

1 **IND**  
2 DAVID ROGER  
3 Clark County District Attorney  
4 Nevada Bar #002781  
5 BERNARD ZADROWSKI  
6 Chief Deputy District Attorney  
7 Nevada Bar #006545  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 [REDACTED]  
11 Attorney for Plaintiff

**FILED**  
FEB 02 2011  
*John T. Quinn*  
CLERK OF COURT

7 DISTRICT COURT  
8 CLARK COUNTY, NEVADA

9 )  
10 THE STATE OF NEVADA,

11 Plaintiff,

Case No. C-11-270780-1  
Dept. No. VII

12 -vs-

13 JOSEPH RAYMOND FRANCIS,  
14 #2685530

Defendant(s).

**INDICTMENT**

15 )  
16 )  
17 STATE OF NEVADA )  
18 COUNTY OF CLARK ) ss.

19 The Defendant(s) above named, JOSEPH RAYMOND FRANCIS, accused by the  
20 Clark County Grand Jury of the crime(s) of THEFT (Felony - NRS 205.0832, 205.0835,  
21 205.132, 205.380) and DRAWING AND PASSING A CHECK WITHOUT SUFFICIENT  
22 FUNDS IN DRAWEE BANK WITH INTENT TO DEFRAUD, PRESUMPTIONS OF  
23 INTENT TO DEFRAUD (Felony - NRS 205.130, 205.132), committed at and within the  
24 County of Clark, State of Nevada, on or between February 12, 2007 and February 18, 2007,  
25 as follows:

26 COUNT 1 - THEFT

27 did then and there knowingly, feloniously, and without lawful authority, commit theft  
28 by obtaining personal property in the amount of \$250.00, or more, lawful money of the

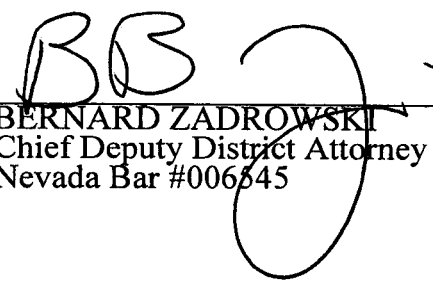
1 United States of WYNN LAS VEGAS HOTEL AND CASINO, 3131 South Las Vegas  
2 Boulevard, Las Vegas, Clark County, Nevada, by a material misrepresentation with intent to  
3 deprive that person of the property, in the following manner, to-wit: by the Defendant, a  
4 patron of WYNN LAS VEGAS HOTEL AND CASINO, receiving the sum of \$2,500,000.00  
5 cash and/or gaming chips in exchange for check no. [REDACTED] drawn upon Wells Fargo  
6 Bank, Account No. [REDACTED], said account being closed, while falsely representing said  
7 check would clear his bank account, thereby obtaining the personal property of WYNN LAS  
8 VEGAS HOTEL AND CASINO by a material misrepresentation with intent to deprive them  
9 of the lawful money of the United States and/or gaming chips.

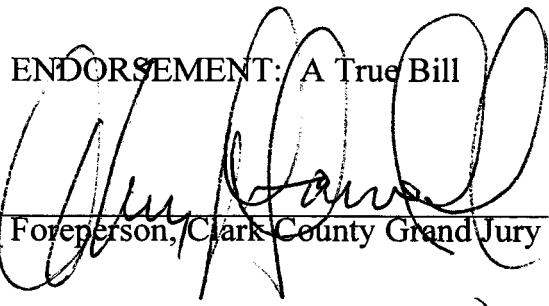
10 COUNT 2 - DRAWING AND PASSING A CHECK WITHOUT SUFFICIENT FUNDS  
11 IN DRAWEE BANK WITH INTENT TO DEFRAUD, PRESUMPTIONS OF  
INTENT TO DEFRAUD

12 did willfully, unlawfully, and with intent to defraud, draw and pass a check to obtain  
13 cash and/or gaming chips, drawn upon Wells Fargo Bank, Account No. [REDACTED] made  
14 payable to WYNN LAS VEGAS HOTEL AND CASINO, at 3131 South Las Vegas  
15 Boulevard, Las Vegas, Clark County, Nevada, in the amount of \$2,500,000.00, check no.  
16 [REDACTED], when the said Defendant had insufficient money, property, or credit with the  
17 drawee of the instrument to pay it in full upon its presentation.

18 DATED this 1<sup>st</sup> day of February, 2011.

19 DAVID ROGER  
20 DISTRICT ATTORNEY  
21 Nevada Bar #002781

22 BY   
23 BERNARD ZADROWSKI  
24 Chief Deputy District Attorney  
25 Nevada Bar #006845

26 ENDORSEMENT: A True Bill  
27   
28 Foreperson, Clark County Grand Jury

1 Names of witnesses testifying before the Grand Jury:

2 ALTSCHUL, LARRY, c/o CCDA, 200 Lewis Ave, LV, NV

3 CHENG, PETER, c/o CCDA, 200 Lewis Ave, LV, NV

4 CONWAY, BARBARA, c/o CCDA, 200 Lewis Ave, LV, NV

5 VARGAS, JUDITH, c/o CCDA, 200 Lewis Ave, LV, NV

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9 Additional witnesses known to the District Attorney at time of filing the Indictment:

10 CUSTODIAN OF RECORDS, CCDC

11 CUSTODIAN OF RECORDS, WELLS FARGO BANK

12 CUSTODIAN OF RECORDS, WYNN/ENCORE HOTEL/CASINO

13 PANEK, DARLENE, c/o CCDA, 200 Lewis Ave, LV, NV

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27 10AGJ091X/08F19351X/sam

28 DAO EV#0809018094

(TK5)