

1 **INFM**  
2 AARON D. FORD  
3 Attorney General  
4 CHELSEA KALLAS (Bar No. 13902)  
5 Senior Deputy Attorney General  
6 Office of the Attorney General  
7 555 E. Washington Ave., Ste. 3900  
8 Las Vegas, Nevada 89101-1068  
9 P: (702) 486-5707  
10 F: (702) 486-3768  
11 Ckallas@ag.nv.gov  
12 *Attorneys for the State of Nevada*

13 **DISTRICT COURT**  
14 **CLARK COUNTY, NEVADA**

15 STATE OF NEVADA,  
16  
17 Plaintiff,  
18  
19 v.

Case No.: C-21-354236-1  
Dept. No.: XII

20 EUSTACHIUS BURSEY #7028533,  
21 aka Stacey Brandon Shell,  
22 aka Stacey Shell,  
23 aka Stacy Shell,  
24 aka Sema J. Holai,  
25 aka Brian Williams,  
26 aka Kainielle Williams,  
27 aka Jamal Demarcus Flint,  
28 Defendant.

**INFORMATION**

AARON D. FORD, Attorney General for the State of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

The above-named defendant, EUSTACHIUS BURSEY, has committed the crimes of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category “B” felony in violation of NRS 205.0832; OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER, a category “B” felony in violation of NRS 205.463; UNLAWFUL ACTS CONCERNING FEDERAL FOOD STAMPS, a category “E” felony in violation of NRS 207.340; and MULTIPLE TRANSACTIONS

///

1 INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category  
2 “B” felony, in violation of NRS 205.377.

3 All of the acts alleged herein have been committed or completed on or between August 2016 and  
4 May 2019, by the above-named defendant, within the County of Clark, State of Nevada, in the following  
5 manner:

6 **COUNT 1**  
7 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**  
8 **Category "B" Felony - NRS 205.0832**

9 Defendant, EUSTACHIUS BURSEY, did on or between August 2016 through May 2019, without  
10 lawful authority, knowingly obtain property or services of another person by a material misrepresentation  
11 with intent to deprive that person of the property or services, with the value of said property being \$3,500,  
12 to wit: Defendant knowingly obtained benefits from the Division of Welfare and Supportive Services  
13 (“DWSS”) by fraudulently applying for Supplemental Nutritional Assistance Program (“SNAP”) and/or  
14 Family Medical Coverage (“MEDICAID”) benefits in the name of ANTONIO HENDERSON and/or  
15 REGINALD RICHIE and/or CARLOS HURSE and/or MICHAEL MCDONALD and/or MICHAEL  
16 KNORP and/or DESEAN MOORE and/or STANLEY GORSUCH and/or RONALD GIBSON and/or  
17 DUESQUENE GARRETT and/or KATREETA HEWITT and/or TINA HALEY and/or WINTER  
18 COOPER and/or JAYLIANE KEITH, in order for Defendant to personally and fraudulently collect said  
19 benefits, with the value of said benefits being \$3,500 or more.

20 **COUNT 2**  
21 **OBTAINING AND USING PERSONAL IDENTIFYING INFORMATION OF ANOTHER**  
22 **Category "B" Felony - NRS 205.463**

23 Defendant, EUSTACHIUS BURSEY, did on or between August 2016 through May 2019,  
24 knowingly, obtain personal identifying information of another person, to wit: ANTONIO HENDERSON  
25 and/or REGINALD RICHIE and/or CARLOS HURSE and/or MICHAEL MCDONALD and/or  
26 MICHAEL KNORP and/or DESEAN MOORE and/or STANLEY GORSUCH and/or RONALD  
27 GIBSON and/or DUESQUENE GARRETT and/or KATREETA HEWITT and/or TINA HALEY and/or  
28 WINTER COOPER and/or JAYLIANE KEITH; and did use said identifying information for any  
unlawful purpose, including without limitation, the obtaining of credit, goods, services or anything of  
value in the name of said person, to wit: by using ANTONIO HENDERSON’s and/or REGINALD

1 RICHIE's and/or CARLOS HURSE's and/or MICHAEL MCDONALD's and/or MICHAEL KNORP's  
2 and/or DESEAN MOORE's and/or STANLEY GORSUCH's and/or RONALD GIBSON's and/or  
3 DUESQUENE GARRETT's and/or KATREETA HEWITT's and/or TINA HALEY's and/or WINTER  
4 COOPER's and/or JAYLIANE KEITH's personal information to fraudulently apply for SNAP and/or  
5 MEDICAID benefits, in order for Defendant to personally and fraudulently collect said benefits.

6 **COUNT 3**  
7 **UNLAWFUL ACTS CONCERNING FEDERAL FOOD STAMPS**  
8 **Category "E" Felony - NRS 207.340**

9 Defendant, EUSTACHIUS BURSEY, did on or between August 2016 through May 2019, without  
10 lawful authority, knowingly use, transfer, sell, purchase, acquire, alter or possess food stamps, coupons,  
11 certificates, or access devices (collectively "coupons") issued by the United States Department of  
12 Agriculture as provided in the Food Stamp Act, and/or present or cause to be presented coupons which  
13 were received, transferred or used in an unauthorized manner, with the value of said coupons being \$650  
14 or more, to wit: Defendant knowingly used and/or transferred and/or sold and/or acquired and/or  
15 possessed coupons issued by the United States Department of Agriculture as provided in the Food Stamp  
16 Act, by fraudulently applying for SNAP benefits in the name of ANTONIO HENDERSON and/or  
17 REGINALD RICHIE and/or CARLOS HURSE and/or MICHAEL MCDONALD and/or MICHAEL  
18 KNORP and/or DESEAN MOORE and/or STANLEY GORSUCH and/or RONALD GIBSON and/or  
19 DUESQUENE GARRETT and/or KATREETA HEWITT and/or TINA HALEY and/or WINTER  
20 COOPER and/or JAYLIANE KEITH, in order for Defendant to personally and fraudulently collect  
21 coupons and/or Defendant presented and/or caused to be presented said coupons which he received and/or  
22 transferred and/or used in an unauthorized manner, with the value of said coupons being \$650 or more.

23 **COUNT 4**  
24 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**  
25 **ENTERPRISE OR OCCUPATION**  
26 **Category "B" Felony - NRS 205.377**

27 Defendant, EUSTACHIUS BURSEY, did on or between August 2016 through May 2019, in the  
28 course of an enterprise or occupation, knowingly and with the intent to defraud, engaged in an act,  
practice or course of business or employed a device, scheme or artifice which operated or would have  
operated as a fraud or deceit upon a person by means of a false representation or omission of a material

1 fact that: (a) the person knew to be false or omitted; (b) the person intended another to rely on; and (c)  
2 resulted in a loss to any person who relied on the false representation or omission, in at least two  
3 transactions that had the same or similar pattern, intents, results, accomplices, victims or methods of  
4 commission, or were otherwise interrelated by distinguishing characteristics and were not isolated  
5 incidents within 4 years and in which the aggregate loss or intended loss was more than \$650, to wit:  
6 Defendant knowingly and with the intent to defraud, engaged in a scheme in order to obtain benefits from  
7 DWSS, in which the loss and/or intended loss was more than \$650, by Defendant committing the acts as  
8 set forth in Counts 1-3, said acts being incorporated by this reference as though fully set forth herein.

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

11 DATED this 11<sup>th</sup> day of March, 2021.

12 SUBMITTED BY

13 AARON D. FORD  
14 Attorney General

15 By: /s/ Chelsea Kallas  
16 CHELSEA KALLAS (Bar No. 13902)  
17 Senior Deputy Attorney General  
18 *Attorneys for the State of Nevada*  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28