

In the Circuit Court of the State of Oregon  
For Multnomah County

22CR35546

Court Nbr DA 2450204-1  
Crime Report CLAS 20-70046

Verified Correct Copy of Original 7/25/2022

STATE OF OREGON

Plaintiff,

v.

RICHARD JOHN CHENEY  
DOB: 08/04/1972

Defendant(s).

Indictment for Violation of

ORS 475.890 (1,2,3)  
ORS 811.540 (4,7)  
ORS 811.140 (5),  
ORS 163.195 (6)

FILED

JUL 25 2022

CIRCUIT COURT  
MULTNOMAH COUNTY, OREGON

The above-named defendant(s) are accused by the Grand Jury of Multnomah County, State of Oregon, by this indictment of crime(s) of COUNT 1,2,3 - UNLAWFUL DELIVERY OF METHAMPHETAMINE, COUNT 4 - FELONY FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER, COUNT 5 - RECKLESS DRIVING, COUNT 6 - RECKLESSLY ENDANGERING ANOTHER PERSON, COUNT 7 - MISDEMEANOR FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER, committed as follows:

**COUNT 1**

**UNLAWFUL DELIVERY OF METHAMPHETAMINE**

The said Defendant(s), **RICHARD JOHN CHENEY**, on or about February 28, 2020, in the County of Multnomah, State of Oregon, did unlawfully and intentionally and knowingly deliver METHAMPHETAMINE, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

The state further alleges that the above-described delivery involved substantial quantities of a controlled substance, consisting of 10 or more grams of a mixture or substance containing a detectable amount of METHAMPHETAMINE, its salts, isomers or salts of its isomers;

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

**COUNT 2**

**UNLAWFUL DELIVERY OF METHAMPHETAMINE**

The said Defendant(s), **RICHARD JOHN CHENEY**, on or about March 05, 2020, in the County of Multnomah, State of Oregon, did unlawfully and intentionally and knowingly deliver METHAMPHETAMINE, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

The state further alleges that the above-described delivery involved substantial quantities of a controlled substance, consisting of 10 or more grams of a mixture or substance containing a detectable amount of METHAMPHETAMINE, its salts, isomers or salts of its isomers;

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

**COUNT 3**

**UNLAWFUL DELIVERY OF METHAMPHETAMINE**

The said Defendant(s), **RICHARD JOHN CHENEY**, on or about March 13, 2020, in the County of Multnomah, State of Oregon, did unlawfully and intentionally and knowingly deliver METHAMPHETAMINE, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

The state further alleges that the above-described delivery involved substantial quantities of a controlled substance, consisting of 10 or more grams of a mixture or substance containing a detectable amount of METHAMPHETAMINE, its salts, isomers or salts of its isomers;

The state further alleges that the above-described delivery of METHAMPHETAMINE involved 100 grams or more of a mixture or substance containing a detectable amount of METHAMPHETAMINE, its salts, isomers, or salts of its isomers.

This count is connected together by two or more acts or transactions with the other count(s) of this charging instrument. This count is of the same and similar character as the conduct alleged in the other count(s) of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other count(s) of this charging instrument.

**COUNT 4**

**FELONY FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER**

The said Defendant(s), **RICHARD JOHN CHENEY**, on or about March 13, 2020, in the County of Multnomah, State of Oregon, being an operator of a motor vehicle upon a public highway and premises open to the public, and having been given a visible and audible signal to stop by a police officer who was in uniform and prominently displaying the police officer's badge of office, did unlawfully and knowingly, while still in the vehicle, flee and attempt to elude a pursuing police officer, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

22CR35546  
IN  
Indictment

Verified Correct Copy of Original 7/25/2022.

The said Defendant(s), RICHARD JOHN CHENEY, on or about March 13, 2020, in the County of Multnomah, State of Oregon, did unlawfully and recklessly drive a vehicle upon a public highway and premises open to the public, in a manner that endangered the safety of persons or property, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

COUNT 6

RECKLESSLY ENDANGERING ANOTHER PERSON

The said Defendant(s), RICHARD JOHN CHENEY, on or about March 13, 2020, in the County of Multnomah, State of Oregon, did unlawfully and recklessly create a substantial risk of serious physical injury to another person, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

COUNT 7

MISDEMEANOR FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER

The said Defendant(s), RICHARD JOHN CHENEY, on or about March 13, 2020, in the County of Multnomah, State of Oregon, being an operator of a motor vehicle upon a public highway and premises open to the public, and having been given a visible and audible signal to stop by a police officer who was in uniform and prominently displaying the police officer's badge of office, did get out of the vehicle and unlawfully and knowingly flee and attempt to elude the police officer, contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Oregon,

This count is connected together by two or more acts or transactions with the other counts of this charging instrument. This count is of the same and similar character as the conduct alleged in the other counts of this charging instrument. This count constitutes part of a common scheme or plan based on two or more acts or transactions with the other counts of this charging instrument.

Dated at Portland, Oregon, in the county aforesaid, on JULY 25, 2022.

Witnesses

Examined Before the Grand Jury in person (unless noted)

Zach Bohince (By Simultaneous Television Transmission)

Grand Jury Proceedings on: July 22, 2022

A TRUE BILL

[Signature] /s/ Zane Steinbrecher Foreperson of the Grand Jury

MIKE SCHMIDT (084679) District Attorney Multnomah County, Oregon

By [Signature] Deputy

Crime Classification (Def - CHENEY) B/F + B/F + B/F + C/F + A/M + A/M + A/M

AFFIRMATIVE DECLARATION

The District Attorney hereby affirmatively declares for the record, as required by ORS 161.566, upon the date scheduled for the first appearance of the defendant, and before the court asks under ORS 135.020 how the defendant pleads to the charge(s), the State's intention that any misdemeanor charged herein proceed as a misdemeanor. CODY W. LINDERHOLM OSB 194042 //jbm

Pursuant to 2005 Or Laws ch. 463 sections 1 to 7, 20(1) and 21 to 23, the State hereby provides written notice of the State's intention to rely at sentencing on enhancement facts for any statutory ground for the imposition of consecutive sentences codified under ORS 137.123 on these counts or to any other sentence which has been previously imposed or is simultaneously imposed upon this defendant.