



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-16-316714-1

11 Plaintiff,

Dept. No.: XIX

12 vs.

13 A PLUS AUTO BODY, INC.,

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 Defendant, A PLUS AUTO BODY, INC., has committed the crime of: one (1) count of
20 MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE
21 OR OCCUPATION, a category B felony in violation of NRS 205.377.

22 All of the acts or omissions alleged herein have been committed or completed on or
23 between about September 15, 2011 and September 21, 2012, by the above-named defendant,
24 within the county of Clark, state of Nevada, in the following manner:

25 ///

26 ///

27 ///

28 ///

1 **COUNT I**
2 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**
3 **IN COURSE OF ENTERPRISE OR OCCUPATION**
4 **(Category B Felony – NRS 205.377)**

5 The above-named defendant did unlawfully, in the course of an enterprise or occupation,
6 knowingly and with the intent to defraud, engage in an act, practice or course of business or
7 employ a device, scheme or artifice which operated or would operate as a fraud or deceit upon a
8 person by means of a false representation or omission of a material fact that (a) they knew to be
9 false or omitted; (b) they intended another to rely on; and (c) resulted in a loss to any person who
10 relied on the false representation or omission, in at least two transactions that have the same or
11 similar pattern, intents, results, accomplices, victims or methods of commission, or are otherwise
12 interrelated by distinguishing characteristics and are not isolated incidents within 4 years and in
13 which the aggregate loss or intended loss is more than \$650, to wit:

14 On or between about September 15, 2011 and September 21, 2012, within the county of
15 Clark, state of Nevada, Defendant, A PLUS AUTO BODY, INC., did so by agreeing with Farmers
16 Insurance to make specified repairs to multiple motor vehicles and by failing to make all of the
17 specified repairs agreed upon and/or making repairs which substantially deviated from the
18 specified repairs agreed upon. Defendant's fraudulent acts or omissions resulted in a loss to
19 Farmers Insurance of more than \$650.

20 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD
21 OR DECEIT IN COURSE OF ENTERPRISE OR OCCUPATION, a category B felony in violation
22 of NRS 205.377. All of which is contrary to the form, force and effect of the statutes in such
23 cases made and provided, and against the peace and dignity of the state of Nevada.

24 DATED this 27th day of July, 2016.

25 SUBMITTED BY:

26 ADAM PAUL LAXALT
27 Attorney General

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