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NEVADA GAMING COMMISSION
CARSON CITY, NEVADA

NGC 26-07

STATE OF NEVADA

BEFORE THE NEVADA GAMING COMMISSION

NEVADA GAMING CONTROL BOARD, Complainant, vs. CASA DI AMORE, LLC dba CASA DI AMORE; and MICHAEL ANTHONY CAMPAGNO, Respondents.	**COMPLAINT**

The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD ("BOARD"), Complainant herein, by and through its counsel, AARON D. FORD, Attorney General, and NONA ML LAWRENCE, Deputy Attorney General, hereby files this Complaint for disciplinary action ("Complaint") before the Nevada Gaming Commission ("Commission" or "NGC") against CASA DI AMORE, LLC dba CASA DI AMORE ("CDA") and MICHAEL ANTHONY CAMPAGNO ("CAMPAGNO") (collectively, "RESPONDENTS"), Respondents herein, pursuant to Nevada Revised Statute ("NRS") 463.310(2).

JURISDICTION

1. Complainant, BOARD, is an administrative agency of the State of Nevada duly organized and existing under and by virtue of Chapter 463 of NRS and is charged with the administration and enforcement of the gaming laws of this State as set forth in Title 41 of the NRS ("Nevada Gaming Control Act" or "Act") and the regulations of the Commission adopted thereunder.

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2. Respondent CDA, located at 2850 East Tropicana Avenue, Las Vegas, Nevada 89121, at all times relevant to this Complaint, held, and currently holds, a restricted gaming license issued by the Commission, and, as such, has been charged with the responsibility of complying with all relevant provisions of the Act and the regulations of the Commission.

3. Respondent CAMPAGNO, at all times relevant to this Complaint, was, and currently is, licensed by the Commission as manager of CDA, owning 100% thereof, and, as such, has been charged with the responsibility of complying with all relevant provisions of the Act and the regulations of the Commission.

RELEVANT LAW

4. The Nevada Legislature set forth the importance of the gaming industry to the State of Nevada and its responsibility to the State's inhabitants in NRS 463.0129. The Legislature specifically set out that the continued growth and success of gaming is dependent on public confidence and trust and that such public confidence and trust "can only be maintained by strict regulation of all persons, locations, practices, associations and activities related to the operation of licensed gaming establishments. . . ." NRS 463.0129.

5. To ensure proper oversight and control over the gaming industry, the Nevada Legislature has granted the Commission "full and absolute power and authority to. . . limit, condition, restrict, revoke or suspend any license, registration, finding of suitability or approval, or fine any person licensed, registered, found suitable or approved, for any cause deemed reasonable by the Commission." NRS 463.1405(4).

6. The BOARD is statutorily charged with determining whether a violation of the Gaming Control Act has occurred. NRS 463.310(1). If the BOARD determines that a violation has occurred, and is satisfied that discipline is warranted, it shall initiate disciplinary action by filing a complaint with the Commission. NRS 463.310(2).

7. The BOARD is authorized to observe the conduct of all licensees in order to ensure that gaming operations are not being operated in an unsuitable manner or by an unqualified or unsuitable person. NRS 463.1405(1) and Nev. Gaming Comm'n Reg. 5.040.

8. A person approved by the Commission has an ongoing obligation to meet the standards required to obtain such approval, including, without limitation, to be a person of good character, honesty, and integrity and to refrain from activities and associations that may have an impact on the interests of Nevada, the regulation of gaming, or the reputation of gaming in Nevada. NRS 463.170(8).

9. Nevada Gaming Commission Regulation 5.011(1) provides, in relevant part, as follows:

> The Board and the Commission deem any activity on the part of a licensee, registrant, or person found suitable by the Commission, or an agent or employee thereof, that is inimical to the public health, safety, morals, good order, or general welfare of the people of the State of Nevada, or that would reflect or tend to reflect discredit upon the State of Nevada or the gaming industry, to be an unsuitable method of operation and shall be grounds for disciplinary action by the Board and the Commission in accordance with the Nevada Gaming Control Act and the regulations of the Commission.

Nev. Gaming Comm'n Reg. 5.011(1).

10. Nevada Gaming Commission Regulation 5.030 provides as follows:

> Violation of any provision of the Nevada Gaming Control Act or of these regulations by a licensee, the licensee's agent or employee shall be deemed contrary to the public health, safety, morals, good order and general welfare of the inhabitants of the State of Nevada and grounds for suspension or revocation of a license. Acceptance of a state gaming license or renewal thereof by a licensee constitutes an agreement on the part of the licensee to be bound by all of the regulations of the Commission as the same now are or may hereafter be amended or promulgated. It is the responsibility of the licensee to keep informed of the content of all such regulations, and ignorance thereof will not excuse violations.

Nev. Gaming Comm'n Reg. 5.030.

11. At all times relevant to the Complaint, NGC Regulation 5.050 imposes a requirement upon licensees to submit mandatory annual affirmations related to company structure and changes:

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> 1. Except as otherwise provided herein, every licensee shall report to the Board annually the full name and address of every person, including lending agencies, who has, or had during the previous twelve months, any right to share in the profits of the licensee's licensed games, whether as an owner, assignee, landlord or otherwise, or to whom any interest or share in the profits of any licensed game has been pledged or hypothecated as security for a debt or deposited as a security for the performance of any act or to secure the performance of a contract of sale. Such report shall be submitted annually on a date as determined by the Board Chair.
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> 2. Any person who has received Commission approval to share in the profits of the licensee's licensed games or who is otherwise allowed to share in the licensee's profits of licensed games pursuant to NRS chapter 463 is not required to be included in the annual report.
>
> 3. Failure to comply with this section is an unsuitable method of operation.

Nev. Gaming Comm'n Reg. 5.050.

12. At all times relevant to the Complaint, the disposition of any interest in a corporation that holds a state gaming license must be approved in advance by the Commission pursuant to NRS 463.510:

> **NRS 463.510 Prior approval by Commission required for other disposition of securities issued by corporation other than publicly traded corporation; restrictions on unsuitable persons; statement on certificate.**
>
> 1. The purported sale, assignment, transfer, pledge, exercise of an option to purchase or other disposition of any security issued by a corporation, other than a publicly traded corporation, which holds a state gaming license or which is a holding company or an intermediary company for an entity that holds a state gaming license is void unless approved in advance by the Commission.

NRS 463.510.

13. At all times relevant to the Complaint, NGC Regulation 8.050 prohibits licensees from transferring any interest for consideration prior to obtaining appropriate approvals:

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> 1. Except as and to the extent provided in these regulations pertaining to emergency situations, no money or other thing of value constituting any part of the consideration for the transfer or acquisition of any interest in a licensed gaming operation, in a licensee or in a holding company shall be paid over, received or used until complete compliance has been had with all prerequisites set forth in the law and these regulations for the consummation of such transaction; but such funds may be placed in escrow pending completion of the transaction. Any loan, pledge or other transaction between the parties or with other parties may be deemed an attempt to evade the requirements of this regulation and, as such, in violation of this regulation.

Nev. Gaming Comm'n Reg. 8.050.

COUNT ONE
VIOLATION OF NGC REGULATION 5.050(1)
RESPONDENT CDA'S SUBMISSION OF FALSE INFORMATION TO THE BOARD

14. The BOARD realleges and incorporates the above paragraphs by reference as though set forth in full herein.

15. On September 26, 2002, the NGC approved the license of Respondent CDA for a restricted gaming license. In February of 2006, a transfer of interest was approved to transfer 100% of the interest from Paul Schiada to Jecor, LLC, and the NGC found Jeffrey Steven Schwartz suitable as the 100% member and manager of Jecor, LLC. In February 2018, a transfer of interest was approved to transfer 25% of the interest from Jecor, LLC to Respondent CAMPAGNO, along with the appointment of Respondent CAMPAGNO as manager.

16. An application for a transfer of interest was made to the BOARD on January 21, 2026, on behalf of Respondent CAMPAGNO to transfer 75% of the membership interest in Respondent CDA from Jecor, LLC to him. Licensee Jeffrey Steven Schwartz was the 100% member and manager of Jecor, LLC.

17. Prior to the application being filed, the law firm of Hutchison & Steffen, PLLC was retained by Respondent CAMPAGNO on an unrelated matter. Counsel discovered the error and RESPONDENTS self-reported to the BOARD in a letter dated January 13, 2026.

Counsel acknowledged that an improper transfer of interest had occurred prior to their engagement and Respondents recognized they may be subject to discipline.

18. NGC-09, the annual reporting form required of licensees pursuant to NGC Regulation 5.050, was submitted without indicating that the transfer of interest had occurred on April 3, 2025 and March 30, 2026.

19. The NGC-09 forms were attested to and electronically submitted in the name of Licensee Jeffrey Schwartz.

20. The false representation made to the BOARD regarding the actual officers of IHL constitutes a violation of NGC Regulation 5.050(1) and calls into question RESPONDENTS' oversight of the company. NRS 463.170(8).

21. Such violations constitute an unsuitable method of operation and, as such, provide grounds for disciplinary action. *See* NRS 463.170(8) and Nev. Gaming Comm'n Regs. 5.010(2), 5.011(1), and 5.030.

COUNT TWO
VIOLATIONS OF NRS 463.510(1) AND NGC REGULATION 8.050
PURPORTED DISPOSITION OF SECURITIES IN LICENSEE PRIOR TO COMMISSION GRANTING APPROVAL

22. The BOARD realleges and incorporates the above paragraphs by reference as though set forth in full herein.

23. As stated above, the disposition of any interest in a corporation that holds a state gaming license must be approved in advance by the Commission or it is deemed void. NRS 463.510(1).

24. Further, at the time of the purported transfer of interest at issue herein, NGC Regulation 8.050 required advance written notice of a transfer of interest among existing owners to be provided to the BOARD along with other documentation so the BOARD could investigate the proposed transfer and inform the Commission. Nev. Gaming Comm'n Reg. 8.050. Without such notice and documentation, the Commission was unable to approve the transfer. *Id.*

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25. When Respondent CDA applied for its restricted gaming license, it had the following ownership structure in place:

a. Respondent CAMPAGNO – 25% Owner/Manager, Casa Di Amore

b. Licensee Schwartz – 75% Owner/Manager, Casa Di Amore

c. Licensee Schwartz – 100% Owner/Manager, Jecor, LLC

26. On or about January 17, 2024, Licensee Schwartz and Respondent CAMPAGNO entered into a Membership Interest Purchase Agreement whereby Respondent CAMPAGNO agreed to pay Licensee Schwartz $1,200,000 to transfer his 75% interest in Casa Di Amore to him.

27. The agreement was subsequently amended on January 7, 2026 to reflect Jecor, LLC as the seller rather than Licensee Schwartz individually.

28. No written notice or other necessary documentation was provided to the BOARD in advance of the above purported transfer as required in NGC Regulation 8.050.

29. Accordingly, the funds used for the purported transfer of interest were not placed in escrow pending completion of the transaction in violation of NGC Regulation 8.050.

30. Such violations constitute an unsuitable method of operation, and, as such, provide grounds for disciplinary action. *See* NRS 463.170(8) and Nev. Gaming Comm'n Regs. 5.010(2), 5.011(1), and 5.030.

PRAYER FOR RELIEF

WHEREFORE, based upon the allegations contained herein, which constitute reasonable cause for disciplinary action against RESPONDENTS pursuant to NRS 463.310 and/or NGC Regulations 5.010, 5.011, and/or 5.030, the BOARD prays for relief as follows:

1. That the Commission serve a copy of this Complaint on RESPONDENTS pursuant to NRS 463.312(2);

2. That the Commission fine RESPONDENTS a monetary sum pursuant to the parameters defined in NRS 463.310(4) for each separate violation of the provisions of the Nevada Gaming Control Act or the Regulations of the Commission;

3. That the Commission take action against RESPONDENTS' licenses and/or registrations pursuant to the parameters defined in NRS 463.310(4); and

4. For such other and further relief as the Commission may deem just and proper.

DATED this 4th day of November, 2026.

NEVADA GAMING CONTROL BOARD

MIKE DREITZER, Chairman

HON. GEORGE ASSAD (RET.), Member

CHANDENI K. SENDALL, Member

Submitted by:

AARON D. FORD
Attorney General

By: _____
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