



CLERK OF THE COURT

1 **INFM**  
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14 (I.A. 08/12/13, 9:30 A.M.)  
15  
16

9 **DISTRICT COURT**  
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA, ) Case No.: C13-291519-1  
12 )  
13 Plaintiff, ) Dept. No.: XI  
14 )  
15 v. )  
16 MARY JENNIFER AGSALUD, )  
17 )  
18 Defendant. )

17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, CATHERINE CORTEZ MASTO,  
19 Nevada Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,  
20 informs this Honorable Court that MARY JENNIFER AGSALUD, the Defendant above named,  
21 has committed the offenses of NEGLECT OF A VULNERABLE PERSON, a gross  
22 misdemeanor violation of NRS 200.5099(2)(a), 200.5099(2)(c) and 200.5092(4), all within  
23 Clark County, State of Nevada as follows:

24 At all times pertinent to this Information, Defendant operated Las Vegas Home Sweet  
25 Home (LVHSH), a housing facility located at 2615 Lindell Road, Las Vegas, Nevada.

26 **COUNT ONE**

27 **NEGLECT OF A VULNERABLE PERSON**

28 **Gross Misdemeanor - NRS 200.5099(2)(a), 200.5099(2)(c) and 200.5092(4)**

Defendant assumed the responsibility to care for a vulnerable person, including the

1 provision of food shelter, clothing or services necessary to maintain the physical or mental  
2 health of the vulnerable person. Defendant neglected the vulnerable person, causing the  
3 vulnerable person to suffer physical pain or mental suffering and/or permitted or allowed the  
4 vulnerable person to be placed in a situation where the vulnerable person may suffer physical  
5 pain or mental suffering as the result of abuse or neglect in the following manner:

6 On or about June through August 2011, Defendant assumed responsibility to care for  
7 A.I., a vulnerable person who had physical limitations that restricted his ability to perform the  
8 normal activities of daily living. Defendant admitted A.I. to LVHSH even though A.I. had  
9 medical conditions which rendered LVHSH unsuitable for A.I.'s residence there. Defendant  
10 herself provided care to A.I. at LVHSH although she lacked the requirements to be a qualified  
11 caregiver. Defendant subsequently moved A.I. to an unlicensed and unregulated personal  
12 residence, again providing care to A.I. as an unqualified caregiver. Defendant further refused  
13 to provide A.I. with his wheelchair while at the personal residence, rendering him bed-bound  
14 for approximately two weeks. Defendant also failed to provide A.I. with a shower while at the  
15 personal residence.

16 All of which constitutes a gross misdemeanor violation of NRS 200.5099(2) and  
17 200.5092(4).

18 All of which is contrary to the form, force and effect of the statutes in such cases made  
19 and provided, and against the peace and dignity of the State of Nevada. Furthermore,  
20 complainant makes this declaration subject to the penalty of perjury.

21  
22 Dated this 2<sup>nd</sup> day of August, 2013.

23 CATHERINE CORTEZ MASTO  
24 Attorney General  
25 By: Andrew Schulke  
26 ANDREW SCHULKE  
27 Sup. Senior Deputy Attorney General  
28 Medicaid Fraud Control Unit

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