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**FILED**

2017 JUN -9 A 10: 20

JUSTICE COURT  
LAS VEGAS, NEVADA  
LG  
DEPUTY

7 Attorneys for the state of Nevada

8 JUSTICE COURT, LAS VEGAS TOWNSHIP  
9 CLARK COUNTY, NEVADA

10 STATE OF NEVADA,

Case No. 17F07565X

11 Plaintiff,

Dept. No. 12

12 v.

13 DANIEL HARRIS a.k.a. DANIEL LE  
14 HARRIS, ID #1596540,

15 Defendant.

16 **CRIMINAL COMPLAINT**

17 Plaintiff, THE STATE OF NEVADA, by and through its counsel, ADAM PAUL LAXALT,  
18 Attorney General, and ROBERT G. GIUNTA, Senior Deputy Attorney General, hereby complains and  
19 charges Defendant, DANIEL LE HARRIS, with having committed the following offenses within the  
20 County of Clark, State of Nevada:

21 **COUNT ONE**  
22 **INSURANCE FRAUD**

(NRS 686A.281 to NRS 686A.295, inclusive – Category “D” Felony)

23 On or about February 25, 2015, Defendant, DANIEL LE HARRIS, did unlawfully, knowingly  
24 and willfully present or cause to be presented any statement as a part of, or in support of, a claim for  
25 payment or other benefits under a policy of insurance issued pursuant to the Nevada Insurance Code,  
26 knowing that the statement conceals or omits facts, or contains false or misleading information  
27 concerning any fact material to that claim; and/or act or fail to act with the intent of defrauding or  
28 deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any proceeds or

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

7 During said time period and for said purposes, Defendant, DANIEL LE HARRIS, did file  
8 Claim Number 001017356662, under his Nevada Insurance Policy (AMERICAN BANKERS  
9 INSURANCE COMPANY Policy #RIN343864200) for a theft which he represented had occurred on  
10 February 22, 2015, involving the contents of his 2008 PT Cruiser vehicle, including a Dell laptop  
11 computer, a leather case, an Apple MP3 player and forty (40) CDs, when in truth and in fact, the  
12 contents of said vehicle had not been stolen as Defendant well knew.

13 All of which constitutes the crime of INSURANCE FRAUD a Category "D" Felony, in  
14 violation of NRS 686A.281 to NRS 686A.295, inclusive.

15 **COUNT TWO**  
16 **INSURANCE FRAUD**  
17 **(NRS 686A.281 to NRS 686A.295, inclusive – Category "D" Felony)**

18 On or between January 21, 2016, Defendant, DANIEL LE HARRIS, did unlawfully, knowingly  
19 and 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 issued pursuant to the Nevada Insurance Code,  
21 knowing that the statement conceals or omits facts, or contains false or misleading information  
22 concerning any fact material to that claim; and/or act or fail to act with the intent of defrauding or  
23 deceiving an insurer, a reinsurer, a producer, a broker or any agent thereof, to obtain any proceeds or  
24 other benefits under a policy of insurance issued pursuant to the Nevada Insurance Code; and/or  
25 participate in, assist, aid, abet, solicit or conspire with another person to present or cause to be  
26 presented any statement to an insurer, a reinsurer, a producer, a broker or any agent thereof, knowing  
27 that the statement conceals or omits facts, or contains false or misleading information concerning any  
28 fact material to a claim for payment or other benefits under a policy of insurance issued pursuant to the  
Nevada Insurance Code, or any of the foregoing acts or omissions; to wit:

1 During said time period and for said purposes, Defendant, DANIEL LE HARRIS, did file  
2 Claim Number PA0016629756, under his Nevada Insurance Policy (Hartford Auto Insurance Policy  
3 #55PHT904284 alleging that his vehicle, a 2008 PT Cruiser had been stolen in Las Vegas, Nevada,  
4 when in truth and in fact, defendant had given said vehicle to an acquaintance who had agreed to  
5 destroy said vehicle for him.

6 All of which constitutes the crime of INSURANCE FRAUD a Category "D" Felony in violation  
7 of NRS 686A.281 to NRS 686A.295, inclusive.

8 **COUNT THREE**  
9 **ATTEMPT TO OBTAIN MONEY UNDER FALSE PRETENSE**  
10 **(NRS 193.330; NRS 205.0821 to NRS 205.0835, inclusive – Category "C" Felony)**

11 On or about January 21, 2016, Defendant, DANIEL LE HARRIS, did unlawfully, knowingly  
12 and willfully attempt to obtain real, personal or intangible property or the services of another person,  
13 valued at \$3,500 or more, by one or more material misrepresentations with intent to deprive that person  
14 of the property or services; to wit:

15 During said time period and for said purposes, Defendant, HARRIS, did file a claim, under his  
16 Nevada insurance policy (Hartford Insurance Policy #55PHT904284) for the theft of his 2008 PT  
17 Cruiser VIN 3A8FY48B28T128005 which he represented occurred on January 20, 2016, when in truth  
18 and in fact, the vehicle was not stolen on that date, in an attempt to obtain a payout in an amount in  
19 excess of \$3,500 for said loss from Hartford Insurance Company.

20 All of which constitutes the crime of ATTEMPT THEFT a Category "C" Felony, in violation of  
21 NRS 193.330; NRS 205.0821 to NRS 205.0835, inclusive.

22 **COUNT FOUR**  
23 **THEFT**  
24 **(NRS 205.0821 to NRS 205.0835, inclusive – Category "C" Felony)**

25 On or about January 21, 2016, Defendant, DANIEL LE HARRIS, did unlawfully, knowingly  
26 and willfully obtain real, personal or intangible property or the services of another person, valued at  
27 \$650 or more, by one or more material misrepresentations with intent to deprive that person of the  
28 property or services; to wit:

During said time period and for said purposes, Defendant, HARRIS, did file a claim, under his  
Nevada insurance policy (HARTFORD Auto insurance Policy #55PHT904284) for the loss of the use

1 of his 20008 PT Cruiser VIN 3A8FY48B28T128005 as the result of a theft which he represented  
2 occurred on January 20, 2016, when in truth and in fact, the vehicle was not stolen on that date, and  
3 obtained a payout for towing and rental car expenses from USAA Insurance in an amount of  
4 approximately \$1,018.25 for towing and rental car expenses from USAA Insurance.

5 All of which constitutes the crime of THEFT, a Category "C" Felony, in violation of  
6 NRS 205.0821 to NRS 205.0835, inclusive.

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

9 ***The Complainant requests a Summons in Lieu of Arrest be issued at this time pursuant to***  
10 ***NRS 171.106.***

11 That Complainant knows that said crimes occurred and that the Defendant, DANIEL LE  
12 HARRIS, has committed the same based upon the following: Because Complainant is a Senior Deputy  
13 Attorney General, and is in possession of, among other things, an affidavit written by Investigator Keri  
14 Halversen, known to Complainant to be employed with the Office of the Attorney General, a copy of  
15 which is attached hereto and hereby incorporated by reference herein for the limited purpose of  
16 securing a Summons in Lieu of Arrest.

17 Said Complainant makes this declaration under penalty of perjury.

18 DATED this 21<sup>st</sup> day of May, 2017.

19 SUBMITTED BY

20 ADAM PAUL LAXALT  
21 Attorney General

22 By: 

23 Robert G. Giunta (Bar. No. 12209)  
24 Senior Deputy Attorney General  
25 *Attorneys for the State of Nevada*