

  
CLERK OF THE COURT

1 **INFM**  
ADAM PAUL LAXALT  
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9 **DISTRICT COURT**  
10 **CLARK COUNTY, STATE OF NEVADA**

11 THE STATE OF NEVADA, )  
12 Plaintiff, ) Case No.: C-15-308075-2  
13 v. ) Dept. No.: IV  
14 ESGAR CHAVARIN, )  
A.K.A. ESGAR FLORENTINO CHAVARIN, )  
15 ID #2856867, )  
16 Defendant. )

17 **INFORMATION**  
Arraignment: August 31, 2015, at 10:00 AM

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

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1 **COUNT ONE**  
2 **INSURANCE FRAUD**  
3 **CATEGORY "D" FELONY – NRS 686A.2815; NRS 686A.291**

4 On or about May 15, 2012, through June 23, 2012, in Clark County, Nevada, Defendant  
5 ESGAR CHAVARIN knowingly and willfully presented or caused to be presented, or aided or  
6 abetted another, or directly or indirectly counseled, encouraged, hired, commanded, induced, or  
7 otherwise procured another to knowingly and willfully present or cause to be presented to an  
8 insurer false or misleading information concerning a material fact in support of a claim for  
9 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:  
10 Defendant ESGAR CHAVARIN intentionally aided another individual in knowingly and willfully  
11 making fraudulent insurance claims with Nationwide Insurance Company, the City of Henderson,  
and Sentry Insurance Company, by intentionally participating in an insurance fraud scheme by:

- 12 • riding as a passenger in vehicles driven by coconspirator Martin Curiel-Guerra,  
13 knowing that Curiel-Guerra was going to intentionally cause automobile collisions with  
14 automobiles insured by said entities;
- 15 • falsely claiming that said collisions were accidents; and
- 16 • carrying out those actions for the purpose of increasing any insurance benefits  
17 obtained as a result of said collisions.

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

21 DATED this 21st day of August, 2015.

22 ADAM PAUL LAXALT  
23 Attorney General

24 By: /s/ Behnaz F. Salimian  
25 BEHNAZ F. SALIMIAN  
26 Deputy Attorney General  
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