

Justice # S1033323
Data # 2834338

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA

STATE OF NEBRASKA
Plaintiff,

vs.

ABRAHAM M WAGNER,
Defendant.
D.O.B. 4 March 1980.
ADDRESS: 6204 N 155 ST
 OMAHA, NE 68116
DR. LIC.: H13003283 NE
AR# S1033323
RB# M24949
CMS# S1033323
CR

CR# 22-921

CRIMINAL COMPLAINT

**FILED
CRIM/TRAF DIVISION**

JAN 18 2022

Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA

The State of Nebraska hereby complains to the Court that ABRAHAM M WAGNER is alleged to have violated the laws of the State of Nebraska and/or the ordinances of the City of Omaha, to-wit:

COUNT 1: CRIMINAL MISCHIEF - \$1500 - \$4999
§ 28-519(3)

On or about 16 January 2022, in Douglas County, Nebraska, ABRAHAM WAGNER within Douglas County, Nebraska contrary to the Statutes of the State of Nebraska and against the peace and dignity of the State did: (a) damage the property of ANGELA AGOSTA intentionally or recklessly or (b) intentionally tamper with the property of ANGELA AGOSTA so as to endanger person or property or (c) intentionally or maliciously cause ANGELA AGOSTA to suffer pecuniary loss by deception or threat and said damage or pecuniary loss being in the amount of one thousand five hundred dollars or more but less than five thousand dollars. (Penalty: 28-519 Class I Misdemeanor)

COUNT 2: VIOLATE RESTRICTIONS OF CARRY HANDGUN PERMIT
§ 69-2441-M3

On or about 16 January 2022, in Douglas County, Nebraska, ABRAHAM WAGNER within Douglas County, Nebraska contrary to the Statutes of the State of Nebraska and against the peace and dignity of the State while a holder of a valid handgun permit in accordance with the Concealed Handgun Permit Act did unlawfully carry a concealed handgun: (a). at a place where the possession or carrying of a firearm is prohibited by state or federal law or (b) at a place or premises where the person, persons, entity, or control of the



property has prohibited permitholders from carrying concealed handguns into or onto the place or premises or (c) into or onto any place or premises where handguns are prohibited by state law or (d) while he or she is consuming alcohol or while he or she has remaining in his or her blood, urine or breath any previously consumed alcohol or any controlled substance as defined in state law. (Penalty: 69-2441 Class III Misdemeanor)

COUNT 3: ASSAULT AND BATTERY

§ 20-61(2)

On or about 16 January 2022, in Douglas County, Nebraska, ABRAHAM WAGNER within the City of Omaha, Douglas County, Nebraska contrary to the Ordinances of the City of Omaha and against the peace and dignity of the State of Nebraska did unlawfully, purposely or knowingly: (a) strike or attempt to strike ANGELA AGOSTA with intent to cause bodily injury or (b) cause or attempt to cause bodily injury to ANGELA AGOSTA or (c) place ANGELA AGOSTA in fear of imminent bodily harm. (Penalty: OMC 1-10)

I, MICHAEL MCINERNEY, Deputy County Attorney / Special Assistant City Prosecutor, allege that this Criminal Complaint is true based upon my information and belief.



MICHAEL MCINERNEY, # 26831
Deputy County Attorney
Special Assistant City Prosecutor

Witnesses for the State:

GREG BEALL #F216
STEVIE MCGILL #F217
SHANON TYSOR #S051
CHRISTINE GABIG #S551
CALEB D BROCKER #S520
ANDREW R BERKSHIRE #S475
ANGELA AGOSTA
A. A.

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CRIM/TRAF DIVISION**

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**Clerk of Court
DOUGLAS COUNTY COURT
OMAHA, NEBRASKA**