



CLERK OF THE COURT

1 **INFM**  
ADAM PAUL LAXALT  
2 Attorney General  
MICHAEL C. KOVAC  
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8 **DISTRICT COURT**

9 **CLARK COUNTY, STATE OF NEVADA**

10	THE STATE OF NEVADA,	)	Case No.: C-15-305213-1
11	Plaintiff,	)	
12	v.	)	Dept. No.: 23
13	TODD ALLAN SCHWARTING, #1491021,	)	
14	Defendant(s).	)	

15 **INFORMATION**

16 Arraignment: March 30, 2015, at 1:00 PM

17 Plaintiff, THE STATE OF NEVADA, by and through its counsel, ADAM PAUL LAXALT,  
18 Attorney General, and MICHAEL C. KOVAC, Deputy Attorney General, hereby informs this Court  
19 that Defendant TODD ALLAN SCHWARTING did, in Clark County, Nevada, commit the following  
20 offense(s):

21 **COUNT ONE**

22 **UNEMPLOYMENT INSURANCE FRAUD**  
23 **(NRS 612.445 – Category C Felony)**

24 On or about August 11, 2011 through February 7, 2012, within Clark County, Nevada,  
25 Defendant TODD ALLAN SCHWARTING intentionally made and/or intentionally, directly or  
26 indirectly counseled, encouraged, hired, commanded, induced or otherwise procured another to  
27 make, false statements or representations, knowing them to be false, or knowingly fail to  
28 disclose a material fact, to the Employment Security Division of the Department of Employment,  
Training and Rehabilitation of the State of Nevada, located at 2800 East Saint Louis Avenue, Las

1 Vegas, Nevada 89104-4267, to wit: Defendant TODD ALLAN SCHWARTING had another  
2 individual inform the Employment Security Division that he (SCHWARTING) was able and  
3 available to work and failed to disclose TODD ALLAN SCHWARTING'S incarceration in the  
4 Clark County Detention Center and Nevada State Prison, in order to unlawfully obtain benefits  
5 under Chapter 612 of the Nevada Revised Statutes in the amount of \$2,500 or more.

6 All of which is contrary to the form, force and effect of the statutes in such cases made  
7 and provided, and against the peace and dignity of the State of Nevada. Said complainant  
8 makes this declaration under penalty of perjury.

9 DATED this 26th day of March, 2015.

10 ADAM PAUL LAXALT  
11 Attorney General

12 By: /s/ Michael C. Kovac  
13 MICHAEL C. KOVAC  
14 Deputy Attorney General

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