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IND  
DAVID ROGER  
Clark County District Attorney  
Nevada Bar #002781  
SCOTT S. MITCHELL  
Chief Deputy District Attorney  
Nevada Bar #000346  
200 Lewis Avenue  
Las Vegas, Nevada 89155-2212  
(702) 671-2500  
Attorney for Plaintiff

**FILED**  
FEB 20 12 20 PM '08  
*CLERK*  
CLERK OF DISTRICT COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,  
Plaintiff,

-vs-

LACY L. THOMAS,  
Defendant(s).

Case No. C241569  
Dept. No. XVII

INDICTMENT

STATE OF NEVADA }  
COUNTY OF CLARK } ss.

The Defendant(s) above named, LACY L. THOMAS, accused by the Clark County Grand Jury of the crime(s) of THEFT (Felony - NRS 205.0832, 205.0835); and MISCONDUCT OF A PUBLIC OFFICER (Felony - NRS 197.110), committed at and within the County of Clark, State of Nevada, on or between September, 2004, and January, 2007, as follows:

COUNT I - THEFT

Defendant did, on or between May, 2005, and January, 2007, then and there knowingly, feloniously, and without lawful authority, commit theft by using the services or property of another person entrusted to him, or placed in his possession of a limited,

1 authorized period of determined or prescribed duration or for a limited use, having a value of  
2 \$2500.00 or more, lawful money of the United States, belonging to University Medical  
3 Center and/or Clark County, Clark County, Nevada, in the following manner, to-wit: by the  
4 Defendant, while employed as Chief Executive Officer at said University Medical Center,  
5 entering into a contract with Superior Consulting and/or ACS Company, a company run by  
6 longtime friends or associates of Defendant, for Superior Consulting and/or ACS to collect  
7 money owed to University Medical Center under contracts or terms grossly unfavorable to  
8 said University Medical Center, whereby University Medical Center was obligated to pay  
9 said Superior Consulting and/or ACS for collection work already being performed by an  
10 agency of Clark County and could not terminate said contract for a lengthy period of time  
11 regardless of whether Superior Consulting and/or ACS was successfully increasing the  
12 collection of University Medical Center's debt, and/or by allowing Superior Consulting  
13 and/or ACS to sell valuable accounts receivable to a third party for an unreasonably low  
14 price and to charge a high commission for said sale, and after learning that debt collection  
15 had decreased under the direction of Superior Consulting and/or ACS, modifying the  
16 contract to greatly increase the amount of money University Medical Center paid said  
17 Superior Consulting and/or ACS for said debt collection services, thereby using the services  
18 or property for another use.

19 COUNT 2 – THEFT

20 Defendant did, on or between December, 2004, and December, 2006, then and there  
21 knowingly, feloniously, and without lawful authority, commit theft by using the services or  
22 property of another person entrusted to him, or placed in his possession of a limited,  
23 authorized period of determined or prescribed duration or for a limited use, having a value of  
24 \$2500.00 or more, lawful money of the United States, belonging to University Medical  
25 Center and/or Clark County, Clark County, Nevada, in the following manner, to-wit: by the  
26 Defendant, while employed as Chief Executive Officer at said University Medical Center,  
27 entering into contracts with Frasier Systems Group, a company owned by Gregory Boone, a  
28 friend of said Defendant, whereby said Frasier Systems Group was paid with University

1 Medical Center funds to plan and implement a project manager's office for University  
2 Medical Center projects but never produced any product or services in return for said  
3 payment, and said Defendant causing payments to be made on said contract while he knew  
4 or should have known that services were not being received as contracted for under said  
5 contract and said contract was unnecessary in that University Medical Center already had  
6 available, free of charge, the services of a project manager's office run by Clark County,  
7 thereby using the services or property for another use.

8 COUNT 3 - THEFT

9 Defendant did, on or between September, 2004, and December, 2006, then and there  
10 knowingly, feloniously, and without lawful authority, commit theft by using the services or  
11 property of another person entrusted to him, or placed in his possession of a limited,  
12 authorized period of determined or prescribed duration or for a limited use, having a value of  
13 \$2500.00 or more, lawful money of the United States, belonging to University Medical  
14 Center and/or Clark County, Clark County, Nevada, in the following manner, to-wit: by the  
15 Defendant, while employed as Chief Executive Officer at said University Medical Center,  
16 entering into a contract with TBL Construction, on behalf of University Medical Center  
17 whereby said TBL Construction was paid by University Medical Center to oversee the  
18 installation of the landscaping and electrical feed to University Medical Center Northeast  
19 Tower project under construction; Defendant knowing at the time of entering into said  
20 contract that the electrical feed and landscaping work was already covered and provided for  
21 in a separate contract with the general contractor of said project, and that said general  
22 contractor was already being paid to do said work, and that the said TBL Construction would  
23 not be doing any work pursuant to said contract with University Medical Center, and that  
24 said contract was unnecessary, thereby using the services or property for another use.

25 COUNT 4 - THEFT

26 Defendant did, on or about April, 2005, then and there knowingly, feloniously, and  
27 without lawful authority, commit theft by using the services or property of another person  
28 entrusted to him, or placed in his possession of a limited, authorized period of determined or

1 prescribed duration or for a limited use, having a value of \$2500.00 or more, lawful money  
2 of the United States, belonging to University Medical Center and/or Clark County, Clark  
3 County, Nevada, in the following manner, to-wit: by the Defendant, while employed as  
4 Chief Executive Officer at said University Medical Center, by paying University Medical  
5 Center funds to Premier Alliance Management, LLC, a company owned by Orlando Jones, a  
6 friend of Defendant, after said Premier Alliance Management LLC agreed to analyze and  
7 report on planning, priorities and communications systems at University Medical Center, in  
8 return for which said Premier Alliance Management LLC provided no report or analysis to  
9 University Medical Center, and none was requested or required by Defendant in return for  
10 said money paid, thereby using the services or property for another use.

11 COUNT 5 – THEFT

12 Defendant did, on or between June 2005 and December, 2006, then and there  
13 knowingly, feloniously, and without lawful authority, commit theft by using the services or  
14 property of another person entrusted to him, or placed in his possession of a limited,  
15 authorized period of determined or prescribed duration or for a limited use, having a value of  
16 \$2500.00 or more, lawful money of the United States, belonging to University Medical  
17 Center and/or Clark County, Clark County, Nevada, in the following manner, to-wit: by the  
18 Defendant, while employed as Chief Executive Officer at said University Medical Center,  
19 entering into a contract with Crystal Communications LLC, a company owned and operated  
20 by Orlando Jones and Martello Pollock, friends of the Defendant, to pay Crystal  
21 Communications, LLC, to oversee the selection and installation of the best  
22 telecommunications equipment available for the University Medical Center Northeast Tower  
23 project, and Defendant thereafter paying said Crystal Communications, LLC, without said  
24 company being qualified or capable of providing services valuable to University Medical  
25 Center, and said company thereafter failing to provide a valuable service pursuant to said  
26 contract, thereby using the property of University Medical Center for another use.

27 COUNT 6 – MISCONDUCT OF A PUBLIC OFFICER

28 Defendant did, on or between May, 2005, and January, 2007, then and there

1 knowingly, feloniously, and without legal authority, while acting as a public officer as Chief  
 2 Executive Officer of University Medical Center, employ or use money under his official  
 3 control or direction, or in his official custody, for the private benefit or gain of himself or  
 4 another, by doing the acts set forth in Count 1, hereinabove.

5 COUNT 7 – MISCONDUCT OF A PUBLIC OFFICER

6 Defendant did, on or between December, 2004, and December, 2006, then and there  
 7 knowingly, feloniously, and without legal authority, while acting as a public officer as Chief  
 8 Executive Officer of University Medical Center, employ or use money under his official  
 9 control or direction, or in his official custody, for the private benefit or gain of himself or  
 10 another, by doing the acts set forth in Count 2, hereinabove.

11 COUNT 8 – MISCONDUCT OF A PUBLIC OFFICER

12 Defendant did, on or between September, 2004, and December, 2006, then and there  
 13 knowingly, feloniously, and without legal authority, while acting as a public officer as Chief  
 14 Executive Officer of University Medical Center, employ or use money under his official  
 15 control or direction, or in his official custody, for the private benefit or gain of himself or  
 16 another, by doing the acts set forth in Count 3, hereinabove.

17 COUNT 9 – MISCONDUCT OF A PUBLIC OFFICER

18 Defendant did, on or about April, 2005, then and there knowingly, feloniously, and  
 19 without legal authority, while acting as a public officer as Chief Executive Officer of  
 20 University Medical Center, employ or use money under his official control or direction, or in  
 21 his official custody, for the private benefit or gain of himself or another, by doing the acts set  
 22 forth in Count 4, hereinabove.

23 COUNT 10 – MISCONDUCT OF A PUBLIC OFFICER

24 Defendant did, on or between June, 2005, and December, 2006, then and there  
 25 knowingly, feloniously, and without legal authority, while acting as a public officer as Chief


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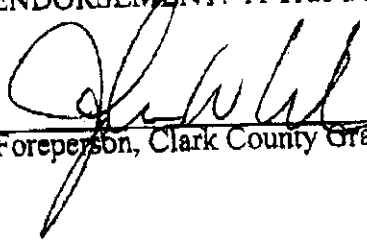
Executive Officer of University Medical Center, employ or use money under his official control or direction, or in his official custody, for the private benefit or gain of himself or another, by doing the acts set forth in Count 5, hereinabove.

DATED this 20<sup>th</sup> day of February, 2008.

DAVID ROGER  
DISTRICT ATTORNEY  
Nevada Bar #002781

BY   
SCOTT S. MITCHELL  
Chief Deputy District Attorney  
Nevada Bar #000346

ENDORSEMENT: A True Bill

  
Foreperson, Clark County Grand Jury

1 Names of witnesses testifying before the Grand Jury:

2 CARROLL, JERMAH, CPA, DIRECTOR, CLARK COUNTY AUDIT DEPT., C/O  
3 CCDA, 200 LEWIS AVENUE, LVN 89101

4 VALENTINE, VIRGINIA, CLARK COUNTY MANAGER

5 MARY ANNE MILLER, DEPUTY DISTRICT ATTORNEY, CIVIL DIVISION

6 FORD, MICHAEL, LVMPD P#5279

7 CLAYPOOL, D. BLAINE, CHIEF EXECUTIVE OFFICER, UNIVERSITY OF NEVADA,  
8 SCHOOL OF MEDICINE

9 WALSH, MICHAEL, DIRECTOR OF ADMINISTRATION, SOUTHERN NEVADA  
10 HEALTH DISTRICT

11 FINGER, EDWARD, COUNTY COMPTROLLER

12 MYERS, H. LEE, UMC SUPPORT SERVICES

13 MALCOLM JOHN ERNEST MCKINLEY, UMC, DIRECTOR OF INFORMATION  
14 SYSTEMS

15 CALUYA, CHRIS, VICE PRESIDENT CLARK-SULLIVAN CONSTRUCTORS

16 WHITELEY, ROBERT, LVMPD P#4996

17 STEVENS, GEORGE, CHIEF FINANCIAL OFFICER, CLARK COUNTY

18 REILLY, THOMAS, C/O CCDA, 200 LEWIS AVE., LVN 89101

19 HARRIS, QUINCY, NETWORKS WEST , PRESIDENT

20 ANDREWS, WILLIAM, INTERNAL AUDIT, UMC

21 Additional witnesses known to the District Attorney at the time of filing this Indictment:

22 COE, DANIEL, LVMPD P#4552

23 SAMPSON, NANCY, LVMPD P#4627

24 ROTH, CHRISTOPHER, FORMER DIRECTOR OF PLANNING AND OPERATIONS,  
25 UNIVERSITY MEDICAL CENTER

26 HAIGHT, DON, UMC EXECUTIVE DIRECTOR FOR CONTRACT MANAGEMENT

27 NORTHUTT, DOUG, UMC, CHIEF INFORMATION OFFICER

28 STEVENS, FLOYD, UMC COMPTROLLER

HAYES, MICHAEL, UMC MANAGEMENT ANALYSIS

MCELHONE, JOHN II, UMC, DIRECTOR OF CONSTRUCTION