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8 **IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP**  
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA, )  
11 )  
Plaintiff, ) Case No.:  
12 )  
vs. ) Dept. No.:  
13 )  
14 ASSOCIATION OF COMMUNITY )  
ORGANIZATION FOR REFORM NOW INC., )  
15 CHRISTOPHER HOWELL EDWARDS, and )  
AMY ADELE BUSEFINK, )  
16 Defendants. )

17 **CRIMINAL COMPLAINT**

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19 The undersigned, CATHERINE CORTEZ MASTO, Attorney General of the State of  
20 Nevada, by and through Chief Deputy Attorney General, Conrad Hafen, complains and  
21 charges the above named defendants, ASSOCIATION OF COMMUNITY ORGANIZATION  
22 FOR REFORM NOW INC.(ACORN), CHRISTOPHER HOWELL EDWARDS AND AMY  
23 ADELE BUSEFINK, with having committed the crimes of COMPENSATION FOR  
24 REGISTRATION OF VOTERS (26 Counts), a Category E Felony, in violation of NRS 293.805,  
25 and PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
26 (13 Counts), a category E Felony, in violation of NRS 195.020 and NRS 293.805 in Clark  
27 County, State of Nevada as follows:

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**COUNT ONE**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Eartha Jackson to register voters in Clark County, Nevada and conditioned her pay upon submitting twenty (20) registration cards per shift. In addition, Defendant, through ACORN Las Vegas Field Director Christopher Howell Edwards, paid Eartha Jackson a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT TWO**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or “21”. Pursuant to this bonus program, Defendant paid ACORN employee Eartha Jackson an additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT THREE**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director for Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to

1 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
2 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
3 ACORN employee Eartha Jackson a bonus payment of five dollars (\$5.00) if she submitted  
4 twenty-one (21) or more voter registration cards per shift.

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6 **COUNT FOUR**

7 **COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 293.805)**

9 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR**  
10 **REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters  
11 that is based upon the total number of voters a person registers to wit: That from August to  
12 September, 2008, the defendant employed Richard Barnett to register voters in Clark County,  
13 Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In  
14 addition, Defendant, through ACORN Las Vegas Field Director Christopher Howell Edwards,  
15 paid Richard Barnett a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more  
16 voter registration cards per shift.

17 **COUNT FIVE**

18 **COMPENSATION FOR REGISTRATION OF VOTERS**  
19 **(A Category E Felony – NRS 293.805)**

20 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
21 compensation for registering voters that is based upon the total number of voters a person  
22 registers to wit: That from August to September, 2008, the defendant, while acting as the Las  
23 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
24 "21". Pursuant to this bonus program, Defendant paid ACORN employee Richard Barnett an  
25 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
26 per shift.

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1 COUNT SIX

2 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
3 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

4 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
5 registering voters that is based upon the total number of voters a person registers to wit: That  
6 from August to September, 2008, the defendant, as ACORN Regional Director for Voter  
7 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
8 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
9 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
10 ACORN employee Richard Barnett a bonus payment of five dollars (\$5.00) if he submitted  
11 twenty-one (21) or more voter registration cards per shift.

12 COUNT SEVEN

13 **COMPENSATION FOR REGISTRATION OF VOTERS**  
14 **(A Category E Felony – NRS 293.805)**

15 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR**  
16 **REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters  
17 that is based upon the total number of voters a person registers to wit: That from August to  
18 September, 2008, the defendant employed Richard Agusti to register voters in Clark County,  
19 Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In  
20 addition, Defendant, through ACORN Las Vegas Field Director Christopher Howell Edwards,  
21 paid Richard Agusti a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more  
22 voter registration cards per shift.

23 COUNT EIGHT

24 **COMPENSATION FOR REGISTRATION OF VOTERS**  
25 **(A Category E Felony – NRS 293.805)**

26 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
27 compensation for registering voters that is based upon the total number of voters a person  
28 registers to wit: That from August to September, 2008, the defendant, while acting as the Las

1 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
2 "21". Pursuant to this bonus program, Defendant paid ACORN employee Richard Agusti an  
3 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
4 per shift.

5 **COUNT NINE**

6 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
7 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

8 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
9 registering voters that is based upon the total number of voters a person registers to wit: That  
10 from August to September, 2008, the defendant, as ACORN Regional Director of Voter  
11 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
12 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
13 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
14 ACORN employee Richard Agusti a bonus payment of five dollars (\$5.00) if he submitted  
15 twenty-one (21) or more voter registration cards per shift.

16 **COUNT TEN**

17 **COMPENSATION FOR REGISTRATION OF VOTERS**  
18 **(A Category E Felony – NRS 293.805)**

19 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR**  
20 **REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters  
21 that is based upon the total number of voters a person registers to wit: That from August to  
22 September, 2008, the defendant employed DiJon Doss to register voters in Clark County,  
23 Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In  
24 addition, Defendant, through ACORN Las Vegas Field Director Christopher Howell Edwards,  
25 paid DiJon Doss a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter  
26 registration cards per shift.

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**COUNT ELEVEN**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or “21”. Pursuant to this bonus program, Defendant paid ACORN employee DiJon Doss an additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT TWELVE**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director of Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas Field Director Christopher Howell Edwards’ blackjack or “21” bonus program that gave ACORN employee DiJon Doss a bonus payment of five dollars (\$5.00) if he submitted twenty-one (21) or more voter registration cards per shift.

**COUNT THIRTEEN**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Dewaine Denne to register voters in Clark County, Nevada and

1 conditioned his pay upon submitting twenty (20) registration cards per shift. In addition,  
2 Defendant, through ACORN Las Vegas Field Director Christopher Howell Edwards, paid  
3 Dewaine Denne a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter  
4 registration cards per shift.

5 **COUNT FOURTEEN**

6 **COMPENSATION FOR REGISTRATION OF VOTERS**  
7 **(A Category E Felony – NRS 293.805)**

8 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
9 compensation for registering voters that is based upon the total number of voters a person  
10 registers to wit: That from August to September, 2008, the defendant, while acting as the Las  
11 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
12 “21”. Pursuant to this bonus program, Defendant paid ACORN employee Dewaine Denne an  
13 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
14 per shift.

15 **COUNT FIFTEEN**

16 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
17 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

18 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
19 registering voters that is based upon the total number of voters a person registers to wit: That  
20 from August to September, 2008, the defendant, as ACORN Regional Director for Voter  
21 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
22 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
23 Field Director Christopher Howell Edwards’ blackjack or “21” bonus program that gave  
24 ACORN employee Dewaine Denne a bonus payment of five dollars (\$5.00) if he submitted  
25 twenty-one (21) or more voter registration cards per shift.

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**COUNT SIXTEEN**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Joseph Terry to register voters in Clark County, Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Joseph Terry a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT SEVENTEEN**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or “21”. Pursuant to this bonus program, Defendant paid ACORN employee Joseph Terry an additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT EIGHTEEN**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director for Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to



1 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
2 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
3 ACORN employee Joseph Terry a bonus payment of five dollars (\$5.00) if he submitted  
4 twenty-one (21) or more voter registration cards per shift.

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6 **COUNT NINETEEN**

7 **COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 293.805)**

9 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR**  
10 **REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters  
11 that is based upon the total number of voters a person registers to wit: That from August to  
12 September, 2008, the defendant employed Steven Jackson to register voters in Clark County,  
13 Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In  
14 addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid  
15 Steven Jackson a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter  
16 registration cards per shift.

17 **COUNT TWENTY**

18 **COMPENSATION FOR REGISTRATION OF VOTERS**  
19 **(A Category E Felony – NRS 293.805)**

20 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
21 compensation for registering voters that is based upon the total number of voters a person  
22 registers to wit: That from August to September, 2008, the defendant, while acting as the Las  
23 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
24 "21". Pursuant to this bonus program, Defendant paid ACORN employee Steven Jackson an  
25 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
26 per shift.

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**COUNT TWENTY-ONE**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director for Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave ACORN employee Steven Jackson a bonus payment of five dollars (\$5.00) if he submitted twenty-one (21) or more voter registration cards per shift.

**COUNT TWENTY-TWO**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Carl Barker to register voters in Clark County, Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Carl Barker a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT TWENTY-THREE**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las

1 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
2 "21". Pursuant to this bonus program, Defendant paid ACORN employee Carl Barker an  
3 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
4 per shift.

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6 **COUNT TWENTY-FOUR**

7 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

9 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
10 registering voters that is based upon the total number of voters a person registers to wit: That  
11 from August to September, 2008, the defendant, as ACORN Regional Director for Voter  
12 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
13 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
14 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
15 ACORN employee Carl Barker a bonus payment of five dollars (\$5.00) if he submitted twenty-  
16 one (21) or more voter registration cards per shift.

17 **COUNT TWENTY-FIVE**

18 **COMPENSATION FOR REGISTRATION OF VOTERS**  
19 **(A Category E Felony – NRS 293.805)**

20 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR**  
21 **REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters  
22 that is based upon the total number of voters a person registers to wit: That from August to  
23 September, 2008, the defendant employed Susan Hollis to register voters in Clark County,  
24 Nevada and conditioned her pay upon submitting twenty (20) registration cards per shift. In  
25 addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid  
26 Susan Hollis a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter  
27 registration cards per shift.

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1 Nevada and conditioned his pay upon submitting twenty (20) registration cards per shift. In  
2 addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Erick  
3 Scott a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration  
4 cards per shift.

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6 **COUNT TWENTY-NINE**

7 **COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 293.805)**

9 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
10 compensation for registering voters that is based upon the total number of voters a person  
11 registers to wit: That from August to September, 2008, the defendant, while acting as the Las  
12 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
13 “21”. Pursuant to this bonus program, Defendant paid ACORN employee Erick Scott an  
14 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
15 per shift.

16 **COUNT THIRTY**

17 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
18 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

19 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
20 registering voters that is based upon the total number of voters a person registers to wit: That  
21 from August to September, 2008, the defendant, as ACORN Regional Director for Voter  
22 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
23 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
24 Field Director Christopher Howell Edwards’ blackjack or “21” bonus program that gave  
25 ACORN employee Erick Scott a bonus payment of five dollars (\$5.00) if he submitted twenty-

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**COUNT THIRTY-ONE**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Andre Stewart to register voters in Clark County, Nevada and conditioned her pay upon submitting twenty (20) registration cards per shift. In addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Andre Stewart a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT THIRTY-TWO**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or “21”. Pursuant to this bonus program, Defendant paid ACORN employee Andre Stewart an additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT THIRTY-THREE**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director for Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to

1 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
2 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
3 ACORN employee Andre Stewart a bonus payment of five dollars (\$5.00) if she submitted  
4 twenty-one (21) or more voter registration cards per shift.

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6 **COUNT THIRTY-FOUR**

7 **COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 293.805)**

9 That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM**  
10 **NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based  
11 upon the total number of voters a person registers to wit: That from August to September,  
12 2008, the defendant employed Tracy Owens to register voters in Clark County, Nevada and  
13 conditioned his pay upon submitting twenty (20) registration cards per shift. In addition,  
14 Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Tracy Owens  
15 a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
16 per shift.

17 **COUNT THIRTY-FIVE**

18 **COMPENSATION FOR REGISTRATION OF VOTERS**  
19 **(A Category E Felony – NRS 293.805)**

20 That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide  
21 compensation for registering voters that is based upon the total number of voters a person  
22 registers to wit: That from August to September, 2008, the defendant, while acting as the Las  
23 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
24 "21". Pursuant to this bonus program, Defendant paid ACORN employee Tracy Owens an  
25 additional five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards  
26 per shift.

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**COUNT THIRTY-SIX**

**PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 195.020 and NRS 293.805)**

That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, as ACORN Regional Director for Voter Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave ACORN employee Tracy Owens a bonus payment of five dollars (\$5.00) if he submitted twenty-one (21) or more voter registration cards per shift.

**COUNT THIRTY-SEVEN**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN)**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant employed Marshea Greenwood to register voters in Clark County, Nevada and conditioned her pay upon submitting twenty (20) registration cards per shift. In addition, Defendant, through Las Vegas Field Director Christopher Howell Edwards, paid Marshea Greenwood a bonus of five dollars (\$5.00) for submitting twenty-one (21) or more voter registration cards per shift.

**COUNT THIRTY-EIGHT**

**COMPENSATION FOR REGISTRATION OF VOTERS  
(A Category E Felony – NRS 293.805)**

That the Defendant, **CHRISTOPHER HOWELL EDWARDS**, did unlawfully provide compensation for registering voters that is based upon the total number of voters a person registers to wit: That from August to September, 2008, the defendant, while acting as the Las



1 Vegas Field Director for ACORN, created a bonus incentive program known as blackjack or  
2 "21". Pursuant to this bonus program, Defendant paid ACORN employee Marshea  
3 Greenwood an additional five dollars (\$5.00) for submitting twenty-one (21) or more voter  
4 registration cards per shift.

5  
6 **COUNT THIRTY-NINE**

7 **PRINCIPAL TO THE CRIME OF COMPENSATION FOR REGISTRATION OF VOTERS**  
8 **(A Category E Felony – NRS 195.020 and NRS 293.805)**

9 That the Defendant, **AMY ADELE BUSEFINK**, did unlawfully provide compensation for  
10 registering voters that is based upon the total number of voters a person registers to wit: That  
11 from August to September, 2008, the defendant, as ACORN Regional Director for Voter  
12 Registration, did aid, abet, counsel, encourage, hire, command, induce or procure ACORN to  
13 commit the crime of Compensation for Registration of Voters by approving ACORN Las Vegas  
14 Field Director Christopher Howell Edwards' blackjack or "21" bonus program that gave  
15 ACORN employee Marshea Greenwood a bonus payment of five dollars (\$5.00) if she  
16 submitted twenty-one (21) or more voter registration cards per shift.

17 That complainant knows that said crimes occurred and that the Defendants,  
18 ASSOCIATION OF COMMUNITY ORGANIZATION FOR REFORM NOW INC. (ACORN),  
19 CHRISTOPHER HOWELL EDWARDS and AMY ADELE BUSEFINK, committed the same  
20 based upon the following: Because complainant is the Chief Deputy Attorney General, and is  
21 in possession of an affidavit written by Investigator Colin Haynes known to complainant to be  
22 an investigator with the Nevada Secretary of State's Office. A copy of which is attached hereto  
23 and incorporated by reference herein for the limited purpose of securing a summons and a  
24 summons in lieu of arrest.

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1 All of which is contrary to the form of the Statute in such cases made and provided, and  
2 against the peace and dignity of the State of Nevada. Furthermore, complainant makes this  
3 declaration subject to the penalty of perjury.

4 Dated this \_\_\_\_ day of May, 2009.

5 CATHERINE CORTEZ MASTO  
6 Attorney General

7 By: \_\_\_\_\_  
8 CONRAD HAFEN  
9 Chief Deputy Attorney General

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