


CLERK OF THE COURT

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EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

v.

WILLIAM ANTHONY DIGILIO, ID #
1195017

Defendant.

Case No.: C-16-313968-1

Dept. No.: IX

INDICTMENT

The above named defendant, WILLIAM ANTHONY DIGILIO, is accused by the Clark County Grand Jury of the crimes of one (1) count of ESTABLISHING OR POSSESSING FINANCIAL FORGERY LABORATORY, a category "B" felony in violation of NRS 205.46513, and three (3) counts of FORGERY, a category "D" felony in violation of NRS 205.090 and NRS 205.110, in Clark County, State of Nevada as follows:

COUNT I
ESTABLISHING OR POSSESSING FINANCIAL FORGERY LABORATORY
Category "B" Felony - NRS 205.46513

That the Defendant, WILLIAM ANTHONY DIGILIO, in the County of Clark, State of Nevada, did, with the intent to commit any unlawful act, establish or possess any computer, system, program or other electronic or mechanical device, or any combination thereof, that is specifically configured for the purpose of unlawfully manufacturing any forged or fraudulent

1 financial instrument, document or item, including, without limitation, any negotiable instrument,
2 check, draft, bond, credit card, debit card, stock certificate, annuity, bank bill or note, draft, bill of
3 exchange, contract, promissory note, traveler's check or money order, to wit:

4 On or about May 21, 2013, the Defendant, with the intent to commit forgery, established
5 or possessed, in his residence, a financial forgery laboratory, consisting of one (1) or more
6 computers and/or one (1) or more printers and/or one (1) or more scanners specifically
7 configured, alone or in combination, for the purpose of unlawfully manufacturing counterfeit
8 Federal Reserve Notes.

9 All of which constitutes the crime of ESTABLISHING OR POSSESSING FINANCIAL
10 FORGERY LABORATORY, a category "B" felony, in violation NRS 205.46513.

11 **COUNT II**
12 **FORGERY**

13 **Category "D" Felony - NRS 205.090 & 205.110**

14 That the Defendant, WILLIAM ANTHONY DIGILIO, in the County of Clark, State of
15 Nevada, did, knowing the same to be forged or altered, and with intent to defraud, utter, offer,
16 dispose of or put off as true, or have in his possession with intent so to utter, offer, dispose of or
17 put off any forged writing, instrument or other thing, to wit:

18 On or about May 21, 2013, the Defendant, knowing the same to be forged or altered, and
19 with intent to defraud, possessed, in a wallet with his identification, three (3) counterfeit \$100
20 Federal Reserve Notes, all bearing the serial number K00486899.

21 All of which constitutes the crime of FORGERY, a category "D" felony, in violation NRS
22 205.090 and NRS 205.110.

23 **COUNT III**
24 **FORGERY**

25 **Category "D" Felony - NRS 205.090 & 205.110**

26 That the Defendant, WILLIAM ANTHONY DIGILIO, in the County of Clark, State of
27 Nevada, did, knowing the same to be forged or altered, and with intent to defraud, utter, offer,
28 dispose of or put off as true, or have in his possession with intent so to utter, offer, dispose of or
put off any forged writing, instrument or other thing, to wit:

///

1 On or about May 21, 2013, the Defendant, knowing the same to be forged or altered, and
2 with intent to defraud, possessed, in a wallet with his identification, five (5) counterfeit \$20
3 Federal Reserve Notes, all bearing the serial number JA19642512A.

4 All of which constitutes the crime of FORGERY, a category "D" felony, in violation NRS
5 205.090 and NRS 205.110.

6 **COUNT IV**
7 **FORGERY**
8 **Category "D" Felony - NRS 205.090 & 205.110**

9 That the Defendant, WILLIAM ANTHONY DIGILIO, in the County of Clark, State of
10 Nevada, did, knowing the same to be forged or altered, and with intent to defraud, utter, offer,
11 dispose of or put off as true, or have in his possession with intent so to utter, offer, dispose of or
12 put off any forged writing, instrument or other thing, to wit:

13 On or about May 21, 2013, the Defendant, knowing the same to be forged or altered, and
14 with intent to defraud, possessed, in a wallet with his identification, three (3) counterfeit \$20
15 Federal Reserve Notes, all bearing the serial number JF56022339C.

16 All of which constitutes the crime of FORGERY, a category "D" felony, in violation NRS
17 205.090 and NRS 205.110.

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

20 DATED this 6th day of April, 2016.

21 SUBMITTED BY

22 ADAM PAUL LAXALT
23 Attorney General

24 By: Amy K. Steelman
25 AMY K. STEELMAN
26 Deputy Attorney General
27 Nevada Bar No. 12927
28 Attorneys for the State of Nevada

29 ENDORSEMENT: A True Bill

30 By: Cynthia Hall
31 Foreperson, Clark County Grand Jury
32 GJ# 15B33042X