

1 **IND**
2 ADAM PAUL LAXALT
3 Attorney General
4 Michael C. Kovac, Bar No. 11177
5 Senior Deputy Attorney General
6 Office of the Attorney General
7 555 E. Washington Ave., Ste. 3900
8 Las Vegas, Nevada 89101-1068
9 P: (702) 486-3420
10 F: (702) 486-2377
11 MKovac@ag.nv.gov
12 Attorneys for the State of Nevada

FILED IN OPEN COURT

SEPT. 14, 2017

STEVEN D. GRIERSON
CLERK OF THE COURT

BY 
DULCE MARIE ROMEA DEPUTY

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

10 STATE OF NEVADA,
11
12 Plaintiff,

Case No.: C-17-326471-1
Dept. No.: XVIII

13 v.

14 **JULIO CAESAR GONZALEZ**, (a/k/a JULIO
15 **CESAR GONZALEZ-MEJIA**, a/k/a CESAR
16 **GONZALEZ**, a/k/a CHRISTIAN LOPEZ, a/k/a
17 **JUAN CHAVEZ GARCIA**, a/k/a
18 **ALEJANDRO REYES-RODRIGUEZ**, a/k/a
19 **ROMAN CONTRERAS GARCIA**, a/k/a
20 **EDUARDO URIBE PENA**, a/k/a CRISTIAN
21 **GONZALEZ-GONZALEZ**, a/k/a CRISTIAN
22 **GONZALEZ**, a/k/a ERICK CRUZ, a/k/a ERIK
23 **GARCIA**, a/k/a ERICK GARCIA-GARCIA,
24 a/k/a ALBERTO HERNANDEZ TORRES,
25 a/k/a YELANDIS PENICHER VARGAS, a/k/a
26 **OSCAR PEREIRA SANTANA**, a/k/a YOEL
27 **ARRASTIA**, a/k/a LIAN GRAVE DE
28 **PERALTA ROSALES**, a/k/a JORGE
AYLLON-LOPEZ, a/k/a JOSE NUNEZ
BADILLO, a/k/a COOKIE, a/k/a KUKY, a/k/a
KUKYS), ID #1892303;
LEANDRO FONSECA (a/k/a LEANDRO
FONSECA-CASTELLANOS, a/k/a
ALEJANDRO FONSECA, a/k/a ALBERTO
FONSECA), ID #1968337;
JUAN MIGUEL ANGEL JUNIOR
DOLORES (a/k/a EDVARDO ALVARES,
a/k/a CESAR CAMPOS-AGUILAR), ID
#1967374;
JACOB SALAZAR-MORALES;
DORIAN ABNER INESA, ID #1960228;
ELEUTERIO MORALES RAMIREZ (a/k/a
CHRISTIAN LOPEZ);
CARLOS ALBERTO VIERA, ID #2846095;

C-17-326471-1
IND
Indictment
4882809



1 **JOSE DE JESUS NUNEZ-BADILLO** (a/k/a
JOSE NUNEZ, a/k/a JOSE NUNES);
2 **YOEL ARRASTIAROJAS** (a/k/a YOEL
ARRASTIA), ID #1919484;
3 **ANTHONY ROBLES**;
ERICK GARCIA-GARCIA;
4 **IRMA YOLANDA MERAZ-RANGEL**;
LIAN GRAVE DE PERALTA ROSALES,
5 ID #2820944;
LOIPA VUELTA ARAFET;
6 **EDUARDO DURAN ROSALES**;
JESUS NUNEZ ARANDA;
7 **ELOISA BADILLO ESPARZA**;
LEMAY OLIVER MONZON, ID #2648020;
8 **ARLENE MANUELA HERNANDEZ**, ID
#5994034;
9 **ANILU VIANEY GONZALEZ** (a/k/a
MARIA MENDEZ);
10 **YELANDIS PENICHER VARGAS**, ID
#6069120;
11 **JESSICA VALDES TARRIO**;
EDGAR BETANCOURT PREVAL; and
12 **JOSE ALEJANDRO BETANCOURT** (a/k/a
JOSE ALEJANDRO BETANCOURT-
13 **BENITEZ**);

14 Defendant(s).

15 **INDICTMENT**

16 The above-named defendants are accused by the Clark County Grand Jury of the crimes(s) of:

- 17 • RACKETEERING, a category B felony, in violation of NRS 207.400(1)(c);¹
- 18 • RACKETEERING CONSPIRACY, a category B felony, in violation of NRS
19 207.400(1)(j);²
- 20 • MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE
21 OF AN ENTERPRISE OR OCCUPATION, a category B felony, in violation of NRS
22 205.377;³
- 23 • BATTERY WITH A DEADLY WEAPON, a category B felony, in violation of NRS
24 200.481(1)(e)(1);⁴

26 ¹ One count against all defendants.

27 ² One count against all defendants.

28 ³ One count against defendants JULIO CAESAR GONZALES, FONSECA, DOLORES, NUNEZ BADILLO, GRAVE DE PERALTA ROSALES, VUELTA ARAFET, DURAN ROSALES, and PENICHER VARGAS; zero counts against the remaining defendants.

⁴ Seventeen counts against defendant JULIO CAESAR GONZALEZ; one count against defendants DOLORES and MORALES RAMIREZ; and zero counts against the remaining defendants.

- INSURANCE FRAUD, a category D felony, in violation of NRS 686A.2815, 686A.291;⁵
- THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category B felony, in violation of 205.0832(1)(c);⁶ and
- ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE, a category C felony, in violation of NRS 193.330, 205.0832(1)(c),⁷

in Clark County, State of Nevada as follows:

COUNT 1
RACKETEERING
Category "B" Felony – NRS 207.400(1)(c)

Defendants **JULIO CAESAR GONZALEZ**, (a/k/a JULIO CESAR GONZALEZ-MEJIA, a/k/a CESAR GONZALEZ, a/k/a CHRISTIAN LOPEZ, a/k/a JUAN CHAVEZ GARCIA, a/k/a ALEJANDRO REYES-RODRIGUEZ, a/k/a ROMAN CONTRERAS GARCIA, a/k/a EDUARDO URIBE PENA, a/k/a CRISTIAN GONZALEZ-GONZALEZ, a/k/a CRISTIAN GONZALEZ, a/k/a ERICK CRUZ, a/k/a ERIK GARCIA, a/k/a ERICK GARCIA-GARCIA, a/k/a ALBERTO HERNANDEZ TORRES, a/k/a YELANDIS PENICHET VARGAS, a/k/a OSCAR PEREIRA SANTANA, a/k/a YOEL ARRASTIA, a/k/a LIAN GRAVE DE PERALTA ROSALES, a/k/a JORGE AYLLON-LOPEZ, a/k/a JOSE NUNEZ BADILLO, a/k/a COOKIE, a/k/a KUKY, a/k/a KUKYS); **LEANDRO FONSECA** (a/k/a LEANDRO FONSECA-CATELLANOS, a/k/a ALEJANDRO FONSECA, a/k/a ALBERTO FONSECA); **JUAN MIGUEL ANGEL JUNIOR DOLORES** (a/k/a EDVARDO ALVARES, a/k/a CESAR CAMPOS-AGUILAR); **JACOB SALAZAR-MORALES**; **DORIAN ABNER INESA**; **ELEUTERIO MORALES-RAMIREZ** (a/k/a CHRISTIAN LOPEZ); **CARLOS ALBERTO VIERA**; **JOSE DE JESUS NUNEZ BADILLO** (a/k/a JOSE NUNEZ, a/k/a JOSE NUNES); **YOEL ARRASTIAROJAS** (a/k/a YOEL ARRASTIA); **ANTHONY ROBLES**; **ERICK GARCIA-GARCIA**; **IRMA YOLANDA**

⁵ Eighteen counts against defendant JULIO CAESAR GONZALEZ; eight counts against defendant FONSECA; three counts against defendant GRAVE DE PERALTA ROSALES; two counts against defendants DOLORES, DE JESUS NUNEZ-BADILLO, DURAN ROSALES, PENICHET VARGAS, and VUELTA ARAFET; and one count against the remaining defendants.

⁶ Four counts against defendants FONSECA and JULIO CAESAR GONZALEZ; one count against defendants DOLORES, MORALES-RAMIREZ, OLIVER MONZON, ARELENE MANUELA HERNANDEZ, VIERA, BETANCOURT PREVAL, and BETANCOURT; zero counts against the remaining defendants.

⁷ Fourteen counts against defendant JULIO CAESAR GONZALEZ; four counts against defendant FONSECA; three counts against defendant GRAVE DE PERALTA ROSALES; two counts against defendants DE JESUS NUNEZ-BADILLO, DURAN ROSALES, PENICHET VARGAS, and VUELTA ARAFET; one count against defendants SALAZAR-MORALES, INESA, ARRASTIAROJAS, ROBLES, GARCIA-GARCIA, MERAZ-RANGEL, NUNEZ ARANDA, BADILLO ESPARZA, ANILU VIANEY GONZALEZ, and VALDES TARRIO; and zero counts against the remaining defendants.

1 **MERAZ-RANGEL; LIAN GRAVE DE PERALTA ROSALES; LOIPA VUELTA ARAFET;**
2 **EDUARDO DURAN ROSALES; JESUS NUNEZ-ARANDA; ELOISA BADILLO ESPARZA;**
3 **LEMAY OLIVER MONZON; ARLENE MANUELA HERNANDEZ; ANILU VIANEY**
4 **GONZALEZ (a/k/a MARIA MENDEZ); YELANDIS PENICHER VARGAS; JESSICA VALDES**
5 **TARRIO; EDGAR BETANCOURT PREVAL; and JOSE ALEJANDRO BETANCOURT (a/k/a**
6 **JOSE ALEJANDRO BETANCOURT-BENITEZ),** within Clark County, Nevada, while employed by or
7 associated with an enterprise, conducted or participated, directly or indirectly, in: (i) the affairs of the
8 enterprise through racketeering activity, or (ii) racketeering activity through the affairs of the enterprise,
9 and/or aided or abetted one or more others to engage in said conduct, to wit:

- 10 1. The allegations contained in counts two through 68 are hereby incorporated herein as if fully
11 set forth in this count.

12 **The Enterprise**

- 13 2. On or about September 2, 2014 through May 6, 2017, Defendants participated in an insurance
14 fraud ring, in which participants would intentionally cause automobile accidents and/or make
15 false claims of theft for the purpose of filing fraudulent insurance claims.

- 16 3. Defendants participated in said ring by engaging in the activities described in counts two
17 through 68, as well as the following activities:

- 18 a. With respect to the September 2, 2014 loss, defendants **SALAZAR-MORALES** and
19 **INSESA** provided the vehicle used to stage an accident and/or provided agents and/or
20 employees of Federated Insurance with false statements regarding the ownership history
21 said vehicle;
- 22 b. With respect to the September 2, 2014 loss, defendant **INESA** provided agents and/or
23 employees of Federated Insurance with false statements regarding his relationship with
24 defendant **DOLORES** and his alleged purpose in lending his vehicle to **DOLORES** on
25 the date of said loss;
- 26 c. With respect to the February 26, 2015 loss, Defendant **JULIO CAESAR**
27 **GONZALEZ**, in efforts to increase any possible insurance payout: (i) falsely held
28 himself out as driver "Christian Lopez"; (ii) filed or had another file an insurance claim

- 1 on his behalf, representing the accident as having occurred unintentionally; and/or (iii)
2 obtained medical treatment for injuries allegedly sustained on February 26, 2015;
- 3 d. With respect to the February 26, 2015 loss, Defendant **DOLORES**, in efforts to
4 increase any possible insurance payout: (i) falsely held himself out as passenger “Cesar
5 Campos-Aguilar”; (ii) filed or had another file an insurance claim on his behalf,
6 representing the accident as having occurred unintentionally; and/or (iii) obtained
7 medical treatment for injuries allegedly sustained on February 26, 2015;
- 8 e. With respect to the February 26, 2016 loss, Defendant **FONSECA** had another stage an
9 automobile accident for the purpose of having a false insurance claim filed;
- 10 f. With respect to the February 26, 2016 loss, Defendants **OLIVER MONZON** and
11 **ARLENE MANUELA HERNANDEZ**: (i) provided an automobile to be used to stage
12 an automobile accident on that day; (ii) falsely represented to agents and/or employees
13 of Nationwide Insurance that said automobile had been involved in an unintentional
14 accident; and/or (iii) falsely represented that defendant **ARLENE MANUELA**
15 **HERNANDEZ** had been in the automobile at the time of the alleged accident;
- 16 g. With respect to the September 23, 2015 loss, defendant **VIERA**, in efforts to obtain an
17 insurance payout, was a passenger in an automobile used to stage an automobile
18 accident and falsely represented that the accident was not caused intentionally;
- 19 h. With respect to the October 27, 2015 loss, defendant **DE JESUS NUNEZ BADILLO**
20 provided another with the use of his vehicle for the purpose of staging an automobile
21 accident and obtaining an insurance payout;
- 22 i. With respect to the October 27, 2015 loss, defendant **ARRASTIAROJAS** falsely
23 represented to an agent and/or employee of Farmers Insurance that he had been the
24 driver in an automobile accident on that date;
- 25 j. With respect to the December 10, 2015 loss, defendant **FONSECA**, in an effort to
26 facilitate a fraudulent insurance claim and while using the false name of “Alejandro,”
27 authorized repairs for an automobile used to stage an accident on that date;
- 28

- 1 k. With respect to the February 3, 2016 loss, defendants **NUNEZ ARANDA** and
2 **BADILLO ESPARZA** falsely represented to medical providers and/or employees
3 and/or agents of Western National Insurance that they were involved in an automobile
4 accident on that date;
- 5 l. With respect to the February 1, 2016 loss, defendants **GRAVE DE PERALTA**
6 **ROSALES** and **DURAN ROSALES** falsely represented to employees and/or agents of
7 Progressive Insurance that they had been involved in an automobile accident on that
8 date;
- 9 m. With respect to the March 7, 2016 loss, defendant **ANILU VIANEY GONZALEZ**
10 falsely represented or had another falsely represent to Progressive Insurance that her
11 name was “Maria Mendez,” and/or that the automobile accident occurring that day and
12 in which she was a passenger was caused unintentionally;
- 13 n. With respect to the March 30, 2016 loss, defendants **GARCIA-GARCIA** and
14 **MERAZ-RANGEL** provided an automobile used to stage an accident and/or falsely
15 represented to employees and/or agents of Progressive Insurance that they had been in
16 an automobile involved in the alleged accident at the time of said alleged accident;
- 17 o. With respect to the December 1, 2016 loss, defendant **ROBLES**, for the purpose of
18 attempting to obtain an insurance payout, knowingly participated in a staged automobile
19 accident by riding as a passenger in an automobile used to stage said alleged accident;
- 20 p. With respect to the April 7, 2017 loss, defendants **PENICHET VARGAS** and
21 **VALDES TARRIO** falsely represented to medical providers and/or employees and/or
22 agents of GEICO that they were involved in an automobile accident on that date;
- 23 q. With respect to the January 22, 2016 loss, defendants **FONSECA** and **DURAN**
24 **ROSALES** held themselves out to employees and/or agents of State Farm as witnesses
25 to circumstances involving an alleged theft of property belonging to defendants
26 **GRAVE DE PERALTA ROSALES** and **ARAFET**, and in doing so, made false
27 representations regarding said circumstances;
- 28

- 1 r. With respect to the January 22, 2016 loss, defendants **GRAVE DE PERALTA**
2 **ROSALES** and **ARAFET** falsely represented to employees and/or agents of State Farm
3 that their property had been stolen;
- 4 s. With respect to the October 19, 2016 loss, defendant **FONSECA** falsely held himself
5 out to employees and or agents of GEICO as defendant **BETANCOURT PREVAL**,
6 and in doing so, falsely claimed that an automobile had been stolen;
- 7 t. With respect to the October 19, 2016 loss, defendant **BETANCOURT PREVAL**
8 insured or had an another insure an automobile for the purpose of facilitating the filing
9 of a fraudulent insurance claim based on a false claim of theft;
- 10 u. With respect to the November 7, 2016 loss, defendant **FONSECA** falsely held himself
11 out to employees and or agents of GEICO as defendant **BETANCOURT**, and in doing
12 so, falsely claimed that a vehicle had been stolen;
- 13 v. With respect to the November 7, 2016 loss, defendant **BETANCOURT** insured or had
14 an another insure a vehicle for the purpose of facilitating the filing of a fraudulent
15 insurance claim based on a false claim of theft;
- 16 w. With respect to the March 9, 2017 loss, defendants **GRAVE DE PERALTA**
17 **ROSALES** and **VUELTA ARAFET**: (i) falsely claimed that **GRAVE DE PERALTA**
18 **ROSALES** had driven to Virginia to purchase the automobile they claimed to have
19 been stolen on that date; (ii) falsely claimed that an automobile and/or other personal
20 property had been stolen on that date; and/or (iii) falsely represented that defendant
21 **PENICHET VARGAS** was at the location of the alleged theft for a purpose other than
22 driving them home from the site of the alleged theft;
- 23 x. With respect to the March 9, 2017 loss, defendant **FONSECA**: (i) knowingly provided
24 the automobile to be used for the purpose of staging a theft in order to have a fraudulent
25 insurance claim filed; (ii) for the purpose of having a fraudulent insurance claim filed,
26 falsely informed State Farm employees and/or agents that he was defendant
27 **PENICHET VARGAS**; and (iii) moved said automobile in order to make it appear as
28 though it had been stolen;

- 1 y. With respect to the March 9, 2017 loss, defendant **PENICHER VARGAS** knowingly
2 assisted in facilitating a fraudulent insurance claim for theft by transporting defendants
3 **GRAVE DE PERALTA ROSALES** and **VUELTA ARAFET** from the scene of the
4 alleged theft to a police substation so that defendants **GRAVE DE PERALTA**
5 **ROSALES** and **VUELTA ARAFET** could make a false theft claim; and
6 z. With respect to the October 8, 2015 loss, defendants **FONSECA** and **DE JESUS**
7 **NUNEZ BADILLO** knowingly, falsely represented or had another represent to Ace
8 Property & Casualty Company and/or medical providers that they were involved in an
9 automobile accident on that day, which was not caused intentionally.

10 **Racketeering Activity**

- 11 4. As described in greater detail in in the present count, as well counts two through 68, which
12 charge Defendants with Racketeering, Racketeering Conspiracy, Multiple Transactions
13 Involving Fraud or Deceit in the Course of an Enterprise or Occupation, Battery with Deadly
14 Weapon, Insurance Fraud, Theft, and Attempt Theft, Defendants intentionally, personally
15 made, and/or aided another individual in knowingly and willfully making, fraudulent insurance
16 claims by (i) intentionally causing or aiding and abetting in causing, automobile collisions that
17 said individual(s) falsely claimed were the product of unintentional conduct, and/or (ii) being a
18 passenger in the vehicle causing said automobile collisions for the purpose of increasing any
19 insurance payout obtained as a result of said collisions; and/or (iii) making, or aiding and
20 abetting in the making of, false theft claims to insurance companies.

21 Defendants, either personally or by and through their agent(s), perpetrated said unlawful acts on
22 numerous entities and individuals consisting of Federated Mutual Insurance Company, Great West
23 Casualty Company, Travelers, State Farm Insurance, Farmers Insurance, Mercury Casualty Company
24 Progressive Casualty Insurance Company, Western National, Nationwide Insurance, AIG, State National
25 Insurance Company, GEICO, Ace Property & Casualty Company, Antoine Maurice Thomas, Leo Diggs,
26 Austin Welling, Delfino Cervantes, Annie Aiko, Scott Stevens, Javier Lopez, Hilario Soto-Fernandez,
27 Victor Orellena, Lloyd Rankin, Devinder Singh, Courtney Staley, Jesus Vargas, Martin Carrasco-Marin,
28 Ambrosia Loza-Aguilar, Robert Rodriguez, Alberto Elena-Sandoval, Justin Devera, and Leon Morgan, Jr.

1 **COUNT 2**
2 **RACKETEERING CONSPIRACY**
3 **Category "B" Felony – NRS 207.400(1)(j)**

4 Defendants, on or about September 2, 2014 through May 6, 2017, within Clark County, Nevada,
5 conspired to commit the crime of racketeering, as set forth in count one of the present charging document.
6 The allegations contained in counts one and three through 68 are hereby incorporated herein as if fully set
7 forth in this count.

8 **COUNT 3**
9 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN**
10 **ENTERPRISE OR OCCUPATION**
11 **Category "B" Felony – NRS 205.377**

12 Defendants **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, JUAN MIGUEL**
13 **ANGEL JUNIOR DOLORES, JOSE DE JESUS NUNEZ BADILLO, LIAN GRAVE DE PERALTA**
14 **ROSALES, LOIPA VUELTA ARAFET, EDUARDO DURAN ROSALES, and YELANDIS**
15 **PENICHET VARGAS**, in the County of Clark, State of Nevada, did, in the course of an enterprise or
16 occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of business or
17 employed a device, scheme or artifice which operated or would have operated as a fraud or deceit upon a
18 person by means of a false representation or omission of a material fact that: (a) the person knew to be
19 false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any person who
20 relied on the false representation or omission, in at least two transactions that had the same or similar
21 pattern, intents, results, accomplices, victims or methods of commission, or were otherwise interrelated by
22 distinguishing characteristics and were not isolated incidents within 4 years and in which the aggregate
23 loss or intended loss was more than \$650, to wit:

24 On or about September 2, 2014 through May 6, 2017, in and through the course of an enterprise,
25 defendants **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, JUAN MIGUEL ANGEL**
26 **JUNIOR DOLORES, JOSE DE JESUS NUNEZ BADILLO, LIAN GRAVE DE PERALTA**
27 **ROSALES, LOIPA VUELTA ARAFET, EDUARDO DURAN ROSALES, and YELANDIS**
28 **PENICHET VARGAS** knowingly and with the intent to defraud, obtained thousands of dollars from
various insurance companies by means of, either personally or through an agent, knowingly and falsely
representing to said companies that they had been involved in automobile accidents that were not the

1 product of intentional collisions and/or had personal property stolen, all of which resulted in a loss of more
2 than \$650.00. The allegations contained in counts one through two and four through 68 are hereby
3 repeated and incorporated herein as if fully set forth in this count.

4 **COUNT 4**
5 **BATTERY WITH A DEADLY WEAPON**
6 **Category "B" Felony – NRS 200.481(1)(e)(1)**

7 Defendant(s) **JUAN MIGUEL ANGEL JUNIOR DOLORES**, within Clark County, Nevada,
8 willfully and unlawfully used force or violence upon the person of another with the use of a deadly
9 weapon, which did not result in substantial bodily harm to the victim, to wit:

10 On or about September 2, 2014, **DOLORES** willfully and unlawfully caused an automobile he was
11 driving to collide with automobile driven by Antoine Maurice Thomas. The allegations contained in count
12 one are hereby incorporated herein as if fully set forth in this count.

13 **COUNT 5**
14 **INSURANCE FRAUD**
15 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

16 Defendant(s) **JUAN MIGUEL ANGEL JUNIOR DOLORES, JACOB SALAZAR-**
17 **MORALES**, and **DORIAN ABNER INESA**, within Clark County, Nevada, (i) acted or failed to act with
18 the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a
19 policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be
20 presented, or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be
21 presented, a claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada
22 Insurance Act, knowing that statement contained or omitted facts, or contained false or misleading
23 information concerning any fact material to that claim, to wit:

24 On or about September 2, 2014, through November 4, 2014, **DOLORES, SALAZAR-**
25 **MORALES**, and **INESA** staged an automobile accident and/or made false representations regarding the
26 manner in which the purported accident occurred and/or the ownership of the automobile involved in the
27 purported accident to agents of Federated Mutual Insurance Company with the intent to defraud Federated
28 Mutual Insurance Company of insurance benefits. The allegations contained in count one are hereby
29 incorporated herein as if fully set forth in this count.

///

1 **COUNT 6**
2 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
3 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

4 Defendant(s) **JUAN MIGUEL ANGEL JUNIOR DOLORES, JACOB SALAZAR-**
5 **MORALES**, and **DORIAN ABNER INESA**, in the County of Clark, State of Nevada, without lawful
6 authority, knowingly attempted to obtain real, personal or intangible property by a material
7 misrepresentation with intent to deprive that person of the property, with the value of said property being
8 \$3,500 or more, to wit:

9 On or about September 2, 2014, through November 4, 2014, **DOLORES, SALAZAR-**
10 **MORALES**, and **INESA** staged an automobile accident and/or made false representations regarding the
11 manner in which the purported accident occurred and/or the ownership of the automobile involved in the
12 purported accident to agents of Federated Mutual Insurance Company with the intent to defraud Federated
13 Mutual Insurance Company of insurance benefits valued at \$3,500 or more. The allegations contained in
14 count one are hereby incorporated herein as if fully set forth in this count.

14 **COUNT 7**
15 **BATTERY WITH A DEADLY WEAPON**
16 **Category "B" Felony – NRS 200.481(1)(e)(1)**

17 Defendant(s) **ELEUTERIO MORALES-RAMIREZ (a/k/a CHRISTIAN LOPEZ)**, within Clark
18 County, Nevada, willfully and unlawfully used force or violence upon the person of another with the use
19 of a deadly weapon, which did not result in substantial bodily harm to the victim, to wit:

20 On or about February 26, 2015, Defendant(s) **MORALES-RAMIREZ** willfully and unlawfully
21 caused an automobile he was driving to collide with an automobile driven by Leo Diggs. The allegations
22 contained in count one are hereby incorporated herein as if fully set forth in this count.

22 **COUNT 8**
23 **INSURANCE FRAUD**
24 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

25 Defendant(s) **ELEUTERIO MORALES RAMIREZ, JUAN MIGUEL ANGEL JUNIOR**
26 **DOLORES**, and **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to act
27 with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
28 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or

1 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
2 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
3 misleading information concerning any fact material to that claim, to wit:

4 On or about February 26, 2015, through June 21, 2016, Defendant(s) **MORALES RAMIREZ,**
5 **DOLORES,** and **JULIO CAESAR GONZALEZ,** either personally or through an agent, staged an
6 automobile accident and/or made false representations regarding the manner in which purported accident
7 occurred and/or injuries sustained as a result of said purported accident to agents of Nationwide Insurance
8 and/or Great West Casualty Company with the intent to defraud Nationwide Insurance and/or Great West
9 Casualty Company of insurance benefits. The allegations contained in count one are hereby incorporated
10 herein as if fully set forth in this count.

11 **COUNT 9**
12 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
13 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

14 Defendant(s) **ELEUTERIO MORALES RAMIREZ, JUAN MIGUEL ANGEL JUNIOR**
15 **DOLORES,** and **JULIO CAESAR GONZALEZ,** in the County of Clark, State of Nevada, without
16 lawful authority, knowingly obtained real, personal or intangible property by a material misrepresentation
17 with intent to deprive that person of the property, with the value of said property being \$3,500 or more, to
18 wit:

19 On or about February 26, 2015, through June 21, 2016, Defendant(s) **MORALES RAMIREZ,**
20 **DOLORES,** and **JULIO CAESAR GONZALEZ,** either personally or through an agent, knowingly
21 staged an automobile accident and/or made false representations regarding the manner in which the
22 purported accident took place and/or injuries sustained as a result of said purported accident to agents of
23 Nationwide Insurance and/or Great West Casualty Company to defraud Nationwide Insurance and/or
24 Great West Casualty Company of insurance benefits valued at \$3,500 or more. The allegations contained
25 in count one are hereby incorporated herein as if fully set forth in this count.

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1 **COUNT 10**
2 **BATTERY WITH A DEADLY WEAPON**
3 **Category "B" Felony – NRS 200.481(1)(e)(1)**

4 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
5 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
6 not result in substantial bodily harm to the victim, to wit:

7 On or about August 6, 2015, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
8 unlawfully caused an automobile he was driving to collide with an automobile driven by Austin Welling.
9 The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

10 **COUNT 11**
11 **INSURANCE FRAUD**
12 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

13 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to
14 act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
15 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
16 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
17 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
18 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
19 misleading information concerning any fact material to that claim, to wit:

20 On or about August 6, 2015 through November 11, 2015, Defendant(s) **JULIO CAESAR**
21 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
22 made false representations regarding the manner in which the purported accident took place and/or injuries
23 sustained as a result of said purported accident to agents of Travelers with the intent to defraud Travelers
24 of insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set
25 forth in this count.

26 **COUNT 12**
27 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
28 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

29 Defendant(s) **JULIO CAESAR GONZALEZ**, in the County of Clark, State of Nevada, without
30 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material

1 misrepresentation with intent to deprive that person of the property, with the value of said property being
2 \$3,500 or more, to wit:

3 On or about August 6, 2015 through November 11, 2015, Defendant(s) **JULIO CAESAR**
4 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
5 made false representations regarding the manner in which the purported accident took place and/or injuries
6 sustained as a result of said purported accident to agents of Travelers with the intent to defraud Travelers
7 of insurance benefits valued at \$3,500 or more. The allegations contained in count one are hereby
8 incorporated herein as if fully set forth in this count.

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10 **COUNT 13**
11 **BATTERY WITH A DEADLY WEAPON**
12 **Category "B" Felony – NRS 200.481(1)(e)(1)**

13 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
14 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
15 not result in substantial bodily harm to the victim, to wit:

16 On or about September 23, 2015, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
17 unlawfully caused an automobile he was driving to collide with an automobile containing Delfino
18 Cervantes and Rosa Garcia de Cervantes. The allegations contained in count one are hereby incorporated
19 herein as if fully set forth in this count.

20 **COUNT 14**
21 **INSURANCE FRAUD**
22 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

23 Defendant(s) **JULIO CAESAR GONZALEZ** and **CARLOS ALBERTO VIERA**, within Clark
24 County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent
25 thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada
26 Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or
27 conspired with another person to present or cause to be presented, a claim for payment or other benefits
28 under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement
29 contained or omitted facts, or contained false or misleading information concerning any fact material to
30 that claim, to wit:

1 On or about September 23, 2015, through October 29, 2015, **JULIO CAESAR GONZALEZ** and
2 **VIERA**, either personally or through an agent, knowingly staged an automobile accident and/or made
3 false representations regarding the manner in which the purported accident took place and/or injuries
4 sustained as a result of said purported accident to agents of State Farm Insurance with the intent to defraud
5 State Farm Insurance of insurance benefits. The allegations contained in count one are hereby incorporated
6 herein as if fully set forth in this count.

7 **COUNT 15**
8 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
9 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

10 Defendant(s) **JULIO CAESAR GONZALEZ** and **CARLOS ALBERTO VIERA**, in the County
11 of Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or
12 intangible property by a material misrepresentation with intent to deprive that person of the property, with
13 the value of said property being \$3,500 or more, to wit:

14 On or about September 23, 2015, through October 29, 2015, Defendant(s) **JULIO CAESAR**
15 **GONZALEZ** and **VIERA**, either personally or through an agent, knowingly staged an automobile
16 accident and/or made false representations regarding the manner in which the purported accident took
17 place and/or injuries sustained as a result of said purported accident to agents of State Farm Insurance with
18 the intent to defraud State Farm Insurance of insurance benefits valued at \$3,500 or more. The allegations
19 contained in count one are hereby incorporated herein as if fully set forth in this count.

20 **COUNT 16**
21 **BATTERY WITH A DEADLY WEAPON**
22 **Category "B" Felony – NRS 200.481(1)(e)(1)**

23 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
24 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
25 not result in substantial bodily harm to the victim, to wit:

26 On or about October 8, 2015, **JULIO CAESAR GONZALEZ** willfully and unlawfully caused an
27 automobile he was driving to collide with automobile driven by Justin Devera. The allegations contained
28 in count one are hereby incorporated herein as if fully set forth in this count.

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1 COUNT 17
2 INSURANCE FRAUD

3 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

4 Defendant(s) **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, and JOSE DE JESUS**
5 **NUNEZ BADILLO**, within Clark County, Nevada, (i) acted or failed to act with the intent of defrauding
6 or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of insurance
7 issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented, or
8 assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a
9 claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance
10 Act, knowing that statement contained or omitted facts, or contained false or misleading information
11 concerning any fact material to that claim, to wit:

12 On or about October 8, 2015 through November 16, 2015, **JULIO CAESAR GONZALEZ,**
13 **FONSECA, and DE JESUS NUNEZ BADILLO** staged an automobile accident and/or made false
14 representations regarding the manner in which the purported accident occurred and/or the their actual
15 identities to agents of Ace Property & Casualty Company with the intent to defraud Ace Property &
16 Casualty Company of insurance benefits. The allegations contained in count one are hereby incorporated
17 herein as if fully set forth in this count.

18 COUNT 18
19 ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE
20 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

21 Defendant(s) **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, and JOSE DE JESUS**
22 **NUNEZ BADILLO**, in the County of Clark, State of Nevada, without lawful authority, knowingly
23 attempted to obtain real, personal or intangible property by a material misrepresentation with intent to
24 deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

25 On or about October 8, 2015 through November 16, 2015, **JULIO CAESAR GONZALEZ,**
26 **FONSECA, and DE JESUS NUNEZ BADILLO** staged an automobile accident and/or made false
27 representations regarding the manner in which the purported accident occurred and/or the their actual
28 identities to agents of Ace Property & Casualty Company with the intent to defraud Ace Property &
Casualty Company of insurance benefits valued at \$3,500 or more. The allegations contained in count one
are hereby incorporated herein as if fully set forth in this count.

1 **COUNT 21**
2 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
3 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

4 Defendant(s) **JULIO CAESAR GONZALEZ, JOSE DE JESUS NUNEZ BADILLO, and**
5 **YOEL ARRASTIAROJAS**, in the County of Clark, State of Nevada, without lawful authority,
6 knowingly attempted to obtain real, personal or intangible property by a material misrepresentation with
7 intent to deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

8 On or about October 27, 2015, through June 10, 2016, Defendant(s) **JULIO CAESAR**
9 **GONZALEZ, DE JESUS NUNEZ BADILLO, and ARRASTIAROJAS**, either personally or through
10 an agent, knowingly staged an automobile accident and/or made false representations regarding the
11 manner in which the purported accident took place and/or injuries sustained as a result of said purported
12 accident to agents of Farmers Insurance with the intent to defraud Farmers Insurance of insurance benefits
13 valued at \$3,500 or more. The allegations contained in count one are hereby incorporated herein as if fully
14 set forth in this count.

15 **COUNT 22**
16 **BATTERY WITH A DEADLY WEAPON**
17 **Category "B" Felony - NRS 200.481(1)(e)(1)**

18 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
19 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
20 not result in substantial bodily harm to the victim, to wit:

21 On or about December 10, 2015, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
22 unlawfully caused an automobile he was driving to collide with an automobile driven by Scott Stevens.
23 The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

24 **COUNT 23**
25 **INSURANCE FRAUD**
26 **Category "D" Felony - NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

27 Defendant(s) **JULIO CAESAR GONZALEZ and LEANDRO FONSECA**, within Clark County,
28 Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent thereof to
obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada Insurance Act,
and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or conspired with
another person to present or cause to be presented, a claim for payment or other benefits under a policy of

1 insurance issued pursuant to the Nevada Insurance Act, knowing that statement contained or omitted facts,
2 or contained false or misleading information concerning any fact material to that claim, to wit:

3 On or about December 10, 2015, through September 7, 2016, Defendant(s) **JULIO CAESAR**
4 **GONZALEZ** and **FONSECA**, either personally or through an agent, knowingly staged an automobile
5 accident and/or made false representations regarding the manner in which the purported accident took
6 place and/or injuries sustained as a result of said purported accident to agents of State Farm with the intent
7 to defraud State Farm of insurance benefits. The allegations contained in count one are hereby
8 incorporated herein as if fully set forth in this count.

9 **COUNT 24**
10 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
11 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

12 Defendant(s) **JULIO CAESAR GONZALEZ** and **LEANDRO FONSECA**, in the County of
13 Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or
14 intangible property by a material misrepresentation with intent to deprive that person of the property, with
15 the value of said property being \$3,500 or more, to wit:

16 On or about December 10, 2015, through September 7, 2016, Defendant(s) and **JULIO CAESAR**
17 **GONZALEZ** and **FONSECA**, either personally or through an agent, knowingly staged an automobile
18 accident and/or made false representations regarding the manner in which the purported accident took
19 place and/or injuries sustained as a result of said purported accident to agents of State Farm with the intent
20 to defraud State Farm of insurance benefits valued at \$3,500 or more. The allegations contained in count
21 one are hereby incorporated herein as if fully set forth in this count.

22 **COUNT 25**
23 **BATTERY WITH A DEADLY WEAPON**
24 **Category "B" Felony – NRS 200.481(1)(e)(1)**

25 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
26 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
27 not result in substantial bodily harm to the victim, to wit:

28 On or about January 8, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
unlawfully caused an automobile he was driving to collide with an automobile driven by Javier Lopez. The
allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

1 COUNT 26
2 INSURANCE FRAUD

3 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

4 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to
5 act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
6 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
7 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
8 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
9 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
10 misleading information concerning any fact material to that claim, to wit:

11 On or about January 8, 2016, through September 1, 2016, Defendant(s) **JULIO CAESAR**
12 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
13 made false representations regarding the manner in which the purported accident took place and/or injuries
14 sustained as a result of said purported accident to agents of Farmers with the intent to defraud Farmers of
15 insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set
16 forth in this count.

17 COUNT 27
18 ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE
19 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

20 Defendant(s) **JULIO CAESAR GONZALEZ**, in the County of Clark, State of Nevada, without
21 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
22 misrepresentation with intent to deprive that person of the property, with the value of said property being
23 \$3,500 or more, to wit:

24 On or about January 8, 2016, through September 1, 2016, Defendant(s) **JULIO CAESAR**
25 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
26 made false representations regarding the manner in which the purported accident took place and/or injuries
27 sustained as a result of said purported accident to agents of Farmers with the intent to defraud Farmers of
28 insurance benefits valued at \$3,500 or more. The allegations contained in count one are hereby
29 incorporated herein as if fully set forth in this count.

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COUNT 28
BATTERY WITH A DEADLY WEAPON
Category "B" Felony - NRS 200.481(1)(e)(1)

Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did not result in substantial bodily harm to the victim, to wit:

On or about January 28, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and unlawfully caused an automobile he was driving to collide with an automobile driven by Hilario Soto-Fernandez. The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

COUNT 29
INSURANCE FRAUD
Category "D" Felony - NRS 686A.2815(2), (3), (4), and/or (8); 686A.291

Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or misleading information concerning any fact material to that claim, to wit:

On or about January 28, 2016, through September 28, 2016, Defendant(s) **JULIO CAESAR GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or made false representations regarding the manner in which the purported accident took place and/or injuries sustained as a result of said purported accident to agents of Mercury General with the intent to defraud Mercury General of insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

COUNT 30
ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835

Defendant(s) **JULIO CAESAR GONZALEZ**, in the County of Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or intangible property by a material

1 misrepresentation with intent to deprive that person of the property, with the value of said property being
2 \$3,500 or more, to wit:

3 On or about January 28, 2016, through September 28, 2016, Defendant(s) **JULIO CAESAR**
4 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
5 made false representations regarding the manner in which the purported accident took place and/or injuries
6 sustained as a result of said purported accident to agents of Mercury General with the intent to defraud
7 Mercury General of insurance benefits valued at \$3,500 or more. The allegations contained in count one
8 are hereby incorporated herein as if fully set forth in this count.

9 **COUNT 31**
10 **BATTERY WITH A DEADLY WEAPON**
11 **Category "B" Felony – NRS 200.481(1)(e)(1)**

12 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
13 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
14 not result in substantial bodily harm to the victim, to wit:

15 On or about February 1, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
16 unlawfully caused an automobile he was driving to collide with an automobile driven by Victor Orellana.
17 The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

18 **COUNT 32**
19 **INSURANCE FRAUD**
20 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

21 Defendant(s) **JULIO CAESAR GONZALEZ, LIAN GRAVE DE PERALTA ROSALES, and**
22 **EDUARDO DURAN ROSALES**, within Clark County, Nevada, (i) acted or failed to act with the intent
23 of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of
24 insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented,
25 or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a
26 claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance
27 Act, knowing that statement contained or omitted facts, or contained false or misleading information
28 concerning any fact material to that claim, to wit:

On or about February 1, 2016 through June 14, 2016, Defendant(s) **JULIO CAESAR**
GONZALEZ, GRAVE DE PERALTA ROSALES, and DURAN ROSALES, either personally or

1 through an agent, knowingly staged an automobile accident and/or made false representations regarding
2 the manner in which the purported accident took place and/or injuries sustained as a result of said
3 purported accident to agents of Progressive Casualty Insurance Company with the intent to defraud
4 Progressive Casualty Insurance Company of insurance benefits. The allegations contained in count one are
5 hereby incorporated herein as if fully set forth in this count.

6 **COUNT 33**
7 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
8 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

9 Defendant(s) **JULIO CAESAR GONZALEZ, LIAN GRAVE DE PERALTA ROSALES**, and
10 **EDUARDO DURAN ROSALES**, in the County of Clark, State of Nevada, without lawful authority,
11 knowingly attempted to obtain real, personal or intangible property by a material misrepresentation with
12 intent to deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

13 On or about February 1, 2016 through June 14, 2016, Defendant(s) **JULIO CAESAR**
14 **GONZALEZ, GRAVE DE PERALTA ROSALES**, and **DURAN ROSALES**, either personally or
15 through an agent, knowingly staged an automobile accident and/or made false representations regarding
16 the manner in which the purported accident took place and/or injuries sustained as a result of said
17 purported accident to agents of Progressive Casualty Insurance Company with the intent to defraud
18 Progressive Casualty Insurance Company of insurance benefits valued at \$3,500 or more. The allegations
19 contained in count one are hereby incorporated herein as if fully set forth in this count.

20 **COUNT 34**
21 **BATTERY WITH A DEADLY WEAPON**
22 **Category "B" Felony - NRS 200.481(1)(e)(1)**

23 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
24 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
25 not result in substantial bodily harm to the victim, to wit:

26 On or about February 3, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
27 unlawfully caused an automobile he was driving to collide with an automobile driven by Lloyd Rankin.
28 The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

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COUNT 35
INSURANCE FRAUD

Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291

Defendant(s) **JULIO CAESAR GONZALEZ, JESUS NUNEZ ARANDA, and ELOISA BADILLO ESPARZA**, within Clark County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or misleading information concerning any fact material to that claim, to wit:

On or about February 3, 2016, through May 6, 2017, Defendant(s) **JULIO CAESAR GONZALEZ, NUNEZ ARANDA, and BADILLO ESPARZA**, either personally or through an agent, knowingly staged an automobile accident and/or made false representations regarding the manner in which the purported accident took place and/or injuries sustained as a result of said purported accident to agents of Western National with the intent to defraud Western National of insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

COUNT 36
ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835

Defendant(s) **JULIO CAESAR GONZALEZ, JESUS NUNEZ ARANDA, and ELOISA BADILLO ESPARZA**, in the County of Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or intangible property by a material misrepresentation with intent to deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

On or about February 3, 2016, through May 6, 2017, Defendant(s) **JULIO CAESAR GONZALEZ, NUNEZ ARANDA, and BADILLO ESPARZA**, either personally or through an agent, knowingly staged an automobile accident and/or made false representations regarding the manner in which the purported accident took place and/or injuries sustained as a result of said purported accident to agents of Western National with the intent to defraud Western National of insurance benefits valued at \$3,500 or

1 more. The allegations contained in count one are hereby incorporated herein as if fully set forth in this
2 count.

3 **COUNT 37**
4 **BATTERY WITH A DEADLY WEAPON**
5 **Category "B" Felony – NRS 200.481(1)(e)(1)**

6 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
7 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
8 not result in substantial bodily harm to the victim, to wit:

9 On or about February 26, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
10 unlawfully caused an automobile he was driving to collide with an automobile driven by Devinder Singh,
11 also causing an automobile driven by Cesar Roberto Talavera to collide with the automobile driven by
12 Devinder Singh. The allegations contained in count one are hereby incorporated herein as if fully set forth
13 in this count.

14 **COUNT 38**
15 **INSURANCE FRAUD**
16 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

17 Defendant(s) **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, LEMAY OLIVER**
18 **MONZON, and ARLENE MANUELA HERNANDEZ**, within Clark County, Nevada, (i) acted or failed
19 to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or
20 benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented
21 or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present
22 or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant
23 to the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
24 misleading information concerning any fact material to that claim, to wit:

25 On or about February 26, 2016, through May 26, 2016, Defendant(s) **JULIO CAESAR**
26 **GONZALEZ, FONSECA, OLIVER MONZON, and ARLENE MANUELA HERNANDEZ**, either
27 personally or through an agent, knowingly staged an automobile accident and/or made false
28 representations regarding the manner in which the purported accident took place and/or injuries sustained
as a result of said purported accident to agents of Nationwide Insurance and/or Great West Casualty
Company with the intent to defraud Nationwide Insurance and/or Great West Casualty Company of

1 insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set
2 forth in this count.

3 **COUNT 39**
4 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
5 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

6 Defendant(s) **JULIO CAESAR GONZALEZ, LEANDRO FONSECA, LEMAY OLIVER**
7 **MONZON, and ARLENE MANUELA HERNANDEZ**, in the County of Clark, State of Nevada,
8 without lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
9 misrepresentation with intent to deprive that person of the property, with the value of said property being
\$3,500 or more, to wit:

10 On or about February 26, 2016, through May 26, 2016, **JULIO CAESAR GONZALEZ,**
11 **FONSECA, OLIVER MONZON, and ARLENE MANUELA HERNANDEZ**, either personally or
12 through an agent, knowingly staged an automobile accident and/or made false representations regarding
13 the manner in which the purported accident took place and/or injuries sustained as a result of said
14 purported accident to agents of Nationwide Insurance and/or Great West Casualty Company with the
15 intent to defraud Nationwide Insurance and/or Great West Casualty Company of insurance benefits valued
16 at \$3,500 or more. The allegations contained in count one are hereby incorporated herein as if fully set
17 forth in this count.

18 **COUNT 40**
19 **BATTERY WITH A DEADLY WEAPON**
20 **Category "B" Felony - NRS 200.481(1)(e)(1)**

21 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
22 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
not result in substantial bodily harm to the victim, to wit:

23 On or about March 7, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
24 unlawfully caused an automobile he was driving to collide with an automobile containing Sharae Staley
25 and Courtney Staley. The allegations contained in count one are hereby incorporated herein as if fully set
26 forth in this count.

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COUNT 41
INSURANCE FRAUD

Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291

Defendant(s) **JULIO CAESAR GONZALEZ** and **ANILU VIANEY GONZALEZ**, within Clark County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or misleading information concerning any fact material to that claim, to wit:

On or about March 7, 2016 through April 28, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** and **ANILU VIANEY GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or made false representations regarding the manner in which the purported accident took place and/or injuries sustained as a result of said purported accident to agents of Progressive Casualty Insurance Company with the intent to defraud Progressive Casualty Insurance Company of insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

COUNT 42
ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE
Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835

Defendant(s) **JULIO CAESAR GONZALEZ** and **ANILU VIANEY GONZALEZ**, in the County of Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or intangible property by a material misrepresentation with intent to deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

On or about March 7, 2016 through April 28, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** and **ANILU VIANEY GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or made false representations regarding the manner in which the purported accident took place and/or injuries sustained as a result of said purported accident to agents of Progressive Casualty Insurance Company with the intent to defraud Progressive Casualty Insurance Company of

1 insurance benefits valued at \$3,500 or more. The allegations contained in count one are hereby
2 incorporated herein as if fully set forth in this count.

3 **COUNT 43**
4 **BATTERY WITH A DEADLY WEAPON**
5 **Category "B" Felony – NRS 200.481(1)(e)(1)**

6 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
7 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
8 not result in substantial bodily harm to the victim, to wit:

9 On or about March 14, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
10 unlawfully caused an automobile he was driving to collide with an automobile driven by Gary Coble. The
11 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

12 **COUNT 44**
13 **INSURANCE FRAUD**
14 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

15 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to
16 act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
17 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
18 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
19 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
20 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
21 misleading information concerning any fact material to that claim, to wit:

22 On or about March 14, 2016 through November 22, 2016, Defendant(s) **JULIO CAESAR**
23 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
24 made false representations regarding the manner in which the purported accident took place and/or injuries
25 sustained as a result of said purported accident to agents of AIG with the intent to defraud AIG of
26 insurance benefits. The allegations contained in count one are hereby incorporated herein as if fully set
27 forth in this count.

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1 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
2 misleading information concerning any fact material to that claim, to wit:

3 On or about March 25, 2016 through August 8, 2016, Defendant(s) **JULIO CAESAR**
4 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
5 made false representations regarding the manner in which the purported accident took place and/or injuries
6 sustained as a result of said purported accident to agents of Nationwide Insurance with the intent to
7 defraud Nationwide Insurance of insurance benefits. The allegations contained in count one are hereby
8 incorporated herein as if fully set forth in this count.

9 **COUNT 48**
10 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
11 **Category "C" Felony – NRS 193.330, 205.0832(1)(c), and 205.0835**

12 Defendant(s) **JULIO CAESAR GONZALEZ**, in the County of Clark, State of Nevada, without
13 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
14 misrepresentation made with intent to deprive that person of the property, with the value of said property
15 being \$3,500 or more, to wit:

16 On or about March 25, 2016 through August 8, 2016, Defendant(s) **JULIO CAESAR**
17 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
18 made false representations regarding the manner in which the purported accident took place and/or injuries
19 sustained as a result of said purported accident to agents of Nationwide Insurance in order to attempt to
20 defraud Nationwide Insurance of insurance benefits valued at \$3,500 or more. The allegations contained in
21 count one are hereby incorporated herein as if fully set forth in this count.

22 **COUNT 49**
23 **BATTERY WITH A DEADLY WEAPON**
24 **Category "B" Felony – NRS 200.481(1)(e)(1)**

25 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
26 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
27 not result in substantial bodily harm to the victim, to wit:

28 On or about March 30, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
unlawfully caused an automobile he was driving to collide with an automobile driven by Ambrosio Loza-

1 Aguiar. The allegations contained in count one are hereby incorporated herein as if fully set forth in this
2 count.

3 **COUNT 50**
4 **INSURANCE FRAUD**
5 **Category "D" Felony - NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

6 Defendant(s) **JULIO CAESAR GONZALEZ, ERICK GARCIA-GARCIA, and IRMA**
7 **YOLANDA MERAZ-RANGEL**, within Clark County, Nevada, (i) acted or failed to act with the intent of
8 defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits under a policy of
9 insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or caused to be presented,
10 or assisted, aided, abetted, solicited, or conspired with another person to present or cause to be presented, a
11 claim for payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance
12 Act, knowing that statement contained or omitted facts, or contained false or misleading information
13 concerning any fact material to that claim, to wit:

14 On or about March 30, 2016, through May 31, 2016, Defendant(s) **JULIO CAESAR**
15 **GONZALEZ, GARCIA-GARCIA, and MERAZ-RANGEL**, either personally or through an agent,
16 knowingly staged an automobile accident and/or made false representations regarding the manner in which
17 the purported accident took place and/or injuries sustained as a result of said purported accident to agents
18 of Progressive Casualty Insurance Company with the intent to defraud Progressive Casualty Insurance
19 Company of insurance benefits. The allegations contained in count one are hereby incorporated herein as if
20 fully set forth in this count.

21 **COUNT 51**
22 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
23 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

24 Defendant(s) **JULIO CAESAR GONZALEZ, ERICK GARCIA-GARCIA, and IRMA**
25 **YOLANDA MERAZ-RANGEL**, in the County of Clark, State of Nevada, without lawful authority,
26 knowingly attempted to obtain real, personal or intangible property by a material misrepresentation with
27 intent to deprive that person of the property, with the value of said property being \$3,500 or more, to wit:

28 On or about March 30, 2016, through May 31, 2016, Defendant(s) **JULIO CAESAR**
GONZALEZ, GARCIA-GARCIA, and MERAZ-RANGEL, either personally or through an agent,
knowingly staged an automobile accident and/or made false representations regarding the manner in which

1 the purported accident took place and/or injuries sustained as a result of said purported accident to agents
2 of Progressive Casualty Insurance Company with the intent to defraud Progressive Casualty Insurance
3 Company of insurance benefits valued at \$3,500 or more. The allegations contained in count one are
4 hereby incorporated herein as if fully set forth in this count.

5 **COUNT 52**
6 **BATTERY WITH A DEADLY WEAPON**
7 **Category "B" Felony – NRS 200.481(1)(e)(1)**

8 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
9 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
10 not result in substantial bodily harm to the victim, to wit:

11 On or about June 23, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and unlawfully
12 caused an automobile he was driving to collide with an automobile driven by Robert Rodriguez. The
13 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

14 **COUNT 53**
15 **INSURANCE FRAUD**
16 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

17 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, (i) acted or failed to
18 act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
19 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
20 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
21 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
22 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
23 misleading information concerning any fact material to that claim, to wit:

24 On or about June 23, 2016, through August 23, 2016, Defendant(s) **JULIO CAESAR**
25 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
26 made false representations regarding the manner in which the purported accident took place and/or injuries
27 sustained as a result of said purported accident to agents of State National Insurance Company with the
28 intent to defraud State National Insurance Company of insurance benefits. The allegations contained in
count one are hereby incorporated herein as if fully set forth in this count.

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4 **COUNT 54**

5 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
6 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

7 Defendant(s) **JULIO CAESAR GONZALEZ**, in the County of Clark, State of Nevada, without
8 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
9 misrepresentation with intent to deprive that person of the property, with the value of said property being
10 \$3,500 or more, to wit:

11 On or about June 23, 2016, through August 23, 2016, Defendant(s) **JULIO CAESAR**
12 **GONZALEZ**, either personally or through an agent, knowingly staged an automobile accident and/or
13 made false representations regarding the manner in which the purported accident took place and/or injuries
14 sustained as a result of said purported accident to agents of State National Insurance Company with the
15 intent to defraud State National Insurance Company of insurance benefits valued at \$3,500 or more. The
16 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

17 **COUNT 55**

18 **BATTERY WITH A DEADLY WEAPON**
19 **Category "B" Felony - NRS 200.481(1)(e)(1)**

20 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
21 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
22 not result in substantial bodily harm to the victim, to wit:

23 On or about December 1, 2016, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and
24 unlawfully caused an automobile he was driving to collide with an automobile driven by Alberto Elena-
25 Sandoval. The allegations contained in count one are hereby incorporated herein as if fully set forth in this
26 count.

27 **COUNT 56**

28 **INSURANCE FRAUD**
Category "D" Felony - NRS 686A.2815(2), (3), (4), and/or (8); 686A.291

Defendant(s) **JULIO CAESAR GONZALEZ** and **ANTHONY ROBLES**, within Clark County,
Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent thereof to
obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada Insurance Act,

1 and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or conspired with
2 another person to present or cause to be presented, a claim for payment or other benefits under a policy of
3 insurance issued pursuant to the Nevada Insurance Act, knowing that statement contained or omitted facts,
4 or contained false or misleading information concerning any fact material to that claim, to wit:

5 On or about December 1, 2016 through May 6, 2017, Defendant(s) **JULIO CAESAR**
6 **GONZALEZ** and **ROBLES**, either personally or through an agent, knowingly staged an automobile
7 accident and/or made false representations regarding the manner in which the purported accident took
8 place and/or injuries sustained as a result of said purported accident to agents of Progressive with the
9 intent to defraud Progressive of insurance benefits. The allegations contained in count one are hereby
10 incorporated herein as if fully set forth in this count.

11 **COUNT 57**
12 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
13 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

14 Defendant(s) **JULIO CAESAR GONZALEZ** and **ANTHONY ROBLES**, in the County of
15 Clark, State of Nevada, without lawful authority, knowingly attempted to obtain real, personal or
16 intangible property by a material misrepresentation with intent to deprive that person of the property, with
17 the value of said property being \$3,500 or more, to wit:

18 On or about December 1, 2016 through May 6, 2017, Defendant(s) **JULIO CAESAR**
19 **GONZALEZ** and **ROBLES**, either personally or through an agent, knowingly staged an automobile
20 accident and/or made false representations regarding the manner in which the purported accident took
21 place and/or injuries sustained as a result of said purported accident to agents of Progressive with the
22 intent to defraud Progressive of insurance benefits valued at \$3,500 or more. The allegations contained in
23 count one are hereby incorporated herein as if fully set forth in this count.

24 **COUNT 58**
25 **BATTERY WITH A DEADLY WEAPON**
26 **Category "B" Felony – NRS 200.481(1)(e)(1)**

27 Defendant(s) **JULIO CAESAR GONZALEZ**, within Clark County, Nevada, willfully and
28 unlawfully used force or violence upon the person of another with the use of a deadly weapon, which did
not result in substantial bodily harm to the victim, to wit:

1 On or about April 7, 2017, Defendant(s) **JULIO CAESAR GONZALEZ** willfully and unlawfully
2 caused an automobile he was driving to collide with an automobile driven by Leon Morgan, Jr. The
3 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

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5 **COUNT 59**
6 **INSURANCE FRAUD**
7 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

8 Defendant(s) **JULIO CAESAR GONZALEZ, YELANDIS PENICHER VARGAS, JESSICA**
9 **VALDES TARRIO, and LEANDRO FONSECA**, within Clark County, Nevada, (i) acted or failed to act
10 with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
11 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
12 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
13 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
14 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
15 misleading information concerning any fact material to that claim, to wit:

16 On or about April 7, 2017 through May 6, 2017, Defendant(s) **JULIO CAESAR GONZALEZ,**
17 **PENICHER VARGAS, VALDES TARRIO, and FONSECA**, either personally or through an agent,
18 knowingly staged an automobile accident and/or made false representations regarding the manner in which
19 the purported accident took place and/or injuries sustained as a result of said purported accident to agents
20 of GEICO with the intent to defraud GEICO of insurance benefits. The allegations contained in count one
21 are hereby incorporated herein as if fully set forth in this count.

22 **COUNT 60**
23 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
24 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

25 Defendant(s) **JULIO CAESAR GONZALEZ, YELANDIS PENICHER VARGAS, JESSICA**
26 **VALDES TARRIO, and LEANDRO FONSECA**, in the County of Clark, State of Nevada, without
27 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
28 misrepresentation with intent to deprive that person of the property, with the value of said property being
\$3,500 or more, to wit:

On or about April 7, 2017 through May 6, 2017, Defendant(s) **JULIO CAESAR GONZALEZ,**
PENICHER VARGAS, VALDES TARRIO, and FONSECA, either personally or through an agent,

1 knowingly staged an automobile accident and/or made false representations regarding the manner in which
2 the purported accident took place and/or injuries sustained as a result of said purported accident to agents
3 of GEICO with the intent to defraud Progressive of insurance benefits valued at \$3,500 or more. The
4 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

5 **COUNT 61**
6 **INSURANCE FRAUD**
7 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

8 Defendant(s) **LIAN GRAVE DE PERALTA, EDUARDO DURAN ROSALES, LOIPA**
9 **VUELTA ARAFET, and LEANDRO FONSECA**, within Clark County, Nevada, (i) acted or failed to act
10 with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
11 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
12 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
13 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
14 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
15 misleading information concerning any fact material to that claim, to wit:

16 On or about January 22, 2016 through April 19, 2016, Defendant(s) **GRAVE DE PERALTA,**
17 **DURAN ROSALES, VUELTA ARAFET, and FONSECA**, either personally or through an agent, in an
18 attempt to obtain insurance benefits, falsely informed one or more representatives of State Farm that
19 property of Defendant(s) **GRAVE DE PERALTA and VUELTA ARAFET** had been stolen. The
20 allegations contained in count one are hereby incorporated herein as if fully set forth in this count.

21 **COUNT 62**
22 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
23 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

24 Defendant(s) **LIAN GRAVE DE PERALTA, EDUARDO DURAN ROSALES, LOIPA**
25 **VUELTA ARAFET, and LEANDRO FONSECA**, in the County of Clark, State of Nevada, without
26 lawful authority, knowingly attempted to obtain real, personal or intangible property by a material
27 misrepresentation with intent to deprive that person of the property, with the value of said property being
28 \$3,500 or more, to wit:

On or about January 22, 2016 through April 19, 2016, Defendant(s) **GRAVE DE PERALTA,**
DURAN ROSALES, VUELTA ARAFET, and FONSECA, either personally or through an agent,

1 knowingly, falsely informed one or more representatives of State Farm that property of Defendant(s)
2 **GRAVE DE PERALTA** and **VUELTA ARAFET** had been stolen, with the intent to defraud State Farm
3 of insurance benefits valued at \$3,500 or more. The allegations contained in count one are hereby
4 incorporated herein as if fully set forth in this count.

5 **COUNT 63**
6 **INSURANCE FRAUD**

7 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

8 Defendant(s) **EDGAR BETANCOURT PREVAL** and **LEANDRO FONSECA**, within Clark
9 County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent
10 thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada
11 Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or
12 conspired with another person to present or cause to be presented, a claim for payment or other benefits
13 under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement
14 contained or omitted facts, or contained false or misleading information concerning any fact material to
15 that claim, to wit:

16 On or about October 19, 2016 through October 27, 2016, Defendant(s) **BETANCOURT**
17 **PREVAL** and **FONSECA**, either personally or through an agent, in an attempt to obtain insurance
18 benefits, falsely informed one or more representatives of GEICO, or caused one or more representatives of
19 GEICO to be informed, that: (i) property of Defendant(s) **BETANCOURT PREVAL** had been stolen,
20 and/or (ii) **BETANCOURT PREVAL** was personally making the insurance claim. The allegations
21 contained in count one are hereby incorporated herein as if fully set forth in this count.

22 **COUNT 64**
23 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
24 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

25 Defendant(s) **EDGAR BETANCOURT PREVAL** and **LEANDRO FONSECA**, in the County of
26 Clark, State of Nevada, without lawful authority, knowingly obtained real, personal or intangible property
27 by a material misrepresentation with intent to deprive that person of the property, with the value of said
28 property being \$3,500 or more, to wit:

On or about October 19, 2016 through October 27, 2016, Defendant(s) **BETANCOURT**
PREVAL and **FONSECA**, either personally or through an agent, knowingly, falsely informed one or

1 more representatives of State Farm, or caused one or more representatives of State Farm to be informed,
2 that: (i) property of Defendant(s) **BETANCOURT PREVAL** had been stolen, and/or (ii)
3 **BETANCOURT PREVAL** was personally making the insurance claim, with the intent and effect of
4 defrauding GEICO of insurance benefits valued at \$3,500 or more. The allegations contained in count one
5 are hereby incorporated herein as if fully set forth in this count.

6 **COUNT 65**
7 **INSURANCE FRAUD**

8 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

9 Defendant(s) **JOSE ALEJANDRO BETANCOURT** and **LEANDRO FONSECA**, within Clark
10 County, Nevada, (i) acted or failed to act with the intent of defrauding or deceiving an insurer or agent
11 thereof to obtain any proceeds or benefits under a policy of insurance issued pursuant to the Nevada
12 Insurance Act, and and/or (ii) presented or caused to be presented, or assisted, aided, abetted, solicited, or
13 conspired with another person to present or cause to be presented, a claim for payment or other benefits
14 under a policy of insurance issued pursuant to the Nevada Insurance Act, knowing that statement
15 contained or omitted facts, or contained false or misleading information concerning any fact material to
16 that claim, to wit:

17 On or about November 7, 2016 through February 2, 2017, Defendant(s) **BETANCOURT** and
18 **FONSECA**, either personally or through an agent, in an attempt to obtain insurance benefits, falsely
19 informed one or more representatives of GEICO, or caused one or more representatives of GEICO to be
20 informed, that: (i) property of Defendant(s) **BETANCOURT** had been stolen, and/or (ii)
21 **BETANCOURT** was personally making the insurance claim. The allegations contained in count one are
22 hereby incorporated herein as if fully set forth in this count.

23 **COUNT 66**
24 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**
25 **Category "B" Felony - NRS 205.0832(1)(c), and 205.0835**

26 Defendant(s) **JOSE ALEJANDRO BETANCOURT** and **LEANDRO FONSECA**, in the County
27 of Clark, State of Nevada, without lawful authority, knowingly obtained real, personal or intangible
28 property by a material misrepresentation with intent to deprive that person of the property, with the value
of said property being \$3,500 or more, to wit:

1 On or about November 7, 2016 through February 2, 2017, Defendant(s) **BETANCOURT** and
2 **FONSECA**, either personally or through an agent, knowingly, falsely informed one or more
3 representatives of State Farm, or caused one or more representatives of State Farm to be informed, that: (i)
4 property of Defendant(s) **BETANCOURT** had been stolen, and/or (ii) **BETANCOURT** was personally
5 making the insurance claim, with the intent and effect of defrauding GEICO of insurance benefits valued
6 at \$3,500 or more. The allegations contained in count one are hereby incorporated herein as if fully set
7 forth in this count.

8 **COUNT 67**
9 **INSURANCE FRAUD**

10 **Category "D" Felony – NRS 686A.2815(2), (3), (4), and/or (8); 686A.291**

11 Defendant(s) **LIAN GRAVE DE PERALTA, LOIPA VUELTA ARAFET, YELANDIS**
12 **PENICHET VARGAS**, and **LEANDRO FONSECA**, within Clark County, Nevada, (i) acted or failed to
13 act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or benefits
14 under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented or
15 caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present or
16 cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant to
17 the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
18 misleading information concerning any fact material to that claim, to wit:

19 On or about March 9, 2017 through May 6, 2017, Defendant(s) **GRAVE DE PERALTA,**
20 **VUELTA ARAFET, PENICHET VARGAS**, and **FONSECA**, either personally or through an agent, in
21 an attempt to obtain insurance benefits, falsely informed one or more representatives of State Farm that
22 their property had been stolen. The allegations contained in count one are hereby incorporated herein as if
23 fully set forth in this count.

24 **COUNT 68**
25 **ATTEMPT THEFT IN THE AMOUNT OF \$3,500 OR MORE**
26 **Category "C" Felony - NRS 193.330, 205.0832(1)(c), and 205.0835**

27 Defendant(s) **LIAN GRAVE DE PERALTA, LOIPA VUELTA ARAFET, YELANDIS**
28 **PENICHET VARGAS**, and **LEANDRO FONSECA**, in the County of Clark, State of Nevada, without
lawful authority, knowingly attempted to obtain real, personal or intangible property by a material

1 misrepresentation with intent to deprive that person of the property, with the value of said property being
2 \$3,500 or more, to wit:

3 On or about March 9, 2017 through May 6, 2017, Defendant(s) **GRAVE DE PERALTA, LOIPA**
4 **VUELTA ARAFET, PENICHET VARGAS, and FONSECA**, either personally or through an agent,
5 knowingly, falsely informed one or more representatives of State Farm that their property had been stolen,
6 with the intent to defraud State Farm of insurance benefits valued at \$3,500 or more. The allegations
7 contained in count one are hereby incorporated herein as if fully set forth in this count.

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

10 DATED this 14 day of September, 2017.

11 SUBMITTED BY

12 ADAM PAUL LAXALT
13 Attorney General

14 By: Michael C. Kovac
15 Michael C. Kovac, Bar No. 11177
16 Senior Deputy Attorney General
17 *Attorneys for the State of Nevada*

18 ENDORSEMENT: A True Bill

19 By: John R. Blachin
20 Foreperson, Clark County Grand Jury
21 GJ# 16BGJ151A-X
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