



CLERK OF THE COURT

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

10 STATE OF NEVADA,

Case No.: C-16-313634-1

11 Plaintiff,

Dept. No.: XVII

12 v.

13 ANGEL AYESHA CASH A.K.A. ANGEL
AYESHA HOOD, ID #7029757,

14 Defendant.
15

16 **INFORMATION**

17 ADAM PAUL LAXALT, Attorney General for the State of Nevada, in the name and by the
18 authority of the State of Nevada, informs the Court:

19 ANGEL AYESHA CASH has committed the crime of one (1) count of INSURANCE
20 FRAUD, a category "D" felony in violation of NRS 686A.281 to 686A.295, inclusive.

21 All of the acts alleged herein have been committed or completed on or between about
22 July 13, 2013 and November 8, 2013, by the above-named Defendant, within the County of
23 Clark, State of Nevada, in the following manner:

24 **COUNT I**
INSURANCE FRAUD
25 **Category "D" Felony - NRS 686A.281 to 686A.295, inclusive**

26 That the Defendant, ANGEL AYESHA CASH, in the County of Clark, State of Nevada, did
27 without lawful authority, knowingly and willfully: present or cause to be presented any statement
28 as a part of, or in support of, a claim for payment or other benefits under a policy of insurance

1 issued pursuant to the Nevada Insurance Code, knowing that the statement conceals or omits
2 facts, or contains false or misleading information concerning any fact material to that claim;
3 and/or act or fail to act with the intent of defrauding or deceiving an insurer, a reinsurer, a
4 producer, a broker or any agent thereof, to obtain any proceeds or other benefits under a policy
5 of insurance issued pursuant to the Nevada Insurance Code; and/or participate in, assist, aid,
6 abet, solicit or conspire with another person to present or cause to be presented any statement
7 to an insurer, a reinsurer, a producer, a broker or any agent thereof, knowing that the statement
8 conceals or omits facts, or contains false or misleading information concerning any fact material
9 to a claim for payment or other benefits under a policy of insurance issued pursuant to the
10 Nevada Insurance Code, or any of the foregoing acts or omissions, to wit:

11 On or between about July 13, 2013, and November 8, 2013, the Defendant, ANGEL
12 AYESHA CASH, did commit said crime by filing a claim under an insurance policy (Liberty
13 Mutual Policy Number TBJ-Z61-065692-043/Policy Period: May 1, 2013, to May 1, 2014/Liberty
14 Mutual Claim Number P 96A-000693-01), by claiming bodily injuries (skin condition) caused by a
15 product (comforter) bought from one of Liberty Mutual's insureds (Anna's Linens), and by
16 submitting false medical records in support thereof.

17 All of which constitutes the crime of INSURANCE FRAUD, a category "D" felony, in
18 violation NRS 686A.281 to 686A.295, inclusive.

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

21 DATED this 28th day of March, 2016.

22 SUBMITTED BY,

23 ADAM PAUL LAXALT
24 Attorney General

25 By: /s/ Roger R. Madsen
26 ROGER R. MADSEN
27 Senior Deputy Attorney General
28 Nevada Bar No. 7075
Attorneys for the state of Nevada