

1 **AIND**
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7
8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 JESSICA VALDES TARRIO,

14 Defendant.

Case No.: C-17-326471-22
Dept. No.: XVIII

15
16 **AMENDED INDICTMENT**

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

20 **COUNT I**
INSURANCE FRAUD

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

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

1 On or about April 7, 2017, through May 6, 2017, Defendant(s) JESSICA VALDES TARRIO,
2 either personally or through an agent, knowingly staged an automobile accident and/or made false
3 representations regarding the manner in which the purported accident took place and/or injuries sustained
4 as a result of said purported accident to agents of GEICO with the intent to defraud GEICO of insurance
5 benefits.

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

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

10 DATED this _____ day of _____, 2018.

11 SUBMITTED BY

12 ADAM PAUL LAXALT
13 Attorney General

14 By:

15 Michael C. Kovac, Bar No. 11177
16 Senior Deputy Attorney General
17 *Attorneys for the State of Nevada*

18 ENDORSEMENT: A True Bill

19 By: _____
20 Foreperson, Clark County Grand Jury
21 GJ#_16BGJ151-A-X