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JUSTICE COURT
LAS VEGAS NEVADA

BY _____
DEPUTY

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8 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
9 **CLARK COUNTY, STATE OF NEVADA**

10 STATE OF NEVADA,
11
12 Plaintiff,
13
14 v.
YAZZMINE CATO,
15 Defendant.

Case No.: 18F19004X
Dept. No.: 7

18F19004X
CRM
Criminal Complaint
10075490



16 **CRIMINAL COMPLAINT**

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18 ADAM PAUL LAXALT, Attorney General for the State of Nevada, complains and charges that:

19 The above-named defendant, YAZZMINE CATO, has committed the crimes of two (2) counts of
20 THEFT IN THE AMOUNT OF \$3,500 OR MORE, a technological crime under NRS 205A.030 and a
21 category "B" felony in violation of NRS 205.0832, and two (2) counts of UNLAWFUL ACTS
22 CONCERNING FEDERAL FOOD STAMPS, a category "E" felony in violation of NRS 207.340.

23 All of the acts alleged herein have been committed or completed on or between May 2017, and August
24 2017, by the above-named defendant, within the County of Clark, State of Nevada, in the following
25 manner:

26 **COUNT I**
27 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
Category "B" Felony - NRS 205.0832; 205A.030

28 Defendant, YAZZMINE CATO, in the County of Clark, State of Nevada, did without lawful

1 authority, knowingly obtain property or services of another person by a material misrepresentation with
2 intent to deprive that person of the property or services, with the value of said property being \$3,500 or
3 more, by way of acts that involved, directly or indirectly, any component, device, equipment, system or
4 network that, alone or in conjunction with any other component, device, equipment, system or network, is
5 designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit,
6 transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a
7 technological format, including, without limitation, a format that involves analog, digital, electronic,
8 electromagnetic, magnetic or optical technology, to wit: On or between May 2017, through August 2017,
9 Defendant knowingly obtained benefits from the Division of Welfare and Supportive Services (“DWSS”)
10 by fraudulently opening and/or approving Temporary Assistance for Needy Families (“TANF”) and/or
11 Supplemental Nutritional Assistance Program (“SNAP”) accounts in the name of Elisabeth Cervantes,
12 through DWSS’s computer system, in order for Defendant to personally and fraudulently collect benefits
13 from said accounts, with the value of said benefits being \$3,500 or more.

14 **COUNT II**
15 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
16 **Category "B" Felony - NRS 205.0832; 205A.030**

17 Defendant, YAZZMINE CATO, in the County of Clark, State of Nevada, did without lawful
18 authority, knowingly obtain property or services of another person by a material misrepresentation with
19 intent to deprive that person of the property or services, with the value of said property being \$3,500 or
20 more, by way of acts that involved, directly or indirectly, any component, device, equipment, system or
21 network that, alone or in conjunction with any other component, device, equipment, system or network, is
22 designed or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey, emit,
23 transmit, receive, relay, record or reproduce any data, information, image, program, signal or sound in a
24 technological format, including, without limitation, a format that involves analog, digital, electronic,
25 electromagnetic, magnetic or optical technology, to wit: On or between June 2017, through August 2017,
26 Defendant knowingly obtained benefits from DWSS by fraudulently opening and/or approving TANF
27 and/or SNAP accounts in the name of Shana Holston, through DWSS’s computer system, in order for
28 Defendant to personally and fraudulently collect benefits from said accounts, with the value of said
benefits being \$3,500 or more.

1 **COUNT III**
2 **UNLAWFUL ACTS CONCERNING FEDERAL FOOD STAMPS**
3 **Category "E" Felony - NRS 207.340**

4 Defendant, YAZZMINE CATO, in the County of Clark, State of Nevada, did without lawful
5 authority, knowingly use, transfer, sell, purchase, acquire, alter or possess food stamps, coupons,
6 certificates, or access devices (collectively "coupons") issued by the United States Department of
7 Agriculture as provided in the Food Stamp Act, and/or present or cause to be presented coupons which
8 were received, transferred or used in an unauthorized manner, with the value of said coupons being \$650
9 or more, to wit: On or between May 2017, through August 2017, Defendant knowingly used and/or
10 transferred and/or acquired and/or possessed coupons issued by the United States Department of
11 Agriculture as provided in the Food Stamp Act, by fraudulently opening and/or approving TANF and/or
12 SNAP accounts in the name of Elisabeth Cervantes, in order for Defendant to personally and fraudulently
13 collect coupons from said accounts and/or Defendant presented said coupons which she received and/or
14 transferred and/or used in an unauthorized manner, for the purpose of making personal purchases, with the
15 value of said coupons being \$650 or more.

16 **COUNT IV**
17 **UNLAWFUL ACTS CONCERNING FEDERAL FOOD STAMPS**
18 **Category "E" Felony - NRS 207.340**

19 Defendant, YAZZMINE CATO, in the County of Clark, State of Nevada, did without lawful
20 authority, knowingly use, transfer, sell, purchase, acquire, alter or possess food stamps, coupons,
21 certificates, or access devices (collectively "coupons") issued by the United States Department of
22 Agriculture as provided in the Food Stamp Act, and/or present or cause to be presented coupons which
23 were received, transferred or used in an unauthorized manner, with the value of said coupons being \$650
24 or more, to wit: On or between June 2017, through August 2017, Defendant knowingly used and/or
25 transferred and/or acquired and/or possessed coupons issued by the United States Department of
26 Agriculture as provided in the Food Stamp Act, by fraudulently opening and/or approving TANF and/or
27 SNAP accounts in the name of Shana Holston, in order for Defendant to personally and fraudulently
28 collect coupons from said accounts and/or Defendant presented said coupons which she received and/or
transferred and/or used in an unauthorized manner, for the purpose of making personal purchases, with the
value of said coupons being \$650 or more.

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

3 ***The Complainant requests an Arrest Warrant be issued at this time pursuant to NRS 171.106.***

4 That Complainant knows these crimes occurred and that the Defendant, YAZZMINE CATO, has
5 committed these crimes because Complainant is a Deputy Attorney General, and is in possession of,
6 among other things, an affidavit written by an investigator, known to Complainant to be employed with the
7 Nevada Office of the Attorney General, a copy of which is attached and incorporated by reference for the
8 limited purpose of securing a warrant of arrest.

9 Said Complainant makes this declaration under penalty of perjury.

10 DATED this 16 day of October, 2018.

11
12 SUBMITTED BY

13 ADAM PAUL LAXALT
14 Attorney General

15 By:

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17 CHELSEA KALLAS (Bar No. 13902)
18 Deputy Attorney General
19 *Attorneys for the State of Nevada*
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