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ADAM PAUL LAXALT  
2 Attorney General  
RONDA CLIFTON  
3 Senior Deputy Attorney General  
Nevada State Bar No. 4733  
4 5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511  
5 Telephone: (775) 687-2108  
rclifton@ag.nv.gov  
6 Attorney for Plaintiff

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8 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
9 IN AND FOR THE COUNTY OF WASHOE

10 STATE OF NEVADA, )  
11 Plaintiff, ) Case No. CR17-0401  
12 v. ) Dept. No. 3  
13 YOHANNES HABTEMICHAEL, )  
14 Defendant. )

15 **CRIMINAL INFORMATION**

16 ADAM PAUL LAXALT, Attorney General of the State of Nevada, and RONDA  
17 CLIFTON, Senior Deputy Attorney General, in the name and by the authority of the  
18 State of Nevada, inform the above-entitled court that YOHANNES HABTEMICHAEL,  
19 contrary to the form, force and effect of statutes in such cases made and provided and  
20 against the peace and dignity of the State of Nevada, committed the following  
21 offenses:

22 **COUNT I**  
23 **EXPLOITATION OF AN OLDER PERSON**  
**Category "B" Felony - NRS 200.5092(3)(b), NRS 200.5092(6), and NRS 200.5099(3)(c)**

24 That the said defendant, YOHANNES HABTEMICHAEL, within Washoe County, State of  
25 Nevada, on or about August 19, 2014, to on or about November 30, 2015, did knowingly and  
26 unlawfully, after having been appointed as guardian of a person over 60 years of age, exploit that  
27 person by converting money, assets and/or property with a value of over \$5,000, with the intention

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1 of permanently depriving the older person of the ownership, use, benefit or possession of his  
2 money, assets or property, in the following manner:

3 YOHANNES HABTEMICHAEL was appointed guardian of the estate and person of  
4 Tewolde Habtemicael, a person over the age of 60 years at the time the offense was committed, for  
5 the purpose of providing for his care. Subsequently, YOHANNES HABTEMICHAEL converted  
6 and/or used over \$5,000 from the estate and/or person of Tewolde Habtemicael for his personal use  
7 and not for the purpose of providing for the care of Tewolde Habtemicael, with the intention of  
8 permanently depriving Tewolde Habtemicael of the ownership, use, benefit or possession of said  
9 money, assets or property.

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

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

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

15 DATED this 15th day of March, 2017.

16 ADAM PAUL LAXALT  
17 Attorney General

18 By: /s/ Ronda Clifton  
19 RONDA CLIFTON  
20 Senior Deputy Attorney General  
21 Fraud Unit  
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