



CLERK OF THE COURT

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9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 STATE OF NEVADA,)	CASE NO.:	C-13-291557-3
12 Plaintiff,)	DEPT. NO.:	XII
13 v.)		
14 STEVEN MARTIN SHAW ID#2694714,)		
15 CHAD GARY KRUGER, ID#2694716,)		
16 MICHAEL JOSEPH HUGHES,)		
17 ID#5992441)		
18 Defendants.)		

18 **INDICTMENT**

19 The Defendants above named, STEVEN MARTIN SHAW, CHAD GARY KRUGER, and
20 MICHAEL JOSEPH HUGHES, are accused by the Grand Jury of the County of Clark, of the
21 crimes of INSURANCE FRAUD COMMITTED TO PROMOTE ACTIVITIES OF CRIMINAL
22 GANG, Category D Felony in violation of NRS 686A.2815(3), NRS 686A.291, and NRS 193.168;
23 THEFT COMMITTED TO PROMOTE ACTIVITIES OF CRIMINAL GANG in violation of
24 NRS 205.0832(1)(c), NRS 205.0833, NRS 205.0835(4), and NRS 193.168; and CONSPIRACY
25 in violation of NRS 199.480(3)(d), within the Clark County, State of Nevada as follows:

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COUNT ONE

INSURANCE FRAUD COMMITTED TO PROMOTE ACTIVITIES OF CRIMINAL GANG
(A Category D Felony in violation of NRS 686A.2815(3), NRS 686A.291, and NRS 193.168)

Defendants, STEVEN MARTIN SHAW, CHAD GARY KRUGER and MICHAEL JOSEPH HUGHES, on or about October 25, 2012, within the County of Clark, in the State of Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with another person to present or caused to be presented to an insurer false or misleading information concerning a material fact in support of a claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance Code, and the crime was committed knowingly for the benefit of, at the direction of, or in affiliation with, a criminal gang, with the specific intent to promote, further or assist the activities of the criminal gang, to wit: Defendants did conspire to conceal a Suzuki Motorcycle belonging to HUGHES so that HUGHES could report the motorcycle as stolen to Progressive Insurance and obtain an insurance payment for the value of the vehicle. Both SHAW and KRUGER were members at the time of the crime of the Green Machine Outlaw Motorcycle Gang, and HUGHES was a prospective member. The proceeds of the insurance fraud were to assist HUGHES in purchasing a Harley Davidson motorcycle from KRUGER so that HUGHES could a full member of the Green Machine Outlaw Motorcycle Gang.

COUNT TWO

THEFT COMMITTED TO PROMOTE ACTIVITIES OF CRIMINAL GANG
(A Category B Felony in violation of NRS 205.0832(1)(c), NRS 205.0833, NRS 205.0835(4), NRS 195.020, and NRS 193.168)

Defendants, STEVEN MARTIN SHAW, CHAD GARY KRUGER, and MICHAEL JOSEPH HUGHES, on or about October 25, 2012, within the County of Clark, in the State of Nevada, did knowingly obtain real, personal or intangible property or the services of another person, valued at more than THIRTY-FIVE HUNDRED DOLLARS (\$3,500.00), by a material misrepresentation with intent to deprive that person of the property or services, and the crime was committed knowingly for the benefit of, at the direction of, or in affiliation with, a criminal gang, with the specific intent to promote, further or assist the activities of the criminal gang, to wit: Defendants

1 SHAW and KRUGER did assist HUGHES by concealing his Suzuki motorcycle. HUGHES then
2 reported the vehicle stolen to Progressive Insurance and as a result did receive SIX
3 THOUSAND SIX HUNDRED EIGHTY-SEVEN DOLLARS AND TWELVE CENTS (\$6,687.12) for
4 the value of the motorcycle. Defendants took these actions so HUGHES could purchase a
5 Harley Davidson motorcycle from KRUGER and join KRUGER and SHAW as members of the
6 Green Machine Outlaw Motorcycle Gang.

7 **COUNT THREE**

8 **CONSPIRACY**

9 **(A Gross Misdemeanor in violation of NRS 199.480(1)(d))**

10 Defendants, STEVEN MARTIN SHAW, CHAD GARY KRUGER, and MICHAEL JOSEPH
11 HUGHES, on or about October 25, 2012, within the County of Clark, in the State of Nevada, did
12 conspire to cheat or defraud another out of any property by unlawful or fraudulent means, to wit:
13 Defendants did conspire to conceal a Suzuki motorcycle belonging to HUGHES so that he could
14 report it stolen to Progressive Insurance and receive an insurance settlement for its value.

15 All of which is contrary to the form, force, and effect of the statutes in such cases made
16 and provided, and against the peace and dignity of the State of Nevada.

17 DATED this 30th day of July, 2013.

18 CATHERINE CORTEZ MASTO
19 Attorney General

20 By: Brian Williams
21 BRIAN WILLIAMS
22 Senior Deputy Attorney General
23 Nevada Bar No. 010469

24 ENDORSEMENT: A True Bill

25 By: Edward Galea
26 Foreperson, Clark County Grand Jury
27
28

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WITNESS LIST:

1. Detective Anthony Watkins
North Las Vegas Police Department
2. Detective Agustino Brancato
Los Angeles County Sheriff's Department
3. Julie Rizik
Claims Adjustor Progressive Insurance Company
4. Detective Donald Ruberio
Las Vegas Metropolitan Police Department
5. Officer Boyd Brown
Las Vegas Metropolitan Police Department
6. Detective Aboreen
Las Vegas Metropolitan Police Department

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