FILED

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JUSTICE OF	
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Attorneys for Plaintiff

IN THE JUSTICE COURT OF CARSON TOWNSHIP
IN AND FOR CARSON CITY, STATE OF NEVADA

STATE OF NEVADA, Plaintiff, v.) Case No. 18 CK 604671C
VICKY JO ADAMS,	
Defendant.	·)

CRIMINAL COMPLAINT

The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through TIRZAH MATHEWS, Senior Deputy Attorney General, upon her knowledge, information and/or belief, complains and charges under penalty of perjury the above-named Defendant, VICKY JO ADAMS, with having committed the following crime(s) of: THEFT OF AN OLDER PERSON, a technological crime under NRS 205A.030 and a category "B" felony, in violation of NRS 205.0832, NRS 205.0835, and NRS 193.167(1)(j); and EXPLOITATION OF AN OLDER PERSON, a technological crime under NRS 205A.030 and a Category "B" felony in violation of NRS 200.5092 and NRS 200.5099.

All of the acts alleged herein have been committed or completed on or about April 2017, to on or about December, 2017, by the above-named Defendant, within Carson City, State of Nevada, in the following manner:

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COUNT I

THEFT OF AN OLDER PERSON Category "B" Felony – NRS 205.0832, NRS 205.0835, NRS 193.167(1)(j),

and NRS 205A.030

That the defendant, VICKY JO ADAMS, within Carson City, State of Nevada, did knowingly, unlawfully, and without lawful authority, convert or use the property of another person, who is 60 years of age or older, while said property was entrusted or placed in her possession for a limited use, and said property is valued in excess of \$3,500 or more, by way of acts that involved, directly or indirectly, any component, device, equipment, system or network that, alone or in conjunction with any other component, device, equipment, system or network, is designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, to wit: On or about April 2017 to on or about December 2017, the defendant, VICKY JO ADAMS used John Lindblade's (DOB 7/12/1924) Wells Fargo bank debit card, entrusted to VICKY JO ADAMS with providing John Lindblade with cash, without his knowledge or consent, to facilitate multiple cash withdrawal transactions in the amount of \$3,500 or more by using an ATM machine in Bodine's Casino located in Carson City, Nevada, and used the funds to gamble.

COUNT II

EXPLOITATION OF AN OLDER PERSON Category "B" Felony - NRS 200.5092, NRS 200.5099(3)(c), and NRS 205A.030

That the said defendant, VICKY JO ADAMS, within Carson City, State of Nevada, did knowingly and unlawfully exploit an older person or a vulnerable person or any use of the power of attorney or guardianship of an older person or a vulnerable person over 60 years of age, by converting money, assets and/or property with a value of over \$5,000, with the intention of permanently depriving the older person of the ownership, use, benefit or

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possession of his money, assets or property, by way of acts that involved, directly or indirectly, any component, device, equipment, system or network that, alone or in conjunction with any other component, device, equipment, system or network, is designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a technological format, including, without limitation, a format that involves analog, digital, electronic, electromagnetic, magnetic or optical technology, to wit: the defendant, VICKY JO ADAMS, converted and/or used over \$5,000 obtained from an ATM machine using a Wells Fargo bank debit card belonging to John Lindblade (DOB 7/12/1924), for her personal use and not for the intended purpose of providing for the care of John Lindblade, with the intention of permanently depriving John Lindblade of the ownership, use, benefit or possession of said money, assets or property.

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.

Said complainant therefore desires that an arrest warrant be issued to the said defendant, and that he dealt with according to the law.

AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding document, CRIMINAL COMPLAINT, filed in Carson Township Justice Court, State of Nevada v. Vicky Jo Adams, does not contain the social security number of any person.

DATED this 2014 day of March, 2018.

ADAM PAUL LAXALT Attorney General

 $\mathbf{B}\mathbf{y}$

TIRZAH MATHEWS (Bar #11647 Senior Deputy Attorney General

Financial Fraud Unit

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