

JUSTICE COURT OF HENDERSON TOWNSHIP
IN AND FOR THE COUNTY OF CLARK, STATE OF NEVADA

2001 MAY 29 A 3 12

STATE OF NEVADA,

Plaintiff,

REBECCA KAYE GOODMAN, aka
REBECCA GOODMAN YOWELL
ID# #0963807

Defendant.

CASE NO. 01F112180X

DEPT NO. 2

CRIMINAL COMPLAINT

Date of Hearing: 06/04/01
Time of Hearing: 9:00 a.m.

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

Personally appeared before the undersigned notary public this _____ day of _____, 2001, April Lavergne, an Investigator for the Office of the Attorney General, Medicaid Fraud Control Unit, who being first duly sworn and within her knowledge, information, and belief, complains and charges REBECCA KAYE GOODMAN aka REBECCA GOODMAN YOWELL (hereinafter YOWELL), the above named Defendant with having committed the offense of:

1. NEGLECT of an OLDER PERSON, one count, a Felony in violation of NRS 200.5099(2) and (7) and NRS 200.5092(4).

Said offense committed in the following manner to wit:

COUNT I (Felony—Class B)
NEGLECT of an OLDER PERSON
NRS 200.5092(4), 200.5099(2) and (7) penalty

That within her knowledge, information, and belief, YOWELL, a professional caretaker who had assumed responsibility, legally, voluntarily, or pursuant to a contract to care for an older person, Helen H. age 90, acted unreasonably with knowledge or with reason to have known that her actions or omissions neglected the older person causing her to suffer substantial bodily harm; or permitted or allowed the older person to suffer substantial bodily harm in the following matter:

At all times stated herein, YOWELL was a licensed practical nurse and a contractually paid caregiver/companion of Ms. H. and YOWELL resided with Ms. H. at 701 Aspen Peak Loop, No.

Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

1 2611, Henderson, Clark County, Nevada.

2 At all times stated herein, YOWELL agreed with relatives of Ms. H to provide said care and
3 companionship for the amount of \$1,400 per month. The care provided included the services of meals,
4 shelter, basic hygiene and other services necessary to maintain Ms. H's physical or mental health.

5 During April and May 2000, Ms. H developed a pressure ulcer on her coccyx. Defendant
6 acted without a physician's order and attempted to treat the pressure ulcer. On May 3, 2000,
7 approximately eight (8) days from the onset of the pressure ulcer, Ms. H was transported to St. Rose
8 Dominican Hospital, emergency admissions. At the hospital, she was noted to have electrolyte
9 abnormalities, dehydration and sepsis. Hospital staff also discovered the pressure ulcer had developed
10 to "Stage IV" status with eschar and foul odor, while Proteus Mirabilis and Bacteroides bacteria were
11 noted in her urine and blood cultures. The pressure ulcer had developed through the skin, the
12 underlying tissue, had reached the bone, and approximated 4 centimeters in length and width.

13 The pressure ulcer caused substantial bodily harm as Ms. H suffered prolonged physical pain
14 during its cleanings; and serious impairment of the basic functions of her skin, nervous system, muscles
15 and or tissues and circulatory systems. The pressure ulcer was causing permanent scarring and
16 disfigurement.

17 Defendant knew or should have known that her treatment of the pressure ulcer without
18 physician's orders was contrary to the Nevada State Board of Nursing's Nurse Practice Act. Defendant
19 knew or should have known that her provision of care for Ms. H without proper licensure was
20 contrary to the requirements of NRS 449.249.

21 All of which constitutes a felony offense of NEGLECT of an OLDER PERSON in violation of
22 NRS 200.5099(2) and (7), and 200.5092 (4).

23 All of which is contrary to the form, force and effects of the statutes in such cases made and
24 provided, against the peace and dignity of the State of Nevada.

25 An arrest warrant was issued on April 16, 2001 for the appearance of Defendant REBECCA
26 KAYE GOODMAN aka REBECCA GOODMAN YOWELL and she was arrested on April 16, 2001.
27 and appeared in the Las Vegas Township Justice Court (case # 01F06294X).

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1 She is currently out on bail for this underlying offenses, posted April 22, 2001 and is awaiting
2 her initial appearance on June 4, 2001, 9:00 a.m. in Henderson Township Justice Court.

3 Said Complainant therefore prays that upon her appearance Defendant be dealt with according
4 to law.

5 Dated this 25th day of May, 2001.

6 By: April Avergne
7 April Avergne
8 Investigator

9 SUBSCRIBED and SWORN to before me this

10 25th day of May, 2001.

11
12 Maria Denise Reiff
13 Notary Public in and for the County of
14 Clark, State of Nevada

15 SUBMITTED BY:
16 FRANKIE SUE DEL PAPA
17 Attorney General

18 By: Mark Kemberling
19 Mark Kemberling
20 Deputy Attorney General
21 Bar No. 5388
22 555 E. Washington Ave., #3900
23 Las Vegas, Nevada 89101
24 (702) 486-3420

25
26 Justice Court # 01FH2180X

27 TRK 2

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