

Case No. 19 CR 00069-B

LEA Case No(s). 19NY-0132

FILED
BEATTY JUSTICE COURT

2019 AUG -6 AM 11: 35

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IN THE JUSTICE COURT OF BEATTY TOWNSHIP

COUNTY OF NYE, STATE OF NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

CRIMINAL COMPLAINT

**PATRICIA LYNN CHAPPUIS; and
MARCEL CLAUDE CHAPPUIS,**

Defendants.

The undersigned, CHRIS ARABIA, District Attorney, County of Nye, State of Nevada, by and through his deputy, Patrick A. Ferguson, complains and charges the above-named defendants, **PATRICIA LYNN CHAPPUIS** and **MARCEL CLAUDE CHAPPUIS**, with having committed the following offenses within said County of Nye, State of Nevada:

COUNT I

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said

1 children, specifically A.J. (16-17 years of age), with sufficient potable
2 water and/or by failing to ensure that said child was not able to ingest
3 unsafe tap water; and/or by failing to adequately screen and supervise
4 the faculty and/or staff of the Northwest Academy, to protect said child
5 from physical pain and/or mental suffering inflicted by said faculty and/or
6 staff via physical and/or verbal abuse;

7 **COUNT II**

8 **CHILD ABUSE OR NEGLECT**, in violation of **NRS 200.508(1)(b)(1), A**
9 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
10 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
11 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
12 Defendants, and each of them, did willfully and unlawfully cause the
13 children enrolled at the Northwest Academy, located at 1492 South
14 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
15 mental suffering as a result of abuse or neglect or to be placed in a
16 situation where said child may have suffered physical pain or mental
17 suffering as the result of abuse or neglect, by: failing to provide said
18 children, specifically K.M. (13-14 years of age), with sufficient potable
19 water and/or by failing to ensure that said child was not able to ingest
20 unsafe tap water; and/or by failing to adequately screen and supervise
21 the faculty and/or staff of the Northwest Academy, to protect said child
22 from physical pain and/or mental suffering inflicted by said faculty and/or
23 staff via physical and/or verbal abuse;

24 **COUNT III**

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A**
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
FEBRUARY 12, 2019, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically A.F. (14-15 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

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COUNT IV

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **R.K.** (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT V

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **Z.W.** (13-14 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT VI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically A.J. (12-13 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT VII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically J.M. (14-15 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT VIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically D.S. (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT IX

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **Q.L.** (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT X

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **K.G.** (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically S.M. (11-12 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT XII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically A.Y. (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT XIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically T.G. (14-15 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XIV

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **S.K.** (13-14 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XV

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **M.L.** (14-15 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XVI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically A.M. (16-17 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT XVII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically Z.H. (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT XVIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically T.L. (14-15 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XIX

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **S.A.** (11-13 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XX

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **K.B.** (16-17 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XXI

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically K.G. (14-16 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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11 **COUNT XXII**

12 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
13 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
14 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
15 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
16 Defendants, and each of them, did willfully and unlawfully cause the
17 children enrolled at the Northwest Academy, located at 1492 South
18 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
19 mental suffering as a result of abuse or neglect or to be placed in a
20 situation where said child may have suffered physical pain or mental
21 suffering as the result of abuse or neglect, by: failing to provide said
22 children, specifically N.L. (15-16 years of age), with sufficient potable
23 water and/or by failing to ensure that said child was not able to ingest
24 unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

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16 **COUNT XXIII**

17 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
18 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
19 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
20 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
21 Defendants, and each of them, did willfully and unlawfully cause the
22 children enrolled at the Northwest Academy, located at 1492 South
23 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
24 mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically A.T. (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXIV

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY, committed in the following manner, to wit: That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **S.G.** (14-15 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XXV

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY, committed in the following manner, to wit: That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **M.S.** (15-16 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XXVI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY, committed in the following manner, to wit: That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically C.T. (16-17 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT XXVII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically D.M. (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT XXVIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically J.D. (12-13 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXIX

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **J.S.** (11-12 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXX

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically **X.J.** (13-14 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXXI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically K.K. (14-15 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT XXXII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically A.H. (13-14 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT XXXIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically E.L. (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXXIV

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **L.O.** (16-17 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XXXV

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **A.F.** (15-16 years of age, female), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XXXVI

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically A.F. (15-16 years of age, male), with sufficient
4 potable water and/or by failing to ensure that said child was not able to
5 ingest unsafe tap water; and/or by failing to adequately screen and
6 supervise the faculty and/or staff of the Northwest Academy, to protect
7 said child from physical pain and/or mental suffering inflicted by said
8 faculty and/or staff via physical and/or verbal abuse;

6 **COUNT XXXVII**

7 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
8 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
9 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
10 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
11 Defendants, and each of them, did willfully and unlawfully cause the
12 children enrolled at the Northwest Academy, located at 1492 South
13 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
14 mental suffering as a result of abuse or neglect or to be placed in a
15 situation where said child may have suffered physical pain or mental
16 suffering as the result of abuse or neglect, by: failing to provide said
17 children, specifically D.T. (13-14 years of age), with sufficient potable
18 water and/or by failing to ensure that said child was not able to ingest
19 unsafe tap water; and/or by failing to adequately screen and supervise
20 the faculty and/or staff of the Northwest Academy, to protect said child
21 from physical pain and/or mental suffering inflicted by said faculty and/or
22 staff via physical and/or verbal abuse;

15 **COUNT XXXVIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically E.R. (11-12 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XXXIX

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically J.H. (11-12 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XL

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a
situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically J.R. (16-17 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XLI

CHILD ABUSE OR NEGLECT, in violation of NRS 200.508(1)(b)(1), A
CATEGORY 'B' FELONY, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND
FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
Defendants, and each of them, did willfully and unlawfully cause the
children enrolled at the Northwest Academy, located at 1492 South
Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
mental suffering as a result of abuse or neglect or to be placed in a

1 situation where said child may have suffered physical pain or mental
2 suffering as the result of abuse or neglect, by: failing to provide said
3 children, specifically M.P. (15-16 years of age), with sufficient potable
4 water and/or by failing to ensure that said child was not able to ingest
5 unsafe tap water; and/or by failing to adequately screen and supervise
6 the faculty and/or staff of the Northwest Academy, to protect said child
7 from physical pain and/or mental suffering inflicted by said faculty and/or
8 staff via physical and/or verbal abuse;

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15 **COUNT XLII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically M.W. (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

15 **COUNT XLIII**

16 **CHILD ABUSE OR NEGLECT**, in violation of NRS 200.508(1)(b)(1), A
17 **CATEGORY 'B' FELONY**, committed in the following manner, to wit:
18 That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND**
19 **FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said
20 Defendants, and each of them, did willfully and unlawfully cause the
21 children enrolled at the Northwest Academy, located at 1492 South
22 Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or
23 mental suffering as a result of abuse or neglect or to be placed in a
24 situation where said child may have suffered physical pain or mental
suffering as the result of abuse or neglect, by: failing to provide said
children, specifically Q.S. (15-16 years of age), with sufficient potable
water and/or by failing to ensure that said child was not able to ingest
unsafe tap water; and/or by failing to adequately screen and supervise
the faculty and/or staff of the Northwest Academy, to protect said child
from physical pain and/or mental suffering inflicted by said faculty and/or
staff via physical and/or verbal abuse;

COUNT XLIV

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **S.B.** (15-16 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

COUNT XLV

CHILD ABUSE OR NEGLECT, in violation of **NRS 200.508(1)(b)(1), A CATEGORY 'B' FELONY**, committed in the following manner, to wit:
That **ON, ABOUT OR BETWEEN FEBRUARY 9, 2018, AND FEBRUARY 12, 2019**, in Beatty Township, Nye County, Nevada, said Defendants, and each of them, did willfully and unlawfully cause the children enrolled at the Northwest Academy, located at 1492 South Highway 373 in Amargosa Valley, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where said child may have suffered physical pain or mental suffering as the result of abuse or neglect, by: failing to provide said children, specifically **W.W.** (15-16 years of age), with sufficient potable water and/or by failing to ensure that said child was not able to ingest unsafe tap water; and/or by failing to adequately screen and supervise the faculty and/or staff of the Northwest Academy, to protect said child from physical pain and/or mental suffering inflicted by said faculty and/or staff via physical and/or verbal abuse;

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1 All of which is contrary to the form, force and effect of the statutes in such cases
2 made and provided, and against the peace and dignity of the State of Nevada. Said
3 complainant makes this declaration under penalty of perjury.

4 **DATED** this 2nd day of August, 2019.

5 **CHRIS ARABIA**
6 **NYE COUNTY DISTRICT ATTORNEY**

7
8 By 
9 **PATRICK A. FERGUSON**
10 Deputy District Attorney

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NYE COUNTY DISTRICT ATTORNEY
P.O. BOX 593
TONOPAH, NEVADA 89049
(775) 482-8166



Case # 19 CR 00069 B

FILED
BEATTY JUSTICE COURT
2019 AUG -6 AM 11:58

IN THE JUSTICE COURT OF BEATTY TOWNSHIP
COUNTY OF NYE, STATE OF NEVADA

BY ce

THE STATE OF NEVADA,

Plaintiff,

Vs

CERTIFICATE OF MAILING

PATRICIA LYNN CHAPPUIS,

Defendant.

I HEREBY CERTIFY that service of the **CRIMINAL COMPLAINT FOR ARRAIGNMENT HEARING SCHEDULED MONDAY, AUGUST 19, 2019 AT 10:00 A.M.** for the above-mentioned case was made this 6TH day of AUGUST 2019 by depositing a copy of the same in the United States Postal Service, postage prepaid, addressed to the following:

PATRICIA LYNN CHAPPUIS
10300 W. CHARLESTON BLVD., SUITE H-35
LAS VEGAS, NEVADA 89135

THOMAS J. GIBSON, ESQUIRE
1601 E. BASIN ROAD, SUITE 302
PAHRUMP, NEVADA 89060
ATTORNEY FOR DEFENDANT
VIA EMAIL

NYE COUNTY DISTRICT ATTORNEY
By County Courier to Tonopah Courthouse
101 Radar Road
Tonopah, Nevada 89049
Via Email


Chelsea Cathcart
Beatty Justice Court Clerk