

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

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 ARLENE MANUELA HERNANDEZ, ID
#5994034,

14 Defendant.
15

Case No.: C-17-326471-19
Dept. No.: XVIII

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17 **AMENDED INDICTMENT**

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

21 **COUNT I**
INSURANCE FRAUD

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

23 Defendant(s) ARLENE MANUELA HERNANDEZ, within Clark County, Nevada, (i) acted or
24 failed to act with the intent of defrauding or deceiving an insurer or agent thereof to obtain any proceeds or
25 benefits under a policy of insurance issued pursuant to the Nevada Insurance Act, and and/or (ii) presented
26 or caused to be presented, or assisted, aided, abetted, solicited, or conspired with another person to present
27 or cause to be presented, a claim for payment or other benefits under a policy of insurance issued pursuant
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1 to the Nevada Insurance Act, knowing that statement contained or omitted facts, or contained false or
2 misleading information concerning any fact material to that claim, to wit:

3 On or about February 26, 2016, through May 26, 2016, Defendant(s) ARLENE MANUELA
4 HERNANDEZ, either personally or through an agent, knowingly staged an automobile accident and/or
5 made false representations regarding the manner in which the purported accident took place and/or injuries
6 sustained as a result of said purported accident to agents of Nationwide Insurance and/or Great West
7 Casualty Company with the intent to defraud Nationwide Insurance and/or Great West Casualty Company
8 of insurance benefits.

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

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

13 DATED this _____ day of _____, 2018.

14 SUBMITTED BY

15 ADAM PAUL LAXALT
16 Attorney General

17 By:

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

20 ENDORSEMENT: A True Bill

21
22 By: _____
23 Foreperson, Clark County Grand Jury
24 GJ#_16BGJ151-A-X
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