

1 **AINF**  
ADAM PAUL LAXALT  
2 Attorney General  
SAMUEL R. KERN  
3 Senior Deputy Attorney General  
Nevada Bar No. 10638  
4 555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101-1068  
5 P: (702) 486-3788  
F: (702) 486-0660  
6 SKern@ag.nv.gov  
Attorneys for Plaintiff State of Nevada

**ORIGINAL**

**FILED IN OPEN COURT**  
STEVEN D. GRIERSON  
CLERK OF THE COURT

AUG 06 2015

BY: *Carol Donahoo*  
CAROL DONAHO, DEPUTY

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,

Case No.: C-15-304810-1

11 Plaintiff,

Dept. No.: 17

12 vs.

13 LAWRENCE RONALD VALENTINE,

14 Defendant.

**SECOND AMENDED INFORMATION**

16 ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through his  
17 deputy, SAMUEL R. KERN, complains and charges that the above-named defendant,  
18 **LAWRENCE RONALD VALENTINE** (hereinafter "**VALENTINE**"), has committed one (1)  
19 count of Theft in the Amount of \$3,500 or More, a category "B" felony in violation of NRS  
20 205.0832.

21 All of the acts alleged herein have been committed on or between July 1, 2010 and  
22 October 22, 2010, by the above-named Defendant, within the County of Clark, State of  
23 Nevada, in the following manner:

**COUNT I**

**THEFT IN THE AMOUNT OF \$3,500 OR MORE**

**CATEGORY "C" FELONY - NRS 205.0832**

27 That the Defendant, **VALENTINE**, in the County of Clark, State of Nevada without  
28 lawful authority, did knowingly obtain property or services of another person by a material

1 misrepresentation with intent to deprive that person of the property or services, and the value  
2 of said property was \$3,500 or more, to wit:

3 On or about between July 1, 2010 and October 22, 2010, **VALENTINE** knowingly, and  
4 with the intent to deprive BERNARD BUSHELMAN ("BUSHELMAN"), who was 60 years of age  
5 or older at the time, of his property, misrepresented that if BUSHELMAN entrusted  
6 **VALENTINE** with approximately One Hundred and Three Thousand Dollars (\$103,000)  
7 **VALENTINE** would invest BUSHELMAN'S money in the stock market and that BUSHELMAN  
8 would share in the profits derived from those investments. Relying upon this  
9 misrepresentation, BUSHELMAN entrusted VALENTINE with approximately One Hundred  
10 and Three Thousand Dollars (\$103,000). **VALENTINE** did not invest BUSHELMAN'S money  
11 as promised, and did not return BUSHELMAN'S money.

12 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a  
13 category "B" felony, in violation NRS 205.0832.

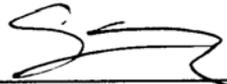
14 All of which is contrary to the form, force and effect of the statutes in such cases made and  
15 provided, and against the peace and dignity of the State of Nevada. Said complainant makes this  
16 declaration under penalty of perjury.

17 DATED this 17<sup>th</sup> day of July, 2015.

18 SUBMITTED BY

19 ADAM PAUL LAXALT  
20 Attorney General

21 By:

  
22 SAMUEL R. KERN  
23 Senior Deputy Attorney General  
24 Nevada Bar No.: 10638  
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