



1 **INFM**
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9 **DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA,) Case No.: C-19-342711-1
12)
Plaintiff,) Dept. No.: XXX
13)
vs.)
14)
CHERYL LEE CONGDON)
15 a.k.a. CHERYL LEE BERKEY)
(ID #1465901),)
16 Defendant.)
17 _____)

18 **INFORMATION**

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

21 Defendant, CHERYL LEE CONGDON, has committed the crime(s) of: Two (2) Counts of
22 INSURANCE FRAUD, category D felonies in violation of NRS 686A.2815/NRS 686A.291 and NRS
23 686A.292.

24 All of the acts alleged herein were committed on or between about February 17, 2017 and March
25 8, 2018, by the above-named defendant, within the county of Clark, state of Nevada, in the following
26 manner:

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28 ///

1 **COUNT I**
2 **INSURANCE FRAUD**
3 **(Category D Felony - NRS 686A.2815/NRS 686A.291 and NRS 686A.292)**

4 On or between about February 17, 2017 and March 27, 2017, Defendant, CHERYL LEE
5 CONGDON, did without lawful authority, knowingly and willfully present or cause to be presented any
6 statement as a part of, or in support of, a claim for payment or other benefits under a policy of insurance,
7 knowing that the statement conceals or omits facts, or contains false or misleading information
8 concerning any fact material to that claim; and/or act or fail to act with the intent of defrauding or
9 deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any proceeds or
10 other benefits under a policy of insurance; and/or accept any proceeds or other benefits under a policy of
11 insurance knowing that the proceeds or other benefits are derived from any of the foregoing acts or
12 omissions, to wit:

13 The above-named defendant did so by reporting a property loss (jewelry) to Country Financial
14 under homeowners insurance policy number AK4779792, when in truth and in fact, the property
15 (jewelry) was not lost. As a result of the above-named defendant's wrongdoing, she accepted insurance
16 proceeds or other benefits under Country Financial claim number 204-0027455.

17 **COUNT II**
18 **INSURANCE FRAUD**
19 **(Category D Felony - NRS 686A.2815/NRS 686A.291 and NRS 686A.292)**

20 On or between about February 10, 2018 and March 8, 2018, Defendant, CHERYL LEE
21 CONGDON, did without lawful authority, knowingly and willfully present or cause to be presented any
22 statement as a part of, or in support of, a claim for payment or other benefits under a policy of insurance,
23 knowing that the statement conceals or omits facts, or contains false or misleading information
24 concerning any fact material to that claim; and/or act or fail to act with the intent of defrauding or
25 deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any proceeds or
26 other benefits under a policy of insurance, to wit:

27 The above-named defendant did so by reporting a property loss (jewelry) to Homesite Insurance
28 Company under homeowners insurance policy number 34841920, when in truth and in fact, the property
(jewelry) was not lost. As a result of the above-named defendant's wrongdoing, her claim under Homesite
Insurance Company claim number 2278865 was denied.

1 All of which is contrary to the form, force and effect of the statutes in such cases made and
2 provided, and against the peace and dignity of the state of Nevada.

3 DATED this 21st day of August, 2019.

4 SUBMITTED BY:

5 AARON D. FORD
6 Attorney General

7 By: /s/ Roger R. Madsen
8 ROGER R. MADSEN (NV Bar No. 7075)
9 Senior Deputy Attorney General
10 *Attorneys for the State of Nevada*