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**GMEM**  
CATHERINE CORTEZ MASTO  
Attorney General  
By: CONRAD HAFEN  
Chief Deputy Attorney General  
Nevada Bar No. 3727  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-3430  
Attorney for State of Nevada

FILED IN OPEN COURT  
FEB 21 2007 20  
CHARLES J. SHORT  
CLERK OF THE COURT  
BY \_\_\_\_\_  
DEPUTY

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*

STATE OF NEVADA,  
Plaintiff,

CASE NO.: C230182  
DEPT. NO.: II

v.

TIFFANY STONE aka  
TIFFANY HUNTSMAN,  
Defendant.

**GUILTY PLEA AGREEMENT**

I hereby agree to plead guilty to: ATTEMPTED THEFT, a Category C Felony, in violation of NRS 193.330 and NRS 205.0832 as more fully alleged in the charging document attached hereto as Exhibit "1".

My decision to plead guilty is based upon the plea agreement in this case which is as follows:

At time of sentencing, the State will recommend that defendant be placed on probation for two years and pay restitution in the amount of \$10,000.00. Furthermore, defendant agrees to pay restitution in the amount of \$10,000.00.

The State explicitly reserves the right to present facts and/or argument through witness and/or victims at the time of sentencing. Furthermore, the State retains the right to comment on Defendant's crimes, past conduct and/or present evidence in any form.

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Las Vegas, NV 89101

1 I have entered into these negotiations and have signed this document of my own free  
2 will without threat or promise on the part of anyone other than expressed herein.

3 Furthermore, I understand that if the State of Nevada has agreed to recommend or  
4 stipulate to a particular sentence or has agreed not to present argument regarding the  
5 sentence, or agreed not to oppose a particular sentence, any such agreement by the State is  
6 contingent upon my appearance in court on the initial sentencing date and any subsequent  
7 date if the sentencing is continued.

8 I understand that if I subsequently withdraw from this plea agreement, the plea  
9 agreement and any factual admissions made at my arraignment in district court are admissible  
10 at time of trial and I waive any rights I may have in this regard.

11 I understand that if I fail to appear for the scheduled sentencing date or I commit a new  
12 criminal offense prior to sentencing the State of Nevada would regain the full right to argue for  
13 any lawful sentence.

14 **CONSEQUENCES OF THE PLEA**

15 I understand that by pleading guilty I admit the facts which support all the elements of  
16 the offense(s) to which I now plead as set forth in Exhibit "1".

17 I understand that as a consequence of my plea of guilty to ATTEMPTED THEFT, I may  
18 be punished by imprisonment for a period of not less than one (1) year and not more than five  
19 (5) years in the Nevada State Prison and pay a fine of not more than \$10,000. Furthermore, I  
20 understand that probation is available for this charge.

21 I understand that, if appropriate, I will be ordered to make restitution to the victim of the  
22 offense(s) to which I am pleading guilty and to the victim of any related offenses which are  
23 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to  
24 reimburse the State of Nevada for any expenses related to my extradition, if any.

25 I understand the Attorney General's Office shall not be bound by any oral negotiations  
26 preceding the actual execution of this Agreement until such time as this Agreement has been  
27 actually executed, that is, signed by the prosecutor representing the State of Nevada and the  
28 Attorney General's Office and I have entered my plea before the court

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1 I understand that if more than one sentence of imprisonment is imposed and I am  
2 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order  
3 the sentences served concurrently or consecutively.

4 I also understand that information regarding charges not filed, dismissed charges, or  
5 charges to be dismissed pursuant to this agreement may be considered by the judge at  
6 sentencing.

7 I have not been promised or guaranteed any particular sentence by anyone. I know  
8 that my sentence is to be determined by the Court within the limits prescribed by statute. I  
9 understand that if my attorney or the State of Nevada or both recommend any specific  
10 punishment to the Court, the Court is not obligated to accept the recommendation.

11 I understand if the offense to which I am pleading guilty to was committed while I was  
12 incarcerated on another charge or while I was on probation or parole that I am not eligible for  
13 credit for time served toward the instant offenses.

14 I understand the Division of Parole and Probation will prepare a report for the  
15 sentencing judge prior to sentencing. This report will include matters relevant to the issue of  
16 sentencing, including my criminal history. This report may contain hearsay information  
17 regarding my background and criminal history. My attorney and I will each have the  
18 opportunity to comment on the information contained in the report at the time of sentencing.  
19 Unless the Attorney General has specifically agreed otherwise, the Attorney General may also  
20 comment on this report.

21 **WAIVER OF RIGHTS**

22 By entering my plea of guilty, I understand that I am waiving and forever giving up the  
23 following rights and privileges:

24 1. The constitutional privilege against self-incrimination, including the right to refuse to  
25 testify at trial, in which event the prosecution would not be allowed to comment to the jury  
26 about my refusal to testify.

27 2. The constitutional right to a speedy and public trial by an impartial jury, free of  
28 excessive pretrial publicity prejudicial to the defense, at which trial I would be entitled to the

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1 assistance of an attorney, either appointed or retained. At trial the State would bear the  
2 burden of proving beyond a reasonable doubt each element of the offense charged.

3 3. The constitutional right to confront and cross-examine any witnesses who would  
4 testify against me.

5 4. The constitutional right to subpoena witnesses to testify on my behalf.

6 5. The constitutional right to testify in my own defense.

7 6. The right to appeal the conviction, with the assistance of an attorney, either  
8 appointed or retained, unless the appeal is based upon reasonable constitutional jurisdictional  
9 or other grounds that challenge the legality of the proceedings and except as otherwise  
10 provided in subsection 3 of NRS 174.035.

11 **VOLUNTARINESS OF PLEA**

12 I have discussed the elements of all of the original charges against me with my attorney  
13 and I understand the nature of the charges against me.

14 I understand that the State would have to prove each element of the charges against  
15 me at trial.

16 I have discussed with my attorney any possible defenses, defense strategies and  
17 circumstances which might be in my favor.

18 All of the foregoing elements, consequences, rights, and waiver of rights have been  
19 thoroughly explained to me by my attorney.

20 I believe that pleading guilty and accepting this plea bargain is in my best interest, and  
21 that a trial would be contrary to my best interest.

22 I am signing this agreement voluntarily, after consultation with my attorney, and I am  
23 not acting under duress or coercion or by virtue of any promises of leniency, except for those  
24 set forth in this agreement.

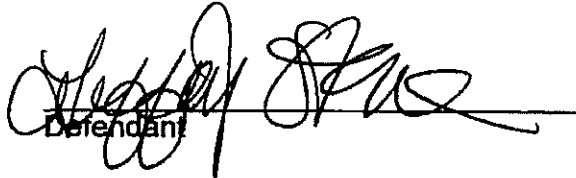
25 I am not now under the influence of any intoxicating liquor, a controlled substance or  
26 other drug which would in any manner impair my ability to comprehend or understand this  
27 agreement or the proceedings surrounding my entry of this plea.

28 ///

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1 My attorney has answered all my questions regarding this guilty plea agreement and its  
2 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

3 DATED this 27<sup>th</sup> day of February, 2007.

4  
5   
6 Defendant

7 AGREED TO BY:

8 CATHERINE CORTEZ MASTO  
9 Attorney General

10  
11 By:   
12 CONRAD HAFEN  
13 Chief Deputy Attorney General

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Las Vegas, NV 89101

1 CERTIFICATE OF COUNSEL:

2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of  
3 the court hereby certify that:

4 1. I have fully explained to the Defendant the allegations contained in the charge(s) to  
5 which guilty pleas are being entered.

6 2. I have advised the Defendant of the penalties for each charge and the restitution  
7 that the Defendant may be ordered to pay.

8 3. All pleas of guilty offered by the Defendant pursuant to this agreement are  
9 consistent with the facts known to me and are made with my advice to the Defendant.


10 4. To the best of my knowledge and belief, the Defendant:

11 a. Is competent and understands the charges and the consequences of pleading  
12 guilty as provided in this agreement.

13 b. Executed this agreement and will enter all guilty pleas pursuant hereto  
14 voluntarily.

15 c. Was not under the influence of intoxicating liquor, a controlled substance or  
16 other drug at the time I consulted with the defendant as certified in paragraphs 1  
17 and 2 above.

18 Dated: This 21<sup>st</sup> day of February, 2007.

19   
20 ATTORNEY FOR DEFENDANT

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

**EXHIBIT 1**

**INFO**

CATHERINE CORTEZ MASTO  
Attorney General  
By: CONRAD HAFEN  
Chief Deputy Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-3430

Attorney for State of Nevada

**FILED**

FEB 5 4 13 PM '07

*Conrad Hafen*  
CLERK OF THE COURT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*

THE STATE OF NEVADA,

Plaintiff,

v.

TIFFANY STONE aka  
TIFFANY HUNTSMAN,

Defendant.

CASE NO.: C230182

DEPT. NO.: II

Date of Hearing: February 21, 2007

Time of Hearing: 1:30

**INFORMATION**

CATHERINE CORTEZ MASTO, Attorney General, through CONRAD HAFEN, Chief Deputy Attorney General, informs this Honorable Court that TIFFANY STONE aka TIFFANY HUNTSMAN, the Defendant above named, has committed the offense of ATTEMPTED THEFT, a Category C Felony in violation of NRS 193.330 and NRS 205.0832 in the following manner:

**COUNT I**

**ATTEMPTED THEFT**

**(A Category C Felony – NRS 193.330 and NRS 205.0832)**

That the defendant, TIFFANY STONE aka TIFFANY HUNTSMAN, being a person who, without lawful authority, knowingly converts, makes an unauthorized transfer of an interest in, or without authorization controls any property or another person, or uses the services or property of another person entrusted to her or placed in her possession for a limited,

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1 authorized period of determined or prescribed duration or for a limited use and the amount is  
 2 \$2,500.00 or more to wit: That from July 2004 through December 2004, in Clark County,  
 3 Nevada, the defendant, in her capacity as dues clerk for Sheet Metal Workers Local Union  
 4 #88, converted \$2,500.00 or more by taking dues or fees paid by union travelers to Sheet  
 5 Metal Workers Local Union #88 without authorization.

6 All of which is contrary to the form, force and effects of the statutes in such cases made  
 7 and provided against the peace and dignity of the State of Nevada. Said complainant makes  
 8 this declaration subject to the penalty of perjury.

9 DATED this 2 day of February, 2007.

10 CATHERINE CORTEX MASTO  
 11 Attorney General

12 By:   
 13 CONRAD HAPEN  
 14 Chief Deputy Attorney General

15 Attorney General's Office  
 16 555 E. Washington, Suite 3900  
 17 Las Vegas, NV 89101

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**WITNESS LIST**

In accordance with NRS 173.045(2), the following is the endorsement of names(s) of such witness(es) known by the Office of the Attorney General at the time of the filing of this Information:

- 1. Andrea Oliphant  
600 Las Vegas Blvd., #750  
Las Vegas, Nevada 89101
- 2. Quentin Heiden  
600 Las Vegas Blvd., #510  
Las Vegas, Nevada 89101
- 3. John Cernick  
6219 Tazewell Court  
Las Vegas, Nevada 89081
- 4. Paul Marino  
4550 West Sahara, #1155  
Las Vegas, Nevada 89102
- 5. Roderick Price  
5101 E. Twain Avenue, Apt. 56  
Las Vegas, Nevada 89122
- 6. Michael Renault  
6201 Boulder Highway, #411  
Las Vegas, Nevada 89122
- 7. Vicki Noyes  
2560 Marlo Street  
Las Vegas, Nevada 89115

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