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**FILED**

2018 MAY 18 P 1:15

JUSTICE COURT  
LAS VEGAS NEVADA  
BY DB  
DEPUTY

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9 **JUSTICE COURT, LAS VEGAS TOWNSHIP**  
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA, ) Case No.: 18F09130ABCDEFG  
12 Plaintiff, ) Dept. No.: 5  
13 vs. )  
14 NA VAR DERICK LEE )  
a.k.a. NAVAR DERICK LEE )  
15 (ID #8191341); TAMEKA NICOLE )  
GREEN (ID# 5008921); TIFFANY )  
16 SHERRIE RUSSELL; LATRICE DENISE )  
HALL a.k.a. LATRICE DENISE LEE; )  
17 KASHEVA RASHAWN MCGRUDER )  
(ID #6036366); CIBELEANA DENISA )  
18 DRAIN; and NAKESHAI LASHAWN )  
NICHOLSON, )  
19 Defendants. )  
20

21 **CRIMINAL COMPLAINT**

22 ADAM PAUL LAXALT, Attorney General for the state of Nevada, complains and charges  
23 that:

24 Defendant, NA VAR DERICK LEE, committed the crimes of: Seven (7) Counts of  
25 INSURANCE FRAUD, category D felonies in violation of NRS 686A.281 to NRS 686A.295,  
26 inclusive; Five (5) Counts of THEFT OF \$3,500 OR MORE, category B felonies in violation of NRS  
27 205.0821 to NRS 205.0835, inclusive; Two (2) Counts of ATTEMPT THEFT OF \$3,500 OR MORE,  
28 category C felonies in violation of NRS 193.330 and NRS 205.0821 to NRS 205.0835, inclusive; One

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Criminal Complaint  
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1 (1) Count of EXTORTION, a category B felony in violation of NRS 205.320; and Two (2) Counts of  
2 MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE  
3 OR OCCUPATION, category B felonies in violation of NRS 205.377.

4 Defendant, TAMEKA NICOLE GREEN, committed the crimes of: One (1) Count of  
5 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
6 inclusive; and One (1) Count of THEFT OF \$3,500 OR MORE, a category B felony in violation of  
7 NRS 205.0821 to NRS 205.0835, inclusive.

8 Defendant, TIFFANY SHERRIE RUSSELL, committed the crimes of: One (1) Count of  
9 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
10 inclusive; and One (1) Count of THEFT OF \$3,500 OR MORE, a category B felony in violation of  
11 NRS 205.0821 to NRS 205.0835, inclusive.

12 Defendant, LATRICE DENISE HALL, committed the crimes of: One (1) Count of  
13 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
14 inclusive; and One (1) Count of THEFT OF \$3,500 OR MORE, a category B felony in violation of  
15 NRS 205.0821 to NRS 205.0835, inclusive.

16 Defendant, KASHEVA RASHAWN MCGRUDER, committed the crimes of: One (1) Count of  
17 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
18 inclusive; and One (1) Count of THEFT OF \$3,500 OR MORE, a category B felony in violation of  
19 NRS 205.0821 to NRS 205.0835, inclusive.

20 Defendant, CIBELEANA DENISA DRAIN, committed the crimes of: One (1) Count of  
21 INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
22 inclusive; and One (1) Count of ATTEMPT THEFT OF \$3,500 OR MORE, a category C felony in  
23 violation of NRS 193.330 and NRS 205.0821 to NRS 205.0835, inclusive.

24 Defendant, NAKESHAI LASHAWN NICHOLSON, committed the crimes of: One (1) Count  
25 of INSURANCE FRAUD, a category D felony in violation of NRS 686A.281 to NRS 686A.295,  
26 inclusive; and One (1) Count of THEFT OF \$3,500 OR MORE, a category B felony in violation of  
27 NRS 205.0821 to NRS 205.0835, inclusive.

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1 All of the acts alleged herein were committed on or between about May 20, 2015 and  
2 September 23, 2016, by the above-named defendants, within the county of Clark, state of Nevada, in  
3 the following manner:

4 **COUNT I**  
5 **INSURANCE FRAUD**  
6 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

7 On or between about May 20, 2015 and June 19, 2015, Defendants, NA VAR DERICK LEE  
8 and TAMEKA NICOLE GREEN, did without lawful authority, knowingly and willfully present or  
9 cause to be presented any statement as a part of, or in support of, a claim for payment or other benefits  
10 under a policy of insurance, knowing that the statement conceals or omits facts, or contains false or  
11 misleading information concerning any fact material to that claim; and/or act or fail to act with the  
12 intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to  
13 obtain any proceeds or other benefits under a policy of insurance; and/or accept any proceeds or other  
14 benefits under a policy of insurance knowing that the proceeds or other benefits are derived from any of  
15 the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or conspire with another  
16 person to present or cause to be presented any statement to an insurer, a reinsurer, a producer, a broker  
17 or any agent thereof, knowing that the statement conceals or omits facts, or contains false or misleading  
18 information concerning any fact material to a claim for payment or other benefits under a policy of  
19 insurance, or any of the foregoing acts or omissions, to wit:

20 The above-named defendants presented a false insurance claim to State Farm Mutual  
21 Automobile Insurance Company, under claim number 28-6K74-918, claiming that on May 20, 2015,  
22 Defendant, NA VAR DERICK LEE, was hit by a motor vehicle driven by Defendant, TAMEKA  
23 NICOLE GREEN, when in truth and in fact, the accident never occurred. In so doing, Defendant, NA  
24 VAR DERICK LEE, wrongfully accepted insurance proceeds or other benefits.

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1 **COUNT II**  
2 **THEFT OF \$3,500 OR MORE**  
3 **(Category B Felony – NRS 205.0821 to NRS 205.0835, inclusive)**

4 On or between about May 20, 2015 and June 19, 2015, Defendants, NA VAR DERICK LEE  
5 and TAMEKA NICOLE GREEN, did without lawful authority, knowingly obtain real, personal or  
6 intangible property or the services of another person, valued at \$3,500 or more, by a material  
7 misrepresentation with intent to deprive that person of the property or services, to wit:

8 The above-named defendants presented a false insurance claim to State Farm Mutual  
9 Automobile Insurance Company, under claim number 28-6K74-918, claiming that on May 20, 2015,  
10 Defendant, NA VAR DERICK LEE, was hit by a motor vehicle driven by Defendant, TAMEKA  
11 NICOLE GREEN, when in truth and in fact, the accident never occurred. In so doing, Defendant, NA  
12 VAR DERICK LEE, wrongfully obtained insurance proceeds or other benefits in the amount of  
13 \$15,000.

14 **COUNT III**  
15 **INSURANCE FRAUD**  
16 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

17 On or between about October 11, 2015 and November 17, 2015, Defendants, NA VAR  
18 DERICK LEE and TIFFANY SHERRIE RUSSELL, did without lawful authority, knowingly and  
19 willfully present or cause to be presented any statement as a part of, or in support of, a claim for  
20 payment or other benefits under a policy of insurance, knowing that the statement conceals or omits  
21 facts, or contains false or misleading information concerning any fact material to that claim; and/or act  
22 or fail to act with the intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or  
23 any agent thereof, to obtain any proceeds or other benefits under a policy of insurance; and/or accept  
24 any proceeds or other benefits under a policy of insurance knowing that the proceeds or other benefits  
25 are derived from any of the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or  
26 conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer,  
27 a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or  
28 contains false or misleading information concerning any fact material to a claim for payment or other  
benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

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1 The above-named defendants presented a false insurance claim to State Farm Fire and Casualty  
2 Company, under claim number 28-7H54-025, claiming that on October 11, 2015, Defendant, NA VAR  
3 DERICK LEE, was hit by a motor vehicle driven by Defendant, TIFFANY SHERRIE RUSSELL,  
4 when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR DERICK LEE,  
5 wrongfully accepted insurance proceeds or other benefits.

6 **COUNT IV**  
7 **THEFT OF \$3,500 OR MORE**  
8 **(Category B Felony – NRS 205.0821 to NRS 205.0835, inclusive)**

9 On or between about October 11, 2015 and November 17, 2015, Defendants, NA VAR  
10 DERICK LEE and TIFFANY SHERRIE RUSSELL, did without lawful authority, knowingly obtain  
11 real, personal or intangible property or the services of another person, valued at \$3,500 or more, by a  
12 material misrepresentation with intent to deprive that person of the property or services, to wit:

13 The above-named defendants presented a false insurance claim to State Farm Fire and Casualty  
14 Company, under claim number 28-7H54-025, claiming that on October 11, 2015, Defendant, NA VAR  
15 DERICK LEE, was hit by a motor vehicle driven by Defendant, TIFFANY SHERRIE RUSSELL,  
16 when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR DERICK LEE,  
17 wrongfully obtained insurance proceeds or other benefits in the amount of \$7,500.

18 **COUNT V**  
19 **INSURANCE FRAUD**  
20 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

21 On or between about November 22, 2015 and December 11, 2015, Defendants, NA VAR  
22 DERICK LEE and LATRICE DENISE HALL, did without lawful authority, knowingly and willfully  
23 present or cause to be presented any statement as a part of, or in support of, a claim for payment or  
24 other benefits under a policy of insurance, knowing that the statement conceals or omits facts, or  
25 contains false or misleading information concerning any fact material to that claim; and/or act or fail to  
26 act with the intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or any agent  
27 thereof, to obtain any proceeds or other benefits under a policy of insurance; and/or accept any  
28 proceeds or other benefits under a policy of insurance knowing that the proceeds or other benefits are  
derived from any of the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or  
conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer,

1 a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or  
2 contains false or misleading information concerning any fact material to a claim for payment or other  
3 benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

4 The above-named defendants presented a false insurance claim to USAA General Indemnity  
5 Company, under claim number 026663611-7102-6, claiming that on November 22, 2015, Defendant,  
6 NA VAR DERICK LEE, was hit by a motor vehicle driven by Defendant, LATRICE DENISE HALL,  
7 when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR DERICK LEE,  
8 wrongfully accepted insurance proceeds or other benefits.

9 **COUNT VI**  
10 **THEFT OF \$3,500 OR MORE**  
11 **(Category B Felony – NRS 205.0821 to NRS 205.0835, inclusive)**

12 On or between about November 22, 2015 and December 11, 2015, Defendants, NA VAR  
13 DERICK LEE and LATRICE DENISE HALL, did without lawful authority, knowingly obtain real,  
14 personal or intangible property or the services of another person, valued at \$3,500 or more, by a  
15 material misrepresentation with intent to deprive that person of the property or services, to wit:

16 The above-named defendants presented a false insurance claim to USAA General Indemnity  
17 Company, under claim number 026663611-7102-6, claiming that on November 22, 2015, Defendant,  
18 NA VAR DERICK LEE, was hit by a motor vehicle driven by Defendant, LATRICE DENISE HALL,  
19 when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR DERICK LEE,  
20 wrongfully obtained insurance proceeds or other benefits in the amount of \$13,000.

21 **COUNT VII**  
22 **INSURANCE FRAUD**  
23 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

24 On or between about January 27, 2016 and April 26, 2016, Defendants, NA VAR DERICK  
25 LEE and KASHEVA RASHAWN MCGRUDER, did without lawful authority, knowingly and  
26 willfully present or cause to be presented any statement as a part of, or in support of, a claim for  
27 payment or other benefits under a policy of insurance, knowing that the statement conceals or omits  
28 facts, or contains false or misleading information concerning any fact material to that claim; and/or act  
or fail to act with the intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or  
any agent thereof, to obtain any proceeds or other benefits under a policy of insurance; and/or accept

1 any proceeds or other benefits under a policy of insurance knowing that the proceeds or other benefits  
2 are derived from any of the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or  
3 conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer,  
4 a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or  
5 contains false or misleading information concerning any fact material to a claim for payment or other  
6 benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

7 The above-named defendants presented a false insurance claim to GEICO Casualty Company,  
8 under claim number 054172644-0101-018, claiming that on January 27, 2016, Defendant, NA VAR  
9 DERICK LEE, was hit by a motor vehicle driven by Defendant, KASHEVA RASHAWN  
10 MCGRUDER, when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR  
11 DERICK LEE, wrongfully accepted insurance proceeds or other benefits.

12 **COUNT VIII**  
13 **THEFT OF \$3,500 OR MORE**  
14 **(Category B Felony – NRS 205.0821 to NRS 205.0835, inclusive)**

15 On or between about January 27, 2016 and April 26, 2016, Defendants, NA VAR DERICK  
16 LEE and KASHEVA RASHAWN MCGRUDER, did without lawful authority, knowingly obtain real,  
17 personal or intangible property or the services of another person, valued at \$3,500 or more, by a  
18 material misrepresentation with intent to deprive that person of the property or services, to wit:

19 The above-named defendants presented a false insurance claim to GEICO Casualty Company,  
20 under claim number 054172644-0101-018, claiming that on January 27, 2016, Defendant, NA VAR  
21 DERICK LEE, was hit by a motor vehicle driven by Defendant, KASHEVA RASHAWN  
22 MCGRUDER, when in truth and in fact, the accident never occurred. In so doing, Defendant, NA VAR  
23 DERICK LEE, wrongfully obtained insurance proceeds or other benefits in the amount of \$10,000.

24 **COUNT IX**  
25 **INSURANCE FRAUD**  
26 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

27 On or between about March 9, 2016 and July 27, 2016, Defendants, NA VAR DERICK LEE  
28 and CIBELEANA DENISA DRAIN, did without lawful authority, knowingly and willfully present or  
cause to be presented any statement as a part of, or in support of, a claim for payment or other benefits  
under a policy of insurance, knowing that the statement conceals or omits facts, or contains false or





1 insurance, knowing that the statement conceals or omits facts, or contains false or misleading  
2 information concerning any fact material to that claim; and/or act or fail to act with the intent of  
3 defrauding or deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any  
4 proceeds or other benefits under a policy of insurance; and/or participate in, assist, aid, abet, solicit or  
5 conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer,  
6 a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or  
7 contains false or misleading information concerning any fact material to a claim for payment or other  
8 benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

9 The above-named defendant, acting in the name of Allen Davis, presented a false insurance  
10 claim to GEICO General Insurance Company, under claim number 040319961-0101-068, claiming that  
11 on July 4, 2016, he was hit by a motor vehicle driven by the insured Kiesha Maddox, when in truth and  
12 in fact, the accident never occurred.

13 **COUNT XII**  
14 **ATTEMPT THEFT OF \$3,500 OR MORE**  
15 **(Category C Felony – NRS 193.330 and NRS 205.0821 to NRS 205.0835, inclusive)**

16 On or between about July 4, 2016 and September 23, 2016, Defendant, NA VAR DERICK  
17 LEE, did without lawful authority, knowingly attempt to obtain real, personal or intangible property or  
18 the services of another person, valued at \$3,500 or more, by a material misrepresentation with intent to  
19 deprive that person of the property or services, to wit:

20 The above-named defendant, acting as Allen Davis, presented a false insurance claim to GEICO  
21 General Insurance Company, under claim number 040319961-0101-068, claiming that on July 4, 2016,  
22 he was hit by a motor vehicle driven by the insured, Kiesha Maddox, when in truth and in fact, the  
23 accident never occurred. Charges for healthcare in the amount of \$6,638 were submitted in support of  
24 said claim.

25 **COUNT XIII**  
26 **EXTORTION**  
27 **(Category B Felony – NRS 205.320)**

28 On or between about July 4, 2016 and September 23, 2016, Defendant, NA VAR DERICK  
LEE, did without lawful authority, with the intent to extort or gain any money or other property or to  
compel or induce another to make, subscribe, execute, alter or destroy any valuable security or

1 instrument or writing affecting or intended to affect any cause of action or defense, or any property, or  
2 to influence the action of any public officer, or to do or abet or procure any illegal or wrongful act,  
3 whether or not the purpose was accomplished, threatened directly or indirectly: (1) to accuse any  
4 person of a crime; (2) to injure a person or property; (3) to publish or connive at publishing any libel;  
5 (4) to expose or impute to any person any deformity or disgrace; or (5) to expose any secret, to wit:

6 The above-named defendant threatened to injure the insured, Kiesha Maddox, and/or her family  
7 member(s) with the intent to obtain proceeds or other benefits related to the presentation of a false  
8 insurance claim to GEICO General Insurance Company, under claim number 040319961-0101-068,  
9 claiming that on July 4, 2016, he was hit by a motor vehicle driven by the insured Kiesha Maddox,  
10 when in truth and in fact, the accident never occurred.

11 **COUNT XIV**  
12 **INSURANCE FRAUD**  
13 **(Category D Felony - NRS 686A.281 to NRS 686A.295, inclusive)**

14 On or between about July 19, 2016 and August 11, 2016, Defendants, NA VAR DERICK LEE  
15 and NAKESHAI LASHAWN NICHOLSON, did without lawful authority, knowingly and willfully  
16 present or cause to be presented any statement as a part of, or in support of, a claim for payment or  
17 other benefits under a policy of insurance, knowing that the statement conceals or omits facts, or  
18 contains false or misleading information concerning any fact material to that claim; and/or act or fail to  
19 act with the intent of defrauding or deceiving an insurer, a reinsurer, a producer, a broker or any agent  
20 thereof, to obtain any proceeds or other benefits under a policy of insurance; and/or accept any  
21 proceeds or other benefits under a policy of insurance knowing that the proceeds or other benefits are  
22 derived from any of the foregoing acts or omissions; and/or participate in, assist, aid, abet, solicit or  
23 conspire with another person to present or cause to be presented any statement to an insurer, a reinsurer,  
24 a producer, a broker or any agent thereof, knowing that the statement conceals or omits facts, or  
25 contains false or misleading information concerning any fact material to a claim for payment or other  
26 benefits under a policy of insurance, or any of the foregoing acts or omissions, to wit:

27 The above-named defendants presented a false insurance claim to American Family Insurance  
28 Company, under claim number 00-185-140271, claiming that on July 19, 2016, Defendant, NA VAR  
DERICK LEE, acting as Johnnie Ridley, was hit by a motor vehicle driven by Defendant, NAKESHAI

1 LASHAWN NICHOLSON, when in truth and in fact, the accident never occurred. In so doing,  
2 Defendant, NA VAR DERICK LEE, wrongfully accepted insurance proceeds or other benefits.

3 **COUNT XV**  
4 **THEFT OF \$3,500 OR MORE**  
5 **(Category B Felony – NRS 205.0821 to NRS 205.0835, inclusive)**

6 On or between about July 19, 2016 and August 11, 2016, Defendants, NA VAR DERICK LEE  
7 and NAKESHAI LASHAWN NICHOLSON, did without lawful authority, knowingly obtain real,  
8 personal or intangible property or the services of another person, valued at \$3,500 or more, by a  
9 material misrepresentation with intent to deprive that person of the property or services, to wit:

10 The above-named defendants presented a false insurance claim to American Family Insurance  
11 Company, under claim number 00-185-140271, claiming that on July 19, 2016, Defendant, NA VAR  
12 DERICK LEE, acting as Johnnie Ridley, was hit by a motor vehicle driven by Defendant, NAKESHAI  
13 LASHAWN NICHOLSON, when in truth and in fact, the accident never occurred. In so doing,  
14 Defendant, NA VAR DERICK LEE, wrongfully obtained insurance proceeds or other benefits in the  
15 amount of \$5,166.

16 **COUNT XVI**  
17 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**  
18 **IN COURSE OF ENTERPRISE OR OCCUPATION**  
19 **(Category B Felony – NRS 205.377)**

20 On or between about May 20, 2015 and August 11, 2016, Defendant, NA VAR DERICK LEE,  
21 did without lawful authority, in the course of an enterprise or occupation, knowingly and with the intent  
22 to defraud, engage in an act, practice or course of business or employ a device, scheme or artifice which  
23 operated or would operate as a fraud or deceit upon a person by means of a false representation or  
24 omission of a material fact that: (a) he knew to be false or omitted; (b) he intended another to rely on;  
25 and (c) resulted in a loss to any person who relied on the false representation or omission, in at least  
26 two transactions that have the same or similar pattern, intents, results, accomplices, victims or methods  
27 of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated  
28 incidents within 4 years and in which the aggregate loss or intended loss is more than \$650, to wit:

The above-named defendant presented at least two false insurance claims as a source of income  
which resulted in a loss to insurance companies of more than \$650. The allegations contained in counts

1 I through VIII and counts XIV through XV above are hereby incorporated herein by this reference as  
2 though fully set forth in count XVI.

3 **COUNT XVII**  
4 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT**  
5 **IN COURSE OF ENTERPRISE OR OCCUPATION**  
6 **(Category B Felony – NRS 205.377)**

7 On or between about March 9, 2016 and September 23, 2016, Defendant, NA VAR DERICK  
8 LEE, did without lawful authority, in the course of an enterprise or occupation, knowingly and with the  
9 intent to defraud, engage in an act, practice or course of business or employ a device, scheme or artifice  
10 which operated or would operate as a fraud or deceit upon a person by means of a false representation  
11 or omission of a material fact that: (a) he knew to be false or omitted; (b) he intended another to rely  
12 on; and (c) resulted in a loss to any person who relied on the false representation or omission, in at least  
13 two transactions that have the same or similar pattern, intents, results, accomplices, victims or methods  
14 of commission, or are otherwise interrelated by distinguishing characteristics and are not isolated  
15 incidents within 4 years and in which the aggregate loss or intended loss is more than \$650, to wit:

16 The above-named defendant presented at least two false insurance claims as a source of income  
17 with an intended loss to insurance companies of more than \$650. The allegations contained in counts  
18 IX through XIII above are hereby incorporated herein by this reference as though fully set forth in  
19 count XVII.

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

22 *The complainant hereby requests that an Arrest Warrant be issued at this time, pursuant to*  
23 *NRS 171.106, as to Defendants, NA VAR DERICK LEE and NAKESHAI LASHAWN*  
24 *NICHOLSON.* The complainant knows that said crimes occurred and that the above-named defendants  
25 committed the same based upon the following: Because the complainant is a Senior Deputy Attorney  
26 General, and is in possession of, among other things, an affidavit written by Investigator Ryan Evans,  
27 known to the complainant to be employed with the Office of the Attorney General, a copy of which is  
28 attached hereto and incorporated herein by reference for the limited purpose of securing warrants of  
arrest.


1           The complainant hereby requests that a Summons in Lieu of Arrest be issued at this time,  
2 pursuant to NRS 171.106, as to Defendants, **TAMEKA NICOLE GREEN, TIFFANY SHERRIE**  
3 **RUSSELL, LATRICE DENISE HALL, KASHEVA RASHAWN MCGRUDER, and CIBELEANA**  
4 **DENISA DRAIN**. The complainant knows that said crimes occurred and that the above-named  
5 defendants committed the same based upon the following: Because the complainant is a Senior Deputy  
6 Attorney General, and is in possession of, among other things, an affidavit written by Investigator Ryan  
7 Evans, known to the complainant to be employed with the Office of the Attorney General, a copy of  
8 which is attached hereto and incorporated herein by reference for the limited purpose of securing  
9 summons in lieu of arrest.

10           The complainant makes this declaration subject to the penalty for perjury.

11           DATED this 17th day of May, 2018.

12   SUBMITTED BY:

13   ADAM PAUL LAXALT  
14   Attorney General

15                   By:  \_\_\_\_\_  
16   ROGER R. MADSEN (NV Bar No. 7075)  
17   Senior Deputy Attorney General  
18   Attorneys for State of Nevada  
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AFFIDAVIT OF RYAN EVANS

**FILED**

IN SUPPORT OF COMPLAINT AND SUMMONS IN LIEU OF ARREST AND

WARRANT OF ARREST

2018 MAY 18 P 1:15

STATE OF NEVADA )  
COUNTY OF CLARK )

ss:

JUSTICE COURT  
LAS VEGAS, NEVADA  
DB  
BY \_\_\_\_\_  
DEPUTY

1. RYAN EVANS, first being duly sworn, according to law, and based on information and belief, do hereby swear the assertions of this affidavit are true.

2. That Affiant is employed as a Criminal Investigator II for the Nevada Attorney General's Office, Insurance Fraud Unit.

3. In support of the assertion to constitute the existence of probable cause, the following facts are offered.

4. On or about September 15, 2016, Debbie Robinett, Special Investigations Unit (SIU) Investigator with GEICO referred a complaint alleging insurance fraud to the Attorney General's Office. The complaint alleged **NA VAR DERICK LEE a/k/a NAVAR DERICK LEE** (hereinafter **LEE**, ID #8191341) reported to GEICO that he was struck by a 2002 Honda Civic sedan (hereinafter Civic) bearing NV plate 835-LSN and VIN #1HGES26702L018890 as he walked near Lone Mountain Rd. and Lawrence St. in North Las Vegas, Nevada. The Civic driver was Kiesha Maddox, and the accident occurred on 07/04/16 around 1:00 a.m. to 4:00 a.m. The alleged accident was filed under claim number 0403199610101068. During their investigation, GEICO discovered that **LEE** filed the claim using the alias Allen Davis, and conspired with Maddox to report an accident that never happened. Maddox eventually recanted and told GEICO their entire claim was fabricated. It was also discovered that **LEE** had a history of filing similar pedestrian claims with various insurance companies.

5. Maddox's mother (Dorine Maddox) had the Civic insured with GEICO. The policy number was 4206-49-21-28, with effective dates from June 15, 2016 – December 15, 2016. Coverage for bodily injury was \$15,000, property damage liability \$10,000, with a \$500 collision deductible.

6. On July 8, 2016, Maddox called GEICO to report her claim. She claimed the

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1 pedestrian accident occurred on 07/04/16 around 2:30 a.m. at the stop sign near Lawrence  
2 and Lone Mountain. The male (note: she didn't provide his name) didn't want to call the police  
3 and walked away with a limp.

4 7. On July 9, 2016, Maddox called the Las Vegas Metropolitan Police Department  
5 (LVMPD) and reported **LEE** had threatened and extorted her into submitting a false insurance  
6 claim.

7 8. On or about July 12, 2016, the claim was referred to the GEICO SIU because  
8 Maddox said Allen Davis wasn't the real name of the claimant, and the accident never  
9 occurred. Maddox also claimed she was threatened.

10 9. On July 21, 2016, Allen Davis called GEICO regarding the accident claim, and it  
11 was recorded. Davis claimed he was walking when the accident occurred around 1:00 a.m. to  
12 4:00 a.m. near Lone Mountain and Lawrence. Davis said he was injured, limped home, and  
13 woke up the next day in "excruciating pain." Davis claimed he had some X-rays taken at  
14 Desert Springs Hospital, received an ankle brace, and fractured his hand. Davis was asked if  
15 the information he provided was true and correct. He replied "yes, sir."

16 10. I listened to GEICO's audio recording of Allen Davis and compared it to **LEE's**  
17 voice from recorded interviews he provided in separate insurance claims with State Farm  
18 (10/11/15), USAA (11/22/15), GEICO (01/27/16), and Liberty Mutual (03/09/16). The voice of  
19 Allen Davis and **LEE** sounded similar.

20 11. On July 21, 2016, GEICO Investigator Robinett called Davis' phone: 702-500-  
21 3376 for a follow up interview. Davis indicated he wanted to settle the claim without further  
22 delays.

23 12. On or about July 22, 2016, Davis faxed his medical documents from Desert  
24 Springs Hospital to GEICO in support of his claim. Davis visited the hospital on 07/06/16,  
25 almost two days after the alleged accident. The records indicated Davis complained of pain in  
26 his left shoulder, left knee, and left wrist. He provided the address: 1012 Mezpah St. Las  
27 Vegas, NV 89106, and DOB: 08/02/85.

28 13. On July 26, 2016, GEICO Investigator Robinett interviewed Maddox regarding

1 her claim. In summary:

- 2 • Maddox first met **LEE** on 07/03/16 through the dating website Plenty of Fish.
- 3 • She picked **LEE** up in her Civic around midnight, visited her mother's residence,
- 4 became intimate, and returned him to his residence at the Emerald Suites.
- 5 However, **LEE** would not exit her vehicle and eventually threatened Maddox into
- 6 filing a false insurance claim. **LEE** told Maddox what to say and she called GEICO
- 7 to report the false claim while he remained in her car.
- 8 • After Maddox reported the claim to GEICO, **LEE** exited her vehicle and said all he
- 9 had to do was call GEICO and claim he was involved. **LEE** also told Maddox she
- 10 couldn't go back on what she said.
- 11 • **LEE** told Maddox she would get in trouble for filing a false claim, and **LEE** didn't
- 12 provide his information so he wouldn't be in trouble.
- 13 • **LEE** claimed to know the law and never used his own information "so he doesn't get
- 14 his hands dirty."
- 15 • **LEE** said he provided his friend's identity (note: Allen Davis) to GEICO and if
- 16 Maddox got him in trouble Davis would hurt Maddox and her family. Davis was
- 17 going to cash the insurance check and share the money with **LEE**.
- 18 • Investigator Robinett viewed text messages from **LEE** talking about how people get
- 19 killed when they snitch and that he used to "bully and beat up snitches."
- 20 • Investigator Robinett noted in her report the following texts were sent by **LEE** to
- 21 Maddox on 07/11/16 from his number 626-376-3878 [sic]:
- 22 • *'Why you ignoring me, WYD, I wanted to hear your voice, you want me to erase*
- 23 *your number, I actually had some good news for you but if you're still on some other*
- 24 *shit let me know, I really need your bank info, I have a idea, I got \$13,000 coming,*
- 25 *put in your bank, I'll give it to you half the money now instead of waiting on the case*
- 26 *to finish that way you can't say you don't trust me, you gonna have your money now*
- 27 *so I am giving you \$6,500 so we can be done with this and you realize I am a real*
- 28 *man, I don't lie, when I say I got you I really mean that, about to settle with the*
- insurance, call me, so you ignoring me and I am trying to tell you I talked to the*
- insurance and I settled, so you don't want your money?, I dont want you to say I am*
- a shady person, I am not gonna beg you, it's a lot of money so hit me I know you*
- need it I am a man of my word, when you get these thousands in your hand you just*
- want an apology, I am sorry for the arguing, you were sweet to me and I was in an*
- angry place, it wasn't you it was me, I miss you friend I would never hurt you or play*
- you, if you don't want it at least get it for your son.'*



1           14. On or about July 28, 2016, Investigator Robinett did a database search with the  
2 phone number 626-376-3878, and located a match for **LEE**. I also did a database search for  
3 **LEE** and the phone number 626-376-3878 returned as a possible match. Furthermore, a  
4 [www.spydialer.com](http://www.spydialer.com) phone search revealed the name "Navar" near Pasadena, CA.

5           15. On July 28, 2016, Investigator Robinett called Davis and requested an interview.  
6 He declined, and told her she was legally obligated to tell him about her investigation.  
7 Investigator Robinett disagreed, but Davis claimed he knew because he was a lawyer.

8           16. On or about September 27, 2016, GEICO denied Davis' claim because their  
9 investigation revealed the accident "did not take place."

10           17. On January 9, 2018, I tried calling **LEE** for an interview with the number 626-  
11 376-3878, but the number was no longer in service. I called various other numbers for **LEE**  
12 but was unsuccessful.

13           18. On January 10, 2018, I telephonically interviewed Maddox regarding Davis'  
14 claim. In summary:

- 15           • On or about July 3, 2016, Maddox met **LEE** online through the dating website  
16 [www.pof.com](http://www.pof.com) (Plenty of Fish). They hung out for a while, and **LEE** told her to file a  
17 fake insurance claim regarding her Civic.
- 18           • Maddox owned her Honda Civic outright, but was insured under her Mom's (Dorine  
19 Maddox) GEICO policy.
- 20           • **LEE** and Maddox had a brief intimate relationship for one night, and **LEE** lived in a  
21 Budget or Siegel Suites near Paradise or Swenson St. in Las Vegas. **LEE** traveled  
22 back and forth between California and Nevada.
- 23           • **LEE** told Maddox to tell GEICO that she hit a guy called "Allen Davis" with her Civic.  
24 Maddox thought Davis might have been **LEE's** friend living in Las Vegas, but she  
25 never met Davis or knew if he was a real person. Allen Davis would be **LEE's** alias,  
26 and **LEE** explained he did a lot of insurance scams using aliases.
- 27           • **LEE** told Maddox this is what he did for money (filing fake insurance claims) and  
28 that is how he lived. **LEE** didn't say how long or how much money he had

1 previously received, but claimed he did the scam with various insurance companies.  
2 **LEE** told her he knew the law and knew what he was doing. It appeared to Maddox  
3 that **LEE** was operating alone.

- 4 • For the scam, **LEE** provided Maddox the cross streets (near Lone Mountain &  
5 Lawrence) in North Las Vegas and told her to say she accidentally hit Allen Davis  
6 on the right side of her Civic as he was walking around 3 a.m. on 07/04/16.
- 7 • **LEE** was sitting next to Maddox in her Civic (outside his residence at Budget or  
8 Siegel Suites) when she initially called GEICO to report the fictitious claim.
- 9 • Initially, Maddox didn't want to go through with the scam, and hadn't done  
10 something like that in her life. However, **LEE** started threatening her right away,  
11 and was very aggressive. **LEE** physically threatened Maddox and said he would kill  
12 her and her son (currently, about 8 years old). Maddox was overwhelmed and  
13 scared of **LEE**, but still reported the phony claim to GEICO.
- 14 • Sometime later, Maddox heard **LEE** call GEICO and claim he was Allen Davis.
- 15 • A few days later, Maddox told GEICO and her mother Dorine the truth about the  
16 scam. Maddox eventually helped a GEICO Investigator regarding her claim.
- 17 • Maddox said she never submitted any documents to GEICO and didn't know if **LEE**  
18 did.
- 19 • Maddox stopped seeing **LEE** about a week after they met. However, **LEE**  
20 continued to text her for about a month. Maddox filed a police report against **LEE**  
21 with the Las Vegas Metropolitan Police Department (LVMPD).
- 22 • According to Maddox, **LEE** is a very aggressive person, and he did not have a car  
23 when they met. **LEE** is high maintenance, and she didn't know his current  
24 whereabouts.
- 25 • Maddox was willing to testify in court against **LEE**.

26 19. On January 18, 2018, Investigator K. Huss and I interviewed Allen Davis at the  
27 Clark County Detention Center (CCDC) regarding the 07/04/16 claim. Davis was in custody,  
28 and was read his Miranda rights. He agreed to talk with us, and allowed the interview to be

1 recorded. In summary:

- 2 • Davis stated he lost his Driver's License twice in 2016. The first time it occurred  
3 was in the beginning of 2016, and the second time was right after his birthday.
- 4 • Sometime around June or July 2016, Davis visited the hospital because he  
5 slammed the door on his foot "real bad" when he was playing with his twin  
6 daughters. He incurred a limp, and also messed up his hand from a fight. Davis  
7 said his foot injury was at home, but the fight occurred outside.
- 8 • Davis explained he was running behind his young twin daughters and slammed his  
9 foot in the door. Davis did not injure his knee or shoulder, just his foot, and he  
10 visited Desert Springs Hospital. Davis thought the incident might have occurred  
11 around the first of the year.
- 12 • Davis has not visited the hospital since that time in 2016. His hand injury occurred  
13 maybe a couple of months later, but he didn't see a doctor, or receive medical  
14 attention. Davis claimed he had been in a lot of fights, and his hand was swollen.
- 15 • Davis has not filed any insurance claims in the last two years "none." He has not  
16 helped anyone file an insurance claim, and nobody has asked him to file a claim. "I  
17 don't do scams or nothin' like that."
- 18 • Nobody has asked Davis to file a fake claim in the last two years. Davis believed  
19 quick scheme money would "go too fast" and you "don't get no justice out of it."
- 20 • In 2016, Davis lived at 1012 Mezpah Las Vegas, NV 89106. It's an address he's  
21 used for years, and his aunt (Evelyn Fitzgerald) has lived there a long time. Davis  
22 frequently moves.
- 23 • Davis' cell phone provider in 2016 was T-Mobile, and his number was 702-969-  
24 6091.
- 25 • Shirley Banks is Davis' mother, and Tori Carter is his girlfriend of 11 years. Carter's  
26 phone: 702-809-7454.
- 27 • Davis was not employed in 2016. He cut hair as a barber at his house, and he did  
28 not have health insurance. He survived with help from his girlfriend.

- 1 • Davis has never filed a claim with GEICO.
- 2 • Davis reiterated he has not helped someone out with an insurance claim, and
- 3 nobody has asked him to file a fake claim.
- 4 • Davis did not know LEE "hell no." He was shown a black and white photo of LEE's
- 5 California Driver's License and did not recognize him.
- 6 • We told Davis there were discrepancies with his story. Davis said it was his ID that
- 7 we showed him from his visit to Desert Springs Hospital. Davis stated he visited for
- 8 the injury to his foot, not his hand. He thought he received stitches to his hand from
- 9 a preexisting injury possibly in 2015 to his pinkie finger.
- 10 • We read the Desert Springs Hospital report from the 07/06/16 visit about pain to his
- 11 left shoulder, left knee, and left wrist. Davis also reported being struck by a vehicle.
- 12 Davis replied: "I don't remember that."
- 13 • According to Davis, somebody backed up into his leg at his apartment. He claimed
- 14 it was an "old white lady." She hit his right leg or something, and he forgot about it.
- 15 Davis did not file any insurance claim for the accident, and claimed the unknown
- 16 female "barely even tapped me." His knee wasn't swollen. The accident occurred
- 17 where Davis was staying at 1413 Silver Mesa Circle. The 80 year old female hit his
- 18 foot, and nothing happened with his shoulder. Davis did not call the police, was not
- 19 hurt, and the female "barely even touched me." He claimed that's why he visited
- 20 the hospital.
- 21 • Davis was living at 1413 Silver Mesa with his daughters, and didn't recall talking to
- 22 GEICO.
- 23 • Davis said he got bumped, and his knee was hurting. The accident occurred at
- 24 night time around 8 p.m. The "sun probably had been down maybe 30 minutes, 40
- 25 minutes, or something like that." It wasn't 2:00 a.m. or 3:00 a.m. "no, hell no." The
- 26 female was driving a small car like a silver or white Nissan Sentra. They didn't call
- 27 the police, and Davis didn't get her information because he wasn't hurt. He had a
- 28 minor bruise to his leg. Davis reiterated it was "barely, a barely, barely tap." They

1 took X-rays of his left foot, and hand.

- 2 • Davis repeated he did not know **LEE** and did not recognize his picture.
- 3 • I asked Davis how **LEE** would know his information and he alleged maybe **LEE**  
4 found his ID or stole it from his car. "I don't know him."
- 5 • Davis indicated GEICO most likely recorded their conversation with whoever filed  
6 the claim.
- 7 • Davis was shown the faxed Desert Springs Hospital document sent to GEICO on  
8 07/22/16. He said it wasn't his "handwriting." Davis claimed his credit report listed  
9 about \$10,000 in past medical bills.
- 10 • Davis said he was done talking to us, wanted an attorney, and he did not do scams.  
11 He reaffirmed the lady "barely tapped me," it felt like playing with his daughters, and  
12 it was nothing.

13 20. On January 17, 2018, I visited the records department at Desert Springs  
14 Hospital to see what ID was provided to the hospital for Davis' 07/06/16 visit. Their record  
15 clearly showed Davis' Nevada Driver's License.

16 21. On February 13, 2018, I visited Desert Springs Hospital again to see who signed  
17 Davis' medical records disclosure form dated 07/07/16. Davis listed the reason for releasing  
18 his records was "for insurance." Although Davis denied being involved with **LEE** regarding  
19 any insurance claims, the only logical conclusion from the information obtained from the  
20 hospital was that Davis provided his medical records to **LEE**, who then provided them to  
21 GEICO.

22 22. During the course of my investigation, I discovered **LEE** had additional  
23 insurance claims that were similar to the aforementioned GEICO claim. **LEE** claimed injuries  
24 from five additional pedestrian accidents located within the Las Vegas area from 2015-2016  
25 (see below). I also discovered the National Insurance Crime Bureau (NICB) had  
26 approximately 30-40 pedestrian accident claims pending against **LEE** and his possible co-  
27 conspirators in California and Nevada. It's possible **LEE** is associated with a staged  
28 pedestrian accident ring.

23. **SUMMARY OF LEE'S NEVADA CLAIMS:**

**05/20/15 Accident**

Claim against: State Farm (#286K74918)

Location: Vicinity of Clayton St/Tropical Pkwy

Type: Pedestrian Accident (around 12:00-12:30 a.m.)

Driver: Tameka Green

Vehicle: 2014 Jeep Patriot Sport SUV, VIN: 1C4NJPBB9ED870632

Owner: Tameka Green

Police Report: No

Payout: \$15,000 (check #124145800J, dated 05/29/15) to **LEE**

Red Flags: **LEE** struck in crosswalk. **LEE's** CA ID card listed his address: 445 N. Garfield Ave. #218 Pasadena, CA 91101. Per NICB, Garfield Ave. #218 address linked to **LEE** and numerous claims. Tameka Green knew **LEE** and has been involved with other pedestrian claims. Green was the driver in two separate pedestrian accidents on 11/21/15 & 07/04/16 with State Farm. Green was the victim in a separate pedestrian accident on 03/25/17 with Key Insurance.

- On February 14, 2018, Investigator K. Huss and I interviewed Tameka Green (ID #5008921) at her work regarding the accident. Green was not in custody, agreed to being recorded, and provided the following information. In summary:
- Green recalled the pedestrian accident on 05/20/15 with "Mr. **LEE**." She did not meet **LEE** before the accident occurred, and didn't know him at any time prior to the accident.
- Green struck **LEE** with her vehicle sometime at night. She didn't see him, and heard something hit her vehicle. Green exited her vehicle and saw **LEE** on the ground. Green provided her address and insurance information to **LEE**. **LEE** said he was fine and he didn't need the police or paramedics.
- **LEE** did not appear to be injured, and told Green he was ok. **LEE** just "stood there" after Green gave him all her information and left the scene.
- At the time of the accident, Green had insurance with State Farm. She couldn't recall the cross streets of where the accident occurred. Green thought it was in North Las Vegas.
- The vehicle involved in the accident was Green's black 2014 Jeep Patriot. She still uses the Jeep.
- Green did not call the police regarding the accident. **LEE** seemed adamant about not contacting the police, and said he was fine.

- 1 • LEE didn't say where he was injured, and Green didn't see any damage to her
- 2 Jeep.
- 3 • Green didn't know if her insurance rate increased, but switched insurance carriers
- 4 after her premium expired.
- 5 • Prior to the accident, Green had left her grandmother's home. Her grandmother
- 6 lived near Tropical and Clayton. Green was on her way to the Walmart on Ann and
- 7 Simmons.
- 8 • Green didn't know how much money LEE received from the insurance claim.
- 9 Green said the accident was not staged, or planned. Green stated she had never
- 10 been asked to stage an accident or file a false insurance claim.
- 11 • Green did not receive any money from the 05/20/15 accident.
- 12 • Green recognized a black and white Driver's License photo of LEE.
- 13 • She did not find the accident suspicious, and Green was scared. Green did not
- 14 receive any money from LEE, and he did not ask her to file a fake claim.
- 15 • Green restated the 05/20/15 accident with LEE was legitimate. Green didn't think it
- 16 was suspicious, and she was "really, like panicking."
- 17
- 18 • On May 2, 2018, Investigator L. Rosel and I did a follow-up interview with Green at
- 19 her residence. Green was not in custody, agreed to being recorded, and provided
- 20 the following information. In summary:
- 21 • Initially, Green said she wasn't in a relationship with LEE before the purported
- 22 accident (note: 05/20/15). We told Green we didn't believe her story and that she
- 23 already knew LEE.
- 24 • Green eventually admitted she knew LEE, but after the accident. LEE called Green
- 25 and asked if he could take her on a date. Green acknowledged meeting LEE online
- 26 through Plenty of Fish (note: www.pof.com).
- 27 • LEE and Green dated about 3-4 months, and he lived at the apartment complex
- 28 about a month. LEE is not the father of her newborn baby girl.

- 1 • LEE proposed to Green that he could get money.
- 2 • Green acknowledged the 05/20/15 accident was fictitious, and they (LEE & Green)
- 3 planned it a couple weeks beforehand.
- 4 • LEE said he had been in a previous accident, and it was easy for him to get money.
- 5 • LEE did not provide a dollar amount to Green as her portion of the insurance
- 6 payout. Green did not receive any money, and did not request any money.
- 7 • Green explained she helped LEE because he was going to be homeless, and he
- 8 didn't have any friends.
- 9 • According to Green, LEE told her to pick a street and say that Green hit him. LEE
- 10 told her what to say when Green called her insurance company. LEE wasn't
- 11 present when Green called her insurance company, but he wrote instructions on a
- 12 piece of paper for Green. The paper provided details about what to say with the
- 13 insurance company.
- 14 • LEE told Green he had experience doing these things. She thought LEE might
- 15 have done it on two previous occasions in California, but she wasn't sure.
- 16 • Green last spoke to LEE years ago after they had stopped dating. Initially, they met
- 17 approximately two weeks before the 05/20/15 fictitious accident online through
- 18 Plenty of Fish. She stopped communicating with LEE about two months after the
- 19 claim.
- 20 • Green had to change her number because LEE was "hounding" her. She explained
- 21 LEE was hounding her online, and through emails. Green believed LEE acted this
- 22 way because he wanted to "use" Green again.
- 23 • When Green met LEE he was living with some people (NU) at a house near Craig
- 24 and Lamb. She didn't think LEE had a vehicle at the time.
- 25 • Green acknowledged LEE requested help from her by creating a fake insurance
- 26 claim to get some money.
- 27 • According to Green, LEE was not working when she knew him. Green asked LEE
- 28 why he didn't work, and LEE replied "he don't wanna work."



- 1 • Green was shown a black and white photo of a Nevada Identification Card of **LEE**
- 2 and identified him.
- 3 • **LEE** and Green were in a relationship approximately three months, and were
- 4 intimate. They did not live together, but he had previously stayed overnight.
- 5 • Green said **LEE** "was a user" and he threatened her. She explained they had been
- 6 in physical fights with each other and **LEE** said he would "beat my ass."
- 7 • Green reconfirmed the 05/20/15 accident with her Jeep Patriot never occurred.
- 8 • We discussed Green's 11/21/15 pedestrian accident claim (note: State Farm) with
- 9 Sojourner Marable.
- 10 • At that time, Green wasn't speaking with **LEE** anymore, but he had introduced
- 11 Green to Marable. Green acknowledged **LEE** was not involved in her accident with
- 12 Marable, and the accident was fictitious.
- 13 • Marable told Green to say that Green backed into her.
- 14 • Marable suggested that Green should date Lee again, but Green declined.
- 15 • Marable told Green that she didn't want to move back to California, that she lost her
- 16 job, and needed money. Green felt bad for Marable and went along with the claim.
- 17 • Marable did not offer Green any money as her cut from the insurance claim, but did
- 18 give \$200 in cash to Green.
- 19 • Marable didn't tell Green how long she had been conducting these types of scams,
- 20 or who trained her.
- 21 • At the time, Marable was living alone with her two kids (boy & girl) in Las Vegas.
- 22 • Green thought Marable used to date **LEE**, but she wasn't sure. Green last spoke to
- 23 Marable around the beginning of 2017.
- 24 • According to Green, **LEE** tried to have Marable contact Green on his behalf.
- 25 • Marable was with Green when Green contacted State Farm. Green put State Farm
- 26 on speakerphone so Marable could hear. Marable would write down what to say on
- 27 paper notes to Green.
- 28 • Green didn't ask Marable if she was paid from the claim, but figured Marable was

1 paid because she wasn't "hounding me."

- 2 • Green reconfirmed the 11/21/15 accident was fictitious. Marable and Green
- 3 planned it sometime around Halloween (or about three weeks prior).
- 4 • Marable lived in an apartment complex near Flamingo and Maryland Parkway with
- 5 her two young kids (Journey and Harley. Their father was known as Hoddy or
- 6 Hoddie, but she didn't know his real name). Green stated Marable moved a lot.
- 7 • Green said she felt bad about everything and did these claims because she felt
- 8 threatened by LEE, and wanted to help out Marable.
- 9 • Green stated she would apologize to State Farm, and was willing to pay a fine.
- 10 • Green was willing to testify until the end against LEE and Marable. She was a little
- 11 scared of LEE.
- 12 • Green said she wasn't truthful in her previous interview regarding LEE because she
- 13 felt "intimidated by him." She didn't tell the truth about Marable because she was
- 14 "scared" and in trouble.
- 15 • We explained to Green that she would be summoned and not arrested.
- 16 • Green was willing to testify against LEE as a witness and wanted her address to be
- 17 private. Green said she was "really scared" for her life regarding LEE, and he had
- 18 connections. She claimed Hoddy/Hoddie was crazy, and might be LEE's friend.

19 **10/11/15 Accident**

20 Claim against: State Farm (#287H54025)

21 Location: Vicinity of Cheyenne Ave./North 5th St.

22 Type: Pedestrian Accident (around 10:00-11:00 p.m.)

23 Driver: Tiffany Russell

24 Vehicle: 2004 Chevrolet Venture Van, VIN: 1GNDV03E04D220609

25 Owner: Tiffany Russell

26 Police Report: No

27 Payout: \$7,500 (EFT on 10/30/15) to LEE's BofA Account

28 Red Flags: LEE struck in crosswalk. In his two recorded statements, LEE provided his address: 445 N. Garfield Ave. #218 Pasadena, CA 91101 and phone: 626-376-3878. Per NICB, Garfield Ave. #218 address linked to LEE and numerous claims. Phone number used in 11/22/15, 01/27/16, 03/09/16, and 07/04/16 claims. Russell admitted the accident was fictitious.

- On January 10 & 31, 2018, I briefly spoke with Tiffany Russell on the phone and she denied knowing LEE.

- 1 • On April 24, 2018, Investigator L. Rosel and I did a follow-up interview with Russell  
2 at her residence. She was not in custody, and agreed to have the interview  
3 recorded. In summary:
- 4 • Russell initially stated she didn't know the male (NU) she hit in the purported  
5 10/11/15 accident. She was shown a black and white photo of a CA Driver's  
6 License (note: Navar **LEE**) and identified him as the pedestrian in the accident.
- 7 • Russell stated she was driving a 2004 Chevrolet Venture van late at night when the  
8 accident occurred.
- 9 • Russell was asked what part of her vehicle was struck by the pedestrian. She  
10 stopped, started crying, and said "I can't...he lied, he made me lie...I can't lie."  
11 Russell said the accident never happened. She explained she was "in a bind," and  
12 was a single mom with six kids. Russell was about to be evicted, and the  
13 pedestrian approached her explaining this is what he did. He told Russell she  
14 would "get part of whatever the money was." However, eventually he "disappeared"  
15 and she didn't know what happened to him.
- 16 • Russell said the pedestrian's name was Navar (LNU). She met Navar online  
17 through Plenty of Fish (note: [www.pof.com](http://www.pof.com)). They initially talked approximately two  
18 days before the reported accident on 10/11/15. Russell told Navar about her life  
19 and how she had to raise six kids. Navar came up with a "solution" and asked her  
20 do "you want to make some money?"
- 21 • Navar eventually met Russell in person and "made me call in the accident." Navar  
22 told her to "pick a street." Russell agreed, and acknowledged picking the streets of  
23 Cheyenne Ave. and North 5th Street in North Las Vegas. Navar told her to pick a  
24 street close to him as if he was walking home.
- 25 • Navar told her that he lived with a police officer. Russell did not go inside his  
26 residence, but sat on his porch (discussed below).
- 27 • As the claim continued, Russell said people called her, came out to take pictures,  
28 and she didn't want to take part in it anymore. She claimed Navar forced her to fax

1 papers and pick things up for him.

- 2 • Navar specifically told Russell to tell the insurance company that she hit Navar, and  
3 he provided Russell a story.
- 4 • Navar did not specify a dollar amount that Russell would receive, but said he would  
5 call her when the money "come through." Navar stated he had previous  
6 experience, that's how he got paid, and that's what he does. Navar claimed it would  
7 work, and showed Russell his Facebook pictures with lots of money and said "this is  
8 how I live."
- 9 • When Russell called State Farm she was on Navar's porch at his apartment near  
10 the cross streets of Cheyenne and MLK. Navar coaxed, and whispered to Russell  
11 while she talked to State Farm. Russell became nervous.
- 12 • Navar had started planning the fictitious accident approximately two days before it  
13 was reported. Navar didn't specify any amount to Russell, just that he would get  
14 her some money.
- 15 • Russell and Navar did not date, and she met him a few times after the accident was  
16 reported to fax papers. Navar told Russell he had to visit the hospital and have it  
17 put on paper that he was injured. Russell thought, "well, you're not." At that time,  
18 Navar demanded so much from Russell and she stopped caring.
- 19 • Navar advised Russell what to say if they (note: State Farm) called her. Navar did  
20 not say how long he had been doing these types of things.
- 21 • Russell and Navar did not have an intimate relationship, and he did not threaten  
22 her. Navar's approach to Russell was like "this is what we gonna do."
- 23 • Sometime after State Farm took pictures of Russell's van to verify the damage  
24 (there wasn't any), she didn't hear from Navar anymore. Russell thought she and  
25 Navar stopped communicating about 2-3 weeks after the fictitious accident. Russell  
26 waited for Navar to call her, but he never did and she eventually forgot about it until  
27 Investigator Evans called.
- 28 • Russell didn't know how much money Navar received from the insurance payout.

- 1 • Russell reiterated the accident was made up and never occurred.
- 2 • Russell regretted her actions, and was willing to testify in court to clear her name.
- 3 Russell said she was not afraid of Navar, and was willing to cooperate until the end.
- 4 • At the time of the purported accident, Russell did not know insurance fraud was a
- 5 felony. However, Russell understands now, and acknowledged Navar wouldn't
- 6 have received any money if she hadn't participated. Russell stated she would
- 7 apologize to State Farm for being so "naïve."
- 8 • According to Russell, she had limited income at the time, and Navar knew she had
- 9 six kids. That's the only reason she did it "to keep a roof over our head. That's it."
- 10 • Navar didn't appear to have a car, and needed rides and money from Russell. He
- 11 might have had a motorcycle.
- 12 • Navar told Russell he was dating a female police officer (NU) and "she was in on it,
- 13 I guess." Their apartment was located near or behind a gas company possibly by
- 14 Cheyenne and MLK. Navar did not say what type of police officer she was, or how
- 15 long they had been dating.
- 16 • We discussed State Farm's claim note on 10/16/15 at 12:05 PM PDT with Jason
- 17 Glasgow. Russell couldn't remember, but thought she called in using her phone.
- 18 • Navar told Russell to tell State Farm that she didn't call the police, and that she
- 19 heard a bump on the right side of her van from the purported accident.
- 20 • Russell said Navar "made it sound so convincing" and flashed his money on
- 21 Facebook videos. Russell felt Navar took advantage of her, but was grateful she
- 22 didn't receive any money.

23 ///

24 ///

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1           **11/22/15 Accident**

2           Claim against: USAA (#026663611006)

3           Location: Vicinity of Craig Rd/Nellis Blvd or Lamont/San Miguel

4           Type: Pedestrian Accident (around 8:00 p.m.)

5           Driver: Latrice Hall

6           Vehicle: 2007 GMC Yukon SUV, VIN: 1GKFC13J17R122579

7           Owner: Torry Hall (ex-husband of Latrice, divorced 06/05/15)

8           Police Report: No

9           Payout: \$13,000 (check #13252073, dated 12/01/15) to **LEE**

10          Red Flags: **LEE** struck in crosswalk. 11/25/15 claim notes list Lee's address: 445 N.  
11          Garfield Ave. #218 Pasadena, CA 91101. Per NICB, Garfield Ave. #218 address linked  
12          to **LEE** and numerous claims. Hospital records list **LEE's** phone: 626-376-3878.  
13          Phone number used in 10/11/15, 01/27/16, 03/09/16, and 07/04/16 claims. Hall  
14          admitted the accident was fictitious.

- 15          • On January 31, 2018, I telephonically interviewed Latrice Hall, and she provided the  
16          following. In summary:
- 17          • Around 8:00 p.m. on 11/22/15, Hall was driving home in her 2007 GMC Yukon SUV  
18          (hereinafter GMC). She was near the cross streets of Craig Rd. and Lamont St. in  
19          North Las Vegas.
- 20          • Hall was driving alone in her GMC, and it was dark outside (but not too dark). She  
21          was stopped at the four way stop sign at the intersection. Hall noticed a male in her  
22          passenger mirror on the sidewalk. Hall said the male also looked at her. When Hall  
23          started to make the corner turn (traveling maybe 1 mph) she heard a boom on her  
24          GMC. Hall stopped and got out to see the same male (NU) from the sidewalk. She  
25          described him as a black male, approximately 5'7, and with short hair.
- 26          • Hall did not see the male hit her GMC. She saw him just before and after the  
27          accident occurred. Hall said there were no dents or damages to her GMC.
- 28          • Hall immediately became suspicious of the accident and opined the male walked  
                into her big GMC. She said, "how could you miss it?" She did not question the  
                male about her suspicions, but asked if he was ok. The male refused an  
                ambulance, medical treatment, and did not want Hall to call the police. The male  
                told Hall "it's cool" and did not specify any part of his body was injured. Hall said he  
                appeared fine, and did not appear to be limping when he walked away.
- The male appeared to be alone, and Hall didn't recall any additional witnesses.

- 1 • Hall mentioned she was nervous and the location was in a sketchy neighborhood.  
2 She couldn't recall if she provided her phone number, but did not provide her  
3 insurance card to the male. Hall gave her name and alleged maybe the male filed a  
4 claim with her insurance after seeing her license plate.
- 5 • Hall didn't know what to do since the male repeatedly refused any help, and she  
6 called USAA to report the accident.
- 7 • Hall heard from USAA that about \$13,000 was paid on the claim. She didn't know if  
8 her insurance premium increased.
- 9
- 10 • On April 25, 2018, Investigator Gina Lovero and I did a follow-up interview with Hall  
11 at the Attorney General's Office. Hall was not in custody, and agreed to have the  
12 interview recorded. In summary:
- 13 • Initially, Hall acknowledged the pedestrian accident was legitimate and she couldn't  
14 remember the male pedestrian's name.
- 15 • Hall said she had five profiles on Plenty of Fish (note: [www.pof.com](http://www.pof.com)). She actively  
16 started using it in 2016. Hall may have added pictures prior to 11/22/15, but didn't  
17 utilize the website.
- 18 • Hall acknowledged insurance fraud is a felony and it's wrong.
- 19 • We told Hall that we believed the accident never occurred and that she knew the  
20 male pedestrian before the purported accident. Hall admitted she met the male  
21 pedestrian one time, and initially he wanted to meet her to say "hi." Hall agreed,  
22 and explained she was recently divorced at the time.
- 23 • The male got into Hall's Yukon SUV and told her they could make some money.  
24 Hall said it sounded like a scam and told him, no, and that she was ok. The male  
25 told Hall he would show her how, but Hall declined and said she worked and didn't  
26 need additional income.
- 27 • The male asked Hall which insurance company she used, and she replied USAA.  
28 He instructed Hall to call them on the telephone, and "tell them what I tell you to tell

1           them." At the time, Hall was sitting in the driver's seat and the male sat behind her  
2           in the middle back seat.

- 3           • Hall was nervous talking to the female insurance representative and explained the  
4           male already told her that he had tons of money and guns. Hall stated she was  
5           "scared...for my life."
- 6           • The male told Hall: "tell her exactly what I tell you to say and you won't have a  
7           problem...and if I call you that just means you need to answer me, and if I respond  
8           to you in any way, or contact you, you need to tell me what I need to know so that I  
9           can get money." Hall responded, "what, am I doing?" The male told Hall to call her  
10          insurance.
- 11          • Hall didn't know if the female insurance representative picked up on her dilemma,  
12          and repeatedly asked if Hall was ok and needed the police. Hall couldn't really ask  
13          her, because the male was listening behind Hall. The male eventually told Hall to  
14          put their conversation on speaker so he could hear the female representative. Hall  
15          fumbled her words with the representative.
- 16          • The male pedestrian did not physically threaten Hall, but reiterated he had guns.  
17          He told Hall he "needed to get this money, and he was going to get it." Hall  
18          interpreted this as a threat, because she didn't know him.
- 19          • Hall acknowledged the claim was made up, and did not happen.
- 20          • The day Hall reported the fictitious accident was the day the male was in her  
21          vehicle. Hall wasn't certain if she met the male on Plenty of Fish, but they  
22          eventually exchanged phone numbers and met. She couldn't recall his name.
- 23          • Hall was shown a black and white CA Driver's License photo (note: Navar **LEE**) and  
24          thought he looked like the male she spoke with in her SUV. On a scale of 1-10, she  
25          gave him a 7.
- 26          • The male specifically told Hall to tell the insurance company the following:
  - 27               ○ That he was on the sidewalk and walked off and basically into her vehicle.
  - 28               ○ Hall was making a turn and hit him.



- 1           ○ He wasn't bleeding, and he didn't have injuries.
- 2           ○ To hurry up and file/process the claim, and get off the phone.
- 3           ● The male did not ask Hall to fax any documents on his behalf to USAA.
- 4           ● The male often sent text messages to Hall about needing gas money, and how he
- 5           was stuck somewhere. Hall told him to leave her alone, that he was a complete
- 6           stranger, and she didn't want anything to do with him. Hall didn't have the text
- 7           messages anymore, and did not receive any emails from him.
- 8           ● Hall knew the male for approximately 1-2 weeks. They were not boyfriend and
- 9           girlfriend, and did not have an intimate relationship.
- 10          ● The male told Hall she would receive "half of the check" from the claim payout, but
- 11          Hall told him she didn't need it because she was already employed. The male told
- 12          Hall he knew what to do, and had done it before. He explained he did it every 3-6
- 13          months and traveled from California, Nevada, and Arizona. Hall asked him "what
- 14          do you call this?" He replied, "fake insurance claims." Hall questioned him, "I just
- 15          filed a fake fucking claim with my insurance because you're a scam artist?" The
- 16          male said he'd give Hall half the check, but Hall declined because she didn't know
- 17          what he was doing. The male replied, "I do this all the time, and it's easy, it's a legit
- 18          scam, and this is how I got my cars, my guns, and my money."
- 19          ● He also told Hall he had friends and family (NU) in California that did it. Hall thought
- 20          it sounded like it was his immediate family.
- 21          ● The male told Hall he had been doing pedestrian insurance scams about 3-5 years.
- 22          He explained, in most states, if a car hits a person, the person automatically wins.
- 23          He claimed to know the law, and knew exactly what he was doing because he did it
- 24          before in California. He claimed to have received about \$30,000-\$32,000.
- 25          ● Hall initially met the male at Del Taco on Vegas Blvd and Nellis nearby the old
- 26          Walmart. He showed up in a white BMW SUV with really big rims and a California
- 27          license plate.
- 28          ● Hall described the male as skinny, with tattoos (possibly on his neck), black,

1 possibly pierced ears, and had layers of clothing.

- 2 • After the claim was reported to Halls insurance, the male told Hall he did insurance
- 3 scams.
- 4 • According to Hall, when she first met the male at Del Taco he quickly started talking
- 5 about the insurance scam. Hall found that "hella odd" and wondered how she was
- 6 going to get the man out of her vehicle.
- 7 • The male did not tell Hall how much money he received from the insurance claim,
- 8 and couldn't recall his phone number.
- 9 • Hall's insurance premium increased significantly after the fictitious claim and she
- 10 had to switch companies.
- 11 • Hall called her insurance company after the claim was filed, but was unable to get in
- 12 contact with the same female representative who started the claim. The primary
- 13 policy holder was her ex-husband Torry Hall. They were divorced on 06/05/15.
- 14 • Hall regretted her actions, and said the male was aggressive and intimidating since
- 15 he was sitting behind Hall in her SUV.
- 16 • Hall thought the male texted her approximately a month after the fictitious accident
- 17 claiming he was living out of a car, and got beat up in Las Vegas. Hall stopped
- 18 paying attention and didn't want anything to do with him.
- 19 • When Hall previously spoke with Investigator Evans telephonically, she couldn't say
- 20 what she wanted because she was with some people and they would have made
- 21 inquiries.
- 22 • Hall did not receive any money from the claim.
- 23 • Hall said she would apologize to USAA, and would take it back if she could.
- 24 Because Hall "had a kid" she felt threatened and scared for her life.
- 25 • Hall was willing to testify in court.
- 26 • Hall felt the male used her, but she was not desperate for money at the time of the
- 27 claim.
- 28 • Hall stated she initially met the male so she could go on a date, but he didn't turn

1 out like she expected.

- 2 • The male told Hall that he used to date a female law enforcement officer (NU) and  
3 she “partook as well.” He mentioned they dated about two years before Hall’s claim  
4 on 11/22/15. Hall asked him if he was single when Hall met him, but he would not  
5 confirm it. He did not say if they had any children together, but said “she’s bad.”  
6 Hall clarified that meant the officer was pretty. The male occasionally visited the  
7 officer, and he mentioned something about jail. Hall couldn’t elaborate.

8 **01/27/16 Accident**

9 Claim against: GEICO (#0541726440101018)

10 Location: Vicinity of Plaza Verde Pl/Spanish Ct.

11 Type: Pedestrian Accident (around 12:00-1:00 a.m.)

12 Driver: Kasheva McGruder

13 Vehicle: 2007 Nissan Altima, VIN: 1N4AL21E07N440143

14 Owner: Kasheva McGruder

15 Police Report: No

16 Payout: \$10,000 (check #178788300, dated 02/03/16) to LEE

17 Red Flags: LEE struck in crosswalk. Log notes on 01/27/16, 01/29/16, and 02/02/16  
18 list LEE’s phone 626-376-3878. Phone number used in 10/11/15, 11/22/15, 03/09/16,  
19 and 07/04/16 claims. McGruder admitted the accident was fictitious.

- 20 • On February 2, 2018, Investigator L. Rosel and I interviewed Kasheva McGruder  
21 (ID #6036366) at her residence. She provided the following information. In  
22 summary:  
23 • McGruder still has her 2007 Nissan Altima (hereinafter Altima) that was involved in  
24 the accident. There wasn’t any major damage from the incident.  
25 • The accident occurred around 9:30-10:00 p.m. in North Las Vegas. She couldn’t  
26 remember the major cross streets. McGruder was alone and on her way home.  
27 • She was about to turn, felt a thump, parked, and got out to assist the male.  
28 McGruder couldn’t remember his name. McGruder asked him if he was ok,  
apologized, and offered to call the police. The male said he was fine, and started  
walking. The male also limped a little bit.  
• McGruder gave him her full name and insurance. The male reiterated he was fine,  
and was alone. There were not any additional witnesses.  
• McGruder was making a right turn at the stop sign. She did not see anyone just  
prior to the accident. The collision occurred near the front passenger area of her

1 Altima, and she thought he was hit in his upper thigh area.

- 2 • McGruder never met him prior to the accident.
- 3 • The male was standing up right after the accident. McGruder offered to call the
- 4 police, and the man started to walk away.
- 5 • McGruder thought the accident was weird, and thought it was staged. He appeared
- 6 to come out of nowhere. McGruder didn't question him about her suspicions
- 7 because she was scared.
- 8 • The male was adamant about not calling the police or an ambulance.
- 9 • McGruder was the registered owner of the Altima, and her insurance rate increased
- 10 \$10-\$15.
- 11 • The accident occurred about 5-15 minutes from her residence.
- 12 • We showed McGruder a black and white CA Driver's License photo (note: Navar
- 13 Lee) and she recognized him as the man in the accident. She couldn't recall his
- 14 name.
- 15 • The man appeared homeless and was described as skinny, black, and wearing
- 16 baggy clothing. She did not see any visible tattoos.
- 17 • The man did not provide his phone number to McGruder, and the scene of the
- 18 accident had street lights.
- 19
- 20 • On April 24, 2018, Investigator L. Rosel and I did a follow-up interview with
- 21 McGruder at the Attorney General's Office. McGruder was not in custody, and
- 22 agreed to have the interview recorded. In summary:
- 23 • McGruder stated she previously used the website Plenty of Fish (note:
- 24 www.pof.com) around the beginning of 2017.
- 25 • McGruder reiterated she never met the male she struck with her vehicle before the
- 26 accident.
- 27 • We questioned McGruder about some discrepancies from our previous interview.
- 28 She eventually said she had previously known the male she purportedly hit, and

1 apologized.

- 2 • The male told her it was his "second time of doing this." Sometime after the  
3 purported accident McGruder stopped contacting him. McGruder told him she didn't  
4 want to go through with it, and knew something would come back to bite her.
- 5 • McGruder thought one of the two previous claims was possibly done in L.A. He told  
6 McGruder he already had a claim before he came to Las Vegas, she thought he  
7 was from L.A. McGruder couldn't remember his name (note: she later called him  
8 Lavar), but stated she knew who he was.
- 9 • She originally met him on Plenty of Fish. He told McGruder he had an idea, and  
10 had previously done it twice in L.A. He claimed both claims went through and  
11 explained how he received the money.
- 12 • McGruder believed he contacted GEICO the same week they talked to McGruder.  
13 She eventually told him "I'm not a criminal, I can't do this." He did not specify a  
14 dollar amount, but told McGruder she would receive 50% as her cut of the  
15 insurance payout. He initially offered McGruder this amount to entice her, but  
16 McGruder told him she didn't want anything and it was wrong. The male replied she  
17 wouldn't get into trouble, but McGruder believed she would because she filed the  
18 claim.
- 19 • The male and McGruder were dating at the time of the claim.
- 20 • McGruder acknowledged the 01/27/16 pedestrian accident was fabricated and  
21 never occurred.
- 22 • They both met approximately two months prior to the purported 01/27/16 accident.
- 23 • He claimed two other females (NU) had helped him with claims when he used to  
24 live in L.A. He did not tell McGruder who trained him on filing insurance claims.
- 25 • Sometime around November 2015, he started discussing the staged accident on  
26 01/27/16. He specifically told McGruder the following:
- 27 ○ All she had to do was call her insurance company.
- 28 ○ She had an accident and hit him.

- 1           ○ Tell them you didn't call the police, and you gave the person you hit your
- 2           information.
- 3           ○ McGruder was surprised and could tell he had prior experience because he laid
- 4           out the whole plan. The male replied, "yeah, it's easy."
- 5           • When McGruder spoke with GEICO, the male was sitting next to her in the car. She
- 6           knew what to say because he had previously coached her. He also told her that
- 7           GEICO contacted him. Sometime later, the male and McGruder stopped
- 8           communicating.
- 9           • McGruder admitted she was not truthful with us before, and apologized. McGruder
- 10          explained she knew she was in trouble and was scared when we previously spoke
- 11          with her.
- 12          • McGruder reiterated the 01/27/16 accident never happened and the male started
- 13          discussing it about two months prior.
- 14          • McGruder said the male moved out here from L.A. and stayed with a male friend
- 15          (NU). We asked if his friend was Allen Davis, but McGruder didn't know who that
- 16          was.
- 17          • According to McGruder, the male drove a cream/gold or tan BMW SUV possibly
- 18          with red wheels. Their relationship lasted approximately two months, and they were
- 19          intimate.
- 20          • The male never threatened McGruder, but got mad at her and cussed her out.
- 21          McGruder eventually blocked his phone number, and didn't have his number
- 22          anymore.
- 23          • McGruder stated she would apologize to GEICO for putting herself and the
- 24          company "into that bullshit." She did not receive any money from the claim, and
- 25          didn't know how much money the male received.
- 26          • McGruder said she told us the truth 100%, and was willing to testify in court.
- 27          • We told McGruder the prosecutor would determine if she would be charged, and
- 28          McGruder understood what she did was wrong.

- 1 • McGruder was not aware of anyone else working with "Lavar" (LNU). She opined  
2 he did it for the money, and told her his last two payouts were "pretty good." He told  
3 McGruder "we used to do it in L.A. all the time." McGruder believed they were  
4 pedestrian accidents.

### 5 **03/09/16 Accident**

6 Claim against: Liberty Mutual (#033426232)

7 Location: Vicinity of La Canada St/Silver Mesa Circle

8 Type: Pedestrian Accident (between 1:00-4:00 a.m.)

9 Driver: Cibeleana Drain

10 Vehicle: 2001 BMW X5 SUV, VIN: WBAFA53581LM76909

11 Owner: Ralph Crowder

12 Police Report: No

13 Payout: Claim denied, cited a pattern existed from similar claims.

14 Red Flags: **LEE** struck in crosswalk. **LEE** provided his home address: 445 N. Garfield  
15 Ave. #218 Pasadena, CA 91101 and phone: 626-376-3878 to SIU Investigator Ross.  
16 Per NICB, Garfield Ave. #218 address linked to **LEE** and numerous claims. Phone  
17 number used in 10/11/15, 11/22/15, and 01/27/16, and 07/04/16 claims. **LEE** posted a  
18 02/27/16 Facebook photo standing in front of a white Dodge Challenger outside Drain's  
19 residence with the partially visible CA plate: "7RE". After Investigator Ross interviewed  
20 Drain on 03/26/16 at the Hooters Casino, he immediately canvassed the scene at her  
21 residence and took a picture of what appeared to be the same Dodge bearing CA plate  
22 "7REM829" parked behind Drain's BMW. **LEE** appeared to be sleeping inside and  
23 wore the same sunglasses from his Facebook post. Investigator Ross knocked on the  
24 Dodge window, but did not receive an answer. Drain admitted the accident was  
25 fictitious.

- 26 • On January 9, 2018, I briefly spoke with Ralph Crowder via phone and he denied  
27 knowing Cibeleana Drain and **LEE**. He said he was busy and would call me back.  
28 However, I have not heard back from Crowder.
- Drain told SIU Investigator Ross that Crowder was a friend from California, she had  
known him about 1-2 years, Crowder let her use his vehicle, and he picked it up and  
drove it back to California.
- On April 18, 2018, Investigator K. Huss and I interviewed Drain at her residence.  
She was not in custody, and agreed to have the interview recorded. In summary:
- Drain claimed she was driving the BMW SUV and a male bumped up against the  
BMW. She couldn't recall his name, and never called or met the male before the  
accident occurred.
- Drain confirmed the accident was not planned or staged in any way. She had never

1 planned or staged an accident before.

- 2 • The purported accident occurred late at night, and Drain was returning to her  
3 residence 1427 Silver Mesa Circle #4 Las Vegas, NV 89169.
- 4 • Drain reiterated "I don't know the guy," and remembered meeting with an insurance  
5 investigator, and how he recorded their conversation.
- 6 • After the accident occurred, the male pedestrian refused medical assistance and  
7 "kinda limped away." (Note: Drain was shown black and white photos from the  
8 Liberty Mutual claim records of Navar **LEE**). She thought he sort of looked similar,  
9 but it was a dark intersection when she saw him.
- 10 • According to Drain, she was paying for the insurance on the BMW to Liberty Mutual.
- 11 • We told Drain we believed that she already knew **LEE**, but she denied it again.  
12 Eventually, Drain confessed to knowing **LEE**.
- 13 • Drain explained she met **LEE** online through the website Plenty of Fish.com (note:  
14 www.pof.com). Drain indicated she was trying to be truthful, and acknowledged the  
15 situation was a mess.
- 16 • **LEE** mentioned to Drain that he was going through some financial trouble. **LEE** told  
17 Drain he had a car, to call the insurance company, say you hit me, and "we'll get the  
18 money." At the time, Drain didn't think it was a good thing to do. **LEE** said he had  
19 done it a couple of times "and it did work."
- 20 • **LEE** told Drain to call the insurance company and file the claim. He told Drain "what  
21 to say and how to do it," because she didn't know. She recalled on the insurance  
22 recording she was very nervous, and didn't know what to say. During the process,  
23 **LEE** was not "nice" to Drain.
- 24 • After the insurance investigator (note: Justin Ross) spoke with Drain she told **LEE**  
25 she didn't want to have anything else to do with it.
- 26 • Drain was shocked to hear that **LEE** had previously filed so many insurance claims.
- 27 • Initially, **LEE** said Drain would receive half of the insurance payout. **LEE** did not  
28 provide a dollar amount, but claimed the other two times he did it he received



1 different amounts. Drain believed her cut changed to **LEE** taking the larger portion  
2 and she would receive "a couple of dollars."

- 3 • Drain was asked to explain why **LEE** was waiting outside in his car at her former  
4 residence at Silver Mesa Circle. This occurred on 03/26/16 after Liberty Mutual  
5 Investigator Ross had finished interviewing Drain at the Hooters Casino. She stated  
6 **LEE** wasn't waiting for her, and that she was already evicted from that residence.  
7 Drain believed **LEE** rented his Dodge Challenger and may have been living in it  
8 outside her residence. At the time, Drain was staying at Motel 6, and that's why she  
9 met Investigator Ross at Hooter's.
- 10 • According to Drain, the BMW was owned by **LEE's** friend Ralph Crowder. She  
11 opined Crowder was not involved. The BMW had some issues and wasn't really  
12 working. Drain was not friends with Crowder, she never spoke with him on the  
13 phone, and did not personally meet him. She didn't know if Crowder and **LEE** were  
14 close friends.
- 15 • **LEE** told Drain the BMW was towed to her house. She didn't know what happened  
16 to the BMW before it was towed to her former residence (note: 1427 Silver Mesa  
17 Circle). Drain opined **LEE** rented the Dodge Challenger probably because he  
18 needed something to live in and drive around. **LEE** was not staying at Drain's  
19 residence, and would not listen to her to leave the area. She didn't know if **LEE**  
20 stayed there to guard the BMW.
- 21 • Drain never received any money from **LEE**.
- 22 • **LEE** and Drain met in Las Vegas, and she didn't think he was a stalker. Drain  
23 thought **LEE** stayed outside her residence to see if the claim went through. **LEE**  
24 didn't appear to be interested in Drain, and seemed more interested in the claim.  
25 Drain asked **LEE** why he was staying in front of her residence, he replied he had a  
26 right to be there and it was a public street.
- 27 • Drain and **LEE's** relationship lasted around one month. At the time, Drain was  
28 trying to find work and had fallen on hard times. She tried to help **LEE** out, and they

1 were not intimate with each other "not really, no."

- 2 • Approximately two weeks before the 03/09/16 claim, LEE talked to Drain about  
3 doing the insurance claim.
- 4 • Drain specified some of the things LEE told her to tell the insurance company:
- 5 ○ Tell them you got into an accident.
  - 6 ○ This is the car.
  - 7 ○ Tell them this is Ralph's car, but you were driving it.
  - 8 ○ That you hit me on the corner and LEE didn't want any medical assistance.
- 9 • Toward the end of their relationship, LEE told Drain an investigator was coming to  
10 talk to him, and LEE might want to talk to her about the situation. At the time, LEE  
11 was "being very nasty with me" but he did not threaten Drain.
- 12 • Drain didn't have old text messages with LEE.
- 13 • LEE told Drain he had previously received approximately \$7,000-\$10,000 from  
14 other insurance claims.
- 15 • After Drain spoke with the insurance investigator she realized the situation was a  
16 mess and thought "what did I get myself into?" At the time, she knew insurance  
17 fraud was a crime, but was not "thinking straight at all," and expressed remorse.
- 18 • Drain confirmed the 03/09/16 pedestrian accident never occurred. It was all made  
19 up, and was a fabrication.
- 20 • Drain needed time to think about testifying in court to clear her name. She would  
21 consider it.
- 22 • Drain stated she was not afraid of LEE, and felt like a "mule" in the situation.
- 23 • Drain didn't think Ralph Crowder lived in Las Vegas, and never saw him or met him.
- 24 • According to Drain, LEE didn't get along with his mother, and might be living in Las  
25 Vegas and Los Angeles, California.
- 26 • LEE told Drain he had received money from previous claims and lived off it.
- 27 • Drain was asked what she would tell the CEO of Liberty Mutual. Drain replied that  
28 she would apologize, and realized how serious the situation is now. She regretted

1 her story with Liberty Mutual Investigator Ross.

- 2 • **LEE** and Drain were not boyfriend and girlfriend at the time of the claim.
- 3 • Drain admitted to making the phone call to the insurance company, but did not
- 4 submit any documents to them.
- 5 • Drain didn't know **LEE's** whereabouts, and does not talk to him anymore.

6 **07/19/16 Accident**

7 Claim against: American Family Insurance (#00185140271)

8 Location: Vicinity of Lawrence/Lone Mountain

9 Type: Pedestrian Accident (according to Ridley, around 1:00-4:00 a.m.)

10 Pedestrian: Johnnie Bernard Ridley

11 Driver: Nakeshai Nicholson

12 Vehicle: 2004 Toyota Camry, VIN: JTDDBE32K040261547

13 Owner: Nakeshai Nicholson

14 Police Report: No

15 Payout: \$5,166 (check #0100378191, dated 08/11/16) to Johnnie B. Ridley

16 Red Flags: Struck in crosswalk. Ridley's two recorded statements sounded like Navar  
17 **LEE**. Ridley's phone number (702-500-3376, RS & claim notes) was used in the  
18 07/04/16 GEICO claim with Allen Davis (GEICO notes: 07/08/16, 09/09/16 &  
19 09/20/16). Ridley's address: 1413 Silver Mesa #1 LV, NV 89169 is similar to Allen  
20 Davis' address he provided in my 01/18/18 interview (1413 Silver Mesa Cir, apt number  
21 not provided). Ridley claimed he was missing a diamond earring (from his deceased  
22 grandmother) is similar to Lee's 05/20/15 claim. Ridley initially wanted \$7k or he'd go  
23 to the ER and run up additional bills. Then he wanted \$8k (notes: 08/11/16).

- 24 • On May 8, 2018, Investigator K. Huss and I interviewed Johnnie Ridley at High  
25 Desert State Prison in Indian Springs, Nevada regarding the claim. Ridley was in  
26 custody, and was read his Miranda rights. He agreed to speak with us, and have  
27 the interview recorded. In summary:
- 28 • Ridley was shown a black and white photo of a Nevada Identification card (note:  
Navar **LEE**) and was asked if he recognized him. Ridley said he'd "never seen him  
before."
- Ridley was asked if he heard of Navar **LEE**. He acknowledged that he did not, he  
didn't remember him, and **LEE** did not look familiar.
- Ridley was asked about the last time he visited a hospital. He replied that he visited  
the UMC hospital in Las Vegas in 2014.
- Ridley acknowledged he did not visit Sunrise Hospital on Maryland Parkway and  
Desert Inn (DI). He was asked if he visited Sunrise Hospital on July 20, 2016. "Not  
from my recollection...not that I remember."

- 1       • According to Ridley, he lost his ID and wallet a couple of years ago. He lost his ID,
- 2       Social Security card, and birth certificate. Ridley didn't know where he lost them.
- 3       • In July 2016, Ridley resided at 1216 Helen St. N. Las Vegas, NV 89030 with his
- 4       mother Marzette Lewis.
- 5       • Ridley acknowledged he did not fax any documents to an insurance company in the
- 6       last two years. He was shown three pages of a fax submitted 08/09/16 from the
- 7       "COPY Shoppe" regarding a 07/20/16 Sunrise Hospital visit. Ridley indicated he did
- 8       not fax it, and didn't recognize the paperwork.
- 9       • We discussed the Sunrise Hospital sheet (note: obtained from Sunrise Hospital
- 10      records).
- 11
  - 11      ○ Sara Qutob was Ridley's girlfriend and the mother of his daughter.
  - 12      ○ Ridley was "pretty sure" he was unemployed in July 2016. His girlfriend was
  - 13      working at Crescent Jeweler's in Pahrump.
  - 14      ○ Ridley confirmed his DOB was 07/04/85, and the last four digits of his SSN
  - 15      xxx-xx-6089.
  - 16      ○ Ridley didn't know who provided this information.
- 17      • We told Ridley an American Family Insurance claim was filed under his name and
- 18      we were trying to verify the information. Ridley said "I don't remember none of that
- 19      sir."
- 20      • Ridley's last insurance claim was around 12/12/2017. He acknowledged he never
- 21      hit anyone with his vehicle in his lifetime. The December 2017 accident involved
- 22      another vehicle and Ridley received about \$5,000. At that time, Ridley's insurance
- 23      company was Estrella.
- 24      • Ridley didn't know why someone would provide his information for a hospital visit,
- 25      and reiterated he did not know Navar **LEE**.
- 26      • Ridley acknowledged he never staged a car accident or pedestrian accident in his
- 27      life. He was asked if anyone asked him to file a false insurance claim for money
- 28      "not that I remember sir, no."

- 1 • Ridley understood insurance fraud was a felony, and it's wrong.
- 2 • We told Ridley that Navar LEE knew him, but Ridley reiterated he did not know
- 3 LEE. Ridley alleged, maybe LEE was the one who found his ID.
- 4 • Ridley was told again that we didn't believe him, and that he already knew LEE. He
- 5 was asked to tell us what happened, and how much money LEE offered him. At
- 6 this point, Ridley said he needed to speak with his lawyer (note: identified after the
- 7 interview as Roger Bailey).
- 8
- 9 • On May 8, 2018, Investigator L. Rosel and I interviewed Nakeshai Nicholson at the
- 10 Attorney General's Office. Nicholson came in voluntarily, was not in custody, and
- 11 agreed to have the interview recorded. In summary:
- 12 • Nicholson recalled the 07/19/16 claim with American Family Insurance and said "it
- 13 scared me." Nicholson explained she was driving after leaving the Cannery "one
- 14 night" and "I was turning and I didn't see the guy that was crossing the street."
- 15 Nicholson got out of her vehicle and asked if he was ok after she "accidentally had
- 16 hit him." The male told her he was fine, and was "kinda" limping. She couldn't
- 17 remember his name.
- 18 • The accident occurred "at nighttime" and it was dark. Nicholson couldn't remember
- 19 what she was doing at the Cannery, and was driving her 2004 Camry.
- 20 • The person was in the crosswalk, but Nicholson didn't see them because "they had
- 21 on really dark clothing." She couldn't remember the cross streets where the
- 22 accident occurred or specific details.
- 23 • Nicholson stated she gave the details to the insurance representative and called
- 24 them the "next day."
- 25 • Nicholson gave the pedestrian her insurance information, and described him as a
- 26 Caucasian male and possibly in his 30's. Nicholson was asked if he was tall, short,
- 27 or middle and replied "middle." She didn't pay much attention to his build because
- 28 she was concerned if he was ok.

- 1 • Nicholson did not call the police, and the male “was like, I’m good.” She provided
- 2 him her information and insurance.
- 3 • Nicholson did not know the male before the accident occurred, “never.”
- 4 • Nicholson was asked if the accident was planned or staged in any way. She
- 5 replied, “how would you plan something like that? No.”
- 6 • Nicholson was aware of the website Plenty of Fish (note: [www.pof.com](http://www.pof.com)). She
- 7 acknowledged being on it before, and was “probably” on it in 2016. Nicholson said
- 8 she blogged based on her dating experiences. Nicholson said “it’s a possibility” that
- 9 she was on the website in July 2016.
- 10 • We showed a Nevada Identification Card of a male (note: Navar **LEE**) to Nicholson.
- 11 She stated “I don’t recognize that person at all.”
- 12 • Nicholson was asked about the name Navar **LEE**. She said he “doesn’t sound
- 13 familiar, no.”
- 14 • Investigator Rosel asked Nicholson if she met the male (note: pointing to Navar
- 15 **LEE’s** Nevada ID card photo) on Plenty of Fish. She replied [sic] “he doesn’t look
- 16 familiar if for anybody I’ve met there before, no.”
- 17 • Nicholson stated she had “absolutely been 100% truthful.”
- 18 • Nicholson understood insurance fraud or false claims are felonies in Nevada,
- 19 “absolutely.”
- 20 • Nicholson was told the situation was a gigantic mess, and she was in a lot of
- 21 trouble. At that point, Nicholson elected to leave our interview. Nicholson
- 22 mentioned she already consulted with her attorney, and he told her “yeah, go see
- 23 what they have to say.” She felt “uncomfortable” with the situation and decided to
- 24 leave.

25 24. Based on the above information, and totality of the circumstances, it is believed  
26 **LEE** misrepresented material facts related to his bodily injuries and insurance claims to  
27 fraudulently collect approximately \$50,666 in insurance benefits from GEICO, USAA, State  
28 Farm, and American Family Insurance. **LEE** also attempted to collect money from GEICO

1 and Liberty Mutual.

2 25. All of the previously alleged acts have been committed or completed by LEE, in  
3 or about May 2015 - August 2016 within the County of Clark, State of Nevada.

4 26. WHEREFORE, Affiant prays a WARRANT OF ARREST be issued charging  
5 **NA VAR DERICK LEE a/k/a NAVAR DERICK LEE** with the following crimes: ATTEMPT  
6 THEFT OF \$3,500 OR MORE, a Category "C" felony in violation of NRS 193.330, 205.0832,  
7 205.0835; THEFT OF \$3,500 OR MORE, a Category "B" felony in violation of NRS 205.0832,  
8 205.0835; EXTORTION, a Category "B" felony in violation of NRS 205.320; MULTIPLE  
9 TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF ENTERPRISE OR  
10 OCCUPATION, a Category "B" felony in violation of NRS 205.377; and INSURANCE FRAUD,  
11 a category "D" felony in violation of NRS 686A.2815, 686A.291.

12 27. WHEREFORE, Affiant prays a WARRANT OF ARREST be issued charging  
13 **NAKESHAI LASHAWN NICHOLSON** with the following crimes: THEFT OF \$3,500 OR  
14 MORE, a Category "B" felony in violation of NRS 205.0832, 205.0835; and INSURANCE  
15 FRAUD, a category "D" felony in violation of NRS 686A.2815, 686A.291.

16 28. WHEREFORE, Affiant prays a SUMMONS IN LIEU OF ARREST be issued  
17 charging **TAMEKA NICOLE GREEN, TIFFANY SHERRIE RUSSELL, LATRICE DENISE**  
18 **HALL,** and **KASHEVA RASHAWN MCGRUDER,** with the following crimes: THEFT OF  
19 \$3,500 OR MORE, a Category "B" felony in violation of NRS 205.0832, 205.0835; and  
20 INSURANCE FRAUD, a category "D" felony in violation of NRS 686A.2815, 686A.291.

21 ///

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23 ///

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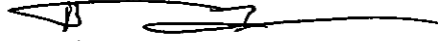
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1           29.   WHEREFORE, Affiant prays a SUMMONS IN LIEU OF ARREST be issued  
2 charging **CIBELEANA DENISA DRAIN** with the following crimes: ATTEMPT THEFT OF  
3 \$3,500 OR MORE, a Category "C" felony in violation of NRS 193.330, 205.0832, 205.0835;  
4 and INSURANCE FRAUD, a category "D" felony in violation of NRS 686A.2815, 686A.291.

5           Dated this 11<sup>th</sup> day of May, 2018.

6  
7 

8 Ryan Evans  
9 Investigator, Insurance Fraud Unit

10 SUBSCRIBED AND SWORN to  
11 Before me this 11<sup>th</sup> day of May, 2018.

12 

13 NOTARY PUBLIC

14 12209-2570

