

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

APR 17 2019

BY: *Kathy Thomas*
KATHY THOMAS DEPUTY

1 **AIND**
AARON D. FORD
2 Attorney General
Alissa Engler, Bar No. 11940
3 Senior Deputy Attorney General
State of Nevada
4 Office of the Attorney General
555 E. Washington Ave., Ste. 3900
5 Las Vegas, Nevada 89101-1068
6 P: (702) 486-5531
7 F: (702) 486-3768
AEngler@ag.nv.gov
Attorneys for the State of Nevada

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

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 THOMAS BURNETT LEITZEN JR., ID
#7049757, TONY MATTHEWS, ID # 1376871,
14 STAN LI, ID #7054076, and ALAN
CHRISTOPHER RUSSELL, ID #7039878,

15 Defendant(s).

Case No.: C-18-336226-5

16 Dept. No.: XXVIII

C-18-336226-5
AIND
Amended Indictment
4830055



17 **AMENDED INDICTMENT**

18 The above-named defendant, ALAN CHRISTOPHER RUSSELL, is accused by the Clark County
19 Grand Jury of the crime(s) of **COUNT 1 – MONEY LAUNDERING, (CATEGORY “D” FELONY)**,
20 in violation of NRS 207.195, in Clark County, State of Nevada as follows:

21 **COUNT 1**
22 **MONEY LAUNDERING**
23 **Category “D” Felony – NRS 207.195**

24 That on or about July 2016 through August 2016, the Defendant, ALAN CHRISTOPHER
25 RUSSELL, did willfully, unlawfully and feloniously, conduct or attempt to conduct financial transactions
26 involving a monetary instrument that represent the proceeds of or are directly or indirectly derived from
27 any unlawful activity, to wit: LIVING FROM THE EARNINGS OF A PROSTITUTE with (1) the intent
28 to further any unlawful activity; and/or (2) the knowledge that the transactions conceal the location,
source, ownership or control of the instrument, to wit: Defendant LEITZEN paid the female prostitutes

1 for their services by writing checks totaling \$3,715.00 from Mango Foods, LLC, to Defendant
2 RUSSELL, an intermediary, who cashed the checks and distributed the payment to the prostitutes.

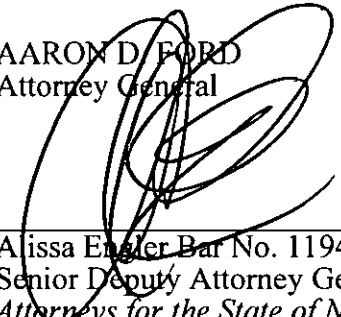
3 All of which is contrary to the form, force and effect of the statutes in such cases made and
4 provided, and against the peace and dignity of the State of Nevada.

5 DATED this 9th day of April, 2019.

SUBMITTED BY:

AARON D. FORD
Attorney General

6
7
8
9 By:


Aissa Engler Bar No. 11940
Senior Deputy Attorney General
Attorneys for the State of Nevada