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1 ADAM PAUL LAXALT
Attorney General
2 RONDA CLIFTON
Senior Deputy Attorney General
3 Nevada State Bar No. 4733
5420 Kietzke Lane, Suite 202
4 Reno, Nevada 89511
Telephone: (775) 687-2108

5 *Attorney for Plaintiff*

6
7 IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
8 IN AND FOR THE COUNTY OF DOUGLAS

9 THE STATE OF NEVADA,)
10 Plaintiff,)
11 vs.)
12 KAREN RAE CHAPON, aka)
KAREN HANNAFIOUS, aka)
13 JOHNNA CHAPON,)
14 Defendant.)

Case No. 16CR0091
Dept. No. 2

15 **CRIMINAL INFORMATION**

16 ADAM PAUL LAXALT, Attorney General of the State of Nevada, and RONDA
17 CLIFTON, Senior Deputy Attorney General, in the name and by the authority of the State of
18 Nevada, inform the above entitled court that KAREN RAE CHAPON, contrary to the form,
19 force and effect of statutes in such cases made and provided, and against the peace and
20 dignity of the State of Nevada, committed the following offenses:

21 **COUNT I**

22 **INSURANCE FRAUD**
23 **A Category D Felony in Violation of NRS 686A.2815(2)**

24 DEFENDANT, KAREN RAE CHAPON, on or about December 29, 2012, to on or
25 about November 10, 2014, within the County of Douglas, State of Nevada, did knowingly,
26 willfully and unlawfully present or cause to be presented statements as part of or in support
27 of a claim and/or claims for payment or other benefits under a policy of insurance known by
28 her to conceal or omit facts, or contain false and misleading information concerning any fact

1 material to an insurance claim. To wit: DEFENDANT made claims for benefits with Travel
2 Guard/AIG Property Casualty Insurance after travel insurance was purchased in 2012 and
3 2014. DEFENDANT submitted travel insurance claims for reimbursement on both claims
4 alleging the death of family members, knowingly, willfully and unlawfully supporting the claim
5 with forged death certificates and/or forged invoices for both claims.

6 **COUNT II**

7 **MORTGAGE LENDING FRAUD**
8 **A Category C Felony in Violation of NRS 205.372(1)(a)**

9 DEFENDANT, KAREN RAE CHAPON, on or about October 1, 2015, to on or about
10 December 21, 2015, within the County of Douglas, State of Nevada, as a participant in a
11 mortgage lending transaction, did knowingly, willfully, and unlawfully make a false statement
12 or misrepresentation concerning a material fact, or did knowingly and unlawfully conceal or
13 fail to disclose a material fact. To wit: DEFENDANT contacted Newmark Investment and
14 Loan, Inc. to secure a \$180,000 loan against 626 Don Drive, Zephyr Cove, Nevada, knowing
15 that DEFENDANT had no ownership rights in the property which was and is owned by the
16 bankruptcy estate, and/or provided forged documentation purporting to substantiate
17 DEFENDANT'S claim that 626 Don Drive, Zephyr Cove, Nevada was not in bankruptcy.

18 **COUNT III**

19 **THEFT**
20 **A Category B Felony in Violation of NRS 205.0832(1)(c) and NRS 205.0835(4)**

21 DEFENDANT, KAREN RAE CHAPON, on or about September 4, 2013, and on or
22 about December 21, 2015, within the County of Douglas, State of Nevada, did knowingly,
23 willfully and unlawfully obtain money from Travel Guard/AIG Property Casualty Insurance
24 and Michael Guidara, via Newmark Investment and Loan Inc., by a material
25 misrepresentation with intent to deprive Travel Guard/AIG Property Casualty and Michael
26 Guidara, via Newmark Investment and Loan Inc., of the money. To wit: DEFENDANT made
27 a claim for benefits with Travel Guard/AIG Property Casualty Insurance after travel insurance
28 was purchased in 2012. DEFENDANT submitted a travel insurance claim for reimbursement

1 alleging the death of a family member, knowingly, willfully and unlawfully supporting the
2 claim with a forged death certificate and/or forged invoice. The material misrepresentations
3 made by DEFENDANT were relied upon by Travel Guard/AIG Property Casualty Insurance
4 and resulted in payment to DEFENDANT over \$3,500.

5 Additionally, DEFENDANT contacted Newmark Investment and Loan, Inc. to secure a
6 \$180,000 loan against 626 Don Drive, Zephyr Cove, Nevada, knowing that DEFENDANT
7 had no ownership rights in the property which was and is owned by the bankruptcy estate,
8 and/or provided forged documentation purporting to substantiate DEFENDANT'S claim that
9 626 Don Drive, Zephyr Cove, Nevada was not in bankruptcy. This material
10 misrepresentation made by DEFENDANT was instrumental in causing Michael Guidara, via
11 Newmark Investment and Loan Inc., to transfer over \$3,500 to DEFENDANT.

12 All of which is contrary to the form, force and effect of the statutes in such cases,
13 made and provided, and against the peace and dignity of the State of Nevada.

14 **AFFIRMATION PURSUANT TO NRS 239B.030**

15 The undersigned does hereby affirm that the preceding document, CRIMINAL
16 INFORMATION, does not contain the social security number of any person.

17 DATED this 28th day of July, 2016.

18 ADAM PAUL LAXALT
19 Attorney General

20 By:


21 for RONDA CLIFTON
22 Senior Deputy Attorney General
23 Insurance Fraud Unit
24
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WITNESS LIST

The following list contains the names and addresses of all witnesses to the matters specified above known to the Office of the Attorney General of the State of Nevada at the time the accompanying criminal information was filed:

1. Investigator Daniell Valerio
Nevada Attorney General's Office
5420 Kietzke Lane, Suite 202
Reno, NV 89511
2. Investigator Nevada Rhodes
Nevada Attorney General's Office
5420 Kietzke Lane, Suite 202
Reno, NV 89511
3. Angela Rasmusson
AIG Property Casualty
17300 W. 119th
Olathe, KS 66061
4. Kim Klasinski
Travel Guard
3300 Business Park Drive
Stevens Point, WI 54482
5. Angelique Lamberti-Clark
U.S. Bankruptcy Court
P.O. Box 50026
Sparks, NV 89435
6. Darren K. Proulx
Newmark Investment and Loan, Inc.
1227 Baring Blvd.
Sparks, NV 89434
7. Kevin Chevrier
AIG
P.O. Box 1528
Alpharetta, GA 30023

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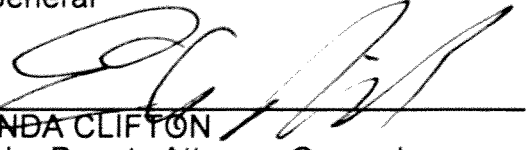
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8. Joel Moskowitz
AIG
P.O. Box 26530
Swanee Mission, KS 66225

RESPECTFULLY SUBMITTED this 28th day of July, 2016.

ADAM PAUL LAXALT
Attorney General


By: 
for RONDA CLIFTON
Senior Deputy Attorney General
Insurance Fraud Unit

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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on the 28th day of July, 2016, I a true and correct copy of the foregoing CRIMINAL INFORMATION, by causing said document to be placed in the U.S. Mail, postage prepaid, to the following:

Richard Davies, Esq.
Attorney at Law
411 Mill Street
Reno, Nevada 89502



An employee of the Office
of the Attorney General