

1 JUSTICE COURT, LAS VEGAS TOWNSHIP
2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA,
4 Plaintiff,

5 -vs-

6 SADIA MORRISON #2594911,
7 ADAM BERNARD JONES,
8 ROBERT REID,

9 Defendants.

CASE NO: 07F03540A-C

DEPT NO: 3

CRIMINAL COMPLAINT

10 The Defendants above named having committed the crimes of COERCION (Felony -
11 NRS 207.190); BATTERY WITH USE OF A DEADLY WEAPON (Felony - NRS
12 200.481); COERCION WITH USE OF A DEADLY WEAPON (Felony - NRS 207.190);
13 BURGLARY (Felony - NRS 205.060); and ASSAULT WITH A DEADLY WEAPON
14 (Felony - NRS 200.471), in the manner following, to-wit: That the said Defendants, on or
15 about the 19th day of February, 2007, at and within the County of Clark, State of Nevada,

16 COUNT 1 - COERCION

17 Defendant ADAM BERNARD JONES did then and there wilfully, unlawfully, and
18 feloniously use physical force, or the immediate threat of such force, against AARON
19 CUDWORTH and/or GEORGE PETRASKI, with intent to compel them to do, or abstain
20 from doing, an act which they had a right to do, or abstain from doing, by the defendant
21 threatening to kill AARON CUDWORTH and/or GEORGE PETRASKI; at the time of the
22 defendant's threat to use immediate physical force AARON CUDWORTH was acting as a
23 Floor Host and security employee while GEORGE PETRASKI was acting as Club Manager
24 for the Minxx Gentlemen's Club and both had the right and responsibility to maintain order
25 in the Minxx Gentlemen's Club; at the time of the defendant's threat the defendant had just
26 physically attacked an employee or customer of the Minxx Gentlemen's Club; the
27 defendant's threat to kill AARON CUDWORTH and/or GEORGE PETRASKI was made
28 with the intent to keep AARON CUDWORTH and/or GEORGE PETRASKI from doing

1 that which they had a right to do.

2 COUNT 2 - COERCION

3 Defendant ADAM BERNARD JONES did then and there wilfully, unlawfully, and
4 feloniously use physical force, or the immediate threat of such force, against AARON
5 CUDWORTH, with intent to compel him to do, or abstain from doing, an act which he had a
6 right to do, or abstain from doing, by the defendant biting the ankle of AARON
7 CUDWORTH as AARON CUDWORTH restrained the defendant; at the time of the
8 defendant's physical attack AARON CUDWORTH was acting as Floor Host and security
9 employee for the Minxx Gentlemen's Club and had the right and responsibility to maintain
10 order in the Minxx Gentlemen's Club; at the time of the defendant's attack the defendant had
11 just physically attacked an employee or customer of the Minxx Gentlemen's Club and had
12 threatened to kill two employees of the Minxx Gentlemen's Club and was being restrained
13 by AARON CUDWORTH; the defendant's physical attack was made with the intent to keep
14 AARON CUDWORTH from doing that which he had a right to do.

15 COUNT 3 - COERCION

16 Defendant ROBERT REID did then and there wilfully, unlawfully, and feloniously
17 use physical force, or the immediate threat of such force, against AARON CUDWORTH,
18 with intent to compel him to do, or abstain from doing, an act which he had a right to do, or
19 abstain from doing, by the defendant physically attacking AARON CUDWORTH and
20 knocking him down as AARON CUDWORTH restrained Defendant ADAM BERNARD
21 JONES; at the time of the defendant's physical attack AARON CUDWORTH was acting as
22 Floor Host and security employee for the Minxx Gentlemen's Club and had the right and
23 responsibility to maintain order in the Minxx Gentlemen's Club; at the time of the
24 defendant's attack Defendant ADAM BERNARD JONES had just physically attacked and
25 threatened to kill employees and/or a customer of the Minxx Gentlemen's Club and was
26 being restrained by AARON CUDWORTH; the defendant's physical attack was made with
27 the intent to keep AARON CUDWORTH from doing that which he had a right to do.

28

1 COUNT 4 - BATTERY WITH USE OF A DEADLY WEAPON

2 Defendant SADIA MORRISON did then and there wilfully, unlawfully, and
3 feloniously use force or violence upon the person of another, to-wit: AARON
4 CUDWORTH, with use of a deadly weapon, to-wit: by the said defendant striking AARON
5 CUDWORTH in the head with a glass bottle.

6 COUNT 5 - COERCION WITH USE OF A DEADLY WEAPON

7 Defendant SADIA MORRISON did then and there wilfully, unlawfully, and
8 feloniously use physical force, or the immediate threat of such force, against AARON
9 CUDWORTH, with intent to compel him to do, or abstain from doing, an act which he had a
10 right to do, or abstain from doing, with use of a deadly weapon, to-wit: by striking AARON
11 CUDWORTH in the head with a glass bottle; at the time of the attack by the defendant,
12 AARON CUDWORTH was acting as Floor Host and security employee for the Minxx
13 Gentlemen's Club and had the right and responsibility to maintain order in the Minxx
14 Gentlemen's Club; at the time of the attack AARON CUDWORTH was restraining ADAM
15 BERNARD JONES who had just physically attacked and threatened to kill two employees
16 and a customer of the Minxx Gentlemen's Club; the defendant striking AARON
17 CUDWORTH in the head with a glass bottle with the intent to keep AARON CUDWORTH
18 from doing that which he had a right to do.

19 COUNT 6 - COERCION

20 Defendant SADIA MORRISON did then and there wilfully, unlawfully, and
21 feloniously use physical force, or the immediate threat of such force, against GEORGE
22 PETRASKI and/or BRET HAMNER and/or LEON MALANOWSKI, with intent to compel
23 them to do, or abstain from doing, an act which they had a right to do, or abstain from doing,
24 by picking up a chair and running toward GEORGE PETRASKI and/or BRET HAMNER
25 and/or LEON MALANOWSKI all of whom were acting as Managers and security
26 employees for the Minxx Gentlemen's Club and who had the right and responsibility to
27 maintain order in the Minxx Gentlemen's Club; the defendant picking up the chair and
28 running toward GEORGE PETRASKI and/or BRET HAMNER and/or LEON

1 MALANOWSKI with the intent to keep the said Managers and security employees from
2 doing that which they had a right to do.

3 COUNT 7 - BURGLARY

4 Defendant SADIA MORRISON did then and there wilfully, unlawfully, and
5 feloniously enter, with intent to commit assault and/or battery, that certain building occupied
6 by MINXX GENTLEMEN'S CLUB, located at 4636 Wynn Road, Las Vegas, Clark County,
7 Nevada.

8 COUNT 8 - ASSAULT WITH A DEADLY WEAPON

9 Defendant SADIA MORRISON did then and there wilfully, unlawfully, feloniously
10 and intentionally place another person, to-wit: GEORGE PETRASKI and/or BRET
11 HAMNER and/or LEON MALANOWSKI, in reasonable apprehension of immediate bodily
12 harm with use of a deadly weapon, to-wit: a stanchion, by the said defendant displaying said
13 stanchion and advancing toward the said GEORGE PETRASKI and/or BRET HAMNER
14 and/or LEON MALANOWSKI.

15 All of which is contrary to the form, force and effect of Statutes in such cases made
16 and provided and against the peace and dignity of the State of Nevada. Said Complainant
17 makes this declaration subject to the penalty of perjury.

18
19
20 6/21/2007

21
22
23
24
25
26
27 07F03540A-C/jgw
28 LVMPD EV# 0702191180
(TK3)

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 07/13/93)

EVENT: 070219-1180
Reference
070219-0604

STATE OF NEVADA)
) ss: SADIA MORRISON (DOB: 02-27-82)
COUNTY OF CLARK) ADAM BERNARD JONES (DOB: 09-30-1983)
) ROBERT REID (DOB: 01-19-1970)

Detective K. Jordan, being first duly sworn, deposes and says:

That he is a police officer with the Las Vegas Metropolitan Police Department, being so employed for a period of 18 years, assigned to investigate the crimes of Battery with Deadly Weapon, Assault with a Deadly Weapon and Coercion committed on or about 02-19-07, which investigation has developed SADIA MORRISON, ADAM BERNARD JONES, and ROBERT REID as the perpetrators thereof.

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME TO WIT:

On February 19, 2007 at approximately 0456 the Las Vegas Metropolitan Police Department received cellular telephone calls from the Minxx Gentlemen's Club at 4636 Wynn Road, Las Vegas, Nevada 89103. LVMPD dispatch was informed that a shooting had taken place in front of the club.

Arriving officers discovered approximately 100 to 150 persons in the area on foot, in or near vehicles, walking away, loitering, entering cabs or limousines, occupying industrial parking lots on the north side of the property, the west side of Wynn Road, or a large dirt lot south of the club. Most of these individuals were hurriedly attempting to leave. Inside the club, were approximately 40 to 50 additional customers and employees. Officers also discovered Thomas Urbanski, Aaron Cudworth, and Natalie Jones laying on the ground in and next to the front club entrance suffering gun shot wounds. Urbanski and Cudworth are security personnel employed by the Minxx Gentleman's Club. Jones is an unaffiliated customer.

During the investigation of events surrounding the shooting, detectives learned that on 02-19-07 at approximately 0222 hours, Adam Bernard Jones, (aka: "Pacman" Jones), who plays professional football for the National Football League (NFL) Tennessee Titans, and approximately six other individuals known as his "entourage" entered the Minxx Gentleman's Club. Included in the "entourage" were Sadia Morrison and Robert Reid. Jones and his "entourage" occupied a private booth, adjacent to the disc jockey station in the northeast portion of the club. Inside the Minxx Club Jones obtained a black plastic trash bag. He used the plastic bag to keep an unknown amount of paper currency of unknown denominations. This money was to be used for tipping the dancers or "Making it rain" in the club. "Making it rain" is a strip club term used when someone of some financial status throws a large amount of paper currency into the air or on the stage toward erotic dancers as a tip. The more money one "rains" down on the dance stage and dancers, the more prestige one is supposed to have with other individuals in the club.

At or about 0437 hours, a physical fight began between two dancers next to the north side of the stage. One dancer was identified as Josline Hernandez. Hernandez has known Adam Jones for approximately

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS

Page 2

EVENT: 070219-1180
Reference
070219-0604

one year and has danced for him on several occasions in Atlanta, Georgia and Fort Lauderdale, Florida. The other dancer is an unknown black female, possibly from Houston, Texas. Jones attempted to separate Hernandez from the other female who was wearing a white t-shirt. Jones grabbed the unknown dancer by the hair and hit her in the face with a closed fist two to three times. The unknown dancer had attempted to collect money from the dance floor that Hernandez believed was hers. During this altercation, Jones observed an unknown black male wearing white clothing take Jones' black trash bag of money. Jones had left the bag on stage during the fight. The bag was still supposed to contain an unknown amount of money. Floor Host (security employee) Aaron Cudworth, acting within his job description to protect patrons, employees, and property, attempted to stop the battery by grabbing Jones from behind by wrapping his arms around Jones chest. This would immobilize Jones' arms from hitting the dancer. Club manager, George Petraski, arrived and also attempted to calm the situation. Petraski asked Jones to follow him to the front door to discuss the situation. Jones began to follow, but at the west end of the stage, near the front entrance, Jones jumped back on the stage and stated, "I ain't fucking going nowhere" and crossed his hands across his chest. Jones then turned to Cudworth stating, "We outta...I'm gonna fucking kill ya." Jones then stated, "Matter of fact, all you's are gonna get it." Petraski believes Jones was talking to Cudworth and himself and that Jones was threatening their lives.

Jones then swung his fist at Cudworth. Cudworth grabbed Jones by the wrist and told him to leave the stage. Jones became enraged and ran to the area south of the stage where he pushed and fought with other dancers and customers. Cudworth followed Jones and attempted to diffuse the situation again for the safety of customers and other employees. Cudworth grabbed Jones from behind again by wrapping his arms around Jones' chest. This was an attempt to prevent Jones from swinging his arms again and hitting Cudworth and others in the area. Robert Reid, Jones' hired bodyguard, then lunged at Cudworth knocking Cudworth and Jones down. Robert Reid is a large black male who is approximately 400 pounds. Reid was hired by Jones to act as his body guard during the NBA All Star Weekend in Las Vegas that included the night of 02-18/19-07. Robert Reid's actions, hindered Cudworth from stopping Jones' aggressive behavior which was endangering other customers and staff. Club manager, George Petraski approached Cudworth, Jones, and Reid to assist. Petraski believed Jones and Reid could cause additional problems that might endanger patrons or the club given Jones' attitude toward security and his actions on stage. Petraski, who is approximately the same size as Robert Reid, focused his attention on Reid asking him to exit the club. Reid's leaving would minimize any further aggressive actions of Reid that could endanger other customers and staff. Reid refused to move so Petraski shoved him slightly toward the front entrance. Reid moved away toward the entrance with Petraski following closely. At a black curtain covering the main floor area entrance, Reid grabbed a floor mounted rail with one hand and refused to move any further. Petraski was forced to peel Reid's fingers back from the rail one at a time in order to get Reid to release the rail. Reid was then escorted the rest of the way out of the front entrance. Petraski told security employees at the door that under no circumstances should they let Reid re-enter into the club.

Reid's actions distracted Petraski from the altercation between Adam Jones and security employee Aaron Cudworth. During this distraction, Jones took another swing at Aaron Cudworth with his fists. Cudworth then placed Adam Jones' right arm in an arm bar hold to keep from being hit. Adam Jones then bit Cudworth on or near the left ankle. Cudworth kicked Jones in the chest to stop Jones from biting

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS

Page 3

EVENT: 070219-1180
Reference
070219-0604

him. Jones regained his feet and started another altercation with an unidentified customer. Jones was then identified on video tape hitting his "business manager," Christopher Horvath with a right cross to the jaw. Cudworth continued to pursue Jones to stop him from harming others. At this time a black female adult from Jones' entourage, with what appeared to be dyed red hair, hit Cudworth in the head with a champagne bottle. This subject was later identified as Sadia Morrison. Security employee Henry Jenkins attempted to keep the calm and witnessed Sadia Morrison hit Aaron Cudworth with the champagne bottle. Morrison, like Jones, intentionally interfered with Cudworth's position as a floor host (security employee) attempting to keep patrons, staff, and property safe. Although receiving a cut on the head when he was struck with the bottle, Cudworth grabbed and controlled Adam Jones again and was able to escort him out the rear (east) door of the club.

While Cudworth was occupied with Jones at the rear of the building, additional club employees; Manager George Petraski, Security employee Brett Hamner, and General Manager Leon Malanowski stayed inside the club to stop any additional damage and protect patrons as they began to leave. Sadia Morrison, still inside the club after attacking Cudworth with the bottle, ran at Petraski, Hamner, and Malanowski while holding a chair in her hands. Morrison's actions forced these employees from their lawful duties to protect additional patrons, employees, and property. Hamner was forced to push Morrison making her drop the chair. This was done to protect himself, Petraski, and Malanowski. Morrison continued to fight forcing the three security employees to take Morrison out of the southwest door of the club. As they attempted to force Morrison out of the southwest doors with the additional help of manager Steve Eargle, Morrison continued to fight, biting Malanowski in the left triceps and punching Hamner in the face two times. Morrison then scratched Petraski's neck and attempted to choke him with a necklace he wore. Petraski was forced to brake Sadia's hands free of his necklace so she could not break it. Morrison was finally pushed out the southwest doors but refused to move her foot from the door jam. Petraski then stepped on her toe until she moved. Several minutes later Malanowski noticed Morrison had returned inside the club with a stanchion in her hands held like a battering ram. She charged at Petraski, Hamner, and Malanowski again. Hamner was forced to push her down again making her drop the stanchion when another subject from Jones' entourage, identified as Cheryl Moss, distracted the employees by verbally accusing them of stealing Morrison's purse. Security ordered Moss and Morrison to leave. Employees then "threw" Morrison "out the southwest doors again."

Outside the rear door where Cudworth had taken Jones, Jones told Cudworth he would shoot him. An unknown number of subjects in Jones' "entourage" then began to exit the rear door to the back parking lot. Several of these individuals disappeared momentarily behind the club's trash receptacle area (east of the building in the parking lot) out of sight. When they emerged, Adam Jones continued to threaten security including Cudworth and Henry Jenkins and began simulating a weapon in his clothing by reaching under his shirt or rear waistband area. Jenkins believed Jones had a gun and was in fear of his life. Several of Adam Jones' "entourage," now including a black male with a black baggy t-shirt and blue jeans also began threatening Aaron Cudworth that he was "Dead" or they were going to "Smoke" Him. Cudworth began to walk toward Adam Jones who began to retreat further into the parking lot. Cudworth was told by other employees who had followed Cudworth outside to back up and re-enter the club. This was done for the employee's safety as none of them could control any weapons outside the club and they felt that threats from Adam Jones and others in his entourage were valid. Cudworth

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS

Page 4

EVENT: 070219-1180
Reference
070219-0604

stopped approaching Jones and re-entered the building with other security employees. Jones and entourage member Christopher Horvath, along with the unidentified black male wearing a black, baggy t-shirt and blue jeans were last seen by Cudworth walking west around the north side of the building toward Wynn Road.

Witness Jacquelyn Sears, a cocktail server at Minxx Gentlemen's Club, was outside near the rear door when Jones was escorted out by Aaron Cudworth. Sears overheard a black male adult who met Adam Jones outside tell him, "Fuck this motherfucker. We'll smoke his ass." Whatever, "let's smoke this fool..." This male was described as a dark skinned male with a "larger than average" build. He had corn-row braids down to the middle of the neck and appeared clean shaven. This male wore a black t-shirt and unknown color pants. The male walked with Jones around the north side of the building toward the front and Wynn Road. The rest of the entourage stood at the rear of the club.

When security employee Aaron Cudworth re-entered the club from the rear parking lot where he was threatened, he was alerted on his club provided two way radio, to proceed upstairs to the dancer's dressing room to diffuse continuing altercations between the dancers. Cudworth proceeded upstairs where the dancer altercations were calmed moments later. Minxx Club Manager Thomas Urbanski, stationed at the club front doors, then called on the radio for support as several altercations had begun outside the front doors. Cudworth left other security employees in the dressing room and went downstairs. Cudworth exited the front doors and observed a physical altercation between unknown black males and an unknown black female across Wynn Road from the club.

Realizing this altercation was off property, Cudworth turned to walk back toward the building. As he turned an unidentified black male in a baggy black t-shirt and blue jeans walked toward the building from the south. This male stood next to the southwest, portion of the building next to the southern most palm tree in the front landscaping. The male produced a black semi-automatic handgun and fired approximately five to six times toward Aaron Cudworth and the front entrance to the club. Cudworth was shot in the chest and left forearm while he attempted to retreat back into the club entrance. Thomas Urbanski, still posted just outside of the front door, was struck in the left hand and left side under the arm. Natalie Jones, a patron exiting the building at that approximate time, was struck in the left side of the head. The suspect turned and was last seen running south on Wynn Road.

Therefore, Declarant prays that a Warrant of Arrest be issued for suspect SADIA MORRISON on 1 count of Battery with a Deadly Weapon for hitting security employee Aaron Cudworth with a bottle, 1 count of Coercion for battering Aaron Cudworth, and or security employee Bret Hamner, and or Manager George Petraski, and or General Manager Leon Malanowski, and or Manager Steve Eargle while they attempted to remove her from the Minxx Club. And 1 count of Assault with a Deadly Weapon for attacking Bret Hamner, and or George Petraski, and or Leon Malanowski with a chair and then a stanchion before being stopped by Bret Hamner.

Declarant additionally prays that a Warrant of Arrest be issued for suspect ADAM BERNARD JONES on 2 counts of Coercion, for the battery, biting of, and interference of Aaron Cudworth who was attempting to protect other patrons, employees, and property; and the battery and threatening of Aaron

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS

Page 5

EVENT: 070219-1180
Reference
070219-0604

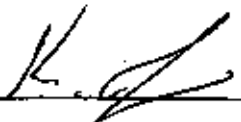
Cudworth and or Manager George Petraski in the Minxx Gentlemen's Club by verbally threatening Cudworth's and Petraski's lives and continuing to fight inside the club after Cudworth and Petraski had previously stopped his aggressive actions.

Declarant further requests that a Warrant of Arrest be issued for suspect ROBERT REID on 1 count of Coercion for the battery of Aaron Cudworth and or George Petraski and for physically tackling Aaron Cudworth distracting him and leaving him unable to defend himself while attempting to stop Adam Bernard Jones from battering other patrons or employees. And for refusing to leave when lawfully asked by Manager George Petraski, forcing Petraski to physically bump Reid and escort him to the exit and then having to remove Reid's hand from a floor mounted railing, finger by finger, to get him to leave the building.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed on this 13 day of June, 2007.

DECLARANT:

 3715

WITNESS:

 7549 DATE: 6-11-2007