



CLERK OF THE COURT

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

10 STATE OF NEVADA,

Case No.: C-16-314537-1

11 Plaintiff,

Dept. No.: XI

12 vs.

13 JAMES MAURICE SAMUEL, SR.  
a.k.a. JAMES MAURICE MITCHELL  
14 (ID #1126947),

15 Defendant.

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17 **INFORMATION**

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

20 JAMES MAURICE SAMUEL, SR. has committed the crime of one (1) count of  
21 INSURANCE FRAUD, a category "D" felony in violation of NRS 686A.281 to 686A.295, inclusive.

22 All of the acts alleged herein have been committed or completed on or between about  
23 February 11, 2013 and January 20, 2014, by the above-named defendant, within the county of  
24 Clark, state of Nevada, in the following manner:

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

Defendant, JAMES MAURICE SAMUEL, SR., did without lawful authority, knowingly and willfully: present or cause to be presented any statement as a part of, or in support of, a claim for payment or other benefits under a policy of insurance, knowing that the statement conceals or omits facts, or contains false or misleading information concerning any fact material to that claim; and/or act or fail to act with the intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any proceeds or other benefits under a policy of insurance; and/or accept any proceeds or other benefits under a policy of insurance, knowing that the proceeds or other benefits were derived from any of the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer, a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or contains false or misleading information concerning any fact material to a claim for payment or other benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

On or between about February 11, 2013 and January 20, 2014, Defendant, JAMES MAURICE SAMUEL, SR., filed a claim for the loss or damage of personal property due to an alleged flood caused by a malfunctioning water heater in his residence, located at 1881 West Alexander Road, Unit 1102, North Las Vegas, Nevada 89032, and submitted forged receipts in support thereof (Date of Loss: February 10, 2013; USAA Claim Number 032653193 – 1; USAA Policy Number 03265 31 93 REN 001). As a result of the above-named defendant's fraudulent acts or omissions, he was paid and accepted proceeds or other benefits under said policy of insurance.

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

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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.

3 DATED this 2nd day of May, 2016.

4 SUBMITTED BY:

5 ADAM PAUL LAXALT  
6 Attorney General

7 By: /s/ Roger R. Madsen  
8 ROGER R. MADSEN  
9 Senior Deputy Attorney General  
10 Nevada Bar No. 7075  
11 *Attorneys for the state of Nevada*