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

NOV 15 2018

BY, _____
KIMBERLY ESTALA, DEPUTY

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

11 STATE OF NEVADA,
12 Plaintiff,

Case No.: **C-18-336226-3**
Dept. No.: XXVIII

13 v.

14 JEFF YU-KUANG LIN, THOMAS BURNETT
LEITZEN JR., ID #7049757, **TONY**
15 **MATTHEWS, ID # 1376871**, STAN LI, ID
#7054076, and ALAN CHRISTOPHER
16 RUSSELL, ID #7039878,
Defendant(s).

18 **INDICTMENT**

19 The above-named defendants, JEFF YU-KUANG LIN, THOMAS BURNETT LEITZEN JR.,
20 TONY MATTHEWS, STAN LI and ALAN CHRISTOPHER RUSSELL are accused by the Clark
21 County Grand Jury of the crimes(s) of:

- 22 • RACKETEERING, a category B felony, in violation of NRS 207.400(1)(c) and (i);¹
- 23 • RACKETEERING CONSPIRACY, a category B felony, in violation of NRS
24 207.400(1)(j);²
- 25 • PANDERING, a category C felony, in violation of NRS 201.300(1);³

26 _____
27 ¹ One count against all defendants.

² One count against all defendants.

28 ³ Four counts against defendants THOMAS BURNETT LEITZEN JR. and JEFF YU-KUANG LIN, two counts against
defendant TONY MATTHEWS and one count against defendant STAN LI.

- 1 • LIVING FROM THE EARNINGS OF A PROSTITUTE, a category D felony, in violation
2 of NRS 201.320;⁴
- 3 • PLACING PERSON IN HOUSE OF PROSTITUTION, a category D felony, in violation
4 of NRS 201.360;⁵ and
- 5 • MONEY LAUNDERING, a category D Felony, in violation of NRS 207.195;⁶

6 All of the above-referenced crimes occurred in Clark County, State of Nevada as follows:

7 **COUNT 1**
8 **RACKETEERING**
9 **Category "B" Felony – NRS 207.400(1)(c) and (i)**

10 Defendants JEFF YU-KUANG LIN, THOMAS BURNETT LEITZEN JR., TONY
11 MATTHEWS, ALAN CHRISTOPHER RUSSELL and STAN LI, within Clark County, Nevada, (1)
12 while employed by or associated with an enterprise, conducted or participated, directly or indirectly, in:
13 (i) the affairs of the enterprise through racketeering activity, or (ii) racketeering activity through the
14 affairs of the enterprise, and/or (2) did with knowledge that property represented proceeds of, or was
15 directly or indirectly derived from, any unlawful activity conducted or attempted to conduct any
16 transaction involving the property (i) with the intent to further racketeering activity; or (ii) with the
17 knowledge that the transaction concealed the location, source, ownership or control of the property, to
18 wit:

- 18 1. The allegations contained in counts two through thirty-six are hereby incorporated herein as
19 if fully set forth in this count and described in detail below.

20 **The Enterprise**

- 21 2. On or about January 2014 through July 18, 2018, Defendants owned and/or operated two
22 houses of prostitution under the façade of massage parlors, in which members of the enterprise
23 would (1) induce women to engage in acts of prostitution with paying customers; (2) accept
24 the earnings from known prostitutes; and (3) live off the earnings of these acts of prostitution.

25 ⁴ Four counts against defendants THOMAS BURNETT LEITZEN JR. and JEFF YU-KUANG LIN, two counts against
26 defendant TONY MATTHEWS and one count defendant against STAN LI.

27 ⁵ Four counts against defendants THOMAS BURNETT LEITZEN JR. and JEFF YU-KUANG LIN, two counts against
28 defendant TONY MATTHEWS and one count against defendant STAN LI.

⁶ Twenty-two counts against Defendant JEFF YU-KUANG LIN, five counts against Defendant THOMAS BURNETT
LEITZEN JR., two counts against Defendant TONY MATTHEWS and six counts against Defendant ALAN
CHRISTOPHER RUSSELL.

1 3. Defendant LIN, with the intent to commit the crimes of Pandering, Living from the Earnings
2 of a Prostitute and Placing a Person in House of Prostitution, carried out the following roles
3 and unlawful acts for the enterprise:

4 a. while employed by or associated with an enterprise, conducted or participated, directly
5 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, or (ii)
6 racketeering activity through the affairs of the enterprise, to include, but not limited
7 to:

8 i. was the co-owner and/or manager of Mango Foods, LLC which was doing
9 business as Mango Spa, an illegal house of prostitution; and/or

10 ii. was the owner and/or manager of Cactus Spa LV, LLC which was doing
11 business as Japanese Spa and/or Jade Spa, an illegal house of prostitution;
12 and/or

13 iii. entered into a lease agreements and merchant sales agreements for the
14 locations of 4770 Spring Mountain Road #102, Las Vegas, Clark County,
15 Nevada and 3141 Sammy Davis Jr. Drive, Las Vegas, Clark County, Nevada
16 wherein said locations operated as illegal houses of prostitution; and/or

17 iv. recruited women to engage in prostitution, and/or

18 v. negotiated prostitution services with customers; and/or

19 vi. facilitated line-ups with prostitutes for customer selection of a prostitute;
20 and/or

21 vii. scheduled shifts for prostitutes; and/or

22 viii. counseled the prostitutes on how to avoid law enforcement or detect law
23 enforcement; and/or

24 ix. received proceeds from prostitution after an act of prostitution was completed;
25 and/or

26 x. maintained business records for the illegal houses of prostitution; and/or

27 xi. facilitated out-call services for the purposes of prostitution; and/or
28

1 xii. advertised Mango Spa, Japanese Spa and/or Jade Spa on *Kickback*, a cell
2 phone application in order to obtain customers for prostitution; and/or

3 b. conducted financial transactions with the intent to further the racketeering activity
4 and/or conceal the location of the source, ownership or control of the property, when
5 he knew that the property represented the proceeds of, or was directly or indirectly
6 derived from prostitution, as fully set forth in counts 15 through 36 below.

7 4. Defendant LEITZEN, with the intent to commit the crimes of Pandering, Living from the
8 Earnings of a Prostitute and Placing a Person in House of Prostitution, carried out the
9 following roles for the enterprise:

10 a. while employed by or associated with an enterprise, conducted or participated, directly
11 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, or (ii)
12 racketeering activity through the affairs of the enterprise, to include, but not limited
13 to:

14 i. was the co-owner and/or manager of Mango Foods, LLC which was doing
15 business as Mango Spa, an illegal house of prostitution; and/or

16 ii. was the co-manager of Cactus Spa LV, LLC which was doing business as
17 Japanese Spa and/or Jade Spa, an illegal house of prostitution; and/or

18 iii. entered into a lease agreement for 3141 Sammy Davis Jr. Drive, Las Vegas,
19 Clark County, Nevada wherein said location operated as an illegal house of
20 prostitution; and/or

21 iv. recruited women to engage in prostitution, and/or

22 v. negotiated prostitution services with customers; and/or

23 vi. facilitated line-ups with prostitutes for customer selection of a prostitute;
24 and/or

25 vii. scheduled shifts for prostitutes; and/or

26 viii. counseled the prostitutes on how to avoid law enforcement or detect law
27 enforcement; and/or

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- 1 ix. received proceeds from prostitution after an act of prostitution was completed;
2 and/or
3 x. facilitated out-call services for the purposes of prostitution; and/or
4 xi. advertised Mango Spa, Japanese Spa and/or Jade Spa on *Kickback*, a cell
5 phone application in order to obtain customers for prostitution; and/or
6 b. conducted financial transactions with the intent to further the racketeering activity
7 and/or conceal the location of the source, ownership or control of the property, when
8 he knew that the property represented the proceeds of, or was directly or indirectly
9 derived from prostitution, as fully set forth in counts 19, 24, 25, 30 and 36.

10 5. Defendant MATTHEWS, with the intent to commit the crimes of Pandering, Living from the
11 Earnings of a Prostitute and Placing a Person in House of Prostitution, carried out the
12 following roles for the enterprise:

- 13 a. while employed by or associated with an enterprise, conducted or participated, directly
14 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, or (ii)
15 racketeering activity through the affairs of the enterprise, to include, but not limited
16 to:
17 i. was the co-manager of the day-to-day operations, an illegal house of
18 prostitution; and/or
19 ii. recruited women to engage in prostitution, and/or
20 iii. negotiated prostitution services with customers; and/or
21 iv. facilitated line-ups with prostitutes for customer selection of a prostitute;
22 and/or
23 v. scheduled shifts for prostitutes; and/or
24 vi. counseled the prostitutes on how to avoid law enforcement or detect law
25 enforcement; and/or
26 vii. received proceeds from prostitution after an act of prostitution was completed;
27 and/or
28 viii. maintained business records for the illegal houses of prostitution; and/or

- 1 ix. facilitated out-call services for the purposes of prostitution; and/or
- 2 x. advertised Mango Spa, Japanese Spa and/or Jade Spa on *Kickback*, a cell
- 3 phone application in order to obtain customers for prostitution; and/or
- 4 b. conducted financial transactions with the intent to further the racketeering activity
- 5 and/or conceal the location of the source, ownership or control of the property, when
- 6 he knew that the property represented the proceeds of, or was directly or indirectly
- 7 derived from prostitution, as fully set forth in counts 25 and 30.
- 8 6. Defendant RUSSELL, with the intent to commit the crimes of Pandering, Living from the
- 9 Earnings of a Prostitute and Placing a Person in House of Prostitution, carried out the
- 10 following roles for the enterprise:
- 11 a. while employed by or associated with an enterprise, conducted or participated, directly
- 12 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, or (ii)
- 13 racketeering activity through the affairs of the enterprise, to include, but not limited
- 14 to:
- 15 i. transported customers to and from businesses for purposes of prostitution
- 16 related activities; and/or
- 17 ii. received checks made payable to RUSSELL from the businesses in order to
- 18 facilitate payment to prostitutes; and/or
- 19 iii. paid the prostitutes their portion of the proceeds from prostitution; and/or
- 20 b. conducted financial transactions with the intent to further the racketeering activity
- 21 and/or conceal the location of the source, ownership or control of the property, when
- 22 he knew that the property represented the proceeds of, or was directly or indirectly
- 23 derived from prostitution, as fully set forth in counts 31 through 36.
- 24 7. Defendant LI, with the intent to commit the crimes of Pandering, Living from the Earnings
- 25 of a Prostitute and Placing a Person in House of Prostitution, carried out the following roles
- 26 for the enterprise:
- 27 a. while employed by or associated with an enterprise, conducted or participated, directly
- 28 or indirectly, in: (i) the affairs of the enterprise through racketeering activity, or (ii)

1 racketeering activity through the affairs of the enterprise, to include, but not limited
2 to:

- 3 i. was the co-manager of the day-to-day operations of Japanese Spa and/or Jade
4 Spa, an illegal house of prostitution; and/or
- 5 ii. negotiated prostitution services with customers; and/or
- 6 iii. facilitated line-ups with prostitutes for customer selection of a prostitute;
7 and/or
- 8 iv. received proceeds from prostitution after an act of prostitution was completed;
9 and/or
- 10 v. facilitated out-call services for the purposes of prostitution; and/or
- 11 vi. paid taxi drivers, Uber drivers and/or Lyft drivers a cut of the proceeds from
12 prostitution for transporting customers to the business for prostitution; and/or
- 13 vii. transported customers to and from businesses for purposes of prostitution
14 related activities; and/or
- 15 viii. paid the prostitutes their portion of the proceeds from prostitution.

16 **Racketeering Activity**

17 8. As described in detail in the present count, and in counts two through fourteen charging the
18 Defendants with Racketeering, Racketeering Conspiracy, Pandering, Living from the
19 Earnings of a Prostitute and Placing Person in House of Prostitution, the Defendants willfully,
20 unlawfully and feloniously (i) induced women to engage in prostitution; (ii) accepted money
21 or other valuable thing, without consideration, from a known prostitute; and (iii) accepted the
22 earnings of a common prostitute. In addition to the facts as alleged in counts two through
23 fourteen incorporated by reference as though fully set forth herein, the Defendants
24 participated in the following activities:

- 25 a. On or about February 28, 2017, Defendants **LIN, LEITZEN and RUSSELL** owned
26 and/or operated a house of prostitution known as Japanese Spa located at 4770 Spring
27 Mountain Road #102, in Las Vegas, Clark County, Nevada wherein they willfully,
28 unlawfully and feloniously accepted the earnings of M.M., a common prostitute;

1 b. On or about June 28, 2018, Defendants **LIN, LEITZEN, and MATTHEWS** owned
2 and/or operated a house of prostitution known as Jade Spa located at 4770 Spring
3 Mountain Road #102, in Las Vegas, Clark County, Nevada wherein they willfully,
4 unlawfully and feloniously accepted the earnings of D.B., a common prostitute;

5 c. On or about June 29, 2018, defendants **LIN, LEITZEN, and MATTHEWS** owned
6 and/or operated a house of prostitution known as Jade Spa located at 4770 Spring
7 Mountain Road #102, in Las Vegas, Clark County, Nevada wherein they willfully,
8 unlawfully and feloniously accepted the earnings of D.B., a common prostitute;

9 **COUNT 2**
10 **RACKETEERING CONSPIRACY**
11 **Category "B" Felony – NRS 207.400(1)(j)**

12 Defendants, **LIN, LEITZEN, MATTHEWS RUSSELL and LI**, on or about January 2014
13 through July 18, 2018, within Clark County, Nevada, conspired to commit the crime of racketeering, as
14 set forth in count one of the present charging document. The allegations contained in counts one and
15 three through thirty-six are hereby incorporated herein as if fully set forth in this count.

16 **COUNT 3**
17 **PANDERING**
18 **Category "C" Felony – NRS 201.300**

19 Defendants **LIN, LEITZEN, MATTHEWS and LI**, on or about January 2018 through
20 July 18, 2018, within Clark County, Nevada, did willfully, unlawfully and feloniously induce D.B. to
21 unlawfully become a prostitute and/or continue to engage in prostitution.

22 **COUNT 4**
23 **LIVING FROM THE EARNINGS OF A PROSTITUTE**
24 **Category "D" Felony – NRS 201.320**

25 Defendants **LIN, LEITZEN, MATTHEWS and LI**, on or about January 2018 through
26 July 18, 2018, within Clark County, Nevada, did knowingly accept, receive, levy or appropriate money
27 or other valuable thing, without consideration, from the proceeds of D.B., a known prostitute.

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1 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
2 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
3 HOUSE OF PROSTITUTION, with the intent to further any unlawful activity, by the Defendant paying
4 rent payments to Sunset Durango, LLC in the amount of \$41,400.00, from the Wells Fargo bank account
5 ending in #2340, in the name of Cactus Spa Las Vegas, LLC, in which the Defendant is the signatory on
6 the account, for the continued operation of the enterprise, knowing said money was the proceeds of
7 unlawful activity.

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9 **COUNT 16**
10 **MONEY LAUNDERING**
11 **Category "D" Felony – 207.195**

12 On or about February 2015 through July 2018, defendant LIN did willfully, unlawfully and
13 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
14 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
15 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
16 HOUSE OF PROSTITUTION, with the intent to further any unlawful activity, by the Defendant paying
17 rent payments to Sunset Durango, LLC in the amount of \$95,525.00, from the Wells Fargo bank account
18 ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and controlling
19 person on the bank account though which money earned from prostitution was moved, for the continued
20 operation of the enterprise, knowing said money was the proceeds of unlawful activity.

21 **COUNT 17**
22 **MONEY LAUNDERING**
23 **Category "D" Felony – 207.195**

24 On or about January 2014 through January 2015, defendant LIN did willfully, unlawfully and
25 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
26 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
27 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
28 HOUSE OF PROSTITUTION, with the intent to further any unlawful activity, by the Defendant paying
advertising expenses to Ads Las Vegas and/or Backpage Classified and/or Miracomm Rubmaps in the
amount of \$24,339.45, from the Wells Fargo bank account ending in #2340, in the name of Cactus Spa

1 Las Vegas, LLC, in which the Defendant is the signer and controlling person on the bank account though
2 which money earned from prostitution was moved, for the continued operation of the enterprise, knowing
3 said money was the proceeds of unlawful activity.

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5 **COUNT 18**
6 **MONEY LAUNDERING**
7 **Category "D" Felony – 207.195**

8 On or about February 2015 through July 2018, defendant LIN did willfully, unlawfully and
9 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
10 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
11 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
12 HOUSE OF PROSTITUTION, with the intent to further any unlawful activity, by the Defendant paying
13 advertising expenses to Ad Postings and/or Ads Las Vegas and/or Backpage Classified and/or Miracomm
14 Rubmaps, in the amount of \$9,395.59, from the Wells Fargo bank account ending in #5401, in the name
15 of Cactus Spa LV, LLC, in which the Defendant is the signer and controlling person on the bank account
16 though which money earned from prostitution was moved, for the continued operation of the enterprise,
17 knowing said money was the proceeds of unlawful activity.

18 **COUNT 19**
19 **MONEY LAUNDERING**
20 **Category "D" Felony – 207.195**

21 On or about March 2017 through August 2017, defendants LIN and LEITZEN did willfully,
22 unlawfully and feloniously, conduct or attempt to conduct financial transactions involving a monetary
23 instrument that represent the proceeds of or are directly or indirectly derived from any unlawful activity,
24 to wit: PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING
25 PERSON IN HOUSE OF PROSTITUTION, with the intent to further any unlawful activity, by the
26 defendants paying rent to Industrial Plaza, LLC in the amount of \$7,802.56, from the Bank of America
27 bank account ending in #4663, in the name of Mango Foods, LLC, in which the Defendants are the
28 signers and controlling persons on the bank account though which money earned from prostitution was
moved, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful
activity, the Defendant(s) being criminally liable under one or more of the following principles of

1 criminal liability, to wit: (1) by directly committing this crime; and/or (2) acting pursuant to a conspiracy
2 to commit this crime, with the intent that this crime be committed as alleged in counts one through
3 fourteen above.

4 **COUNT 20**
5 **MONEY LAUNDERING**
6 **Category "D" Felony – 207.195**

7 On or about January 2014 through January 2015, defendant LIN did willfully, unlawfully and
8 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
9 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
10 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
11 HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the
12 knowledge that the transactions conceal the location, source, ownership or control of the instrument, by
13 the Defendant paying the female prostitutes money in the form of a check made payable to the prostitute
14 for their participation in the unlawful activity in the amount of \$101,705.00, from the Wells Fargo bank
15 account ending in #2340, in the name of Cactus Spa Las Vegas, LLC, in which the Defendant is the
16 signer and controlling person on the bank account through which money earned from prostitution was
17 moved, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful
18 activity.

18 **COUNT 21**
19 **MONEY LAUNDERING**
20 **Category "D" Felony – 207.195**

21 On or about February 2015 through December 2015, defendant LIN did willfully, unlawfully and
22 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
23 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
24 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
25 HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the
26 knowledge that the transactions conceal the location, source, ownership or control of the instrument, by
27 the Defendant paying the female prostitutes money in the form of a check made payable to the prostitute
28 for their participation in the unlawful activity in the amount of \$166,924.00, from the Wells Fargo bank
account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and

1 controlling person on the bank account though which money earned from prostitution was moved, for
2 the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

3 **COUNT 22**
4 **MONEY LAUNDERING**
5 **Category "D" Felony – 207.195**

6 On or about January 2016 through December 2016, defendant LIN did willfully, unlawfully and
7 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
8 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
9 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
10 HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the
11 knowledge that the transactions conceal the location, source, ownership or control of the instrument, by
12 the Defendant paying the female prostitutes money in the form of a check made payable to the prostitute
13 for their participation in the unlawful activity in the amount of \$290,600.00, from the Wells Fargo bank
14 account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and
15 controlling person on the bank account though which money earned from prostitution was moved, for
16 the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

17 **COUNT 23**
18 **MONEY LAUNDERING**
19 **Category "D" Felony – 207.195**

20 On or about January 2017 through December 2017, defendant LIN did willfully, unlawfully and
21 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
22 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
23 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
24 HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the
25 knowledge that the transactions conceal the location, source, ownership or control of the instrument, by
26 the Defendant paying the female prostitutes money in the form of a check made payable to the prostitute
27 for their participation in the unlawful activity in the amount of \$37,145.00, from the Wells Fargo bank
28 account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and

1 controlling person on the bank account through which money earned from prostitution was moved, for
2 the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

3 **COUNT 24**
4 **MONEY LAUNDERING**
5 **Category "D" Felony – 207.195**

6 On or about March 2017 through August 2017, defendants LIN and LEITZEN did willfully,
7 unlawfully and feloniously, conduct or attempt to conduct financial transactions involving a monetary
8 instrument that represent the proceeds of or are directly or indirectly derived from any unlawful activity,
9 to wit: PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING
10 PERSON IN HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or
11 (2) the knowledge that the transaction conceals the location, source, ownership or control of the
12 instrument, by the defendants paying the female prostitutes money in the form of a check made payable
13 to the prostitute for their participation in the unlawful activity in the amount of \$138,473.00, from the
14 Bank of America bank account ending in #4663, in the name of Mango Foods, LLC, in which the
15 Defendants are the signers and controlling persons on the bank account through which money earned from
16 prostitution was moved, for the continued operation of the enterprise, knowing said money was the
17 proceeds of unlawful activity, the Defendant(s) being criminally liable under one or more of the following
18 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) acting pursuant
19 to a conspiracy to commit this crime, with the intent that this crime be committed as alleged in counts
20 one through fourteen above.

21 **COUNT 25**
22 **MONEY LAUNDERING**
23 **Category "D" Felony – 207.195**

24 On or about March 2018 through July 2018, defendants LIN, LEITZEN and MATTHEWS did
25 willfully, unlawfully and feloniously, conduct or attempt to conduct financial transactions involving a
26 monetary instrument that represent the proceeds of or are directly or indirectly derived from any unlawful
27 activity, to wit: PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or
28 PLACING PERSON IN HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful
activity; and/or (2) the knowledge that the transactions conceal the location, source, ownership or control

1 of the instrument, by the defendants paying the female prostitutes money in the form of a check made
2 payable to the prostitute for their participation in the unlawful activity in the amount of \$82,180.00, from
3 the Wells Fargo bank account ending in #2360 in the name of Tony Matthews, in which Defendant
4 MATTHEWS is the signer and controlling person on the account through which money earned from
5 prostitution was earned, for the continued operation of the enterprise, knowing said money was the
6 proceeds of unlawful activity, the Defendant(s) being criminally liable under one or more of the following
7 principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding and
8 abetting in the commission of this crime, with the intent that this crime be committed, by counseling,
9 encouraging, hiring, commanding, inducing and/or otherwise procuring the other to commit the crime,
10 to wit: defendants LIN and LEITZEN, as owners and operators of Cactus Spa Las Vegas, dba Jade Spa,
11 directed defendant MATTHEWS to funnel the credit card proceeds from the business through his
12 personal bank account in order to to pay female employees and obscure the source and the recipient of
13 the funds, and/or (3) pursuant to a conspiracy to commit this crime, with the intent that this crime be
14 committed, Defendants aiding or abetting and/or conspiring by Defendants acting in concert throughout.

15 **COUNT 26**
16 **MONEY LAUNDERING**
17 **Category "D" Felony – 207.195**

18 On or about January 2014 through January 2015, defendant LIN did willfully, unlawfully and
19 feloniously, conduct or attempt to conduct financial transactions involving a monetary instrument that
20 represent the proceeds of or are directly or indirectly derived from any unlawful activity, to wit:
21 PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN
22 HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the
23 knowledge that the transactions conceal the location, source, ownership or control of the instrument, by
24 the defendant paying the female prostitutes money in the form of a check with no payee for their
25 participation in the unlawful activity in the amount of \$3,475.00, from the Wells Fargo bank account
26 ending in #2340, in the name of Cactus Spa Las Vegas, LLC, in which the Defendant is the signer and
27 controlling person on the bank account though which money earned from prostitution was moved, for
28 the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

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COUNT 27
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about February 2015 through December 2015, defendant LIN 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN HOUSE OF PROSTITUTION, 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 Defendant paying the female prostitutes money in the form of a check with no payee for their participation in the unlawful activity in the amount of \$45,450.00, from the Wells Fargo bank account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and controlling person on the bank account though which money earned from prostitution was moved, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

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COUNT 28
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about January 2016 through December 2016, defendant LIN 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN HOUSE OF PROSTITUTION, 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 Defendant paying the female prostitutes money in the form of a check with no payee for their participation in the unlawful activity in the amount of \$67,095.00, from the Wells Fargo bank account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and controlling person on the bank account though which money earned from prostitution was moved, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

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COUNT 29
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about January 2017 through December 2017, defendant LIN 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN HOUSE OF PROSTITUTION, with (1) the intent to further any unlawful activity; and/or (2) the knowledge that the transaction conceals the location, source, ownership or control of the instrument, by the Defendant paying the female prostitutes money in the form of a check with no payee for their participation in the unlawful activity in the amount of \$8,485.00, from the Wells Fargo bank account ending in #5401, in the name of Cactus Spa LV, LLC, in which the Defendant is the signer and controlling person on the bank account though which money earned from prostitution was moved, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity.

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COUNT 30
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about March 2018 through July 2018, defendants LIN, LEITZEN and 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING PERSON IN HOUSE OF PROSTITUTION, 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 with no payee for their participation in the unlawful activity in the amount of \$4,350.00, 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 earned from prostitution was earned, for the continued operation of the enterprise, knowing said money was the proceeds of unlawful activity, the Defendant(s) being criminally liable under one or more of the following principles of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding and abetting in the commission

1 of this crime, with the intent that this crime be committed, by counseling, encouraging, hiring,
2 commanding, inducing and/or otherwise procuring the other to commit the crime, to wit: defendants LIN
3 and LEITZEN, as owners and operators of Cactus Spa Las Vegas, dba Jade Spa, directed defendant
4 MATTHEWS to funnel the credit card proceeds from the business through his personal bank account in
5 order to to pay female employees and obscure the source and the recipient of the funds, and/or (3)
6 pursuant to a conspiracy to commit this crime, with the intent that this crime be committed, Defendants
7 aiding or abetting and/or conspiring by Defendants acting in concert throughout.

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COUNT 31
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about January 2016 through June 2016, defendants LIN and RUSSELL 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING
PERSON IN HOUSE OF PROSTITUTION, 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, to wit: Defendant LIN paid the female prostitutes for their services by writing checks totaling
\$39,890.00 from Cactus Spa LV, LLC, to Defendant RUSSELL, an intermediary, who cashed the checks
and distributed the payment to the prostitutes.

COUNT 32
MONEY LAUNDERING
Category "D" Felony – 207.195

On or about July 2016 through August 2016, defendants LIN and RUSSELL 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, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or PLACING
PERSON IN HOUSE OF PROSTITUTION, 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, to wit: Defendant LIN paid the female prostitutes for their services by writing checks totaling

1 \$39,485.00 from Cactus Spa LV, LLC, to Defendant RUSSELL, an intermediary, who cashed the checks
2 and distributed the payment to the prostitutes.

3 **COUNT 33**
4 **MONEY LAUNDERING**
5 **Category "D" Felony – 207.195**

6 On or about September 2016 through October 2016, defendants **LIN and RUSSELL** did
7 willfully, unlawfully and feloniously, conduct or attempt to conduct financial transactions involving a
8 monetary instrument that represent the proceeds of or are directly or indirectly derived from any unlawful
9 activity, to wit: **PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or**
10 **PLACING PERSON IN HOUSE OF PROSTITUTION**, with (1) the intent to further any unlawful
11 activity; and/or (2) the knowledge that the transactions conceal the location, source, ownership or control
12 of the instrument, to wit: Defendant LIN paid the female prostitutes for their services by writing checks
13 totaling \$39,655.00 from Cactus Spa LV, LLC, to Defendant RUSSELL, an intermediary, who cashed
14 the checks and distributed the payment to the prostitutes.

15 **COUNT 34**
16 **MONEY LAUNDERING**
17 **Category "D" Felony – 207.195**

18 On or about November 2016 through December 2016, defendants **LIN and RUSSELL** did
19 willfully, unlawfully and feloniously, conduct or attempt to conduct financial transaction involving a
20 monetary instrument that represent the proceeds of or are directly or indirectly derived from any unlawful
21 activity, to wit: **PANDERING, LIVING FROM THE EARNINGS OF A PROSTITUTE and/or**
22 **PLACING PERSON IN HOUSE OF PROSTITUTION**, with (1) the intent to further any unlawful
23 activity; and/or (2) the knowledge that the transactions conceal the location, source, ownership or control
24 of the instrument, to wit: Defendant LIN paid the female prostitutes for their services by writing checks
25 totaling \$32,106.00 from Cactus Spa LV, LLC, to Defendant RUSSELL, an intermediary, who cashed
26 the checks and distributed the payment to the prostitutes.

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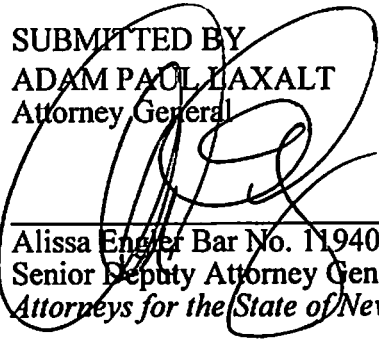
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1 All of which is contrary to the form, force and effect of the statutes in such cases made and
2 provided, and against the peace and dignity of the State of Nevada.

3 DATED this 15th day of Nov, 2018.

4 SUBMITTED BY
5 ADAM PAUL LAXALT
6 Attorney General

7 By:

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9 _____
10 Alissa Engler Bar No. 11940
11 Senior Deputy Attorney General
12 *Attorneys for the State of Nevada*

13 ENDORSEMENT: A True Bill

14 By: _____
15 Foreperson, Clark County Grand Jury
16 GJ# 18BGJ004A-E
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