

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

APR 29 2019

BY, 
ALICE JACOBSON, DEPUTY

1 **AIND**
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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-18-336226-2

16 Dept. No.: XXVIII

17 **AMENDED INDICTMENT**

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19 The above-named defendant, **TONY MATTHEWS**, is accused by the Clark County Grand Jury
20 of the crime(s) of one (1) count of PANDERING, (CATEGORY "C" FELONY), in violation of NRS
21 201.300(1) and one (1) count of MONEY LAUNDERING, (CATEGORY "D" FELONY), in violation
22 of NRS 207.195, in Clark County, State of Nevada as follows:

23 **COUNT 1**
PANDERING
24 **Category C Felony – NRS 201.300(1)**

25 That Defendant **TONY MATTHEWS**, within Clark County, State of Nevada, did willfully,
26 unlawfully and feloniously induce D.B. to unlawfully become a prostitute and/or continue to engage in
27 prostitution.

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COUNT 2
MONEY LAUNDERING
Category "D" Felony – NRS 207.195

On or about March 2018 through July 2018, defendant MATTHEWS did willfully, unlawfully and feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit: PANDERING, with (1) the intent to further any unlawful activity; and/or (2) the knowledge that the transactions conceal the location, source, ownership or control of the instrument, by the defendants paying the female prostitutes money in the form of a check made payable to the prostitute for their participation in the unlawful activity in the amount of \$82,180.00, from the Wells Fargo bank account ending in #2360 in the name of Tony Matthews, in which Defendant MATTHEWS is the signer and controlling person on the account through which money was earned from prostitution, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

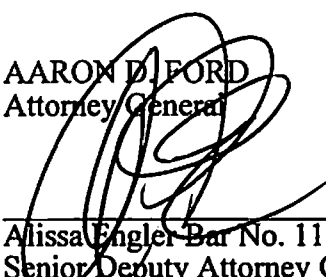
All of which is contrary to the form, force and effect of the statutes in such cases made and provided, and against the peace and dignity of the State of Nevada.

DATED this 9th day of April, 2019.

SUBMITTED BY:

AARON D. FORD
Attorney General

By:



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