

filed date:
Justice Court
Las Vegas Township
April 28, 2005
Clark County, Nevada

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8 JUSTICE COURT, LAS VEGAS TOWNSHIP
9 CLARK COUNTY, NEVADA

10 STATE OF NEVADA,)
Plaintiff,)
11 vs.)
12 IRMA CHIANG RAFAEL)
ID# 1610715)
13 Defendant.)

Case No. 05F07216X
Dept. No. 7

CRIMINAL COMPLAINT

14 State of Nevada)
15 County of Clark) ss

16 Personally appeared before the undersigned notary this 19 day of April, 2005, Colin
17 Haynes, Investigator, Nevada Department of Justice, Office of the Attorney General –
18 Medicaid Fraud Control Unit, who being first duly sworn and within his knowledge, information
19 and belief, complains and charges defendant with having committed the offenses of:

- 20 a.) Neglect of an Older Person Resulting in Death, a violation of NRS 200.5099(2)
21 and (7), 200.5092(4), one (1) count; and
- 22 b.) Involuntary Manslaughter, a violation of NRS 200.070, 200.090, one (1) count.

23 Said offenses committed in Clark County, Nevada on or about March 20, 2004, to wit:

24 COUNT 1
25 NEGLECT OF AN OLDER PERSON – RESULTING IN DEATH
26 Category B Felony - NRS 200.5099(2) and (7), 200.5092(4)

27 Defendant did then and there, while having assumed the responsibility of caring for an
28 older person, including the provision of food, shelter, clothing or services necessary to

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1 Defendant did then and there, while having assumed the responsibility of caring for an
2 older person, including the provision of food, shelter, clothing or services necessary to
3 maintain the physical or mental health of that older person did fail to do so in the following
4 manner:

5 Defendant, while operating a housing facility located at 3036 Holly Hill Avenue, Las
6 Vegas, Nevada, knowingly left the facility without a properly authorized care giver present;
7 thereby neglecting to provide proper oversight and protective services, when a fire broke out
8 proximately causing the death of a facility resident K.R., a person over the age of sixty (60)
9 years.

10 All of which constitutes a Felony violation of NRS 200.5099(2) and (7), 200.5092(4).

11
12 **COUNT 2**
13 **INVOLUNTARY MANSLAUGHTER**
14 **Category D Felony - NRS 200.070, 200.090**

15 Defendant did then and there, while operating a housing facility located at 3036 Holly
16 Hill Avenue, Las Vegas, Nevada, unlawfully and feloniously kill Warren M., a human being,
17 without any intent so to do in the commission of a lawful act in the following unlawful manner:

18 Defendant knowingly left the facility without a properly authorized care giver present,
19 and without proper oversight services, when a fire broke out, proximately causing the death of
20 a facility resident, Warren M.

21 All of which constitutes a Felony violation of NRS 200.070, 200.090.

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

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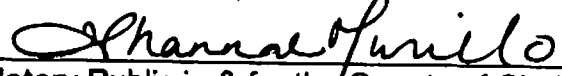
1 Complainant therefore respectfully requests that a warrant be issued for the arrest and
2 appearance of Irma Chiang Rafael, and that she be dealt with according to the laws of the
3 State of Nevada.

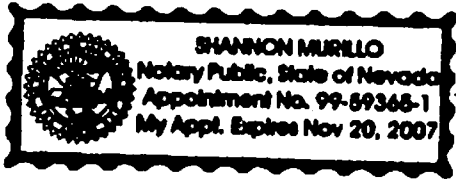
4 DATED this 19 day of April, 2005.

5 BRIAN SANDOVAL
6 Attorney General

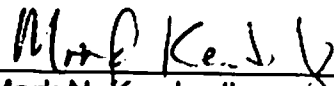
7 By: 
8 Colin Haynes, Investigator

9 Subscribed & Sworn to before me this
10 19 day of April, 2005

11 
12 Notary Public in & for the County of Clark,
State of Nevada



13 Submitted by:
14 BRIAN SANDOVAL
15 Attorney General

16 
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18 Sr. Deputy
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