DA # 434736

UNRPD UN11-000893

1

2

3

4

5

6

ν.

7 8

9

10

12.

13

15

14

16

18

17

19

20 21

22

23 24

25

26

IN THE JUSTICE COURT OF RENO TOWNSHIP

IN AND FOR THE COUNTY OF WASHOE, STATE OF NEVADA

* *

THE STATE OF NEVADA,

Plaintiff,

RCR 2011-064661

DEPT: 1

JUDY MIKOVITS,

Defendant.

THIRD CRIMINAL COMPLAINT

DANIEL J. GRECO, of the County of Washoe, State of Nevada, verifies and declares upon information and belief and under penalty of perjury, that JUDY MIKOVITS, the defendant above-named, has committed the crimes of:

COUNT I. PRINCIPAL TO THE CRIME OF UNLAWFUL TAKING OF

COMPUTER DATA, EQUIPMENT, SUPPLIES, OR OTHER COMPUTER-RELATED

PROPERTY, a felony violation of 205.4765 and 195.020, in the manner following, to wit:

That the said defendant, during or about September 29 through September 30, 2011, within the County of Washoe, State of Nevada, did willfully, unlawfully and without authorization, counsel, encourage, hire, command, induce or otherwise procure her former research associate to take, conceal, or retain possession of data, a program or any supporting documents which exists inside or outside a computer, system or network, or a computer or computer system, or a device used to access a computer network or data, and the cumulative total loss of all items taken or possessed is in excess of \$500.00,

or said taking, concealment or possession caused an interruption or impairment of a public service, including, without limitation, a governmental operation, regardless of the value of the property, to wit: MIKOVITS asked or directed her former research associate, May Pfost, an employee of Whittemore Peterson Institute, to take a black Apple laptop, multiple flash drives, and/or other computer-related from the Whittemore Peterson Institute, Reno, Washoe County, items, Nevada, and Pfost in fact took said items from the Institute. NRS 205.275, a felony, (F900) in the manner following, to wit:

COUNT II. POSSESSION OF STOLEN PROPERTY, a violation of

That the said defendant, JUDY MIKOVITS, during or about October 16 through October 18, 2011, within the County of Washoe, State of Nevada, did willfully and unlawfully, for her own good or to prevent the true owner, from again possessing the property, receive, possess or withhold stolen goods, having a value in excess of Three Thousand Five Hundred Dollars (\$3,500.00), to wit, multiple research notebooks, multiple patient consent forms, multiple correspondence to or from the Whittemore Peterson Institute, and/or other items, said items being the property of the Whittemore Peterson Institute, knowing that said property was stolen property or under such

111 21

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

/// . 22

> 23 111

/// 24

25 ///

26

Custody:

Warrant:

X

Bailed:

circumstances as should have caused a reasonable person to know that said property was stolen property.

AFFIRMATION PURSUANT TO NRS 239B.030

The	undersig	med	does	hereby	affin	m that	the	preceding	document	does
not	contain	the	socia	l secui	city n	umber	of a	ny person.		

DATED	this	8	day	of	February,	2011
			-			

Daniel & Lew	

District Court Dept: 4
District Attorney: GRECO
Defense Attorney:

Bail _______Restitution:

1117434736LJPA1