

IN THE DISTRICT COURT OF OKLAHOMA
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

AUG 30 2012

AMENDED
INFORMATION

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

THE STATE OF OKLAHOMA,)
)
 Plaintiff,)
)
 vs.)
)
 SHAKE HAQUE and NADEEA)
 HOSSAIN,)
)
 Defendants.)

No. CF-2012-5091

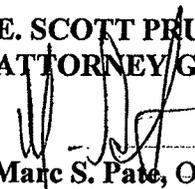
In the name and by the authority of the State of Oklahoma:

Now comes E. SCOTT PRUITT, ATTORNEY GENERAL, in and for the

State and County aforesaid, and gives the court to know and be informed as follows:

COUNT 1: On or about November 29, 2011, Oklahoma County, Oklahoma, **SHAKE HAQUE** and **NADEEA HOSSAIN**, committed the crime of **CONSPIRACY TO COMMIT A FELONY** in violation of 21 O.S. §421, by conspiring and agreeing to make a False Claim for Insurance to GEICO Insurance; to-wit: on November 29, 2011, at approximately 9:28:59 a.m., **SHAKE HAQUE** was involved in an automobile accident, in Oklahoma County, with Carol Knight. At approximately 2:35 p.m. on November 29, 2011, **SHAKE HAQUE's** wife **NADEEA HOSSAIN** purchased automobile insurance, contacted Carol Knight and attempted to have her report the accident date as November 30, 2011, contrary to the form of the Statutes and against the peace and dignity of the State of Oklahoma.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA



Marc S. Pate, OBA #10567
Assistant Attorney General
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
(405) 522-0055

STATE OF OKLAHOMA)
OKLAHOMA COUNTY) ss

I do solemnly swear that the statements and allegations set forth in the within information are true.

Carl Reed, AFFIANT

Signed and sworn to before me by Carl Reed on the _____ day of _____, 2012.

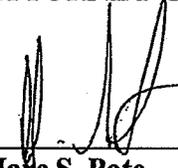
Notary Public

(SEAL)

My Commission Expires: _____.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

By:



Marc S. Pate
Assistant Attorney General

Violation and Penalty:

21 O.S. §421: Not exceeding ten (10) years and/or by a fine not exceeding \$5,000

WITNESSES

Leslie Landwert
GEICO
17904 Stevens Road
Shawnee, Oklahoma 74801

Caitland Luetge
GEICO
4201 Spring Valley Road
Dallas, Texas 75244

Carl Reed
Investigator
Office of Attorney General
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105

William Fitzpatrick
GEICO
4201 Spring Valley Road
Dallas, Texas 75244

Carol Knight
9308 Lyric Lane
Midwest City, Oklahoma 73130

John Anderson
GEICO
4201 Spring Valley Road
Dallas, Texas 75244

Shaun Speth
Farmers Insurance Company
4809 N.W 161st
Edmond, Oklahoma 73013

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

THE STATE OF OKLAHOMA,)	
)	
Plaintiff,)	
)	
v.)	CASE NO.
)	
Nadeea Hossain)	
DOB:09/02/73)	
Shake Haque)	
DOB: 12/12/78)	
)	
Defendants.)	

AFFIDAVIT OF PROBABLE CAUSE

The undersigned, being first duly sworn and upon oath, does depose and state as follows:

I, Carl Reed, am employed as an investigator with the Workers' Compensation and Insurance Fraud Unit in the Office of Attorney General. I was assigned to investigate an alleged case of insurance fraud involving Nadeea Hossain DOB:09/02/73 and Shake Haque DOB:12/12/78. In the course of my investigation I interviewed witnesses, obtained and reviewed various documents to include: a copy of the investigative report submitted by Leslie Landwert, Special Investigator for Geico Insurance Company, and a copy of the insurance company files.

On November 29, 2011, at approximately 9:00 a.m., insured driver Shake Haque was involved in a motor vehicle collision with claimant Carol Knight. Haque was driving a 2007 Honda Fit. Nadeea Hossain is the registered owner of the Honda. Initially Haque provided Knight with an expired AAA policy number. At the time of the accident Haque and his wife, Nadeea Hossain was not insured with Geico. In this claim Haque and Hossain used 1800 David Terrace, Oklahoma City as their residence address.

Following the accident at approximately 2:35 p.m. Nadeea Hossain contacted Geico Insurance company and purchased a liability only automobile policy. Carol Knight received a call from Nadeea Hossain who provided Knight with the Geico policy number. Hossain instructed Knight to inform Geico that the accident occurred on November 30, 2011, instead of November 29, 2011.

Geico contacted Carol Knight on December 6, 2011, and she verified during her recorded statement that the accident occurred on November 29, 2011 at approximately 9:00 a.m. Knight stated she contacted the Midwest City Police Department and an officer was dispatched. Records received from the Midwest City Police Department verify officer R. Weatherly was dispatched to 1801 David Terrace at 9:37 a.m. on November 29, 2011.

