

1 Case No. 18-0510CR

FILED

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NO. 18-0510CR

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EAST FORK JUSTICE COURT

BY mg

6 IN THE JUSTICE COURT OF EAST FORK TOWNSHIP

7 IN AND FOR THE COUNTY OF DOUGLAS, STATE OF NEVADA

8 STATE OF NEVADA,

9 Plaintiff,

10 vs.

CRIMINAL COMPLAINT

11 SHERI HINES,

12 Defendant.

13 The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada,
 14 by and through TIRZAH MATHEWS, Senior Deputy Attorney General, upon her
 15 knowledge, information and/or belief, complains and charges under penalty of perjury the
 16 above-named Defendant, SHERI HINES, with having committed the following crimes of:
 17 THEFT OF AN OLDER PERSON, a technological crime under NRS 205A.030, and a
 18 category "B" felony in violation of NRS 205.0832, NRS 205.0835, and NRS 193.167;
 19 EMBEZZLEMENT OF AN OLDER PERSON, a technological crime under NRS 205A.030,
 20 and a category B felony in violation of NRS 205.300 and NRS 193.167(1)(b); and
 21 EXPLOITATION OF AN OLDER PERSON, a technological crime under NRS 205A.030,
 22 and a Category "B" felony in violation of NRS 200.5092 and NRS 200.5099. All of the acts
 23 alleged herein have been committed or completed on or about January 2017 to on or about
 24 June 2017, by the above-named Defendant, within Douglas County, State of Nevada, in the
 25 following manner:

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1 COUNT I

2 **THEFT OF AN OLDER PERSON**

3 **Category "B" Felony – NRS 205.0832, NRS 205.0835, NRS 193.167,**
4 **and NRS 205A.030**

5 That the defendant, SHERI HINES, within the County of Douglas, State of Nevada,
6 did knowingly, unlawfully, and without lawful authority, convert or use the property of
7 another person, who is 60 years of age or older, while said property was entrusted or placed
8 in her possession for a limited use, and said property is valued in excess of \$3,500 or more, by
9 way of acts that involved, directly or indirectly, any component, device, equipment, system
10 or network that, alone or in conjunction with any other component, device, equipment,
11 system or network, is designed or has the capability to (a) be programmed; or (b) generate,
12 process, store, retrieve, convey, emit, transmit, receive, relay, record or reproduce any data,
13 information, image, program, signal or sound in a technological format, including, without
14 limitation, a format that involves analog, digital, electronic, electromagnetic, magnetic or
15 optical technology, to wit: On or about January 2017 to on or about June 2017, the defendant,
16 SHERI HINES, used Sharon Mayes' (DOB 9/27/1943) U.S. Bank debit card, entrusted to
17 SHERI HINES for providing for care and assistance for Sharon Mayes, without her
18 knowledge or consent, to facilitate multiple cash withdrawal transactions in an amount
19 totaling \$3,500 or more by using ATM machines in Wa She Shu Casino and/or Sharkey's
20 Casino located in Douglas County, Nevada, and used the funds for personal use.

21 COUNT II

22 **EMBEZZLEMENT OF AN OLDER PERSON**

23 **Category "B" Felony - NRS 205.300, NRS 193.167, and NRS 205A.030**

24 That the Defendant, SHERI HINES, within the County of Douglas, State of Nevada,
25 as a person with whom money, property or effects had been entrusted, did use or
26 appropriate the money, property or effects or any part thereof in any manner or for any
27 other purpose than that for which they were entrusted, said money, property or effects
28 belonging to a person who was 60 years of age or older and having a value in excess of

1 \$3,500, by way of acts that involved, directly or indirectly, any component, device,
2 equipment, system or network that, alone or in conjunction with any other component,
3 device, equipment, system or network, is designed or has the capability to (a) be
4 programmed; or (b) generate, process, store, retrieve, convey, emit, transmit, receive, relay,
5 record or reproduce any data, information, image, program, signal or sound in a
6 technological format, including, without limitation, a format that involves analog, digital,
7 electronic, electromagnetic, magnetic or optical technology, to wit: On or about January
8 2017 to on or about June 2017, the Defendant, having been entrusted with the checkbook
9 and/or debit card for a bank account belonging to Sharon Mayes (DOB 9/27/1943) for the
10 purpose of paying Sharon Mayes' bills and/or providing for her care and comfort, did use or
11 appropriate \$3,500 or more from Sharon Mayes' bank accounts by using ATM machines in
12 Wa She Shu Casino and/or Sharkey's Casino located in Douglas County, Nevada, and used
13 the funds for purposes other than paying Sharon Mayes' bills and/or providing for her care
14 and comfort.

15 COUNT III

16 **EXPLOITATION OF AN OLDER PERSON**

17 **Category "B" Felony - NRS 200.5092, NRS 200.5099(3)(c), and NRS 205A.030**

18 That the said defendant, SHERI HINES, within Douglas County, State of Nevada, did
19 knowingly and unlawfully exploit an older person or a vulnerable person or any use of the
20 power of attorney or guardianship of an older person or a vulnerable person over 60 years
21 of age, by converting money, assets and/or property with a value of over \$5,000, with the
22 intention of permanently depriving the older person of the ownership, use, benefit or
23 possession of her money, assets or property, by way of acts that involved, directly or
24 indirectly, any component, device, equipment, system or network that, alone or in
25 conjunction with any other component, device, equipment, system or network, is designed
26 or has the capability to (a) be programmed; or (b) generate, process, store, retrieve, convey,
27 emit, transmit, receive, relay, record or reproduce any data, information, image, program,
28 signal or sound in a technological format, including, without limitation, a format that

1 involves analog, digital, electronic, electromagnetic, magnetic or optical technology, to wit:
2 the defendant, SHERI HINES, converted and/or used over \$5,000 obtained from an ATM
3 machine using a U.S. Bank debit card belonging to Sharon Mayes (DOB 9/27/1943), for her
4 personal use and not for the intended purpose of providing for the care of Sharon Mayes, with
5 the intention of permanently depriving Sharon Mayes of the ownership, use, benefit or
6 possession of said money, assets or property.

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


9 Said complainant therefore desires that an arrest warrant be issued to the said
10 defendant, and that she be dealt with according to the law.

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

12 The undersigned does hereby affirm that the preceding document does not contain
13 the social security number of any person.

14 DATED this 18th day of May, 2018.

15 ADAM PAUL LAXALT
16 Attorney General

17 By: 
18 TIRZAH MATHEWS (Bar #11647)
19 Senior Deputy Attorney General
20 Financial Fraud Unit
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