Office of the Attorney General 5420 Kietzke Lane, Suite 202 Reno, NV 89511

		FILED	
	ELM	O TOWNSHIP	
JUST		MUNICIPAL COL	IRT

16 JUN 27 AM II: 41

C	LE	R	K	
U	LE	ı۲.	'n	

IN THE JUSTICE COURT OF ELKO TOWNSHIP IN AND FOR ELKO COUNTY, STATE OF NEVADA

STATE OF NEVADA,		
) Case No16 CR 00736 4E) Dept. No	
Plaintiff,		
VS.)	
WADE E. FORDIN	CRIMINAL COMPLAINT	
Defendant.)	

The State of Nevada, by and through ADAM PAUL LAXALT, Attorney General, and ERIC NICKEL, Senior Deputy Attorney General, complains and charges, upon his knowledge, information and/or belief, WADE E. FORDIN, the above-named defendant, with having committed the offenses of EXPLOITATION OF AN OLDER PERSON, in violation of NRS 200.5092(2)(b) & NRS 200.5099(3)(c), and THEFT, in violation of NRS 205.0832(1)(b) & NRS 205.0835(4), within Elko Township, Elko County, State of Nevada, committed as follows:

COUNT I

EXPLOITATION OF AN OLDER PERSON

a Category B felony in violation of NRS 200.5092(2)(b) & NRS 200.5099(3)(c)

That the said defendant, WADE E. FORDIN, within Elko Township, County of Elko, State of Nevada, on or between February 26, 2012, and November 6, 2013, did knowingly and unlawfully, after having been appointed as permanent guardian of a person over 60 years of age, exploit that person by converting money, assets and/or property, with the intention of permanently depriving the older person of the ownership, use, benefit or possession of her money, assets or property, in the following manner:

WADE E. FORDIN was appointed guardian of the estate and person of HELEN MAE FORDIN, a person over the age of 60 years at the time the offense was committed, for the purpose of providing for her care, and subsequently converted and/or used approximately \$6,183.48 from the estate and/or person of HELEN MAE FORDIN for his personal expenses, with the intention of permanently depriving HELEN MAE FORDIN of the ownership, use, benefit or possession of said money, assets or property.

THEFT

a Category B felony in violation of NRS 205.0832(1)(b) & NRS 205.0835(4)

That the said defendant, WADE E. FORDIN, within Elko Township, County of Elko, State of Nevada, on or between February 26, 2012, and November 6, 2013, did unlawfully, knowingly, and without lawful authority, convert or use the property of HELEN MAE FORDIN, while said property was entrusted or placed in his possession for a limited use, said property valued in excess of \$3,500.00, in the following manner:

WADE E. FORDIN was entrusted with money as the guardian of the estate and/or person of HELEN MAE FORDIN, for the limited purpose of providing for her care, and subsequently converted and/or used approximately \$6,183.48 of said money for his personal expenses.

All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the State of Nevada.

WHEREFORE, the undersigned complainant requests that a Warrant be issued so that defendant may be hailed into Court and answer to the charges according to law.

. . . .

26 | . . .

28 | . . .

Office of the Attorney General 5420 Kietzke Lane, Suite 202 Reno, NV 89511

AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 24 day of June, 2016.

ADAM PAUL LAXALT Attorney General

By:

Senior Deputy Attorney General Nevada Bar No. 5439

Workers Compensation Fraud Unit

5420 Kietzke Lane, Suite 202

Reno, Nevada 89511 (775) 687-2120

ATTORNEY FOR THE STATE OF NEVADA