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2 DAVID ROGER  
 Clark County District Attorney  
 Nevada Bar #002781  
 3 BERNARD ZADROWSKI  
 Chief Deputy District Attorney  
 Nevada Bar #006545  
 200 Lewis Avenue  
 Las Vegas, Nevada 89155-2212  
 (702) 671-2500  
 Attorney for Plaintiff

FILED

APR 29 1 43 PM '09

*Ed. H. Smith*  
 CLERK OF THE COURT

## DISTRICT COURT

## CLARK COUNTY, NEVADA

10 THE STATE OF NEVADA, )

11 Plaintiff, )

12 -vs- )

13 TERRANCE K. WATANABE, aka  
 TK Watanabe,  
 #2704662

15 Defendant(s). )

Case No. C254057  
 Dept. No. XIV

## INDICTMENT

18 STATE OF NEVADA }  
 19 COUNTY OF CLARK } ss.

20 The Defendant(s) above named, TERRANCE K. WATANABE, aka TK Watanabe,  
 21 accused by the Clark County Grand Jury of the crime(s) of THEFT, (Felony - NRS  
 22 205.0832, 205.0835, 205.132, 205.380), and DRAWING AND PASSING A CHECK  
 23 WITHOUT SUFFICIENT FUNDS IN DRAWEE BANK WITH INTENT TO DEFRAUD,  
 24 PRESUMPTIONS OF INTENT TO DEFRAUD, (Felony - NRS 205.130, 205.132),  
 25 committed at and within the County of Clark, State of Nevada, on or between October 22,  
 26 2007, and December 11, 2007, as follows:

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1     COUNT 1     THEFT

2             did, on or between October 22, 2007, and November 26, 2007, then and there knowingly,  
3     feloniously, and without lawful authority, commit theft by obtaining personal property in the amount  
4     of \$250.00, or more, lawful money of the United States of RIO SUITE HOTEL AND CASINO,  
5     3700 West Flamingo Road, Las Vegas, Clark County, Nevada, by a material misrepresentation with  
6     intent to deprive that person of the property, in the following manner, to-wit: by the Defendant, a  
7     patron of RIO SUITE HOTEL AND CASINO, receiving the sum of \$2,720,000.00 cash and/or  
8     gaming chips in exchange for eight (8) checks, as listed in Count 2, drawn upon Wells Fargo Bank,  
9     Account No. 2042282810, while falsely representing said checks would clear his bank account,  
10    thereby obtaining the personal property of RIO SUITE HOTEL AND CASINO by a material  
11    misrepresentation with intent to deprive them of the lawful money of the United States and/or  
12    gaming chips.

13    COUNT 2     DRAWING AND PASSING A CHECK WITHOUT SUFFICIENT FUNDS IN  
14    DRAWEE BANK WITH INTENT TO DEFRAUD, PRESUMPTIONS OF INTENT TO  
15    DEFRAUD

16            did, on or between October 22, 2007, and November 26, 2007, willfully, unlawfully, and  
17    with intent to defraud, draw and pass eight (8) checks to obtain cash and/or gaming chips, drawn  
18    upon Wells Fargo Bank, Account No. 2042282810, made payable to RIO SUITE HOTEL AND  
19    CASINO, at 3700 West Flamingo Road, Las Vegas, Clark County, Nevada, when the said  
20    Defendant had insufficient money, property, or credit with the drawee of the instrument to pay it in  
21    full upon its presentation.

<u>CHECK NO.</u>	<u>AMOUNT</u>
501484	\$320,000.00
501485	\$550,000.00
501487	\$600,000.00
R6703342	\$250,000.00
R6703343	\$250,000.00
R6703344	\$250,000.00

	<u>CHECK NO.</u>	<u>AMOUNT</u>
1		
2	R6703345	\$250,000.00
3	R6703346	\$250,000.00

COUNT 3 THEFT

did, on or between November 11, 2007, and December 11, 2007, then and there knowingly, feloniously, and without lawful authority, commit theft by obtaining personal property in the amount of \$250.00, or more, lawful money of the United States of CAESARS PALACE HOTEL AND CASINO, 3570 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, by a material misrepresentation with intent to deprive that person of the property, in the following manner, to-wit: by the Defendant, a patron of CAESARS PALACE HOTEL AND CASINO, receiving the sum of \$12,030,000.00 cash and/or gaming chips in exchange for thirty (30) checks, as listed in Count 4, drawn upon Wells Fargo Bank, Account No. 2042282810, while falsely representing said checks would clear his bank account, thereby obtaining the personal property of CAESARS PALACE HOTEL AND CASINO by a material misrepresentation with intent to deprive them of the lawful money of the United States and/or gaming chips.

COUNT 4 DRAWING AND PASSING A CHECK WITHOUT SUFFICIENT FUNDS IN DRAWEE BANK WITH INTENT TO DEFRAUD, PRESUMPTIONS OF INTENT TO DEFRAUD

did, on or between November 11, 2007, and December 11, 2007, willfully, unlawfully, and with intent to defraud, draw and pass thirty (30) checks to obtain cash and/or gaming chips, drawn upon Wells Fargo Bank, Account No. 2042282810, made payable to CAESARS PALACE HOTEL AND CASINO, at 3570 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, when the said Defendant had insufficient money, property, or credit with the drawee of the instrument to pay it in full upon its presentation.

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	<u>CHECK NO.</u>	<u>AMOUNT</u>
1		
2	C1048791	\$750,000.00
3	C1049708	\$875,000.00
4	C1049819	\$500,000.00
5	C1051025	\$200,000.00
6	C1051038	\$200,000.00
7	C1051080	\$200,000.00
8	C1052711	\$500,000.00
9	C1052741	\$600,000.00
10	C1052755	\$250,000.00
11	C1052757	\$200,000.00
12	C1052964	\$450,000.00
13	C1053306	\$200,000.00
14	C1055093	\$375,000.00
15	C1055130	\$500,000.00
16	C1055167	\$325,000.00
17	C1055172	\$375,000.00
18	C1055248	\$480,000.00
19	C1055315	\$700,000.00
20	C1055356	\$500,000.00
21	C1055628	\$500,000.00
22	C1055661	\$250,000.00
23	C1055665	\$200,000.00
24	C1055670	\$400,000.00
25	C1057719	\$200,000.00
26	C1057749	\$275,000.00
27	C1058030	\$500,000.00
28	C1058102	\$200,000.00
	C1058820	\$175,000.00

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C1063923	\$800,000.00
C1063967	\$350,000.00

DATED this 28<sup>TH</sup> day of April, 2009.

DAVID ROGER  
DISTRICT ATTORNEY  
Nevada Bar #002781

BY

B.B.  
BERNARD ZADROWSKI  
Chief Deputy District Attorney  
Nevada Bar #006545

ENDORSEMENT: A True Bill

[Signature]  
Foreperson, Clark County Grand Jury

Names of witnesses testifying before the Grand Jury:

COLIN, MARIA, RIO H&C, 3700 W. FLAMINGO RD., LVN 89103

OLSON, SALLY, RIO H&C, 3700 W. FLAMINGO RD., LVN 89103

GARTH, ERIC, RIO H&C, 3700 W. FLAMINGO RD., LVN 89103

DISTEFANO, MARK, 4306 D. WOODWELL ST., LVN 89147

KING, TERI, RIO HOTEL & CASINO, 3700 W. FLAMINGO RD., LVN 89103

STRAFFORD, SHIPLEY, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

GROSS, GENE, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

BOUCHER, THERESA, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

SILVY, NORMA

GUTIERREZ, MONICA, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

KUCALA, BARBARA, CAESARS PALACE HOTEL, 3570 LVB, LVN 89109

CASE, WILL, RIO H&C, 3700 W. FLAMINGO RD., LVN 89103

DICKINSON, ELLEN

KING, TERI

NING, WILSON, RIO HOTEL & CASINO, 3700 W. FLAMINGO RD., LVN 89103

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

ZADROWSKI, BERNARD, c/o CCDA'S OFFICE, 200 LEWIS AVE., LVN 89101

ZILEWICZ, ERIC, CAESARS PALACE HOTEL, 3570 LVB, LVN 89109

WELLS FARGO BANK, COR, 530 LVBS LVN 89101

RIVERA, MARIANELA, 6530 ANNIE OAKLEY DR. #2818, HEND., NV 89014

WILLIAMS, BRANDON, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

SILVEY, NONI, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

GOLIEBERSUCH, JENNIFER, CAESARS PALACE H&C, 3570 LVBS, LVN 89109

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DAO EV#0808018093  
(TK5)