committed by KIRKLAND KAUZAVA WASHINGTON, who knowingly registered a non-existent person, a person under a false name or address, or a person who is ineligible to register.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS, NORMAN HALL, NICKEY DEMELVIN HUNTLEY for the above-listed crimes. Wherefore, a warrant of arrest is requested for RICHARD THOMAS HOWARD, ROSE MAKEDA SWEENEY, CHRISTOPHER JOSEPH WILLIAMS, KIRKLAND KAUZAVA WASHINGTON, HAROLD BENNETT, LOUIS THOMAS WISE, JAKARA FATI MARDIS, NORMAN HALL, NICKEY DEMELVIN HUNTLEY.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA472537, CONSISTS OF 12 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on October 31, 2018.



RAUL RIOJAS
DECLARANT AND COMPLAINANT

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JACKIE LACEY, DISTRICT ATTORNEY

BY: 

MARIAN M.J. THOMPSON, DEPUTY

AGENCY: LACO D.A. I/O: RAUL RIOJAS ID NO.: 38063 PHONE: (213) 485-3294
BUREAU OF
INVESTIGATION
DR NO.: 180100811180101 OPERATOR: GS PRELIM. TIME EST.: 5 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RTN DATE</u>
HOWARD, RICHARD THOMAS	005732398	1/12/1956		\$25,000	
SWEENEY, ROSE MAKEDA	35106567	12/11/1975		\$25,000	
WILLIAMS, CHRISTOPHER JOSEPH		5/2/1959		\$25,000	
WASHINGTON, KIRKLAND KAUZAVA	028709906	7/29/1980		\$25,000	
BENNETT, HAROLD	007933849	4/17/1965		\$25,000	
WISE, LOUIS THOMAS	021329777	8/4/1982		\$25,000	
MARDIS, JAKARA FATI		5/17/1983		\$25,000	
HALL, NORMAN	05791599	11/1/1957		\$25,000	
HUNTLEY, NICKEY DEMELVIN	012386021	9/2/1974		\$25,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

RICHARD THOMAS HOWARD BAIL: \$ _____

ROSE SWEENEY BAIL: \$ _____

CHRISTOPHER JOSEPH WILLIAMS BAIL: \$ _____

KIRKLAND KAUZAVA WASHINGTON BAIL: \$ _____

HAROLD BENNETT BAIL: \$ _____

LOUIS WISE BAIL: \$ _____

JAKARA FATI MARDIS BAIL: \$ _____

NORMAN HALL BAIL: \$ _____

NICKEY HUNTLEY BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RTN DATE</u>
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FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

RICHARD THOMAS HOWARD

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			

ROSE MAKEDA SWEENEY

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			

CHRISTOPHER JOSEPH WILLIAMS

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			

KIRKLAND KAUZAVA WASHINGTON

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			
9	EL 18611			
10	EL 18613			
11	EL 18101			
12	EL 18101			

HAROLD BENNETT

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			
5	EL 18611			
6	EL 18613			
7	EL 18101			
8	EL 1802			

LOUIS THOMAS WISE

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			

3 EL 18101
 4 EC 18102
 5 EL 18611
 6 EL 18613
 7 EL 18101
 8 EL 1802

JAKARA FATI MARDIS

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			

NORMAN HALL

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	EL 18611			
2	EL 18613			
3	EL 18101			
4	EC 18102			

NICKEY DEMELVIN HUNTLEY

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
5	EL 18611			
6	EL 18613			
7	EL 18101			
8	EL 1802			

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

RICHARD THOMAS HOWARD	_____	Dollars
ROSE MAKEDA SWEENEY	_____	Dollars
CHRISTOPHER JOSEPH WILLIAMS	_____	Dollars
KIRKLAND KAUZAVA WASHINGTON	_____	Dollars
HAROLD BENNETT	_____	Dollars
LOUIS THOMAS WISE	_____	Dollars
JAKARA FATI MARDIS	_____	Dollars
NORMAN HALL	_____	Dollars
NICKEY DEMELVIN HUNTLEY	_____	Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

RICHARD THOMAS HOWARD	_____	in Dept _____
ROSE MAKEDA SWEENEY	_____	in Dept _____
CHRISTOPHER JOSEPH WILLIAMS	_____	in Dept _____
KIRKLAND KAUZAVA WASHINGTON	_____	in Dept _____
HAROLD BENNETT	_____	in Dept _____
LOUIS THOMAS WISE	_____	in Dept _____
JAKARA FATI MARDIS	_____	in Dept _____
NORMAN HALL	_____	in Dept _____
NICKEY DEMELVIN HUNTLEY	_____	in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate