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JUSTICE COURT
LAS VEGAS NEVADA

BY _____
DEPUTY *JSM*

8 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
9 **CLARK COUNTY, STATE OF NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 JEFF LYNN HARPER, ID #1666422,

14 Defendant.

Case No.: 16F06420X

Dept. No.: 11

16 **CRIMINAL COMPLAINT**

17 The undersigned, ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and
18 through his undersigned deputy, ROBERT GIUNTA, under penalty of perjury, and within his
19 knowledge, information and belief, complains and charges that, JEFF LYNN HARPER
20 (hereinafter HARPER), the above-named Defendant, has committed the following offenses in the
21 County of Clark, State of Nevada, as follows:

22 **COUNT ONE**
23 **INSURANCE FRAUD**
(A Category D Felony in violation of NRS 686A.2815, NRS 686A.291)

24 Defendant, HARPER on or about January 10, 2016, within the County of Clark, in the
25 State of Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with
26 another person to present or caused to be presented to an insurer, false or misleading
27 information concerning a material fact in support of a claim for benefits made under a policy of
28 insurance issued pursuant to the Nevada Insurance Code, to wit: Defendant, either on his own or

1 with the assistance of another person, did file a claim asserting that his 2014 Keystone Fuzion
2 Toy Hauler/Fifth Wheel VIN 4YDF3422XEF810793, which was insured under a policy of
3 insurance issued by State Farm Insurance Company had been burned by unknown persons and
4 gave false statements to State Farm Insurance Company in support of a claim for the loss, when
5 the 2014 Keystone Fuzion Toy Hauler had not been burned by unknown persons, as Defendant
6 well knew.

7 All of which constitutes the crime of Insurance Fraud in violation of NRS 686A.2815.

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9 **COUNT TWO**
10 **ATTEMPTED THEFT**
11 **(A Category C Felony in violation of NRS 205.0832(1)(c), NRS 205.0833,**
12 **NRS 205.0835(4), and NRS 193.330)**

13 Defendant HARPER on or about January 10, 2016, within the County of Clark, in the
14 State of Nevada, did knowingly attempt to obtain real, personal or intangible property or the
15 services of another person, valued at more than THIRTY-FIVE HUNDRED DOLLARS
16 (\$3,500.00), by a material misrepresentation with intent to deprive that person of the property or
17 services, to wit: As a result of false statements given during Defendant's insurance claim #28-
18 7V09-735 with State Farm Insurance Company for the loss of his 2014 Keystone Fuzion Toy
19 Hauler/Fifth Wheel VIN # 4YDF3422XEF810793, which was insured under a policy of insurance
20 issued by State Farm Insurance Company, Defendant attempted to obtain a payout of an
21 amount in excess of THIRTY-FIVE HUNDRED DOLLARS (\$3,500.00), by providing false
22 statements in support of said claim.

23 All of which constitutes the crime of Attempt Theft in violation of NRS 205.0832 and
24 NRS 193.330

25 **COUNT THREE**
26 **THIRD DEGREE ARSON**
27 **(A Category D Felony in violation of NRS 205.020(2))**

28 Defendant HARPER on or about January 9, 2016, within the County of Clark, in the State
of Nevada, did knowingly, willfully and maliciously set fire to or burn or cause to be burned, or

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1 aid, counsel or procure the burning of any unoccupied personal property which he owned and in
2 which another person has a legal interest, to wit: Defendant did burn his 2014 Keystone Fuzion
3 Toy Hauler/Fifth Wheel VIN # 4YDF3422XEF810793, said vehicle having a balance owing to
4 Mountain American Credit Union of approximately Sixty Thousand Dollars (\$60,000.00) .

5 All of which constitutes the crime of Third Degree Arson, in violation of NRS 205.020 and
6 NRS 195.020.

7 **COUNT FOUR**
8 **INSURANCE FRAUD**
9 **(A Category D Felony in violation of NRS 686A.2815, NRS 686A.291)**

10 Defendant, JEFF HARPER on or about January 12, 2016, within the County of Clark, in
11 the State of Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with
12 another person to present or caused to be presented to an insurer false or misleading
13 information concerning a material fact in support of a claim for benefits made under a policy of
14 insurance issued pursuant to the Nevada Insurance Code, to wit: Defendant, either on his own or
15 with the assistance of another person, did file claim # 16-5501918-01 asserting that his 2015
16 Razor 90 Four Wheeler VIN # 4XAVCE871FB307936, which was insured under a policy of
17 insurance issued by Progressive Insurance Company, had been damaged by a fire of unknown
18 origin and gave false statements to Progressive Insurance Company in support of the claim for
19 the loss, when the 2015 Razor 90 Four Wheeler had not been burned by unknown persons, as
20 Defendants well knew. All of which constitutes the crime of Insurance Fraud in violation of
21 NRS 686A.2815.

22 **COUNT FIVE**
23 **THEFT**
24 **(A Category B Felony in violation of NRS 205.0832(1)(c),**
25 **NRS 205.0833, NRS 205.0835(4))**

26 Defendant HARPER on or about January 28, 2016, within the County of Clark, in the
27 State of Nevada, did knowingly obtain real, personal or intangible property or the services of
28 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, to wit:
As a result of false statements given during Defendant's insurance claim # 16-5501918-01 with

1 Progressive Insurance Company for damage to his 2015 Razor 90 Four Wheeler VIN #
2 4XAVCE871FB307936, which was insured under a policy of insurance issued by Progressive
3 Insurance Company, Defendant obtained repairs to said Razor for damages resulting from a fire
4 of unknown origin in an amount in excess of THIRTY-FIVE HUNDRED DOLLARS (\$3,500.00),
5 by providing false statements in support of said claim.

6 All of which constitutes the crime of Theft in violation of NRS 205.0832, NRS 205.0833
7 and NRS 205.0835(4).

8 **COUNT SIX**
9 **BURNING OF PROPERTY WITH INTENT TO DEFRAUD INSURER**
10 **(A Category B Felony in violation of NRS 205.030)**

11 Defendant HARPER on or about January 9, 2016, within the County of Clark, in the State
12 of Nevada, did willfully and with the intent to defraud the insurer, sets fire to or burn or cause to
13 be burned, or aid, counsel or procure the burning of any unoccupied personal property which is
14 insured by any person, company or corporation against loss or damage by fire, to wit: Defendant
15 did burn his 2014 Keystone Fuzion Toy Hauler/Fifth Wheel VIN # 4YDF3422XEF810793, said
16 vehicle being insured against loss by fire under Policy # 029-4038-C02-28D issued by State
17 Farm Insurance Company.

18 All of which constitutes the crime of BURNING OF PROPERTY WITH INTENT TO
19 DEFRAUD INSURER, in violation of NRS 205.030.

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

22 ***The Complainant requests an Arrest Warrant be issued at this time pursuant to***
23 ***NRS 171.106.***

24 That Complainant knows that said crimes occurred and that the Defendant JEFF LYNN
25 HARPER has committed the same based upon the following: Because Complainant is a Senior
26 Deputy Attorney General, and is in possession of, among other things, an affidavit written by Fire
27 Investigator Denell Hoggard, known to Complainant to be employed with the Clark County Fire

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1 Department, a copy of which is attached hereto and hereby incorporated by reference herein for
2 the limited purpose of securing a warrant of arrest.

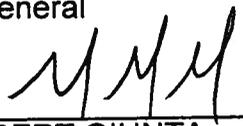
3 Said Complainant makes this declaration under penalty of perjury.

4 DATED this 22nd day of April, 2016.

5 ADAM PAUL LAXALT

6 Attorney General

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8 By:


9 ROBERT GIUNTA
10 Senior Deputy Attorney General
11 Nevada Bar No. 01229
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