



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 06/19/18, 10:00 A.M.)

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

11 THE STATE OF NEVADA,	Case No. C18-332435-1
12 Plaintiff,	Dept. No. I
13 vs.	
14 CESAR ALMODAL CARUNCHO	
15 I.D. #797243,	
16 Defendant.	

17 **INFORMATION**

18 The State of Nevada, by and through legal counsel, ADAM PAUL LAXALT, Nevada
19 Attorney General, and ANDREW SCHULKE, Sup. Senior Deputy Attorney General,
20 informs this Honorable Court that CESAR ALMODAL CARUNCHO, the Defendant above
21 named, has committed the offense of: **NEGLECT OF AN OLDER PERSON**, a gross
22 misdemeanor violation of NRS 200.5092(5) and NRS 200.5099(2)(c), one (1) count, in Clark
23 County, State of Nevada, as follows:

24 **COUNT I**
25 **NEGLECT OF AN OLDER PERSON**
(NRS 200.5092(5) and 200.5099(2)(c), Gross Misdemeanor)

26 Defendant assumed the responsibility to care for an older person, including provision
27 of food, shelter, clothing or services necessary to maintain the physical or mental health of
28 an older person. Defendant neglected an older person and placed him in a situation where

1 the older person could suffer physical pain or mental suffering as a result of neglect in the
2 following manner:

3 Defendant was a caregiver at Las Vegas Alzheimer's and Memory Care Home I
4 (LVAMC) located at 3224 Brazos Street, Las Vegas, NV.

5 On or about January 24, 2016, Defendant had assumed the responsibility to provide
6 care to E.B., an elderly male over the age of 60. While performing duties as a caregiver to
7 E.B., Defendant did fail to provide cardiopulmonary resuscitation (CPR) or call for
8 emergency medical services after E.B. had stopped breathing and Defendant was not able
9 to locate a pulse for E.B. By failing to call for emergency personnel even after he witnessed
10 E.B. having respiratory distress and eventually stop breathing, Defendant placed E.B. in a
11 situation where he could be harmed.

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

15 DATED this 15th day of June, 2018.

16 ADAM PAUL LAXALT
17 Attorney General

18 By: 

19 ANDREW SCHULKE (Bar. No. 10218)
20 Sup. Senior Deputy Attorney General
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