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NEVADA GAMING COMMISSION
CARSON CITY, NEVADA

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10 **IN THE NEVADA GAMING COMMISSION**

11 IN RE FRANCIS CITRO, JR.
12
13 Petitioner

Case No.: 90-20

**SUPPLEMENTAL PETITION IN
SUPPORT OF THE REMOVAL OF
PETITIONER FRANCIS CITRO FROM
THE LIST OF EXCLUDED PERSONS,
PURSUANT TO NEVADA GAMING
REGULATION SECTION 28.080**

14
15 TO: THE NEVADA GAMING COMMISSION

16 Please take notice that Petitioner, Francis Citro, hereby supplements his prior petition with
17 the materials presented herein. Petitioner incorporates his prior petition and the attached
18 PowerPoint as argument for the hearing set on March 26, 2026.

19 **SUPPLEMENTAL MEMORANDUM OF POINTS AND AUTHORITIES**

20 **I. Introduction**

21 Francis Citro, Jr. filed a Petition for removal from the list of excluded persons
22 pursuant to Nevada Gaming Regulations Section 28.080. The pertinent sections read as follows:

23 28.080 Petition to remove from the list.

24 1. Any person who, after a final determination by the Commission, has been placed upon
the list **may petition the Commission in writing and request that his or her name be removed**

1 **from such list.** The petition shall be verified and state with specificity the grounds believed by the
2 petitioner to constitute good cause for removal of his or her name. (Emphasis added)

3 2. The Commission shall have 90 days in which to entertain such petition, after which time
4 the Commission shall either set the petition for hearing or deny the petition. In the event the
5 Commission elects to entertain the petition, a date for hearing shall be specified, and thereafter the
6 procedures specified in section 28.070 shall apply.

7 3. The record of evidence and testimony, if any, used by the Commission in making its
8 original determination of exclusion may be considered by the Commission; provided, however,
9 said record shall not be reopened except upon the express consent of the Commission. Unless
10 otherwise allowed by the Commission, only evidence relevant as to the ground specified in the
11 petition shall be heard; provided, however, the Commission may request additional investigation
12 in this regard. The burden of showing good cause for removal shall at all times rest with the
13 petitioner.

14 He submits this Supplemental Petition, as well as a copy of his PowerPoint presentation,
15 for the Commission's consideration in determining whether to grant petitioner Citro a hearing to
16 discuss his removal from the Black Book.

17 **II. Regulatory Framework**

18 The Nevada Gaming Regulatory framework was established in 1960. Its original
19 intent was to remove active organized crime influence from the casinos. Today, its focus remains
20 fixed upon what constitute current threats, as opposed to focusing on past offenses. Indeed, James
21 Taylor, the NGCB's chief of enforcement for more than 25 years, aptly stated in 2022, "My
22 philosophy has been to look at what is the current threat."

23 It has always been acknowledged that the regulatory framework discussed herein was
24 designed to protect the reputation of Nevada gaming with the ultimate goal of fostering public
25 confidence in the gaming industry. Echoing James Taylor's words, then, must begin with an
26 analysis as to what constitutes a "current threat". Inasmuch as there is no singular definition found
27 within the Gaming Regulatory framework of how to define what qualifies as "current", petitioner

1 Citro herein provides, for reference, other areas within Nevada’s statutory framework that deal
2 with issues related to how judges interpret “current” and/or “relevant”.

3 **B. NEVADA’S CRIMINAL LAWS PRECLUDE THE USE OF STALE PRIOR**
4 **OFFENSES TO AGGRAVATE A CHARGED CRIME. THE SAME ANALYSIS MUST**
5 **BE APPLIED HERE**

6 The Eighth Amendment to the U.S. Constitution, U.S. Supreme Court caselaw, and Nevada
7 caselaw all restrict the State's use of certain prior criminal acts and convictions to heighten the
8 punishment that a person may face. In this instance, it follows that the passage of time that
9 petitioner has been crime free inures to Petitioners benefit in considering whether or not he is
10 entitled to a hearing to remove him from the Black Book. Certainly, had the petitioner been
11 arrested for or committed any recent offenses, that would be a fact used against him in order to
12 conclude that he is not entitled to a hearing. The inverse, then, being the absence of any arrests or
convictions, must apply and be a positive factor which supports petitioner’s request for a hearing.

13 Nevada's statutes and case law are full of examples where the time lapse between the
14 subject *prior* offense and the subject *current* offense are examined in relation to one another to
15 understand what weight to give those prior offenses. In other words, there has always been the
16 rationale in Nevada that older the offense, the less relevant that offense is in relation to the
17 character of person. In the instant case, petitioner Citro’s prior offenses date back approximately
18 35 years. As is argued below, there comes a time in many criminal contexts when certain criminal
19 convictions (or as in this case the convictions used to support the placement of petitioner Citro in
20 the Black Book) become too stale to be used by a prosecuting or regulatory agency. If such is the
21 case in these contexts, then it must also be so in the context of the Commission’s use of prior
22 criminal convictions that subject a person to being included in the Black Book.

23 Example 1 - The Seven-Year Recidivism Window for DUI Offenses

24 In Nevada, a person's third DUI conviction within seven years is a category B felony,
whereas the two prior convictions are misdemeanors if they occurred within the seven-year
window. NRS 484C.400 (l)(c). This concept has been referred to by the Bureau of Justice Statistics

1 as the "recidivism window." 3 The recidivism window has a starting event, such as release from
2 custody, a measure of failure following the starting event, such as a subsequent arrest, and a certain
3 period of time that begins with the starting event. Thus, if an individual reoffends within the seven-
4 year recidivism window for DUI offenses in Nevada, the second offense will remain a
5 misdemeanor while the third rises to a felony.

6 The Nevada Supreme Court provided guidance for interpreting the recidivism window
7 when it held that the third DUI offense must have occurred within seven years, and not
8 have just been sentenced within the seven-year window. *Pfohlman v. State*, 107 Nev. 552, 554
9 (1991). Implied in the *Pfohlman* Court's reasoning is the understanding that a prior course of
10 conduct, even if identical, has an expiration date for its use to be considered as an aggravating
11 factor for the purpose of enhancing the punishment for the offender.

12 In the case of a DUI, an individual being charged with such a crime is free from the
13 potential for the State to apply their prior wrongdoing/s in an arbitrary and capricious manner. The
14 protections provided to those found guilty of DUIs that are more than seven years apart recognize
15 that prior convictions lose their ability to adequately assess punishment. Those protections also
16 prevent those stale prior offenses from being used to enhance their punishment from a
17 misdemeanor to a felony.

18 Example 2 - The Seven-Year Recidivism Window for Domestic Violence Offenses

19 A person's third conviction of domestic violence within seven years is a category C felony,
20 whereas the two prior convictions are misdemeanors if they occurred within the seven-year
21 recidivism window. NRS 200.485 (1)(c). The logic underpinning this statute's recidivism window
22 for sentencing enhancement is the same as that for DUI offenses, in that both Nevada statutes and
23 Nevada Supreme Court caselaw recognize that a stale conviction should not be used to enhance a
24 person's conviction from a misdemeanor to a felony. In looking to the legislative history of this
statute, the Nevada Legislature explained that the amendment to include a felony after three
convictions was the result of "high recidivism rate[s] for the crimes of battery ... when committed

1 against the spouse, child[,] or relative of the offender or other person who the offender is or was
2 dating indicate[d] that alternative sentencing procedures for such crimes [were] necessary."

3 It is widely recognized that high recidivism rates are prevalent within domestic violence
4 offenses, and that for years Nevada consistently ranked first in the nation for domestic violence
5 fatalities, which only reduced to third in 2014. Despite these statistics, the Nevada Legislature has
6 nevertheless recognized that there comes a point in time where an individual's prior offenses are
7 stale and no longer viable for a court to consider as aggravating circumstances for the purpose of
8 enhancing punishment.

9 Example 3 - Nevada's Habitual Criminal Statute Allows for a Sentencing Court to Dismiss
10 a Habitual Criminal Charge When the Prior Offense is Stale

11 NRS 207.010 allows for the sentencing court to dismiss a habitual criminal count "when
12 the prior offenses are stale or trivial, or in other circumstances where an adjudication of habitual
13 criminality would not serve the purposes of the statute or the interests of justice." French v. State,
14 98 Nev. 235,237 (1982) (emphasis added). "NRS 207.010 makes no special allowance for
15 nonviolent crimes or for the remoteness of convictions; instead, these are considerations within
16 the discretion of the district court." Araiakis v. State, 108 Nev. 976, 983 (1992).

17 In 1990, the Nevada Supreme Court reversed a district court's decision to adjudicate a
18 defendant as a habitual criminal based on a 31-year-old conviction, a 27-year-old conviction, and
19 a 25-year-old conviction. Sessions v. State, 106 Nev. 186, 191 (1990) (emphasis added). In that
20 case, the Court noted that although Sessions' past conduct was "reprehensible," it simply "did not
21 warrant the harsh sanction under the habitual criminality statute." Id. Although the Court
22 recognized that the defendant's criminal conduct was mostly non-violent, the Court focused on and
23 based its ruling upon the fact that the defendant's crimes were incredibly stale, with each prior
24 conviction being at least 25 years old. Id. (emphasis added). Similarly, in the instant case, all
parties can agree that the prior convictions could have constituted "reprehensible conduct". The
issue before this commission is whether convictions from 35 years ago are still relevant, and
whether they should continue to be relied upon as the descriptors of who the petitioner is.

1 As with both the DUI and domestic violence statutes, the habitual criminal statute in
2 Nevada recognizes that convictions for prior crimes reach a point in time where they become stale
3 and should no longer be used as an aggravating factor to enhance an individual's sentence. The
4 French Court explained that when a prior offense is stale it no longer serves the interests of justice
5 to be considered. French, 98 Nev. at 237 (1982) (emphasis added). The French Court's reasoning
6 stands to scrutiny when applied to this case, in with which Mr. Citro continues to be included in
7 the Black Book. There must come a point in time where a prior convictions become so remote
8 and stale that their use no longer serves any purpose.

9 Example 4 - Nevada's Limitation on the use of Stale Prior Felony Convictions for
10 Impeachment Purposes

11 NRS 50.095 outlines the use and limitations for impeachment by evidence of a
12 conviction of a crime. For purposes of attacking the credibility of witnesses, evidence that a
13 witness has been convicted of a prior felony is admissible to impeach the witness unless
14 more than ten years have passed since the date of release of the witness from confinement or
15 the expiration of the witness's parole, probation, or sentence, whichever is later. Id. The
16 Nevada Supreme Court has affirmed this statute by allowing for the impeachment of a
17 witness with a prior felony conviction, as long as the prior felony conviction is not too remote.
18 Yates v. State, 95 Nev. 446, 449 (1979).

19 With impeachment, and in accordance with the above examples throughout
20 Nevada's statutes and court decisions, Nevada's limitation on the use of prior felony
21 convictions further illustrates the understanding throughout the justice system that there
22 comes a point in time where a stale prior offense may not be used to adversely affect the
23 constitutional rights and protections afforded to its citizens. NRS 50.095, the section dealing
24 with impeachment by evidence of conviction of crime, states, in pertinent part,

2. Evidence of a conviction is inadmissible under this section **if a period of more than 10
years has elapsed since:**

(a) The date of the release of the witness from confinement; or

1 **(b) The expiration of the period of the witness’s parole, probation or sentence, whichever**
2 **is the later date.** (emphasis added)

3 In other words, Petitioner Citro would be able to testify as a State’s witness if he were a
4 witness to a crime, and he would **NOT** be able to be impeached with any of his prior convictions
5 because they are so old. The rationale must be that he is viewed by the law as someone who is not
6 the same person he was 35 years ago when he suffered those convictions. This all harkens back
7 to James Taylor, the NGCB’s chief of enforcement comment of “My philosophy has been to look
8 at what is the current threat.”

9 Example 5 - Time Eligibility for Filing an Application for a Pardon with the Nevada
10 Board of Pardons

11 The State of Nevada maintains a Board of Pardons that consists of the Governor,
12 Attorney General, and each of the seven Justices of the Supreme Court. The Board of Pardons
13 functions to consider and grant pardons and restore civil rights to persons who have committed
14 crimes under the laws of the state. When reviewing pardon applications, the Board considers
15 several criteria, including the seriousness and relative recency of the offense. This criterion
16 is utilized to ensure that a suitable length of time has elapsed in order to avoid denigrating the
17 seriousness of the offense or undermining the deterrent effect of the conviction. Thus, when
18 an offense is extremely old and stale, equity heavily weighs in favor of granting a pardon.
19 Additionally, there is a time eligibility for filing an application for a pardon. No application may
20 be filed unless and until the specified period of time has elapsed. A person seeking a pardon
21 for their crime must wait: five years from the date the applicant is released from actual custody
22 or from the date when s/he is no longer under a suspended sentence, whichever occurs later,
23 for a misdemeanor conviction of a crime which constitutes domestic violence pursuant to NRS
24 33.018; six years from the date of the release of the applicant from probation, parole, or prison
confinement for a category E felony; eight years from the date of the release of the applicant
from probation for a category B, C, or D felony; nine years from the date of release of the
applicant from parole or prison confinement for a category D or C felony; ten years from

1 the date of the release of the applicant from parole or prison confinement for a category B
2 felony; and twelve years from the date of the release of the applicant from probation, parole,
3 or prison confinement for a category A felony.

4 The Commission, to ensure against the concept of selective enforcement, must grant a hearing
5 to determine if petitioner Citro is still the “worst of the worst” such that his continued inclusion in the
6 Black Book is supportable

7 Selective enforcement cases in Nevada frequently challenge municipal ordinances, and
8 police actions that are applied inconsistently. In Nevada, those cases occur with a relatively high
9 degree of frequency, and the allegations often discuss the unconstitutional targeting of specific
10 groups. In the instant matter, NRS 463.151 controls as it lists the four exclusive grounds for
11 placement on the List of Excluded persons. Those factors include:

12 (1) a felony conviction, a conviction of a crime of moral turpitude, or a violation of
13 the gaming laws of any state;

14 (2) the failure in Nevada to disclose an interest in a gaming establishment for which the
15 person must obtain a license or willful evasion of fees or taxes;

16 (3) a notorious or unsavory reputation which would adversely affect public confidence in
17 the gaming industry; or

18 (4) being placed by a government organization on a List of Excluded
19 persons.

20 This Commission’s decision to include a person on Nevada’s List can be based
21 upon the application of just one of the four categories. The discernment necessary when making
22 these conclusions cannot be overstated. Clearly, thousands of individuals qualify for inclusion in
23 the Black Book based solely on NRS 463.151.

24 From just January to March of 2025, there were over 10,000 felony convictions in
Nevada. From 2001 to present, there were 191 federal RICO cases filed in Nevada,
including proceedings against the Aryan Brotherhood, MS-13, the Sureños, among others.

1 Federal criminal proceedings in our state have also included the gun battle between the Hells
2 Angels and Vagos motorcycle clubs in 2011 which occurred inside Jerry's Nugget in Reno. Federal
3 proceedings have also included the Laughlin River Run Riot occurring within multiple casinos
4 between the Hells Angels and the Mongols in 2002. None of the individuals involved in those
5 cases have ever been nominated for inclusion to the List of Excluded persons, despite
6 meeting at least one, and in some cases, more than one of the four grounds.

7 Recent nominations include active (current) illegal bookmakers, gamblers, and money
8 launderers, such as Matthew Boyer. Similarly, Wayne Nix was placed on the List in February of
9 2026. Their operations contributed to the resignation of long-time gaming licensee Scott Sibella,
10 who lost his gaming license in 2024, due to his federal conviction for failure to report illegal
11 gaming activities. Notably, Mr. Sibella has not been nominated to be placed on the List.

11 **III. Analysis**

12 Nevada's regulatory framework, and statements by the Board, indicates that the
13 Commission's focus is on current threats to the gaming industry and current confidence of the
14 public in its integrity and lack of criminal elements. Nevada's criminal procedure statutes define
15 "current." A third DUI and domestic battery within seven years elevates the charge from a
16 misdemeanor to a felony. Similarly, NRS 179.245 lays the framework for sealing criminal
17 convictions. Even a Category A felony can be sealed after ten years from the date of release from
18 actual custody or discharge from parole or probation, whichever occurs later. Lesser crimes can
19 be sealed after two years. Finally, the major casinos in Las Vegas hire employees with felony
20 convictions. Here, nearly 40 years have elapsed since Citro's last criminal conviction in 1987. He
21 has not re-offended since his inclusion. In today's world, in 2026, he is not a current threat to the
22 gaming industry. He does not operate illegal gambling operations or money laundering. Nor does
23 he associate with organized criminal elements. Indeed, every single person allegedly associated
24 with petitioner Citro in his 1991 hearing has since passed away. There is literally no one left alive
for him to have any unsavory associations. He is no threat to compliance or the integrity of
Nevada's casinos or gaming industry. Finally, as demonstrated by the numerous declarations

1 attached to the Petition, Citro has rehabilitated himself and enjoys a good reputation in the
2 community.

3 The List is intended to be a regulatory safeguard, not a lifetime civil penalty. Since his
4 inclusion in 1991, Citro has served his sentences. He has demonstrated rehabilitation and garnered
5 community support. He has been involved with no criminal activity since the 1980s. Under
6 Regulation 28.080, Francis Citro must be entitled to a hearing to determine whether he should be
7 removed from the List of Excluded Persons. The Board's time eligibility policy functions must
8 like the laws relating to the recidivism window for DUI and domestic violence offenses, the
9 habitual criminal statute, and the limitation on the use of stale prior felony convictions for
10 impeachment purposes, in that there comes a time where the Board believes that enough time
11 has elapsed such that a person's prior criminal offense may not be used against them anymore.

12 As the above examples show, Nevada's criminal laws preclude the use of stale
13 prior offenses in several different and varying contexts. These examples effectively operate
14 to narrow the class of persons that are subject to their consequences by excluding certain
15 people that do not fit within a specific set of criteria. The same principle must be applied to this
16 case that subject a person to lifetime inclusion on the Black Book, because there comes a point
17 in time that this commission is precluded from using a person's *stale* prior criminal offenses for that
18 purpose.

19 DATED this 11th day of March 2026.

20 **SGRO & ROGER**

21 */s/ Anthony P. Sgro*
22 _____
23 ANTHONY P. SGRO, ESQ.
24 Nevada Bar No. 3811
2901 El Camino Ave., Ste. 204
Las Vegas, NV 89102
Attorney for Francis Citro, Jr.

1 **CERTIFICATE OF SERVICE**

2 The undersigned employee of SGRO & ROGER hereby certifies that on the 11th day of
3 March 2026, a true and correct copy of the foregoing **SUPPLEMENTAL PETITION IN**
4 **SUIPPORT OF THE REMOVAL OF PETITIONER FRANCIS CITRO FROM THE LIST**
5 **OF EXCLUDED PERSONS, PURSUANT TO NEVADA GAMING REGULATION**
6 **SECTION 28.080** was served electronically via email:

7 Nicole Rupert
8 Nevada Gaming Control Board
9 Nevada Gaming Commission
10 nrupert@gcb.nv.gov

11 */s/ Alexis Williams*
12 An Employee at SGRO & ROGER

EXHIBIT “1”

EXHIBIT “1”



Francis Citro

REQUEST FOR HEARING



THE BLACK BOOK:

NRS 463.151-463.155 authorizes the Nevada Gaming Commission to compile a list of persons who are to be excluded from all licensed gaming facilities

Regulation 28 provides criteria of individuals to be included on the list

Intended to be a preventative regulatory enforcement
(Regulation 28)

REGULATION 28: INCLUSION CRITERIA

An individual may be included based on just 1 of 4 criteria:

Felony conviction

Notorious or unsavory reputation

Career offender status

Present threat to gaming integrity

MODERN ENFORCEMENT FELONIES

January - March 2025 Quarterly Statistical Summary:
10,883 felony convictions

Offense Group	Female	Male	Total
Drug	106 (11.4%)	657 (6.6%)	763 (7.0%)
DUI	96 (10.3%)	438 (4.4%)	534 (4.9%)
Other	57 (6.1%)	850 (8.5%)	907 (8.3%)
Property	206 (22.1%)	1,098 (11.0%)	1,304 (12.0%)
Sex	27 (2.9%)	1,845 (18.5%)	1,872 (17.2%)
Unknown	3 (0.3%)	24 (0.2%)	27 (0.2%)
Violence	437 (46.9%)	5,039 (50.6%)	5,476 (50.3%)
Total	932 (100.0%)	9,951 (100.0%)	10,883 (100.0%)

VIOLENCE IN OUR CASINOS



THE NEED FOR DISCERNMENT

2001 - February 2026: 191 RICO cases filed in Nevada:

Surenos/Mexican Mafia

MS-13

Aryan Brotherhood

Drug trafficking and heroin operations

Laughlin River Run Riot

Vagos Outlaw Motorcycle Gang

None qualified as the worst of the worst for gaming -None of these individuals were nominated for inclusion to the Black Book

LAS VEGAS REVIEW JOURNAL ON RIVER RUN RIOT

LAS VEGAS REVIEW-JOURNAL

Brawl bystanders fight to keep Harrah's Laughlin lawsuit viable

February 14, 2008 - 10:00 pm

They went to the 2002 Laughlin River Run for a good time and found themselves in the middle of a bloody biker brawl that ended with three dead.

Now a handful of innocent bystanders in the deadly riot between Mongols and Hells Angels find themselves fighting to keep their lawsuit against Harrah's Laughlin alive.

"These people went toe-to-toe with the big guy, and a couple of weeks before trial they have the carpet yanked out from under them," Las Vegas lawyer Brent Bryson said.

He represents seven people who were caught in the middle of the melee or swept up in its aftermath, including a Vietnam veteran who survived the battle on Hamburger Hill and a husband and wife who spent careers in law enforcement.

Their lawsuit against Harrah's Laughlin claims hotel officials knew about an impending violent showdown between the rival gangs yet did not warn patrons or take steps to prevent the violence.

TAHOE DAILY TRIBUNE ON RIVER RUN RIOT

Tahoe Daily Tribune | Lake Tahoe **action**

Bikers leave Laughlin after casino killings; probe continues

News | Apr 29, 2002

LAUGHLIN, Nev. — Thousands of bikers rumbled out of town Sunday as investigators sorted out the details of a casino brawl between rival motorcycle gangs that left three people dead.

The annual Laughlin River Run, one of the nation's largest motorcycle festivals, came to an uneasy end as dozens of extra police patrolled the streets to guard against possible retaliation.

“It’s just a mass exodus,” said Sgt. Chuck Jones of the Las Vegas police department, which has jurisdiction in the Colorado River casino town 80 miles southeast of Las Vegas. “If you go on the highway right now, it’s just motorcycle after motorcycle as far as you can see.”

RECENT BLACK BOOK NOMINATIONS

Nominated individuals include active illegal gamblers, bookmarkers,
and money launderers

Wayne Nix

Matthew Boyer

Their operations contributed to the resignation of Scott Sibella

These cases illustrate present risk

SCOTT SIBELLA AND REGULATORY OVERSIGHT

Scott Sibella - gaming license revoked in 2024 following federal convictions
linked to failure to report illegal gambling

His ties to individuals like Boyer and Nix were the primary concern

Prioritize current operational threats rather than historic conduct

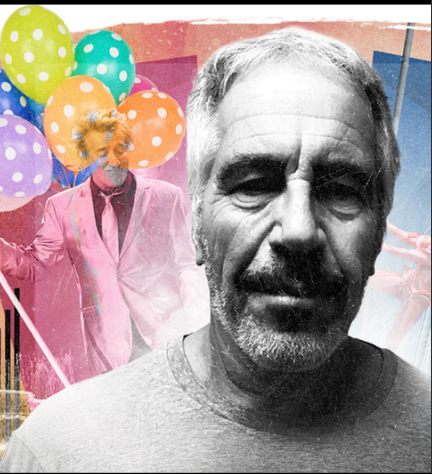
Not nominated for inclusion in the Black Book

LAS VEGAS REVIEW JOURNAL ON EPSTEIN

LAS VEGAS
REVIEW-JOURNAL

Vegas VIP

February 13, 2026 - 2:35 pm



The trip took place about five years after Epstein was convicted and required to register as a sex offender on Florida charges that included a count of solicitation of prostitution from a minor, after he was accused of sexually assaulting multiple underage girls he'd hired for massages. The Miami Herald further scrutinized the case in 2018, probing whether Epstein had received an inequitable plea deal. An FBI investigation followed shortly after.

Details about Epstein's 2013 trip emerged as a team of Las Vegas Review-Journal reporters reviewed hundreds of the millions of Epstein files released by the U.S. Department of Justice in late January. The emailed communications detailed the trip and shed light on how wealthy patrons like Epstein and his entourage get the VIP treatment while visiting the Strip.

It's not clear whether the tentacles of the wide-ranging federal investigation into Epstein's alleged crimes reached the Las Vegas Valley. The Metropolitan Police Department wrote in a statement: "We could not locate any incident crime reports listing this individual."

LAS VEGAS REVIEW JOURNAL “VEGAS VIP” CONT.

LAS VEGAS REVIEW-JOURNAL

February 13, 2026 - 2:35 pm

The VIP manager noted that his party would receive a Seven Stars treatment, which the resort currently describes as the pinnacle tier of the Caesars Rewards loyalty program.

“Members are wowed by all the fantastic benefits afforded to them with additional rewards and all-around bigger and better perks,” according to the [Caesars website](#).

Epstein’s 10-person group secured tickets to a Stewart performance at The Colosseum at Caesars Palace and the “Mystere” by Cirque du Soleil show.

“Please note, this is special billing,” the Caesars manager wrote in an email. “Leon Black, founder of Apollo, is paying for these tickets. We need to give the best seats, please.”

Before the trip, Epstein’s team had a special request: He wanted to attend the DEF CON hacker convention and needed someone to pick up the tickets at the Rio, noting that “apparently the line will be quite long.”

“I have not even passed this idea to Jeffrey yet, but I thought it was worth asking you,” Groff wrote. “Do you have someone on staff that does this sort of errand thing?”

The Caesars staffer wrote she had ordered the tickets and that someone was picking them up. She then wrote in an email that the show tickets would show up on Black’s card but that the eight conference passes would be paid out from a Caesars account because DEF CON organizers didn’t accept credit cards.

JEFFREY EPSTEIN

Convicted sex offender, was known to frequent Las Vegas casinos

Despite prior convictions, regulatory action did not result in his
inclusion in the Black Book



ORIGINAL INTENT

Established in 1960 to remove active organized crime influence
from casinos

Focused on current threats, not past offenses

Protection of gaming reputation and public confidence in industry

WHY FRANCIS CITRO WAS INCLUDED

4 felony convictions between 1980 and 1987

Was labeled in the 1980s as having a notorious and unsavory reputation

Served over 10 years for his convictions

Has been in the Black Book for several decades

No current criminal conduct

WHAT DEFINES “CURRENT” IN NEVADA

Examples include:

DUI - 3rd conviction *within 7 years* › Category B felony

DOMESTIC BATTERY FELONY

3rd conviction *within 7 years*

RECORD SEALING

Nevada Felony Record Sealing:

Category A / Crimes of Violence: 10 years

Category B, C, D: 5 Years

Category E / Gross Misdemeanor: 2 years

Dismissed/Acquitted Charges: Immediate eligibility

Ineligible Convictions: Felony DUI's, sexual offenses, crimes
against children

IMPEACHMENT - NRS 50.095 (2)

Evidence of a conviction is inadmissible under this section if a period of more than 10 years has elapsed

Federal Rule of Evidence 609 - Impeachment with Felony Convictions

10 Year Rule: Convictions older than 10 years generally inadmissible

Pardoned, annulled, or rehabilitated convictions › generally not admissible

CASINO EMPLOYEE FELONS

- Many casinos hire rehabilitated employees, including those with felony convictions
- Major corporations, including:
 - MGM Resorts International
 - Caesars Entertainment
 - Station Casinos
- Second chance hiring programs prove that rehabilitation does not threaten casino integrity



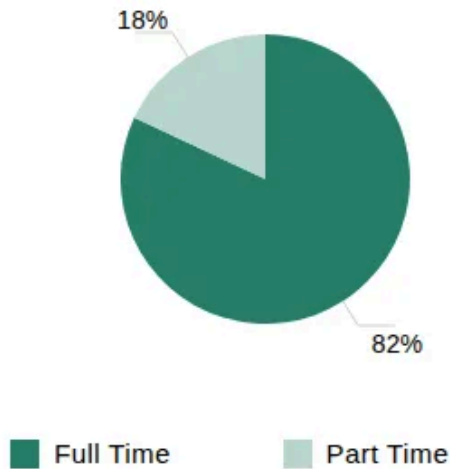
Hospitality and Tourism Sector

Las Vegas and Reno's massive hospitality industry represents the largest employment opportunity for people with criminal records in Nevada. Hotels, casinos, restaurants, and entertainment venues frequently hire individuals with non-violent backgrounds for various positions. Entry-level roles include housekeeping, food service, security, and customer service positions.

Major employers like MGM Resorts, Caesars Entertainment, and Station Casinos have implemented second-chance hiring programs. These companies often provide on-the-job training and advancement opportunities. The industry's high turnover rate creates continuous job openings throughout the year.

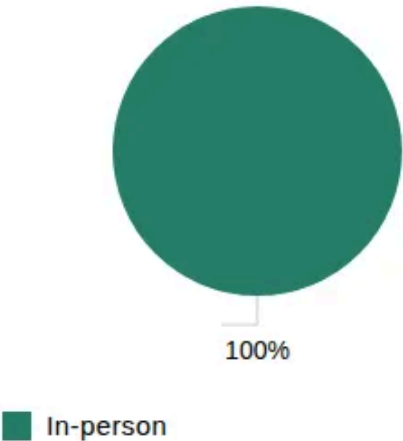
ZIPRECRUITER STATISTICS

Employment type



82% of Hotel That Hire Felons Job Openings in Las Vegas, NV are Full Time positions.

Remote vs. In-person



100% of Hotel That Hire Felons Job Openings in Las Vegas, NV are In-person positions.

Average salary



The average hourly salary for Hotel That Hire Felons Jobs in Las Vegas, NV is \$17.9 per hour.

REHABILITATION AND COMMUNITY SUPPORT

Has been a law-abiding citizen for decades

His supporters who will attest to his character include:

Dr. Herbert Cordero - Las Vegas Cardiologist

Dominic Gentile - Las Vegas Gaming Litigator

Frank Beninato - Las Vegas Attorney and Accountant

Michael Boykin - Las Vegas Digital Creator and Religious Leader

Frankie Scinta - Las Vegas Performer



REGULATION 28.080: GOOD CAUSE

Allows removal if there is “good cause”

Citro has several qualities that meet standards of
good cause including:

No present threat to gaming integrity

approximatley 35 years since
inclusion

Rehabilitation and community
standing



REGULATORY CONSISTENCY

Focus must be on active/present threats to the integrity of gaming casinos

Discernment is the most important function of this commission as to this issue

Prior RICO prosecutions have not resulted in automatic Black Book placement

Casinos hire rehabilitated felons



REGULATORY CONSIDERATIONS

In 2026, does Francis Citro:

Operate illegal gambling money laundering operations?

Associate with organized crime or with Anthony Spilotro, Herbert Blitstein, Vito Dominic Spillone, Frank Serraro, John Clyde Abel, Joseph Bolognese, or John Barro? (all of whom are deceased)

Threaten compliance or casino integrity?

No.

The Excluded Persons List is a regulatory safeguard, not a lifetime civil penalty

Since his inclusion in 1991, Francis Citro has:

Served his sentences

Demonstrated rehabilitation - no criminal activity since 1987

Cultivated community support

Under Regulation 28.080, Francis Citro is entitled to a hearing to determine whether he must be removed from the Excluded Persons List