

1 MIKE WINSOR
2 Special Assistant Attorney General
3 Special Deputy Lewis and Clark County Attorney
4 Office of the Commissioner of Securities and
5 Insurance, Montana State Auditor (CSI)
6 840 Helena Avenue
7 Helena, MT 59601
8 (406) 444-2040

9 *Attorney for the State of Montana*

10 **MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT, GALLATIN COUNTY**

11 THE STATE OF MONTANA,

12 Plaintiff,

13 v.

14 WADE DARREL LUNNISS,

15 Defendant.

Case No. _____

INFORMATION

16 Count I – INSURANCE FRAUD/THEFT, (Common Scheme), a FELONY, in violation of Mont.
17 Code Ann. §§ 33-1-1202(1), 33-1-1211(2), and 45-6-301(6)(a).

18 STATE OF MONTANA)
19 :ss.
20 County of Lewis and Clark)

21 MIKE WINSOR, Special Deputy Gallatin County Attorney, and attorney for the State of
22 Montana, having first obtained leave of the Court, files this Information accusing the above-named
23 Defendant, WADE DARREL LUNNISS, of having committed the following offense:
24
25
26
27
28

COUNT I

1
2 That from on or about February 13, 2012, through on or about March 22, 2012, in Gallatin
3 County, Montana, the Defendant committed the offense of INSURANCE FRAUD/THEFT
4 (Common Scheme), a FELONY, in violation of Mont. Code Ann. §§ 33-1-1202(1), 33-1-1211(2),
5 and 45-6-301(6)(a).
6

7 The facts constituting this offense are as follows:

8 That at the time and place mentioned above, the Defendant purposely or knowingly
9 committed insurance fraud/theft pursuant to a common scheme by presenting, or causing to be
10 presented, written and oral statements to Safeco Insurance Company of Illinois (Safeco) containing
11 false, incomplete, or misleading information concerning facts and/or things material to, as part of,
12 or in support of a claim for payment or other benefit pursuant to an insurance policy, for the
13 purpose of obtaining money and/or benefits in an amount exceeding \$1,500.
14

15 A list of possible witnesses for the State now known to the prosecution is as follows:

16 John Forsman, Investigator, CSI, Helena, MT
17 Diana Harris, Special Investigative Unit, Safeco, Helena, MT
18 Amy Pappas, Claims Adjuster, Safeco, Los Angeles, CA
19 Candice Anderson, Montana Department of Corrections, Bozeman, MT
20 Heather Moore, Montana Department of Corrections, Bozeman, MT
21 Wade Darrel Lunniss, Bozeman, MT
22 Geoffrey Angel Esq., Angel Law Firm, Bozeman, MT

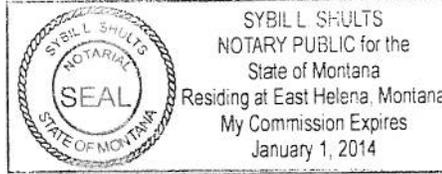
23 DATED this 24th day of January, 2013.

24
25 
26 MIKE WINSOR
27 Special Assistant Attorney General
28 Special Deputy Gallatin County Attorney

1 SUBSCRIBED and SWORN to before me by Mike Winsor this 24th day of

2 January, 2013.

3 



5 POSSIBLE PUNISHMENT:

6
7
8 Count I – INSURANCE FRAUD/THEFT (Common Scheme) a felony: the offense is punishable
9 by a fine not to exceed \$50,000 and/or imprisonment in the state prison for any term not to exceed
10 10 years.