

1 **AIND**  
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7  
8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 YELANDIS PENICHET VARGAS, ID  
#6069120,

14 Defendant.

Case No.: C-17-326471-21  
Dept. No.: XVIII

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17 **AMENDED INDICTMENT**

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

21 **COUNT I**  
**INSURANCE FRAUD**

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

23 Defendant(s) YELANDIS PENICHET VARGAS, within Clark County, Nevada, (i) acted or failed  
24 to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or  
25 benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented  
26 or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present  
27 or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant  
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1 to 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 April 7, 2017, through May 6, 2017, Defendant(s) YELANDIS PENICHET  
4 VARGAS, either personally or through an agent, knowingly staged an automobile accident and/or made  
5 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 GEICO with the intent to defraud GEICO of  
7 insurance benefits.

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

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

12 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

13 SUBMITTED BY

14 ADAM PAUL LAXALT  
15 Attorney General

16 By:

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

19 ENDORSEMENT: A True Bill

20  
21 By: \_\_\_\_\_  
22 Foreperson, Clark County Grand Jury  
23 GJ #16BGJ151-A-X  
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