

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
COUNTY OF ATLANTIC

STATE OF NEW JERSEY)
)
)
v.)
)
)
QINGTAO ZHANG)
)
XIUHUAN ZHANG)
)
)
SHUAI LIU)
)
and)
)
SEN GE)

ATLANTIC COUNTY GRAND JURY

INDICTMENT No. 21-10-01454CP

PROS. No. 21-002545

The Grand Jurors of the County of Atlantic, for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Conspiracy to Commit Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

SHUAI LIU

SEN GE

between on or about August 26, 2021 and on or about August 28, 2021, at the City of Atlantic City, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crime of Theft by Deception in the second degree, did agree with each other that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime; and

B. One or more of them knowingly would aid in the planning, solicitation, attempt, or commission of said crime, that is:

1. one or more of them purposefully obtained or attempted to obtain property of another, having a value in excess of \$75,000.00, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

All in violation of N.J.S.A. 2C:5-2(A)(2), and against the peace of this state, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

SEN GE

on or about August 27, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Caesar's Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG, XIUHUAN ZHANG, and SEN GE did create or reinforce a false impression that a Bank of America Cashier's Check presented by QINGTAO ZHANG to the Caesar's Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

SEN GE

on or about August 27, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Caesar's Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG, XIUHUAN ZHANG, and SEN GE did create or reinforce a false impression that a TD Bank Official Check presented by XIUHUAN ZHANG to the Caesar's Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Borgata Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG and XIUHUAN ZHANG did create or reinforce a false impression that a Bank of America Cashier's Check presented by QINGTAO ZHANG to the Borgata Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Borgata Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG and XIUHUAN ZHANG did create or reinforce a false impression that a TD Bank Official Check presented by XIUHUAN ZHANG to the Borgata Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Golden Nugget Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG and XIUHUAN ZHANG did create or reinforce a false impression that a Bank of America Cashier's Check presented by QINGTAO ZHANG to the Golden Nugget Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Attempted Theft by Deception - Second Degree)

XIUHUAN ZHANG

QINGTAO ZHANG

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully attempt to obtain money and/or property of another, namely gaming cheques belonging to Golden Nugget Casino having a value in excess of \$75,000.00, by deception, that is, the said XIUHUAN ZHANG and QINGTAO ZHANG did create or reinforce a false impression that a TD Bank Official Check presented by XIUHUAN ZHANG to the Golden Nugget Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Deception - Second Degree)

QINGTAO ZHANG

XIUHUAN ZHANG

SHUAI LIU

SEN GE

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Hard Rock Hotel and Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG, XIUHUAN ZHANG, SHUAI LIU, and SEN GE did create or reinforce a false impression that a Bank of America Cashier's Check presented by QINGTAO ZHANG to the Hard Rock Hotel and Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Attempted Theft by Deception - Second Degree)

XIUHUAN ZHANG

QINGTAO ZHANG

SHUAI LIU

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully attempt to obtain money and/or property of another, namely gaming cheques belonging to Hard Rock Hotel and Casino having a value in excess of \$75,000.00, by deception, that is, the said XIUHUAN ZHANG, QINGTAO ZHANG, and SHUAI LIU, did create or reinforce a false impression that a TD Bank Official Check presented by XIUHUAN ZHANG to the Hard Rock Hotel and Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Theft by Deception - Second Degree)

QINGTAO ZHANG

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Ocean Casino having a value in excess of \$75,000.00, by deception, that is, the said QINGTAO ZHANG did create or reinforce a false impression that a Bank of America Cashier's Check presented by QINGTAO ZHANG to the Ocean Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:20-2b(1), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

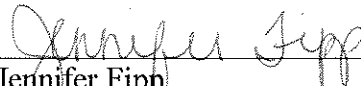
(Theft by Deception - Second Degree)

XIUHUAN ZHANG

SEN GE


SHUAI LIU

on or about August 28, 2021, in the City of Atlantic City, County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposefully obtain money and/or property of another, namely gaming cheques belonging to Ocean Casino having a value in excess of \$75,000.00, by deception, that is, the said XIUHUAN ZHANG, SEN GE, and SHUAI LIU did create or reinforce a false impression that a TD Bank Official Check presented by XIUHUAN ZHANG to the Ocean Casino was legitimate, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.



Jennifer Fipp
Deputy Attorney General
Division of Criminal Justice

A TRUE BILL:


Foreperson

OCT 13 2021
Date