



CLERK OF THE COURT

1 **INFM**
ADAM PAUL LAXALT
2 Attorney General
ROGER R. MADSEN
3 Senior Deputy Attorney General
Nevada Bar No. 7075
4 Office of the Attorney General
555 East Washington Avenue, Suite 3900
5 Las Vegas, Nevada 89101-1068
P: (702) 486-3433
6 F: (702) 486-3768
RMadsen@ag.nv.gov
7 *Attorneys for the state of Nevada*

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

10 STATE OF NEVADA,

Case No.: C-16-315145-1

11 Plaintiff,

Dept. No.: XVII

12 vs.

13 TAWANA ANN ALLEN
a.k.a. TWANA ANN ALLEN,
14 ID #1134845,

15 Defendant.

16
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 Defendant, TAWANA ANN ALLEN, has committed the crime of: one (1) count of
21 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,
22 inclusive.

23 All of the acts or omissions alleged herein have been committed or completed on or
24 between about April 27, 2014 and June 13, 2014, by the above-named defendant, within the
25 county of Clark, state of Nevada, in the following manner:

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

4 Defendant, TAWANA ANN ALLEN, did without lawful authority: knowingly and willfully
5 present or cause to be presented any statement as a part of, or in support of, a claim for
6 payment or other benefits under a policy of insurance, knowing that the statement conceals or
7 omits facts, or contains false or misleading information concerning any fact material to that claim;
8 and/or act or fail to act with the intent of defrauding or deceiving an insurer, a reinsurer, a
9 producer, a broker or any agent thereof, to obtain any proceeds or other benefits under a policy
10 of insurance; and/or accept any proceeds or other benefits under a policy of insurance, knowing
11 that the proceeds or other benefits were derived from any of the foregoing acts or omissions;
12 and/or participate in, assist, aid, abet, solicit or conspire with another person to present or cause
13 to be presented any statement to an insurer, a reinsurer, a producer, a broker or any agent
14 thereof, knowing that the statement conceals or omits facts, or contains false or misleading
15 information concerning any fact material to a claim for payment or other benefits under a policy
16 of insurance, or any of the foregoing acts or omissions, to wit:

17 On or between about April 27, 2014 and June 13, 2014, Defendant, TAWANA ANN
18 ALLEN, did commit said crime by filing a claim under an insurance policy (Hallmark Insurance
19 Company Policy Number 032-112499-00/Policy Period: January 31, 2014, to July 31,
20 2014/Claim Number P0220951) for alleged damage to her motor vehicle (2004 Chevrolet
21 Impala/VIN 2G1WF52E849210980) resulting from an alleged motor vehicle accident on April 27,
22 2014, in the county of Clark, state of Nevada, and by providing inconsistent and incomplete
23 information with respect to the details of the alleged motor vehicle accident. As a result of
24 Defendant's fraudulent act(s) or omission(s), proceeds or other benefits were paid and accepted
25 under said policy of insurance.

26 All of which constitutes the crime of INSURANCE FRAUD, a category D felony in violation
27 of NRS 686A.281 to NRS 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 24th 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*