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

10 THE STATE OF NEVADA,)

11 Plaintiff,)

12 vs.)

13 ALAN RODRIGUES,
14 JONAS BOWEN,
15 LARRY SMITH,
16 **WILLIAM HARPER,**
17 JOZSEF MATE,
and TRACY JONES,)

18 Defendants.)

CASE NO: C-16-312103-4

DEPT NO: VIII

19 **INDICTMENT**

20 Defendants, ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
21 HARPER, JOZSEF MATE, and TRACY JONES, above named, are accused by the grand jury
22 of having committed the following offenses:

23 THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR
24 OLDER, a category "B" felony in violation of NRS 205.0832(1) and 193.167; THEFT IN THE
25 AMOUNT OF \$650 OR MORE, VICTIM 60 YEARS OF AGE OR OLDER, a category "C"
26 felony in violation of NRS 205.0832(1) and 193.167; and MULTIPLE TRANSACTIONS
27 INVOLVING FRAUD OR DECEIT, a category "B" felony, in violation of NRS 205.377.

28 All of the acts alleged herein have been committed or consummated on or between

1 August 2013 and July 2014, by the above-named Defendants, executed in whole or in part
2 within the County of Clark, State of Nevada, in the following manner:

3
4 **COUNT 1**
5 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
6 **OLDER**

7 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

8 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
9 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
10 either by virtue of their own actions or by the actions of their agents or employees, without
11 lawful authority, knowingly controlled property of another person with intent to deprive that
12 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
13 without authorization controlled property of another person, or used the property of another
14 person entrusted to him or placed in his possession for a limited, authorized period of
15 determined or prescribed duration of for a limited use; and/or obtained property of another
16 person by a material misrepresentation with intent to deprive that person of the property, and
17 the value of said property was \$3,500 or more, to wit:

18 On or between August 1, 2013 and September 30, 2013, Defendants ALAN
19 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
20 and TRACY JONES without lawful authority, with the Defendants being criminally liable
21 under one or more of the following principles of criminal liability, to-wit: (1) by directly
22 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
23 the intent that this crime be committed, by providing counsel and/or encouragement and by
24 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
25 JOZSEF MATE operated World Travel Access also known as Travel Solutions, Travel
26 Solutions LLC dba World Travel Access, and WTA Services LLC, and whereby LARRY
27 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
28 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
account in the name of World Travel Access, and/or completed documents on behalf of World

1 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
2 crime be committed;

3 knowingly and with the intent to deprive Karen McCarthy of her property,
4 misrepresented that the Defendants and/or World Travel Access would transfer Karen
5 McCarthy's two (2) timeshare properties in World Travel Access's ownership in exchange for
6 an upfront fee. Relying on that misrepresentation, Karen McCarthy paid to LARRY SMITH
7 and/or World Travel Access approximately \$6,332. However, neither the Defendants nor World
8 Travel Access ever actually attempted to transfer ownership of a timeshare for Karen
9 McCarthy, nor have they refunded Karen McCarthy's money. Karen McCarthy was 60 years of
10 age or older at the time of Defendants' actions.

11 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
12 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
13 205.0832(1) and 193.167.

14
15 **COUNT 2**
16 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
17 **OLDER**

18 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

19 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
20 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
21 either by virtue of their own actions or by the actions of their agents or employees, without
22 lawful authority, knowingly controlled property of another person with intent to deprive that
23 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
24 without authorization controlled property of another person, or used the property of another
25 person entrusted to him or placed in his possession for a limited, authorized period of
26 determined or prescribed duration of for a limited use; and/or obtained property of another
27 person by a material misrepresentation with intent to deprive that person of the property, and
28 the value of said property was \$3,500 or more, to wit:

On or about May 29, 2014, Defendants ALAN RODRIGUES, JONAS BOWEN,

1 LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY JONES without lawful
2 authority, with the Defendants being criminally liable under one or more of the following
3 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
4 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
5 by providing counsel and/or encouragement and by entering into a course of conduct whereby
6 ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated World Travel Access
7 (WTA) also known as Travel Solutions, Travel Solutions LLC dba World Travel Access, and
8 WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER, and TRACY
9 JONES acted as agents of World Travel Access by leading seminars on behalf of World Travel
10 Access, repeatedly obtained monies from a bank account in the name of World Travel Access,
11 and/or completed documents on behalf of World Travel Access; and/or (3) pursuant to a
12 conspiracy to commit this crime with the intent that this crime be committed;

13 knowingly and with the intent to deprive William Shunney of his property,
14 misrepresented that the Defendants and/or World Travel Access would transfer William
15 Shunney's two (2) timeshare properties in exchange for an upfront fee. William Shunney
16 attended a seminar presented by JONAS BOWEN and TRACY JONES, and paid World Travel
17 Access approximately \$7,195 after relying on Defendants' misrepresentations. However,
18 neither the Defendants nor World Travel Access ever actually attempted to transfer ownership
19 of a timeshare for William Shunney, nor have they refunded William Shunney's money.
20 William Shunney was 60 years of age or older at the time of Defendants' actions.

21 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
22 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
23 205.0832(1) and 193.167.

24
25 **COUNT 3**
26 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
27 **OLDER**

28 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM

1 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
2 either by virtue of their own actions or by the actions of their agents or employees, without
3 lawful authority, knowingly controlled property of another person with intent to deprive that
4 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
5 without authorization controlled property of another person, or used the property of another
6 person entrusted to him or placed in his possession for a limited, authorized period of
7 determined or prescribed duration of for a limited use; and/or obtained property of another
8 person by a material misrepresentation with intent to deprive that person of the property, and
9 the value of said property was \$3,500 or more, to wit:

10 On or about May 22, 2014, Defendants ALAN RODRIGUES, JONAS BOWEN,
11 LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY JONES without lawful
12 authority, with the Defendants being criminally liable under one or more of the following
13 principles of criminal liability; to-wit: (1) by directly committing this crime; and/or (2) by
14 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
15 by providing counsel and/or encouragement and by entering into a course of conduct whereby
16 ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated World Travel Access
17 (WTA) also known as Travel Solutions, Travel Solutions LLC dba World Travel Access, and
18 WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER, and TRACY
19 JONES acted as agents of World Travel Access by leading seminars on behalf of World Travel
20 Access, repeatedly obtained monies from a bank account in the name of World Travel Access,
21 and/or completed documents on behalf of World Travel Access; and/or (3) pursuant to a
22 conspiracy to commit this crime with the intent that this crime be committed;

23 knowingly and with the intent to deprive Margaret Sleik of her property, misrepresented
24 that the Defendants would transfer Margaret Sleik's two (2) timeshare properties to World
25 Travel Access's ownership in exchange for an upfront fee. Margaret Sleik attended a seminar
26 presented by JONAS BOWEN and Jeff Kaupa, and paid World Travel Access approximately
27 \$5,995 after relying on Defendants' misrepresentations. However, neither the Defendants nor
28 World Travel Access ever actually attempted to transfer ownership of a timeshare for Margaret

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1 Sleik, nor have they refunded Margaret Sleik's money. Margaret Sleik was 60 years of age or
2 older at the time of Defendants' actions.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
4 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
5 205.0832(1) and 193.167.

6
7 **COUNT 4**
8 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
9 **OLDER**
10 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

11 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
12 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
13 either by virtue of their own actions or by the actions of their agents or employees, without
14 lawful authority, knowingly controlled property of another person with intent to deprive that
15 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
16 without authorization controlled property of another person, or used the property of another
17 person entrusted to him or placed in his possession for a limited, authorized period of
18 determined or prescribed duration of for a limited use; and/or obtained property of another
19 person by a material misrepresentation with intent to deprive that person of the property, and
20 the value of said property was \$3,500 or more, to wit:

21 On or between August 29, 2013, and September 30, 2013, Defendants ALAN
22 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
23 and TRACY JONES without lawful authority, with the Defendants being criminally liable
24 under one or more of the following principles of criminal liability, to-wit: (1) by directly
25 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
26 the intent that this crime be committed, by providing counsel and/or encouragement and by
27 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
28 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY

1 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
2 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
3 account in the name of World Travel Access, and/or completed documents on behalf of World
4 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
5 crime be committed;

6 knowingly and with the intent to deprive Bruce Mann of his property, misrepresented
7 that the Defendants and/or World Travel Access would transfer ownership of Bruce Mann's
8 three (3) timeshare properties in exchange for an upfront fee. Relying on that misrepresentation,
9 Bruce Mann attended a seminar presented by TRACY JONES, and paid World Travel Access
10 approximately \$5,495. However, neither the Defendants nor World Travel Access ever actually
11 attempted to transfer ownership of a timeshare for Bruce Mann, nor have they refunded Bruce
12 Mann's money. Bruce Mann was 60 years of age or older at the time of Defendants' actions.

13 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
14 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
15 205.0832(1) and 193.167.

16 **COUNT 5**
17 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
18 **OLDER**

19 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

20 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
21 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
22 either by virtue of their own actions or by the actions of their agents or employees, without
23 lawful authority, knowingly controlled property of another person with intent to deprive that
24 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
25 without authorization controlled property of another person, or used the property of another
26 person entrusted to him or placed in his possession for a limited, authorized period of
27 determined or prescribed duration of for a limited use; and/or obtained property of another
28 person by a material misrepresentation with intent to deprive that person of the property, and
the value of said property was \$3,500 or more, to wit:

1 On or about August 30, 2013, Defendants ALAN RODRIGUES, JONAS BOWEN,
2 LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY JONES without lawful
3 authority, with the Defendants being criminally liable under one or more of the following
4 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
5 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
6 by providing counsel and/or encouragement and by entering into a course of conduct whereby
7 ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated World Travel Access
8 (WTA) also known as Travel Solutions, Travel Solutions LLC dba World Travel Access, and
9 WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER, and TRACY
10 JONES acted as agents of World Travel Access by leading seminars on behalf of World Travel
11 Access, repeatedly obtained monies from a bank account in the name of World Travel Access,
12 and/or completed documents on behalf of World Travel Access; and/or (3) pursuant to a
13 conspiracy to commit this crime with the intent that this crime be committed;

14 knowingly and with the intent to deprive Michael Wilson of his property, misrepresented
15 that the Defendants and/or World Travel Access would transfer ownership of Michael Wilson's
16 timeshare property in exchange for an upfront fee. Relying on that misrepresentation, Michael
17 Wilson attended a seminar presented by TRACY JONES, and paid World Travel Access
18 approximately \$3,995. However, neither the Defendants nor World Travel Access ever actually
19 attempted to transfer ownership of a timeshare for Michael Wilson, nor have they refunded
20 Michael Wilson's money. Michael Wilson was 60 years of age or older at the time of
21 Defendants' actions.

22 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
23 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
24 205.0832(1) and 193.167.

25 ///
26 ///
27 ///
28 ///

1
2 **COUNT 6**
3 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
4 **OLDER**

5 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

6 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
7 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
8 either by virtue of their own actions or by the actions of their agents or employees, without
9 lawful authority, knowingly controlled property of another person with intent to deprive that
10 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
11 without authorization controlled property of another person, or used the property of another
12 person entrusted to him or placed in his possession for a limited, authorized period of
13 determined or prescribed duration of for a limited use; and/or obtained property of another
14 person by a material misrepresentation with intent to deprive that person of the property, and
15 the value of said property was \$3,500 or more, to wit:

16 On or between August 15, 2013 and September 5, 2013, Defendants ALAN
17 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
18 and TRACY JONES without lawful authority, with the Defendants being criminally liable
19 under one or more of the following principles of criminal liability, to-wit: (1) by directly
20 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
21 the intent that this crime be committed, by providing counsel and/or encouragement and by
22 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
23 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
24 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
25 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
26 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
27 account in the name of World Travel Access, and/or completed documents on behalf of World
28 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
crime be committed;

1 knowingly and with the intent to deprive Lynn Weber of her property, misrepresented
2 that the Defendants, in exchange for an upfront fee, would transfer ownership of Lynn Weber's
3 two (2) timeshare properties and pay the associated maintenance fees. Relying on that
4 misrepresentation, Lynn Weber attended a seminar presented by LARRY SMITH and
5 WILLIAM HARPER, and paid World Travel Access approximately \$4,995. However, neither
6 the Defendants nor World Travel Access ever actually attempted to transfer ownership of a
7 timeshare for Lynn Weber, nor have they refunded Lynn Weber's money. Lynn Weber was 60
8 years of age or older at the time of Defendants' actions.

9 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
10 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
11 205.0832(1) and 193.167.

12
13 **COUNT 7**
14 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
15 **OLDER**
16 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

17 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
18 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
19 either by virtue of their own actions or by the actions of their agents or employees, without
20 lawful authority, knowingly controlled property of another person with intent to deprive that
21 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
22 without authorization controlled property of another person, or used the property of another
23 person entrusted to him or placed in his possession for a limited, authorized period of
24 determined or prescribed duration of for a limited use; and/or obtained property of another
25 person by a material misrepresentation with intent to deprive that person of the property, and
26 the value of said property was \$3,500 or more, to wit:

27 On or between February 1, 2014, and February 28, 2014, Defendants ALAN
28 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
and TRACY JONES without lawful authority, with the Defendants being criminally liable

1 under one or more of the following principles of criminal liability, to-wit: (1) by directly
2 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
3 the intent that this crime be committed, by providing counsel and/or encouragement and by
4 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
5 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
6 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
7 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
8 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
9 account in the name of World Travel Access, and/or completed documents on behalf of World
10 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
11 crime be committed;

12 knowingly and with the intent to deprive Patricia Campbell of her property,
13 misrepresented that the Defendants would transfer ownership of Patricia Campbell's timeshare
14 property in exchange for an upfront fee. Relying on that misrepresentation, Patricia Campbell
15 attended a seminar presented by World Travel Access, and paid World Travel Access
16 approximately \$3,595. However, neither the Defendants nor World Travel Access ever actually
17 attempted to transfer ownership of a timeshare for Patricia Campbell, nor have they refunded
18 Patricia Campbell's money. Patricia Campbell was 60 years of age or older at the time of
19 Defendants' actions.

20 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
21 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
22 205.0832(1) and 193.167.

23
24 **COUNT 8**
25 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
26 **OLDER**
27 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

28 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,

1 either by virtue of their own actions or by the actions of their agents or employees, without
2 lawful authority, knowingly controlled property of another person with intent to deprive that
3 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
4 without authorization controlled property of another person, or used the property of another
5 person entrusted to him or placed in his possession for a limited, authorized period of
6 determined or prescribed duration of for a limited use; and/or obtained property of another
7 person by a material misrepresentation with intent to deprive that person of the property, and
8 the value of said property was \$3,500 or more, to wit:

9 On or between November 1, 2013, and December 31, 2013, Defendants ALAN
10 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
11 and TRACY JONES without lawful authority, with the Defendants being criminally liable
12 under one or more of the following principles of criminal liability, to-wit: (1) by directly
13 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
14 the intent that this crime be committed, by providing counsel and/or encouragement and by
15 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
16 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
17 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
18 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
19 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
20 account in the name of World Travel Access, and/or completed documents on behalf of World
21 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
22 crime be committed;

23 knowingly and with the intent to deprive Mary Paladino of her property, misrepresented
24 that the Defendants, in exchange for an upfront fee, would transfer Mary Paladino's several
25 timeshare properties into World Travel Access' name and would pay the associated
26 maintenance fees. Relying on that misrepresentation, Mary Paladino attended a seminar
27 presented by JONAS BOWEN and LARRY SMITH, and paid World Travel Access
28 approximately \$7,980. However, neither the Defendants nor World Travel Access ever actually

1 attempted to transfer a timeshare for Mary Paladino, nor have they refunded Mary Paladino's
2 money. Mary Paladino was 60 years of age or older at the time of Defendants' actions.

3 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
4 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
5 205.0832(1) and 193.167.

6
7 **COUNT 9**
8 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
9 **OLDER**

10 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

11 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
12 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
13 either by virtue of their own actions or by the actions of their agents or employees, without
14 lawful authority, knowingly controlled property of another person with intent to deprive that
15 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
16 without authorization controlled property of another person, or used the property of another
17 person entrusted to him or placed in his possession for a limited, authorized period of
18 determined or prescribed duration of for a limited use; and/or obtained property of another
19 person by a material misrepresentation with intent to deprive that person of the property, and
20 the value of said property was \$3,500 or more, to wit:

21 On or between January 1, 2013, and July 31, 2013, Defendants ALAN RODRIGUES,
22 JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY
23 JONES without lawful authority, with the Defendants being criminally liable under one or more
24 of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
25 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
26 be committed, by providing counsel and/or encouragement and by entering into a course of
27 conduct whereby ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated
28 World Travel Access (WTA) also known as Travel Solutions, Travel Solutions LLC dba World
Travel Access, and WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER,

1 and TRACY JONES acted as agents of World Travel Access by leading seminars on behalf of
2 World Travel Access, repeatedly obtained monies from a bank account in the name of World
3 Travel Access and/or completed documents on behalf of World Travel Access; and/or (3)
4 pursuant to a conspiracy to commit this crime with the intent that this crime be committed;

5 knowingly and with the intent to deprive Douglas Macduffee of his property,
6 misrepresented that the Defendants would transfer Douglas Macduffee's timeshare property
7 into World Travel Access's name in exchange for an upfront fee. Relying on that
8 misrepresentation, Douglas Macduffee attended a seminar presented by JONAS BOWEN and
9 LARRY SMITH, and paid World Travel Access approximately \$4,995. However, neither the
10 Defendants nor World Travel Access ever actually attempted to transfer a timeshare for
11 Douglas Macduffee, nor have they refunded Douglas Macduffee's money. Douglas Macduffee
12 was 60 years of age or older at the time of Defendants' actions.

13 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
14 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
15 205.0832(1) and 193.167.

16 **COUNT 10**
17 **THEFT IN THE AMOUNT OF \$3500 OR MORE, VICTIM 60 YEARS OF AGE OR**
18 **OLDER**

19 **Category "B" Felony - NRS 205.0832(1); 205.0835; 193.167**

20 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
21 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
22 either by virtue of their own actions or by the actions of their agents or employees, without
23 lawful authority, knowingly controlled property of another person with intent to deprive that
24 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
25 without authorization controlled property of another person, or used the property of another
26 person entrusted to him or placed in his possession for a limited, authorized period of
27 determined or prescribed duration of for a limited use; and/or obtained property of another
28 person by a material misrepresentation with intent to deprive that person of the property, and

1 the value of said property was \$3,500 or more, to wit:

2 On or about September 13, 2013, Defendants ALAN RODRIGUES, JONAS BOWEN,
3 LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY JONES without lawful
4 authority, with the Defendants being criminally liable under one or more of the following
5 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
6 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
7 by providing counsel and/or encouragement and by entering into a course of conduct whereby
8 ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated World Travel Access
9 (WTA) also known as Travel Solutions, Travel Solutions LLC dba World Travel Access, and
10 WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER, and TRACY
11 JONES acted as agents of World Travel Access by leading seminars on behalf of World Travel
12 Access and repeatedly obtained monies from a bank account in the name of World Travel
13 Access and/or (3) pursuant to a conspiracy to commit this crime with the intent that this crime
14 be committed;

15 knowingly and with the intent to deprive George Gregg of his property, misrepresented
16 that the Defendants would transfer George Gregg's timeshare property in exchange for an
17 upfront fee. Relying on that misrepresentation, George Gregg paid World Travel Access
18 approximately \$4,516. JONAS BOWEN, acting as agent of World Travel Access, refused to
19 contact George Gregg or provide George Gregg any updated information. Neither the
20 Defendants nor World Travel Access ever actually attempted to transfer ownership of a
21 timeshare for George Gregg, nor have they refunded George Gregg's money. George Gregg
22 was 60 years of age or older at the time of Defendants' actions.

23 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$3,500 OR MORE,
24 VICTIM 60 YEARS OF AGE OR OLDER, a category "B" felony in violation of NRS
25 205.0832(1) and 193.167.

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27 ///

28 ///

1
2 **COUNT 11**
3 **THEFT IN THE AMOUNT OF \$650 OR MORE, VICTIM 60 YEARS OF AGE OR**
4 **OLDER**

5 **Category "C" Felony - NRS 205.0832(1); 205.0835; 193.167**

6 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
7 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
8 either by virtue of their own actions or by the actions of their agents or employees, without
9 lawful authority, knowingly controlled property of another person with intent to deprive that
10 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
11 without authorization controlled property of another person, or used the property of another
12 person entrusted to him or placed in his possession for a limited, authorized period of
13 determined or prescribed duration of for a limited use; and/or obtained property of another
14 person by a material misrepresentation with intent to deprive that person of the property, and
15 the value of said property was \$650 or more, to wit:

16 On or between December 27, 2013, and January 6, 2014, Defendants ALAN
17 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
18 and TRACY JONES without lawful authority, with the Defendants being criminally liable
19 under one or more of the following principles of criminal liability, to-wit: (1) by directly
20 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
21 the intent that this crime be committed, by providing counsel and/or encouragement and by
22 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
23 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
24 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
25 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
26 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
27 account in the name of World Travel Access, and/or completed documents on behalf of World
28 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
crime be committed;

1 knowingly and with the intent to deprive Robert Hecker of his property, misrepresented
2 that the Defendants would transfer Robert Hecker's timeshare property into World Travel
3 Access's name in exchange for an upfront fee. Relying on that misrepresentation, Robert
4 Hecker attended a seminar presented by WILLIAM HARPER, and paid World Travel Access
5 approximately \$2,495. LARRY SMITH, acting as an agent of World Travel Access,
6 misrepresented to Robert Hecker that the transfer was proceeding as planned. However,
7 neither the Defendants nor World Travel Access ever actually attempted to transfer a timeshare
8 for Robert Hecker, nor have they refunded Robert Hecker's money. Robert Hecker was 60
9 years of age or older at the time of Defendants' actions.

10 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE,
11 VICTIM 60 YEARS OF AGE OR OLDER, a category "C" felony in violation of NRS
12 205.0832(1) and 193.167.

13
14 **COUNT 12**
15 **THEFT IN THE AMOUNT OF \$650 OR MORE, VICTIM 60 YEARS OF AGE OR**
16 **OLDER**
17 **Category "C" Felony - NRS 205.0832(1); 205.0835; 193.167**

18 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
19 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
20 either by virtue of their own actions or by the actions of their agents or employees, without
21 lawful authority, knowingly controlled property of another person with intent to deprive that
22 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
23 without authorization controlled property of another person, or used the property of another
24 person entrusted to him or placed in his possession for a limited, authorized period of
25 determined or prescribed duration of for a limited use; and/or obtained property of another
26 person by a material misrepresentation with intent to deprive that person of the property, and
27 the value of said property was \$650 or more, to wit:

28 On or between March 1, 2014, and March 31, 2014, Defendants ALAN RODRIGUES,
JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY

1 JONES without lawful authority, with the Defendants being criminally liable under one or more
2 of the following principles of criminal liability, to-wit: (1) by directly committing this crime;
3 and/or (2) by aiding or abetting in the commission of this crime, with the intent that this crime
4 be committed, by providing counsel and/or encouragement and by entering into a course of
5 conduct whereby ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated
6 World Travel Access (WTA) also known as Travel Solutions, Travel Solutions LLC dba World
7 Travel Access, and WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER,
8 and TRACY JONES acted as agents of World Travel Access by leading seminars on behalf of
9 World Travel Access, repeatedly obtained monies from a bank account in the name of World
10 Travel Access, and/or completed documents on behalf of World Travel Access; and/or (3)
11 pursuant to a conspiracy to commit this crime with the intent that this crime be committed;

12 knowingly and with the intent to deprive Roberta Bell of her property, misrepresented
13 that the Defendants would transfer Roberta Bell's timeshare property in exchange for an
14 upfront fee. Relying on that misrepresentation, Roberta Bell paid World Travel Access
15 approximately \$1,995. However, neither the Defendants nor World Travel Access ever actually
16 attempted to sell a timeshare for Roberta Bell, nor have they refunded Roberta Bell's money.
17 Roberta Bell was 60 years of age or older at the time of Defendants' actions.

18 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE,
19 VICTIM 60 YEARS OF AGE OR OLDER, a category "C" felony in violation of NRS
20 205.0832(1) and 193.167.

21
22 **COUNT 13**
23 **THEFT IN THE AMOUNT OF \$650 OR MORE, VICTIM 60 YEARS OF AGE OR**
24 **OLDER**

25 **Category "C" Felony - NRS 205.0832(1); 205.0835; 193.167**

26 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
27 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
28 either by virtue of their own actions or by the actions of their agents or employees, without
lawful authority, knowingly controlled property of another person with intent to deprive that

1 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
2 without authorization controlled property of another person, or used the property of another
3 person entrusted to him or placed in his possession for a limited, authorized period of
4 determined or prescribed duration of for a limited use; and/or obtained property of another
5 person by a material misrepresentation with intent to deprive that person of the property, and
6 the value of said property was \$650 or more, to wit:

7 On or between February 1, 2014, and February 15, 2014, Defendants ALAN
8 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
9 and TRACY JONES without lawful authority, with the Defendants being criminally liable
10 under one or more of the following principles of criminal liability, to-wit: (1) by directly
11 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
12 the intent that this crime be committed, by providing counsel and/or encouragement and by
13 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
14 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
15 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
16 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
17 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
18 account in the name of World Travel Access, and/or completed documents on behalf of World
19 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
20 crime be committed;

21 knowingly and with the intent to deprive Ronald Delia of his property, misrepresented
22 that the Defendants would transfer Ronald Delia's timeshare property into World Travel
23 Access's name in exchange for an upfront fee. Relying on that misrepresentation, Ronald Delia
24 attended a seminar presented by World Travel Access, and paid World Travel Access
25 approximately \$2,595. However, neither the Defendants nor World Travel Access ever actually
26 attempted to transfer a timeshare for Ronald Delia, nor have they refunded Ronald Delia's
27 money. Ronald Delia was 60 years of age or older at the time of Defendants' actions.

28 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE,

1 VICTIM 60 YEARS OF AGE OR OLDER, a category "C" felony in violation of NRS
2 205.0832(1) and 193.167.

3
4 **COUNT 14**
5 **THEFT IN THE AMOUNT OF \$650 OR MORE, VICTIM 60 YEARS OF AGE OR**
6 **OLDER**

7 **Category "C" Felony - NRS 205.0832(1); 205.0835; 193.167**

8 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
9 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
10 either by virtue of their own actions or by the actions of their agents or employees, without
11 lawful authority, knowingly controlled property of another person with intent to deprive that
12 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
13 without authorization controlled property of another person, or used the property of another
14 person entrusted to him or placed in his possession for a limited, authorized period of
15 determined or prescribed duration of for a limited use; and/or obtained property of another
16 person by a material misrepresentation with intent to deprive that person of the property, and
17 the value of said property was \$650 or more, to wit:

18 On or about December 9, 2013, Defendants ALAN RODRIGUES, JONAS BOWEN,
19 LARRY SMITH, WILLIAM HARPER, JOZSEF MATE, and TRACY JONES without lawful
20 authority, with the Defendants being criminally liable under one or more of the following
21 principles of criminal liability, to-wit: (1) by directly committing this crime; and/or (2) by
22 aiding or abetting in the commission of this crime, with the intent that this crime be committed,
23 by providing counsel and/or encouragement and by entering into a course of conduct whereby
24 ALAN RODRIGUES, JONAS BOWEN, and JOZSEF MATE operated World Travel Access
25 (WTA) also known as Travel Solutions, Travel Solutions LLC dba World Travel Access, and
26 WTA Services, LLC, and whereby LARRY SMITH, WILLIAM HARPER, and TRACY
27 JONES acted as agents of World Travel Access by leading seminars on behalf of World Travel
28 Access, repeatedly obtained monies from a bank account in the name of World Travel Access,
and/or completed documents on behalf of World Travel Access; and/or (3) pursuant to a

1 conspiracy to commit this crime with the intent that this crime be committed;

2 knowingly and with the intent to deprive Larry Swette of his property, misrepresented
3 that the Defendants would transfer Larry Swette's timeshare property into World Travel
4 Access' name in exchange for an upfront fee. Relying on that misrepresentation, Larry Swette
5 attended a seminar presented by World Travel Access, and paid World Travel Access
6 approximately \$2,400. However, neither the Defendants nor World Travel Access ever actually
7 attempted to transfer a timeshare for Larry Swette, nor have they refunded Larry Swette's
8 money. Larry Swette was 60 years of age or older at the time of Defendants' actions.

9 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE,
10 VICTIM 60 YEARS OF AGE OR OLDER, a category "C" felony in violation of NRS
11 205.0832(1) and 193.167.

12
13 **COUNT 15**
THEFT IN THE AMOUNT OF \$650 OR MORE; VICTIM 60 YEARS OF AGE OR
14 **OLDER**

15 **Category "C" Felony - NRS 205.0832(1); 205.0835; 193.167**

16 Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM
17 HARPER, JOZSEF MATE, and TRACY JONES, in the County of Clark, State of Nevada,
18 either by virtue of their own actions or by the actions of their agents or employees, without
19 lawful authority, knowingly controlled property of another person with intent to deprive that
20 person of the property; and/or converted, made an unauthorized transfer of an interest in, or
21 without authorization controlled property of another person, or used the property of another
22 person entrusted to him or placed in his possession for a limited, authorized period of
23 determined or prescribed duration of for a limited use; and/or obtained property of another
24 person by a material misrepresentation with intent to deprive that person of the property, and
25 the value of said property was \$650 or more, to wit:

26 On or between January 1, 2014, and February 28, 2014, Defendants ALAN
27 RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER, JOZSEF MATE,
28 and TRACY JONES without lawful authority, with the Defendants being criminally liable

1 under one or more of the following principles of criminal liability, to-wit: (1) by directly
2 committing this crime; and/or (2) by aiding or abetting in the commission of this crime, with
3 the intent that this crime be committed, by providing counsel and/or encouragement and by
4 entering into a course of conduct whereby ALAN RODRIGUES, JONAS BOWEN, and
5 JOZSEF MATE operated World Travel Access (WTA) also known as Travel Solutions, Travel
6 Solutions LLC dba World Travel Access, and WTA Services, LLC, and whereby LARRY
7 SMITH, WILLIAM HARPER, and TRACY JONES acted as agents of World Travel Access by
8 leading seminars on behalf of World Travel Access, repeatedly obtained monies from a bank
9 account in the name of World Travel Access, and/or completed documents on behalf of World
10 Travel Access; and/or (3) pursuant to a conspiracy to commit this crime with the intent that this
11 crime be committed;

12 knowingly and with the intent to deprive Les Perkins of his property, misrepresented that
13 the Defendants, would transfer Les Perkins's timeshare property into World Travel Access's
14 name in exchange for an upfront fee. Relying on that misrepresentation, Les Perkins attended a
15 seminar presented by JONAS BOWEN, LARRY SMITH, TRACY JONES, and/or WILLIAM
16 HARPER; and paid World Travel Access approximately \$2,495. However, neither the
17 Defendants nor World Travel Access ever actually attempted to transfer a timeshare for Les
18 Perkins, nor have they refunded Les Perkins' money. Les Perkins was 60 years of age or older
19 at the time of Defendants' actions.

20 All of which constitutes the crime of THEFT IN THE AMOUNT OF \$650 OR MORE,
21 VICTIM 60 YEARS OF AGE OR OLDER, a category "C" felony in violation of NRS
22 205.0832(1) and 193.167.

23
24 **COUNT 16**
25 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN COURSE OF**
26 **ENTERPRISE OR OCCUPATION**
27 **Category "B" Felony - NRS 205.377**

28 On or between August 2013 and July 2014, within the County of Clark, State of Nevada,
Defendants ALAN RODRIGUES, JONAS BOWEN, LARRY SMITH, WILLIAM HARPER,

1 JOZSEF MATE, and TRACY JONES, in the course of an enterprise or occupation, knowingly
2 and with the intent to defraud, engaged in an act, practice or course of business, or employed a
3 device, scheme or artifice which operated as a fraud or deceit upon a person by means of a false
4 representation or omission of a material fact that the Defendants knew to be false or omitted;
5 but which they intended others to rely upon, and which resulted in a loss of money or property
6 to the other party, on at least two occasions occurring within a 4-year period of time, each
7 having an aggregate loss of \$650.00 or more, by engaging in the following:

8 As set forth in Counts One (1) through Fifteen (15), incorporated by reference as though
9 fully set forth herein, Defendants have committed multiple transactions involving fraud or
10 deceit in the course of enterprise or occupation, in two or more transactions in which the
11 purpose, results, methods or commission was the same or similar; each having a value of \$650
12 or more.

13 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING
14 FRAUD OR DECEIT, a category "B" felony in violation of NRS 205.377.

15
16 DATED this 21 day of January, 2016.

17
18 ADAM PAUL LAXALT
Attorney General

19
20 By: 
Daniel Westmeyer
Deputy Attorney General

21
22 ENDORSEMENT: A True Bill

23
24 By: 
Foreperson, Clark County Grand Jury