

1 **GPA**
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8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 MANDEEP SINGH and JASPREET KAUR,

14 Defendant.

Case No.: C-22-363182-2

Dept. No.: XXI

15
16 **GUILTY PLEA AGREEMENT**

17 I hereby agree to plead guilty to crimes of one (1) count of CONSPIRACY TO COMMIT THEFT,
18 a gross misdemeanor, in violation of NRS 205.0832(1)(a) and NRS 199.480(3)(g). as more fully alleged
19 in the charging document attached hereto as Exhibit "1."

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

21 1. The State will not oppose probation.

22 2. I agree to pay restitution in the amount of \$21,500.00, jointly and severally with
23 MANDEEP SINGH to Harpreet Kaur and Harpal Padam.

24 3. I agree to waive any defects or infirmities as to the form of the charging document attached
25 as Exhibit "1."

26 4. I understand and agree that if I fail to interview with the Department of Parole and
27 Probation, fail to appear at any subsequent hearings in this case, or an independent judge or magistrate,
28 by affidavit review or other satisfactory proof, confirms probable cause against me for new criminal

1 charges, including reckless driving or DUI, but excluding minor traffic violations, the State will have the
2 unqualified right to argue for any legal sentence and term of confinement allowable for the crime(s) to
3 which I am pleading guilty. Otherwise, I am entitled to receive the benefits of these negotiations as stated
4 in the plea agreement.

5 CONSEQUENCES OF THE PLEA

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

8 I understand that as a consequence of my plea of guilty to CONSPIRACY TO COMMIT THEFT
9 the Court must sentence me to imprisonment in the county jail for a minimum term of not more than 364
10 or by a fine of not more than \$2,000, or by both fine and imprisonment.

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

15 I understand that I am eligible for probation for the offense(s) to which I am pleading guilty. I
16 further understand that, except as otherwise provided by statute, the question of whether I receive
17 probation is in the discretion of the sentencing judge.

18 I also understand that I must submit to blood and/or saliva tests under the direction of the Division
19 of Parole and Probation to determine genetic markers and/or secretor status.

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

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

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

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

7 I understand if the offense to which I am pleading guilty was committed while I was incarcerated
8 on another charge or while I was on probation or parole that I am not eligible for credit for time served
9 toward the instant offense(s).

10 I understand that if I am not a United States citizen, this criminal conviction will likely result in
11 serious negative immigration consequences including but not limited to: removal from the United States
12 through deportation; an inability to reenter the United States; the inability to gain United States
13 citizenship or legal residency; an inability to renew and/or retain any legal residency status; and/or an
14 indeterminate term of confinement, with the United States Federal Government based on my conviction
15 and immigration status. Regardless of what I have been told by an attorney, no one can promise me that
16 this conviction will not result in negative immigration consequences and/or impact my ability to become
17 a United States citizen and/or legal resident.

18 WAIVER OF RIGHTS

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

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

24 2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive
25 pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an
26 attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a
27 reasonable doubt each element of the offense charged.

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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 14th day of April, 2022.

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7 AGREED TO BY:

8 /s/ Robert A. Whitney
9 ROBERT WHITNEY (Bar No. 8726)
10 Senior Deputy Attorney General

Jaspreet kaur
11 (JASPREET KAUR, Defendant
12 Signed by Adam Gill #11575
13 at the direction of
14 Jaspreet Kaur pursuant
15 to Admin order 20-06
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CERTIFICATE OF DEFENSE COUNSEL

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

1. I have fully explained to Defendant the allegations contained in the charges to which guilty pleas are being entered.

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

3. I have inquired of Defendant facts concerning Defendant's immigration status and explained to Defendant that if Defendant is not a United States citizen any criminal conviction will most likely result in serious negative immigration consequences including but not limited to:

- a. The removal from the United States through deportation;
- b. An inability to reenter the United States;
- c. The inability to gain United States citizenship or legal residency;
- d. An inability to renew and/or retain any legal residency status; and/or
- e. An indeterminate term of confinement with the United States Federal Government based on his/her conviction and immigration status.

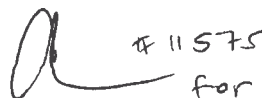
Moreover, I have explained that regardless of Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

4. All pleas of guilty offered by Defendant pursuant to this agreement are consistent with all the facts known to me, and are made with my advice to Defendant and are in the best interest of Defendant:

5. To the best of my knowledge and belief Defendant:

- a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement;
- b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily; and
- c. Was not under the influence of intoxicating liquor, a controlled substance, or other drug at the time I consulted with the Defendant as certified in paragraph 1 and 2 above, or at the time of execution of this agreement.

DATED this 14th day of April, 2021

 # 11575
for

Michal Aisen, Esq
Attorney for Defendant Jaspreet Kaur



1 **INFM**
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15
16 **INFORMATION**

17 AARON D. FORD, Attorney General for the State of Nevada, in the name and by the authority
18 of the State of Nevada, informs the Court:

19 JASPREET KAUR has committed the crime of one (1) count of CONSPIRACY TO COMMIT
20 THEFT, a gross misdemeanor in violation of NRS 205.0832(1)(a) and NRS 199.480(3)(g).

21 All of the acts alleged herein have been committed or completed on or between February 28, 2016
22 and May 11, 2016, by the above-named defendant, within the County of Clark, State of Nevada, in the
23 following manner:

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