

1 **AIND**
ADAM PAUL LAXALT
2 Attorney General
Michael C. Kovac, Bar No. 11177
3 Chief Deputy Attorney General
Office of the Attorney General
4 555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101-1068
5 P: (702) 486-5706
F: (702) 486-2377
6 MKovac@ag.nv.gov
Attorneys for the State of Nevada

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

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 LEMAY OLIVER MONZON, ID # 2648020,

14 Defendant.

Case No.: C-17-326471-18
Dept. No.: XVIII

15
16 **AMENDED INDICTMENT**

17 The above-named defendant, LEMAY OLIVER MONZON, is accused by the Clark County Grand
18 Jury of the crimes(s) of one (1) count of INSURANCE FRAUD, a category “D” felony, in violation of
19 NRS 686A.2815(2), (3), (4), and/or (8), and 686A.291, in Clark County, Nevada as follows:

20 **COUNT I**
INSURANCE FRAUD

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

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

1 On or about February 26, 2016, through May 26, 2016, Defendant(s) LEMAY OLIVER
2 MONZON, 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 Nationwide Insurance and/or Great West
5 Casualty Company with the intent to defraud Nationwide Insurance and/or Great West Casualty Company
6 of insurance benefits.

7 All of which constitutes the crime of INSURANCE FRAUD, a category "D" felony, in violation
8 NRS 686A.2815(2), (3), (4), and/or (8), and 686A.291.

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

11 DATED this _____ day of _____, 2018.

12 SUBMITTED BY

13 ADAM PAUL LAXALT
14 Attorney General

15 By:

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

18 ENDORSEMENT: A True Bill

19
20 By: _____
21 Foreperson, Clark County Grand Jury
GJ #16BGJ151-A-X