

  
CLERK OF THE COURT

1 **INFM**  
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8 **DISTRICT COURT**  
9 **CLARK COUNTY, STATE OF NEVADA**

10 THE STATE OF NEVADA, )  
11 Plaintiff, ) Case No.: C-15-308075-1  
12 v. ) Dept. No.: IV  
13 MARTIN CURIEL-GUERRA, )  
14 A.K.A. MARTIN CURIEL, ID #2624154, )  
15 Defendant. )

16 **INFORMATION**

17 Arraignment: July 27, 2015, at 10:00 AM

18 Plaintiff, THE STATE OF NEVADA, by and through its counsel, ADAM PAUL LAXALT,  
19 Attorney General, and BEHNAZ F. SALIMIAN, Deputy Attorney General, hereby informs this  
20 Court that Defendant MARTIN CURIEL-GUERRA did, in Clark County, Nevada, commit the  
21 following offense(s):

22 **COUNT ONE**  
23 **INSURANCE FRAUD**  
24 **CATEGORY "D" FELONY – NRS 686A.2815; NRS 686A.291**

25 On or about May 15, 2012, through June 23, 2012, in Clark County, Nevada, Defendant  
26 MARTIN CURIEL-GUERRA knowingly and willfully presented or caused to be presented, or  
27 aided or abetted another, or directly or indirectly counseled, encouraged, hired, commanded,  
28 induced, or otherwise procured another to knowingly and willfully present or cause to be  
presented to an insurer false or misleading information concerning a material fact in support of a

1 claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance  
2 Act, to wit:

3 Defendant MARTIN CURIEL-GUERRA intentionally aided another individual in knowingly  
4 and willfully making fraudulent insurance claims with Nationwide Insurance Company, the City of  
5 Henderson, and Sentry Insurance Company, by intentionally causing automobile collisions with  
6 automobiles insured by said entities that said other individual falsely claimed were accidents for  
7 the purpose of unlawfully obtaining insurance benefits.

8 **COUNT TWO**  
9 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE**  
10 **OR OCCUPATION**  
11 **CATEGORY "B" FELONY – NRS 205.377**

12 Defendant MARTIN CURIEL-GUERRA, on or about May 15, 2012, through June 23,  
13 2012, within Clark County, Nevada, in the course of an enterprise or occupation, knowingly and  
14 with the intent to defraud, engaged in an act, practice or course of business or employed a  
15 device, scheme or artifice which operated or would have operated as a fraud or deceit upon a  
16 person by means of a false representation or omission of a material fact that: (a) the person  
17 knew to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss  
18 to any person who relied on the false representation or omission, in at least two transactions that  
19 had the same or similar pattern, intents, results, accomplices, victims or methods of commission,  
20 or were otherwise interrelated by distinguishing characteristics and were not isolated incidents  
21 within 4 years and in which the aggregate loss or intended loss was more than \$650, to wit:

22 In the course of his participation in an insurance fraud enterprise, Defendant MARTIN  
23 CURIEL-GUERRA knowingly and with the intent to defraud, intentionally aided another individual  
24 in knowingly and willfully making fraudulent insurance claims by intentionally causing automobile  
25 collisions that said individual falsely claimed were accidents, intending that representatives of  
26 Nationwide Insurance Company, the City of Henderson, and Sentry Insurance Company rely on  
27 said misrepresentations, and resulting in a loss of more than \$650.00 by said entities as a result  
28 of their reliance on said misrepresentations.

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1 All of which is contrary to the form, force and effect of the statutes in such cases made  
2 and provided, and against the peace and dignity of the State of Nevada. Said Deputy makes this  
3 declaration under penalty of perjury.

4  
5 DATED this 21st day of July, 2015.

6 ADAM PAUL LAXALT  
7 Attorney General

8 By: /s/ Behnaz F. Salimian  
9 BEHNAZ F. SALIMIAN  
10 Deputy Attorney General