

1 **IND**  
2 ADAM PAUL LAXALT  
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ORIGINAL

FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

FEB 12 2013

BY,   
HALYPANNUILLO, DEPUTY

8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,  
11  
12 Plaintiff,  
13  
14 v.  
15 LOUIS JOSEPH CURTO, III, \_\_\_  
16  
17 Defendant.

Case No.: C-17-321360-1  
Dept. No.: XXV

18 **FIRST AMENDED INDICTMENT**

19 The above named defendant, LOUIS JOSEPH CURTO, III, is accused by the Clark County Grand  
20 Jury of the crimes(s) of one (1) count of SECURITIES FRAUD, a category "B" felony in violation of  
21 NRS 90.570 and NRS 90.650(1)(a), in Clark County, State of Nevada as follows:

22 **COUNT I**  
**SECURITIES FRAUD**  
23 **Category "B" Felony - NRS 90.650(1)(a)**

24 That the Defendant, LOUIS JOSEPH CURTO, III, in the County of Clark, State of Nevada, did  
25 willfully and unlawfully, in connection with the offer to sell, sale, offer to purchase or purchase of a  
26 security, directly or indirectly: employ a devise scheme or artifice to defraud; and/or make an untrue  
27 statement of a material fact or omitted to state a material fact necessary in order to make the statements  
28 made not misleading in the light of the circumstances under which they were made; and/or engaged in an



1 act, practice, or course of business which operates or would operate as a fraud or deceit upon a person, to  
2 wit:

3 From about January 26, 2013 through December 7, 2015, in and through the course of an enterprise  
4 known as Bluwyn Management, LLC, Defendant willfully and unlawfully, obtained thousands of dollars  
5 from clients: Keith Iverson, Jacquelyn Christenson, Therese Alt, Kristina Buchanan, and Stephanie  
6 Tanner, by means of knowingly and falsely representing to said clients that Defendant had buyers and  
7 would sell the clients' timeshares, resulting in a loss to the clients of more than \$650 each.

8 All of which constitutes the crime of SECURITIES FRAUD, a category "B" felony, in violation  
9 NRS 90.570 and NRS 90.650(1)(a).


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

12 DATED this 12<sup>th</sup> day of February, 2018.

13 SUBMITTED BY

14 ADAM PAUL LAXALT  
15 Attorney General

16 By:

  
17 RAYA M. SWIFT, Bar No. 11108  
18 Senior Deputy Attorney General  
19 *Attorneys for the State of Nevada*  
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