

SUPREME COURT OF NEVADA

Kasie Raeshi Causey v. Eighth Judicial District Court of the State of Nevada, in and for the County of Clark, and the Honorable Eric Johnson, District Judge

142 Nev. Adv. Op. No. 43 (2026) · No. 90627 · Decided June 18, 2026

SUMMARY

The Nevada Supreme Court denied Kasie Raeshi Causey’s petition for a writ of mandamus challenging an order permitting the State to file an information by affidavit reinstating eleven child-abuse charges. The court held that NRS 200.508 permits either separate charges based on distinct abusive acts or a single charge based on a continuing course of conduct, depending on the circumstances and how the State pleads the case. The court also concluded that the justice court committed egregious legal error by merging the twelve counts and that the information-by-affidavit procedure was appropriate.

CASE DETAILS

COURT	Supreme Court of Nevada
WRITING FOR THE COURT	Stiglich, J.; Cadish, J.; Lee, J.
JURISDICTION	Supreme Court of Nevada
DECIDED	June 18, 2026
DOCKET	90627
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Original petition for a writ of mandamus challenging a district court order granting the State leave to file an information by affidavit reinstating dismissed child-abuse counts.
STANDARD OF REVIEW	Questions of statutory interpretation are reviewed de novo. A district court's determination of egregious error is reviewed de novo. Mandamus relief is extraordinary and discretionary, and is generally considered when there is no plain, speedy, and adequate remedy in the ordinary course of law.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Kasie Raeshi Causey v. The Eighth Judicial District Court of the State of Nevada, in and for the County of Clark, The Honorable Eric

TOPICS

criminal procedure

statutory interpretation

appellate procedure

standard of review

remedies

PRACTICE AREAS

criminal procedure

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mandamus

QUESTIONS PRESENTED

1. Whether the Nevada Supreme Court should exercise its discretion to consider Causey's mandamus petition.
2. Whether NRS 200.508 permits child abuse to be charged only as one continuing offense or permits separate charges based on distinct acts.
3. Whether an information by affidavit under NRS 173.035(2) was an appropriate vehicle to reinstate counts dismissed by the justice court as a matter of law.
4. Whether the justice court committed egregious error by merging the twelve child-abuse counts into one count.

HOLDINGS

1. The unit of prosecution under NRS 200.508(1) is causing a child pain or suffering, and each instance of causing that pain or suffering may constitute a separate violation. The statute permits either a single charge based on a continuing course of conduct or multiple charges based on distinct acts, depending on the circumstances and how the State pleads the case.
2. An information by affidavit was an appropriate means for the State to seek reinstatement of the counts after the accused had been discharged at the preliminary examination, even though the justice court dismissed the counts as a matter of law rather than for lack of probable cause.
3. The justice court committed egregious error by merging the twelve counts based on the erroneous legal conclusion that NRS 200.508 permits only one count for a continuing offense. The district court therefore did not manifestly abuse its discretion by allowing the State to file an information by affidavit.

KEY QUOTATIONS

“Thus, the statute’s plain language demonstrates the appropriate unit of prosecution is causing a child pain or suffering, and each instance of causing that pain or suffering constitutes a separate violation of the statute.” (5)

“To the extent this language created confusion, we now clarify that child abuse under NRS 200.508 can be charged as separate violations of the statute or as a single violation premised on a continuing offense, depending on the circumstances and the theory on which the charge is based.” (8)

“We clarify that child abuse, neglect, or endangerment may be charged under NRS 200.508 as either a single violation or separate violations, depending on the circumstances and way the charge is pleaded.” (10)

FACTUAL BACKGROUND

On March 1, 2025, Causey sent the child's purported father twelve videos recorded over several hours depicting distinct acts of abuse against her infant. The acts included submerging, choking, smothering, pinching, slapping, and strangling the child. After receiving the videos, the father alerted police, and Causey was arrested and charged with twelve counts under NRS 200.508(1).

PROCEDURAL HISTORY

Causey was charged in justice court with twelve counts of child abuse, neglect, or endangerment under NRS 200.508(1), based on twelve videos depicting distinct abusive acts. The justice court merged the counts into one, concluding that child abuse was a continuing offense. The district court permitted the State to file an information by affidavit reinstating the eleven dismissed counts, finding probable cause and concluding that the justice court had committed egregious legal error. The Nevada Supreme Court exercised its discretion to consider Causey's mandamus petition and denied relief.

DISPOSITION

writ_denied

CASES CITED

- Redeker v. Eighth Judicial District Court, 122 Nev. 164, 127 P.3d 520 (2006)
- Hidalgo v. Eighth Judicial District Court, 124 Nev. 330, 184 P.3d 369 (2008)
- Clay v. Eighth Judicial District Court, 129 Nev. 445, 305 P.3d 898 (2013)
- Mona v. Eighth Judicial District Court, 132 Nev. 719, 380 P.3d 836 (2016)
- Castaneda v. State, 132 Nev. 434, 373 P.3d 108 (2016)
- Jackson v. State, 128 Nev. 598, 291 P.3d 1274 (2012)
- State v. Lucero, 127 Nev. 92, 249 P.3d 1226 (2011)
- Rimer v. State, 131 Nev. 307, 351 P.3d 697 (2015)
- Sena v. State, 138 Nev. 310, 510 P.3d 731 (2022)
- Smith v. State, 142 Nev. Adv. Op. 26, 587 P.3d 251 (2026)
- Boyle v. Bowman, 96 Nev. 140, 605 P.2d 1144 (1980)
- Warren v. Eighth Judicial District Court, 134 Nev. 649, 427 P.3d 1033 (2018)
- State v. Sixth Judicial District Court (Warren), 114 Nev. 739, 964 P.2d 48 (1998)
- Moultrie v. State, 131 Nev. 924, 364 P.3d 606 (Ct. App. 2015)