



1 **INFM**
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
(702) 486-5531 (phone)
6 (702) 486-0660 (fax)
aengler@ag.nv.gov

7 *Attorneys for the State of Nevada*

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

11
12 STATE OF NEVADA,

13 Plaintiff,

14 vs.

15 XIAOMEI SHEN, ID# 2086545,

16 Defendant.

Case No.: C-19-341719-1

Dept. No.: XXIII

17 **INFORMATION**

18 AARON D. FORD, Attorney General for the State of Nevada, in the name and by the authority
19 of the State of Nevada, informs the Court that: XIAOMEI SHEN, has committed the crime(s) of one (1)
20 count of **MONEY LAUNDERING, (CATEGORY “D” FELONY)**, in violation of NRS 207.195, in
21 Clark County, State of Nevada as follows:

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

25 That on or about September 30, 2018, through October 30, 2018, the Defendant, XIAOMEI
26 SHEN, did willfully, unlawfully and feloniously, conduct or attempt to conduct financial transactions
27 involving a monetary instrument that represent the proceeds of or are directly or indirectly derived from
28 any unlawful activity, to wit: PANDERING and/or LIVING FROM THE EARNINGS OF A
PROSTITUTE with (1) the intent to further any unlawful activity; and/or (2) the knowledge that the

1 transactions conceal the location, source, ownership or control of the instrument, by SHEN paying a
2 female prostitute money in the form of two checks made payable to the prostitute for her participation in
3 the unlawful activity in the amount of \$10,000.00, from the Wells Fargo bank account ending in #0878,
4 in the name of Oasis Health Spa, in which the Defendant is the signer and controlling person on the bank
5 account through which money earned from prostitution was moved, for the continued operation of the
6 enterprise, knowing said money was the proceeds of unlawful activity.

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

9 DATED this 11th day of July, 2019.

10 SUBMITTED BY:

11 AARON D. FORD
12 Attorney General

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14 By: /s/ Alissa Engler
15 Alissa Engler (Bar No. 11940)
16 Senior Deputy Attorney General
17 *Attorneys for the State of Nevada*
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