

FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT  
JUL 13 2016

1 IND  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 JONATHAN COOPER  
6 Deputy District Attorney  
7 Nevada Bar #012195  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

BY, PHYLLIS IRBY, DEPUTY

DISTRICT COURT  
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,  
10 Plaintiff,

CASE NO: C-16-316406-1

11 -vs-

DEPT NO: XXIII

12 ZIMEI PATTON, #2814868  
13 MICHAEL B. BASS, #1413343

14 Defendant(s).

INDICTMENT

15 STATE OF NEVADA }  
16 COUNTY OF CLARK } ss.

17 The Defendant(s) above named, ZIMEI PATTON and MICHAEL B. BASS, accused  
18 by the Clark County Grand Jury of the crime(s) of PANDERING (Category C Felony - NRS  
19 201.300.1 - NOC 51000); LIVING FROM THE EARNINGS OF A PROSTITUTE (Category  
20 D Felony - NRS 201.320 - NOC 51006); BRIBERY (Category C Felony - NRS 197.020 -  
21 NOC 52295) and MISCONDUCT OF A PUBLIC OFFICER (Category E Felony - NRS  
22 197.110 - NOC 52303), committed at and within the County of Clark, State of Nevada, on or  
23 between July 15, 2013 and September 16, 2014 as follows:

24 COUNT 1 - PANDERING

25 Defendants ZIMEI PATTON and MICHAEL BASS did willfully, unlawfully, and  
26 feloniously induce YINHUA ZHU and/or YANFEN YANG and/or an employee of 99 SPA,  
27 aka, SPA 99 to unlawfully become a prostitute and/or to continue to engage in prostitution or  
28 to enter any place within this State in which prostitution is practiced, encouraged or allowed

1 for the purpose of sexual conduct or prostitution, the Defendants being responsible under one  
2 or more of the following principles of criminal liability; to-wit: (1) by the Defendants directly  
3 committing said crime and/or (2) by aiding or abetting each other and/or one or more co-  
4 conspirators in the commission of the crime, with the intent that this crime be committed,  
5 whereby Defendant ZIMEI PATTON managed and/or owned 99 SPA, aka, SPA 99 and  
6 encouraged and/or assisted employees of 99 SPA, aka, SPA 99 to engage in prostitution and  
7 Defendant MICHAEL BASS assisting Defendant ZIMEI PATTON by providing Defendant  
8 ZIMEI PATTON with information related to upcoming law enforcement operations and/or  
9 information related to upcoming City of Henderson inspections of 99 SPA, aka, SPA 99 and/or  
10 SPA 88 and/or Spa Yi, said information allowing Defendant ZIMEI PATTON to better  
11 conduct prostitution related activities and/or avoid arrests of employees and/or avoid the  
12 discovery of City of Henderson code violations, the Defendants and co-conspirator(s)  
13 encouraged one another throughout by actions and words and acted in concert throughout,  
14 and/or (3) pursuant to a conspiracy to commit this crime.

15 COUNT 2 - LIVING FROM THE EARNINGS OF A PROSTITUTE

16 Defendant ZIMEI PATTON did then and there willfully, unlawfully, feloniously, and  
17 knowingly accept, receive, levy, or appropriate money or other valuable thing, without  
18 consideration, from YINHUA ZHU AND/OR YANFEN YANG and/or an employee of 99  
19 SPA, aka, SPA 99, the proceeds of prostitution activity, the Defendants being responsible  
20 under one or more of the following principles of criminal liability; to-wit: (1) by the  
21 Defendants directly committing said crime and/or (2) by aiding or abetting each other and/or  
22 one or more co-conspirators in the commission of the crime, with the intent that this crime be  
23 committed, whereby Defendant ZIMEI PATTON managed and/or owned 99 SPA, aka, SPA  
24 99 and encouraged and/or assisted employees of 99 SPA, aka, SPA 99 to engage in prostitution  
25 and Defendant MICHAEL BASS assisting Defendant ZIMEI PATTON by providing  
26 Defendant ZIMEI PATTON with information related to upcoming law enforcement operations  
27 and/or information related to upcoming City of Henderson inspections of 99 SPA, aka, SPA  
28 99 and/or SPA 88 and/or Spa Yi, said information allowing Defendant Zimei Patton to better

1 conduct prostitution related activities and/or avoid arrests of employees and/or avoid the  
2 discovery of City of Henderson code violations, the Defendants and co-conspirator(s)  
3 encouraged one another throughout by actions and words and acted in concert throughout,  
4 and/or (3) pursuant to a conspiracy to commit this crime.

5 COUNT 3 - BRIBERY

6 Defendant ZIMEI PATTON did then and there willfully, unlawfully, and feloniously  
7 give, offer, or promise, directly or indirectly, any compensation, gratuity, or reward to  
8 MICHAEL BASS, a public officer elected and/or appointed and/or employed by the City of  
9 Henderson, Clark County, Nevada, with the intent to influence the said public officer, with  
10 respect to any act or decision in the exercise of the said public officer's powers or functions,  
11 by Defendant performing sexual acts with MICHAEL BASS and/or giving MICHAEL BASS  
12 gifts and/or having employees of 99 SPA, aka, SPA 99 perform sexual acts with MICHAEL  
13 BASS in exchange for information related to upcoming law enforcement operations and/or  
14 information related to upcoming City of Henderson inspections of 99 SPA, aka, SPA 99 and/or  
15 SPA 88 and/or Spa Yi.

16 COUNT 4 - MISCONDUCT OF A PUBLIC OFFICER

17 Defendant MICHAEL BASS did then and there willfully, knowingly, feloniously ask  
18 for or receive, directly or indirectly, any compensation, gratuity, or reward for omitting or  
19 deferring the performance of any official duty, to-wit: by Defendant MICHAEL BASS using  
20 his position as a public officer to trade sexual favors from Defendant ZIMEI PATTON and/or  
21 gifts from Defendant ZIMEI PATTON and/or sexual favors from employees of 99 SPA, aka,  
22 SPA 99 in exchange for not properly conducting inspections and/or enforcement operations  
23 on 99 SPA, aka, SPA 99 and/or for information related to upcoming law enforcement

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1 operations and/or information related to upcoming City of Henderson inspections of 99 SPA,  
2 aka, SPA 99 and/or SPA 88 and/or Spa Yi, said information learned by Defendant while  
3 performing his official duties as a Business Licensing Officer.

4 DATED this 12<sup>th</sup> day of July, 2016.

5 STEVEN B. WOLFSON  
6 Clark County District Attorney  
7 Nevada Bar #001565

8 BY

 18193 For  
9 JONATHAN COOPER  
10 Deputy District Attorney  
11 Nevada Bar #012195

12 ENDORSEMENT: A True Bill

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14   
15 Foreperson, Clark County Grand Jury

1 Names of Witnesses and testifying before the Grand Jury:

2 ARBORBEN, DAVID, LVMPD

3 EBERT, JOSEPH, HPD

4 HELFERSTAY, ROBERT, Business License Officer

5 SLATTERY, KYLE, HPD

6 VINCENT, LUKE, HPD

7 WALTON, YUZYING, c/o CCDA, 200 Lewis Avenue, Las Vegas, NV

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

10 CUSTODIAN OF RECORDS, HDC

11 CUSTODIAN OF RECORDS, HPD COMMUNICATIONS

12 CUSTODIAN OF RECORDS, HPD RECORDS

13 YANG, YANFEN, c/o CCDA, 200 Lewis Avenue, Las Vegas, NV

14 ZHU, YINHUA, c/o CCDA, 200 Lewis Avenue, Las Vegas, NV

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