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ORIGINAL

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

JAN 27 2017

BY: 
DENISE M. DURON, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 FRANK DUKE NGUYEN, ID #8232150

14 Defendant.

Case No.: C-17-320771-1
Dept. No.: 4

15
16 INFORMATION

17 ADAM PAUL LAXALT, Attorney General for the State of Nevada, in the name and by the
18 authority of the State of Nevada, informs the Court:

19 FRANK DUKE NGUYEN has committed the crimes(s) of one (1) count of INSURANCE FRAUD, a
20 category "D" felony, in violation of NRS 686A.2815.

21 All of the acts alleged herein have been committed or completed on or about November 6, 2011
22 through March 31, 2014, by the above-named Defendant, within the County of Clark, State of Nevada, in
23 the following manner:

24 COUNT I
25 INSURANCE FRAUD
26 Category "D" Felony - NRS 686A.2815

27 That the Defendant, FRANK DUKE NGUYEN, in the County of Clark, State of Nevada, did
28 knowingly and willfully present or cause to be presented one or more statement(s) as a part of, or in support
of, a claim for payment or other benefits under a policy of insurance, with knowledge that the statement

1 concealed or omitted facts, or contained false or misleading information concerning any fact material to
2 that claim, to wit:

3 On or about November 6, 2011 through March 31, 2014, NGUYEN, either personally or through one
4 or more agent(s), while working as a dentist, knowingly and willfully, and in support of claims for
5 payment under a policy of disability insurance, falsely informed RiverSource Life Insurance Company
6 (also doing business as Ameriprise Financial) that:
7 • From November 6, 2011 through March 31, 2014, he was not working in any capacity;
8 • He had not worked since some time prior to November 6, 2011;
9 • He had not worked with limited or restricted duties since some time prior to November 6, 2011;
10 and/or
11 • He did not know when he would return to work.

12 All of which constitutes the crime of INSURANCE FRAUD, a category "D" felony, in violation NRS
13 686A.2815. All of which is contrary to the form, force and effect of the statutes in such cases made and
14 provided, and against the peace and dignity of the state of Nevada.

15 DATED this 27 day of January, 2017.

16 SUBMITTED BY

17 ADAM PAUL LAXALT
18 Attorney General

19 By: Michael Kallala for
20 MICHAEL C. KOVAC (Bar No. 11177)
21 Senior Deputy Attorney General
22 *Attorneys for the State of Nevada*