



1 NGC Case No. 17-04

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4 **STATE OF NEVADA**  
5 **BEFORE THE NEVADA GAMING COMMISSION**

6  
7 NEVADA GAMING CONTROL BOARD, )  
8 Complainant, )  
9 vs. )  
10 JESUS SAUCEDO )  
11 Respondent. )  
12

**COMPLAINT FOR REVOCATION OF**  
**REGISTRATION AS GAMING**  
**EMPLOYEE**

13 Complainant, NEVADA GAMING CONTROL BOARD (BOARD), by and through  
14 its counsel, ADAM PAUL LAXALT, Attorney General, and MICHAEL P. SOMPS, Senior  
15 Deputy Attorney General, hereby files this Complaint for Revocation of Registration as  
16 Gaming Employee against Respondent, JESUS SAUCEDO, pursuant to Nevada Revised  
17 Statutes (NRS) 463.310 and 463.337 and alleges as follows:

18 **JURISDICTION**

19 1. Complainant, BOARD, is an administrative agency of the State of Nevada duly  
20 organized and existing under and by virtue of Chapter 463 of NRS and is charged with the  
21 administration and enforcement of the Nevada Gaming Control Act and the Regulations of  
22 the Nevada Gaming Commission.

23 2. Respondent, JESUS SAUCEDO, at all times relevant hereto is registered with  
24 the BOARD as a gaming employee and, as such, is subject to the provisions of the Nevada  
25 Gaming Control Act and the Regulations of the Nevada Gaming Commission.

26 **FACTUAL ALLEGATIONS**

27 3. On or about June 17, 2017, Respondent was employed by and working as a poker  
28 dealer at Parball Newco, LLC, dba Bally's Las Vegas (Bally's).

Office of the Attorney General  
Gaming Division  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511

1 4. Bally's is a Nevada licensed gaming establishment holding a nonrestricted  
2 gaming license.

3 5. On or about June 17, 2017, Respondent was observed by a Bally's Surveillance  
4 Agent taking a \$5.00 chip from the casino rake and placing the \$5.00 chip in Respondent's  
5 token box.

6 6. The \$5.00 chip that Respondent took from the casino rake was the property of  
7 Bally's.

8 7. On or about June 17, 2017, Bally's Director of Security signed an Arrest by  
9 Private Person form and a Misdemeanor Citation/Complaint was signed by Respondent.

10 8. Further review of video surveillance by Bally's revealed two additional occasions  
11 where Respondent took a \$5.00 chip from the rake belonging to Bally's and placed the  
12 \$5.00 chip in Respondent's token box.

13 VIOLATION

14 9. An individual's registration as a gaming employee may be revoked by the Nevada  
15 Gaming Commission if that individual has committed, attempted or conspired to commit  
16 larceny or embezzlement against a gaming licensee or upon the premises of a licensed  
17 gaming establishment. NRS 463.337(2) provides in relevant part the following:  
18

19 2. The Commission may revoke the registration of a  
20 gaming employee if the Commission finds, after a hearing as  
21 provided in NRS 463.310 and 463.312 to 463.3145, inclusive,  
22 that the gaming employee . . . , subsequent to being registered  
23 as a gaming employee:

24 . . . .

25 (d) Committed, attempted or conspired to commit larceny or  
26 embezzlement against a gaming licensee or upon the premises of  
27 a licensed gaming establishment;

28 10. Respondent, a registered gaming employee, committed, attempted or conspired  
to commit larceny or embezzlement against Bally's.

WHEREFORE, based upon the allegations contained herein, which constitute

1 grounds for the revocation of Respondent's registration as a gaming employee pursuant to  
2 NRS 463.337, the BOARD prays for relief as follows:

3 1. That the Nevada Gaming Commission serve a copy of this Complaint on  
4 Respondent pursuant to NRS 463.312(2); and

5 2. That the Nevada Gaming Commission revoke Respondent's registration as a  
6 gaming employee pursuant to the parameters defined in NRS 463.337.

7 DATED this 10<sup>th</sup> day of October, 2017.

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9 STATE GAMING CONTROL BOARD

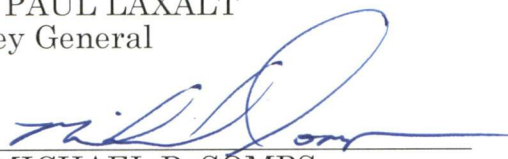
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11 \_\_\_\_\_  
A.G. BURNETT, Chairman

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13 \_\_\_\_\_  
SHAWN R. REID, Member

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15 \_\_\_\_\_  
TERRY JOHNSON, Member

16  
17 Submitted by:

18 ADAM PAUL LAXALT  
19 Attorney General

20 By:   
21 MICHAEL P. SOMPS  
22 Senior Deputy Attorney General  
23 Gaming Division  
24 (775) 687-2124  
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