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FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

MAR 1 - 2018

BY: 
ALAN PAUL CASTLE, SR, DEPUTY

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

C-17-326471-1
AIND
Amended Indictment
4725499



10 STATE OF NEVADA,

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

11 Plaintiff,

12 v.

13 JULIO CAESAR GONZALEZ, ID #1892303,

14 Defendant.

15
16 AMENDED INDICTMENT

17 The above-named defendant, JULIO CAESAR GONZALEZ, is accused by the Clark County
18 Grand Jury of the crimes(s) of:

- 19 • one count of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE
20 COURSE OF AN ENTERPRISE OR OCCUPATION, a category "B" felony, in violation of NRS
21 205.377;
22 • one count of INSURANCE FRAUD, a category D felony, in violation of NRS 686A.2815,
23 686A.291, and
24 • one count of CONSPIRACY TO COMMIT INSURANCE FRAUD, a gross misdemeanor, in
25 violation of NRS 199.480, 686A.2815, 686A.291,

26 in Clark County, Nevada as follows:

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1 **COUNT 1**
2 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN**
3 **ENTERPRISE OR OCCUPATION**
4 **Category "B" Felony – NRS 205.377**

5 Defendant JULIO CAESAR GONZALEZ, in Clark County, Nevada, did, in the course of an
6 enterprise or occupation, knowingly and with the intent to defraud, engaged in an act, practice or course of
7 business or employed a device, scheme or artifice which operated or would have operated as a fraud or
8 deceit upon a person by means of a false representation or omission of a material fact that: (a) the person
9 knew to be false or omitted; (b) the person intended another to rely on; and (c) resulted in a loss to any
10 person who relied on the false representation or omission, in at least two transactions that had the same or
11 similar pattern, intents, results, accomplices, victims or methods of commission, or were otherwise
12 interrelated by distinguishing characteristics and were not isolated incidents within 4 years and in which
the aggregate loss or intended loss was more than \$650, to wit:

13 On or about September 2, 2014 through May 6, 2017, in and through the course of an enterprise,
14 defendant JULIO CAESAR GONZALEZ knowingly and with the intent to defraud, obtained, or assisted
15 others in obtaining, thousands of dollars from various insurance companies by means of, either personally
16 or through an agent, staging multiple automobile collisions and/or knowingly and falsely representing to
17 said insurance companies that he had been involved in multiple automobile accidents that were not the
18 product of intentional collisions, resulting in a loss of more than \$650.00.

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

22 Defendant(s) JULIO CAESAR GONZALEZ, within Clark County, Nevada, (i) acted or failed to
23 act 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 September 2, 2014 through May 6, 2017, Defendant(s) JULIO CAESAR
2 GONZALEZ, either personally or through an agent, knowingly and intentionally staged multiple
3 automobile collisions and/or made false representations regarding the manner in which the purported
4 accidents took place and/or injuries sustained as a result of said purported accidents to agents of numerous
5 insurance companies with the intent to defraud said companies of insurance benefits.

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

8 **COUNT 3**
9 **CONSPIRACY TO COMMIT INSURANCE FRAUD**
10 **Gross Misdemeanor – NRS 199.480; 686A.2815(2), (3), (4), and/or (8); 686A.291**

11 On or about September 2, 2014 through May 6, 2017, Defendant(s) JULIO CAESAR
12 GONZALEZ, within Clark County, Nevada, conspired with one or more other individuals to commit the
13 crime of insurance fraud, as more specifically described in count two of the present indictment. Count two
14 is hereby incorporated by reference as if fully set forth in the present count.

15 All of which constitutes the crime of CONSPIRACY TO COMMIT INSURANCE FRAUD, a
16 gross misdemeanor, in violation NRS 199.480; 686A.2815(2), (3), (4), and/or (8), and 686A.291.

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

19 DATED this 1st day of March, 2018.

20 SUBMITTED BY

21 ADAM PAUL LAXALT
22 Attorney General

23 By: /s/ Michael C. Kovac
24 Michael C. Kovac, Bar No. 11177
25 Chief Deputy Attorney General
26 *Attorneys for the State of Nevada*

27 ENDORSEMENT: A True Bill

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