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7 Attorneys for Plaintiff

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

11 STATE OF NEVADA,
12 Plaintiff,

Case No. CR17-1594
Dept. No. 7

13 v.

14 NICHOLE MARIE FERREL,
15 Defendant.

16 **CRIMINAL INFORMATION**

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

22 **COUNT I**

23 **UNLAWFUL ACTS CONCERNING FEDERAL FOOD STAMPS**
24 **Category "E" Felony - NRS 207.340**

25 That the defendant, NICHOLE MARIE FERREL, from on or about March 12,
26 2014, to on or about December 28, 2016, within Washoe County, State of Nevada, did
27 unlawfully and without authority to do so, use, acquire, or possess food stamps,
28 coupons, certificates, or access devices (collectively "coupons") issued by the United

1 States Department of Agriculture as provided in the Food Stamp Act and/or knowingly
2 present coupons which were received, transferred or used in an unauthorized manner,
3 the value of said coupons being \$650.00 or more, to wit: That on or about March 12,
4 2014, September 8, 2014, March 2, 2015, August 17, 2015, February 16, 2016, and
5 August 28, 2016, NICHOLE MARIE FERREL did submit applications for assistance to
6 the Nevada Division of Welfare and Supportive Services (DWSS) seeking benefits from
7 the Supplemental Nutrition Assistance Program (SNAP). On those applications and/or
8 during conversations with representatives of DWSS, NICHOLE MARIE FERREL
9 deliberately and knowingly omitted the fact that she was residing with Jesse Hammes
10 (the father of two of her three children) and that he was receiving income pursuant to
11 his full-time employment, and/or that she was receiving income from employment. As a
12 result of these fraudulent applications and/or misrepresentations, from on or about
13 March 12, 2014, through December 28, 2016, NICHOLE MARIE FERREL was issued
14 overpayments of SNAP benefits in an amount over \$20,000.00 for which she was not
15 eligible.

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

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

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

21 DATED this 5th day of October, 2017.

22 ADAM PAUL LAXALT
23 Attorney General

24 By: /s/ Ronda Clifton
25 RONDA CLIFTON
26 Senior Deputy Attorney General
27 Financial Fraud Unit
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