

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

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


15 Said complainant therefore desires that an arrest warrant be issued to the said
16 defendant, and that he dealt with according to the law.

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

18 The undersigned does hereby affirm that the preceding document, CRIMINAL
19 COMPLAINT, filed in Carson Township Justice Court, State of Nevada v. Vicky Jo Adams,
20 does not contain the social security number of any person.

21 DATED this 20th day of March, 2018.

22 ADAM PAUL LAXALT
23 Attorney General

24 By: 
25 TIRZAH MATHEWS (Bar #11647)
26 Senior Deputy Attorney General
27 Financial Fraud Unit
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