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CLERK OF THE COURT

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9 **EIGHTH JUDICIAL DISTRICT COURT**  
10 **CLARK COUNTY, NEVADA**

11 STATE OF NEVADA, 12 Plaintiff, 13 v. 14 MARK THOMAS GEORGANTAS, a.k.a. 15 MARK GEOGANTAS, a.k.a. MARK GEORGANTIS, 16 Defendant.	Case No.: C-16-311820-1 Dept. No.: XXIII
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18 **INDICTMENT**

19 The above named defendant, MARK THOMAS GEORGANTAS, a.k.a. MARK  
20 GEOGANTAS, a.k.a. MARK GEORGANTIS ("GEORGANTAS"), is accused by the Clark County  
21 Grand Jury of the crimes(s) of two (2) counts of THEFT IN THE AMOUNT OF \$3,500 OR MORE,  
22 a category "B" felony in violation of NRS 205.0832, and two (2) counts of SECURITIES FRAUD,  
23 a category "B" felony in violation of NRS 90.570, in Clark County, State of Nevada as follows:

24 **COUNT I**  
25 **THEFT IN THE AMOUNT OF \$3,500 OR MORE**  
26 **Category "B" Felony - NRS 205.0832**

27 That the Defendant, GEORGANTAS, in the County of Clark, State of Nevada, did without  
28 lawful authority knowingly: control property of another person with the intent to deprive that  
person of the property; and/or convert, make an unauthorized transfer of an interest in, or without

1 authorization control property of another person, or used the services or property of another  
2 person entrusted to him or placed in his possession for a limited, authorized period of  
3 determined or prescribed duration or for a limited use; and/or obtain property or services of  
4 another person by a material misrepresentation with intent to deprive that person of the property  
5 or services; and/or control property of another person knowing or having reason to know that the  
6 property was stolen, and the value of said property was \$3,500 or more, to wit:

7 On or about between July 24, 2013 and August 10, 2013, GEORGANTAS knowingly  
8 misrepresented to Marcelo Caraveo that he had a proven, guaranteed system to win money  
9 playing certain casino games (the "System"), and/or that he was going to create a documentary  
10 showing his use of the System in Las Vegas casinos as part of a business plan (the  
11 "Documentary"). GEORGANTAS further knowingly misrepresented to Caraveo that he needed  
12 funding for the System and/or the Documentary, and that Caraveo would receive profits from the  
13 System and/or Documentary as a result of providing GEORGANTAS with this funding. Relying  
14 upon these misrepresentations, Caraveo entrusted GEORGANTAS with approximately Three  
15 Hundred Fourteen Thousand Dollars (\$314,000) for the described limited purposes.  
16 GEORGANTAS did not have a guaranteed system to win money playing certain casino games,  
17 did not use Caraveo's money as promised, and did not return Caraveo's money.

18 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE, a  
19 category "B" felony, in violation NRS 205.0832.

20 **COUNT II**  
21 **SECURITIES FRAUD**  
22 **Category "B" Felony – NRS 90.570**

23 That the Defendant, GEORGANTAS in the County of Clark, State of Nevada, did willfully  
24 and unlawfully, in connection with the offer to sell, sale, offer to purchase or purchase of a  
25 security, directly or indirectly: employ a device, scheme or artifice to defraud; and/or made an  
26 untrue statement of a material fact or omitted to state a material fact necessary in order to make  
27 the statements made not misleading in the light of the circumstances under which they are  
28 made; and/or engaged in an act, practice, or course of business which operates or would  
operate as a fraud or deceit upon a person, to wit:

1 On or about between July 24, 2013 and August 10, 2013, GEORGANTAS offered to sell  
2 and/or sold a security and/or securities to Marcelo Caraveo ("Caraveo") for approximately Three  
3 Hundred Fourteen Thousand Dollars (\$314,000). In selling and/or offering to sell this security  
4 and/or securities, GEORGANTAS utilized one or more of the following misrepresentations,  
5 omissions, and/or acts or practices which were fraudulent or deceitful:

6 Material Misrepresentations:

- 7 • GEORGANTAS misrepresented to Caraveo that his name was "Mark Gigantis;"
- 8 • GEORGANTAS misrepresented to Caraveo that he had a proven, guaranteed  
9 system to win money playing certain casino games (the "System");
- 10 • GEORGANTAS misrepresented to Caraveo that he was going to create a  
11 documentary showing his use of the System in Las Vegas casinos as part of a  
12 business plan (the "Documentary");
- 13 • GEORGANTAS misrepresented to Caraveo that he needed funding for the  
14 System and/or the Documentary;
- 15 • GEORGANTAS misrepresented to Caraveo that Caraveo would receive profits  
16 from the System and/or Documentary as a result of providing GEORGANTAS with  
17 funding;

18 Omissions of Material Fact:

- 19 • GEORGANTAS did not inform Caraveo of his true identity;
- 20 • GEORGANTAS did not inform Caraveo of the risks of his investment;
- 21 • GEORGANTAS did not inform Caraveo as to GEORGANTAS's qualifications  
22 and/or history regarding the sale of securities.

23 In truth, GEORGANTAS is not named Gigantis; he did not have a proven, guaranteed  
24 system to win money playing certain casino games; he was not going to create the  
25 Documentary; and he was not looking for funding for the System or the Documentary.

26 All of which constitutes the crime of SECURITIES FRAUD, a category "B" felony, in  
27 violation of NRS 90.570.

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1 security, directly or indirectly: employ a device, scheme or artifice to defraud; and/or made an  
2 untrue statement of a material fact or omitted to state a material fact necessary in order to make  
3 the statements made not misleading in the light of the circumstances under which they are  
4 made; and/or engaged in an act, practice, or course of business which operates or would  
5 operate as a fraud or deceit upon a person, to wit:

6 On or about March 7, 2014, GEORGANTAS offered to sell and/or sold a security and/or  
7 securities to Evan Rodich ("Rodich") for approximately Fifty Thousand Dollars (\$50,000). In  
8 selling and/or offering to sell this security and/or securities, GEORGANTAS utilized one or more  
9 of the following misrepresentations, omissions, and/or acts or practices which were fraudulent or  
10 deceitful:

11 Material Misrepresentations:

- 12 • GEORGANTAS misrepresented to Rodich that he would receive a profit from his  
13 investment on a monthly basis;
- 14 • GEORGANTAS misrepresented to Rodich that GEORGANTAS would return  
15 Rodich's money if he did not receive profits as promised;

16 Omissions of Material Fact:

- 17 • GEORGANTAS did not inform Rodich of the risks of his investment;
- 18 • GEORGANTAS did not inform Rodich as to GEORGANTAS's qualifications and/or  
19 history regarding the sale of securities.

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1 All of which constitutes the crime of SECURITIES FRAUD, a category "B" felony, in  
2 violation of NRS 90.570.

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

5 DATED this 7th day of January, 2016.

6 SUBMITTED BY

7 ADAM PAUL LAXALT  
8 Attorney General

9 By: 

10 Samuel Kern  
11 Chief Deputy Attorney General  
12 Nevada Bar No. 10638  
13 *Attorneys for the state of Nevada*

12 ENDORSEMENT: A True Bill

13  
14 By:   
15 Foreperson, Clark County Grand Jury  
16 CJ# \_\_\_\_\_