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Jaw
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7 **IN THE FIFTH JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA**
8 **IN AND FOR THE COUNTY OF NYE**

9 THE STATE OF NEVADA,)
10 Plaintiff,)
11 vs.)
12 ROY CAVILL, #414314,)
13 Defendant.)
14

CASE NO.: CR6875
DEPT. NO.: 1

15 **INFORMATION**

16 Arraignment: January 14, 2013, 9:00 a.m.

17 CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, by and through
18 Deputy Attorney General MICHAEL C. KOVAC, informs this Honorable Court that ROY CAVILL,
19 the above named defendant, has committed the crimes of INSURANCE FRAUD (CATEGORY D
20 FELONY, in violation of NRS 686A.2815(2), NRS 686A.291, and NRS 195.020); THEFT
21 (CATEGORY B FELONY, in violation of NRS 205.0832(1)(c), NRS 205.0833, NRS 205.0835(4),
22 and NRS 195.020); and CONSPIRACY TO COMMIT THEFT (GROSS MISDEMEANOR, in
23 violation of NRS 199.480(3)(d)) within the County of Nye, State of Nevada, as follows:

24 **COUNT ONE**
INSURANCE FRAUD

25 **(A Category D Felony in violation of NRS 686A.2815(2), NRS 686A.291 and NRS 195.020)**

26 Defendant ROY CAVILL, on or about October 20, 2008, did knowingly and unlawfully,
27 within the County of Nye, in the State of Nevada, assist, abet, solicit, or conspire with another
28 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

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1 issued pursuant to the Nevada Insurance Act, to wit: Defendant participated in a scheme to
2 stage a two car automobile accident wherein Gerard Sparno drove a vehicle and hit the rear of a
3 vehicle driven by ROY CAVILL and with Francisco Guerrero and Bobbie Ann Shourek as
4 passengers, and the staged accident was reported to Hartford and Mendota Insurance
5 Companies and payouts were made to all of the alleged involved individuals for injury and/ or
6 property damage.

7
8 **COUNT TWO**
9 **THEFT**

10 **(A Category B Felony in violation of NRS 205.0832(1)(c), NRS 205.0833,**
11 **NRS 205.0835(4), and NRS 195.020)**

12 Defendant ROY CAVILL, on or about October 20, 2008, in the County of Nye, State of
13 Nevada, did willfully, unlawfully, and feloniously obtain real, personal or intangible property or
14 the services of another person, valued at more than TWENTY-FIVE HUNDRED DOLLARS
15 (\$2,500.00), did attempt by a material misrepresentation with intent to deprive that person of the
16 property or services to wit: Defendant, as part of a scheme wherein he staged an accident
17 between two vehicles and then reported the accident to Hartford and Mendota Insurance
18 Companies, did collect for himself and his coconspirators a total of FIFTY-THREE THOUSAND
19 SIX HUNDRED FORTY-TWO AND 91/100 DOLLARS (\$53,642.91) in fraudulent benefits from
20 the two insurance companies as a settlement for both injuries and property damage he alleged
21 came as a result of the staged accident.

22 **COUNT THREE**
23 **CONSPIRACY TO COMMIT THEFT**
24 **(A Gross Misdemeanor in violation of NRS 199.480(3)(d))**

25 Defendant ROY CAVILL, on or about October 20, 2008, within the County of Nye, in the
26 State of Nevada, did conspire with Gerard Sparno, Francisco Guerrero, and Bobbie Ann
27 Shourek to cheat or defraud another out of any property by unlawful or fraudulent means, to wit:
28 ROY CAVILL, Sparno, Guerrero, and Shourek did conspire to stage an accident and collect an
insurance payout from Mendota and Hartford Insurance Companies.

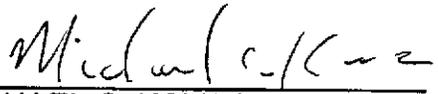
All of which is contrary to the form, force, and effect of the statutes in such cases made
and provided and against the peace and dignity of the state of Nevada. Plaintiff, THE STATE

1 OF NEVADA, by and through its undersigned counsel, makes these statements upon
2 information and belief.

3 DATED this 3rd day of December, 2012.

4 CATHERINE CORTEZ MASTO
5 Attorney General

6 By:


7 MICHAEL C. KOVAC
8 Deputy Attorney General
9 Nevada State Bar No. 11177
10 Insurance Fraud Unit

11 **WITNESSES**

- 12 1. Julie DiFrischia (Mendota Insurance Co.);
- 13 2. Brad Morris (The Hartford Insurance Co.);
- 14 3. Alexander Curren;
- 15 4. Gerard Sparno;
- 16 5. Francisco Guerrero;
- 17 6. Bobbie Ann Shourek;
- 18 7. Any and all persons most knowledgeable deemed necessary;
- 19 8. Any and all other treating physicians deemed necessary; and
- 20 9. Any and all other custodians of records deemed necessary.

21 Plaintiff, THE STATE OF NEVADA, hereby reserves the right to name and call additional
22 witnesses up through and including the time of trial.
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