



1 **INFM**
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8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,
11 Plaintiff,
12 vs.
13 SHAWNA VIRGINIA CUFF,
14 Defendant.

Case No. C-23-378773-1
Dept. No. 10

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16 **INFORMATION**

17 The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada
18 Attorney General, and BEHNAZ SALIMIAN MOLINA, Senior Deputy Attorney General,
19 informs this Honorable Court that SHAWNA VIRGINIA CUFF (CUFF), the defendant
20 above named, has committed the offense of: one (1) count of **ATTEMPTED NEGLECT OF**
21 **VULNERABLE PERSON**, a Category D Felony [NOC 60795] or Gross Misdemeanor
22 [60797] in violation of NRS 193.153(1)(a)(4), NRS 200.5092(5), and NRS 200.5099(2)(a), in
23 Clark County, Nevada.

24 Defendant committed said offense(s) in the following manner:

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1 **COUNT 1**
2 **ATTEMPTED NEGLECT OF A VULNERABLE PERSON**
3 **Category D Felony or Gross Misdemeanor – NRS 193.153(1)(a)(4),**
4 **NRS 200.5092(5), NRS 200.5099(2)(a)**

5 Defendant, while having assumed the responsibility as a manager of a facility and/or
6 voluntarily assumed the responsibility for the caring for a vulnerable person, including the
7 provision of food, shelter, clothing or services necessary to maintain the physical or mental
8 health of that vulnerable person, did attempt to fail to do so, to wit:

9 On or about June 26, 2021, Defendant CUFF, while operating a facility for the
10 dependent located at 1909 Hart Avenue, North Las Vegas, Nevada 89032, and/or
11 voluntarily assuming responsibility for the care of a vulnerable person (T.N., a person 18
12 years of age or older who suffers from a condition of physical or mental incapacitation
13 because of a developmental disability, organic brain damage or mental illness, or has one
14 or more physical or mental limitations that restrict the ability of the person to perform the
15 normal activities of daily living), including providing food, shelter, clothing, or services
16 necessary to maintain the physical or mental health of the vulnerable person, did attempt
17 to fail to provide said care by permitting or allowing a T.N. to be placed in a situation where
18 she could suffer physical pain or mental suffering as a result of abuse or neglect. Defendant
19 knowingly left the facility without a properly authorized caregiver present, thereby leaving
20 T.N. and other residents of the facility without proper oversight and protective services. In
21 Defendant's absence, the facility caught fire. T.N., who had one or more physical or mental
22 limitations that restricted T.N.'s ability to perform the normal activities of daily living, was
23 left inside the home while it was engulfed in flames and where she was trapped in a room
24 that was altered without proper permits, had no windows, and provided no means of egress.
25 Additionally, the facility failed to have requisite fire extinguishers, an evacuation plan, a
26 fire sprinkler system, emergency lighting, and exit signage.

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1 All of which was committed in Clark County, Nevada, and constitutes a Category D
2 Felony or Gross Misdemeanor in violation of NRS 193.153(1)(a)(4), NRS 200.5092(5), and
3 NRS 200.5099(2)(a).

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

7 DATED this **28th** day of **November** 2023.

8 AARON D. FORD
9 Attorney General

10 By: /s/ Behnaz Salimian Molina
11 BEHNAZ SALIMIAN MOLINA (Bar. No. 13752)
12 Senior Deputy Attorney General
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