

CLERK OF THE COURT

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8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 WILLIAM ANTHONY DIGILIO,
14 ID # 1195017

15 Defendant.

Case No.: C-16-313968-1

Dept. No.: IX

16
17 **AMENDED INDICTMENT**

18 The above named defendant, WILLIAM ANTHONY DIGILIO, is accused by the Clark
19 County Grand Jury of the crimes of one (1) count of ESTABLISHING OR POSSESSING
20 FINANCIAL FORGERY LABORATORY, a category "B" felony in violation of NRS 205.46513, in
21 Clark County, State of Nevada as follows:

22 **COUNT I**
23 **ESTABLISHING OR POSSESSING FINANCIAL FORGERY LABORATORY**
24 **Category "B" Felony - NRS 205.46513**

25 That the Defendant, WILLIAM ANTHONY DIGILIO, in the County of Clark, State of
26 Nevada, did, with the intent to commit any unlawful act, establish or possess any computer,
27 system, program or other electronic or mechanical device, or any combination thereof, that is
28 specifically configured for the purpose of unlawfully manufacturing any forged or fraudulent
financial instrument, document or item, including, without limitation, any negotiable instrument,

1 check, draft, bond, credit card, debit card, stock certificate, annuity, bank bill or note, draft, bill of
2 exchange, contract, promissory note, traveler's check or money order, to wit:

3 On or about May 21, 2013, the Defendant, with the intent to commit forgery, established
4 or possessed, in his residence, a financial forgery laboratory, consisting of eleven (11)
5 computers and/or printers and/or scanners specifically configured, alone or in combination, for
6 the purpose of unlawfully manufacturing counterfeit Federal Reserve Notes. The Defendant also
7 possessed \$19,275.00 in printed images of various denominations of counterfeit currency and
8 numerous image files used in the manufacture of counterfeit currency.

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

13 DATED this 5th day of October, 2016.

14 SUBMITTED BY

15 ADAM PAUL LAXALT
16 Attorney General

17 By:


18 AMY K. STEELMAN
19 Deputy Attorney General
20 Nevada Bar No. 12927
21 *Attorneys for the State of Nevada*
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WITNESS LIST

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1. SA Ryan Krummel
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2. SA Scott Fleckenstein
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10 Transient
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