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8 Attorneys for Plaintiff

9 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

10 IN AND FOR CARSON CITY

11 STATE OF NEVADA,

Case No. 18CR001551B

12 Plaintiff,

Dept. No. 1

13 vs.

14 VICKY JO ADAMS aka VICKY JO
LINDBLADE,

15 Defendant.

16
17 **CRIMINAL INFORMATION**

18 ADAM PAUL LAXALT, Attorney General of the State of Nevada, and TIRZAH
19 MATHEWS, Senior Deputy Attorney General, in the name and by the authority of the
20 State of Nevada, inform the above-entitled court that VICKY ADAMS aka VICKY
21 LINDBLADE, contrary to the form, force and effect of statutes in such cases made and
22 provided, and against the peace and dignity of the State of Nevada, committed the following
23 offense:

24 **COUNT I**

25 **EXPLOITATION OF AN OLDER PERSON**

26 **Category "B" Felony - NRS 200.5092, NRS 200.5099(3)(c), and NRS 205A.030**

27 That the said defendant, VICKY JO ADAMS aka VICKY JO LINDBLADE, within
28 Carson City, State of Nevada, did knowingly and unlawfully exploit an older person or a

1 vulnerable person or any use of the power of attorney or guardianship of an older person
2 or a vulnerable person over 60 years of age, by converting money, assets and/or property with
3 a value of over \$5,000, with the intention of permanently depriving the older person of the
4 ownership, use, benefit or possession of his money, assets or property, by way of acts that
5 involved, directly or indirectly, any component, device, equipment, system or network that,
6 alone or in conjunction with any other component, device, equipment, system or network,
7 is designed or has the capability to (a) be programmed; or (b) generate, process, store,
8 retrieve, convey, emit, transmit, receive, relay, record or reproduce any data, information,
9 image, program, signal or sound in a technological format, including, without limitation, a
10 format that involves analog, digital, electronic, electromagnetic, magnetic or optical
11 technology, to wit: the Defendant, VICKY JO ADAMS aka VICKY JO LINDBLADE,
12 converted and/or used over \$5,000 obtained from an ATM machine using a Wells Fargo bank
13 debit card belonging to John Lindblade (DOB 7/12/1924), for her personal use and not for the
14 intended purpose of providing for the care of John Lindblade, with the intention of
15 permanently depriving John Lindblade of the ownership, use, benefit or possession of said
16 money, assets or property.

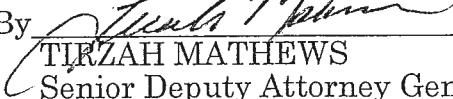
17 All of which is contrary to the form, force and effect of the statutes in such cases,
18 made and provided, and against the peace and dignity of the State of Nevada.

19 **AFFIRMATION PURSUANT TO NRS 239B.030**

20 The undersigned does hereby affirm that the preceding document, CRIMINAL
21 INFORMATION, does not contain the social security number of any person

22 DATED this 23rd day of July, 2018.

23 ADAM PAUL LAXALT
24 Attorney General

25 By 
26 TIRZAH MATHEWS
27 Senior Deputy Attorney General
28 Financial Fraud Unit