

JUN 25 2026

NEVADA GAMING COMMISSION  
CARSON CITY, NEVADA

1 NGC 26-01

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3  
4 **STATE OF NEVADA**

5 **BEFORE THE NEVADA GAMING COMMISSION**

6 NEVADA GAMING CONTROL BOARD,

7 Complainant,

8 vs.

**COMPLAINT**

9 VENETIAN LAS VEGAS GAMING, LLC,  
10 dba THE VENETIAN RESORT LAS  
VEGAS,

11 Respondent.

12 The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD  
13 (BOARD), Complainant herein, by and through its counsel, AARON D. FORD, Attorney  
14 General, MICHAEL P. SOMPS, Senior Deputy Attorney General, and NONA ML  
15 LAWRENCE, Deputy Attorney General, hereby files this Complaint before the Nevada  
16 Gaming Commission (Commission) for disciplinary action against RESPONDENT,  
17 VENETIAN LAS VEGAS GAMING, LLC, dba THE VENETIAN RESORT LAS VEGAS  
18 (VENETIAN), pursuant to Nevada Revised Statute (NRS) 463.310(2), and alleges as  
19 follows:

20 **JURISDICTION**

21 1. Complainant, BOARD, is a regulatory agency of the State of Nevada duly  
22 organized and existing under and by virtue of Chapter 463 of NRS and is charged with the  
23 administration and enforcement of the gaming laws of this State as set forth in Title 41 of  
24 NRS (Nevada Gaming Control Act) and the Regulations of the Commission.

25 2. VENETIAN, located at 3355 South Las Vegas Boulevard, Las Vegas, Nevada,  
26 holds a nonrestricted license issued by the Commission and is licensed to operate gaming  
27 in Nevada.

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RELEVANT LAW

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2           3.     The Nevada Legislature set forth the importance of the gaming industry to  
3 the State of Nevada and its responsibility to the State's inhabitants in NRS 463.0129. The  
4 Legislature specifically set out that the continued growth and success of gaming is  
5 dependent on public confidence and trust and that such "[p]ublic confidence and trust can  
6 only be maintained by strict regulation of all persons, locations, practices, associations and  
7 activities related to the operation of licensed gaming establishments . . . ." See NRS  
8 463.0129.

9           4.     To ensure proper oversight and control over the gaming industry, the Nevada  
10 Legislature has granted the Commission "full and absolute power and authority to . . .  
11 limit, condition, restrict, revoke, or suspend any license . . . or fine any person licensed . . .  
12 for any cause deemed reasonable by the Commission." See NRS 463.1405(4).

13           5.     The BOARD is statutorily charged with determining whether a violation of  
14 the Nevada Gaming Control Act has occurred. See NRS 463.310(1). If the BOARD is  
15 satisfied that discipline is warranted, it shall initiate disciplinary action by filing a  
16 complaint with the Commission. See NRS 463.310(2).

17           6.     The BOARD is authorized to observe the conduct of licensees to ensure that  
18 gaming operations are not being operated in an unsuitable manner or by an unqualified or  
19 unsuitable person. See NRS 463.1405(1) and Commission Regulation 5.040.

20           7.     A person approved by the Commission has an ongoing obligation to meet the  
21 standards required to obtain such approval including, without limitation, to be a person of  
22 good character, honesty and integrity and to refrain from activities and associations which  
23 may impact the interests of Nevada, the regulation of gaming, or the reputation of gaming  
24 in Nevada. Further, failure to continue to meet such applicable standards and  
25 qualifications constitutes grounds for discipline. See NRS 463.170.

26           8.     Commission Regulation 5.011(1) provides in relevant part the following:

27                   The Board and the Commission deem any activity on the  
28                   part of a licensee, registrant, or person found suitable by the  
                  Commission, or an agent or employee thereof, that is inimical to

1 the public health, safety, morals, good order, or general welfare  
2 of the people of the State of Nevada, or that would reflect or tend  
3 to reflect discredit upon the State of Nevada or the gaming  
4 industry, to be an unsuitable method of operation and shall be  
5 grounds for disciplinary action by the Board and the Commission  
6 in accordance with the Nevada Gaming Control Act and the  
7 regulations of the Commission. The following acts or omissions,  
8 without limitation, may be determined to be unsuitable methods  
9 of operation:

10 . . . .

11 (a) Failure to exercise discretion and sound judgment to  
12 prevent incidents which might reflect on the repute of the State  
13 of Nevada and act as a detriment to the development of the  
14 industry.

15 . . . .

16 (k) Failure to conduct gaming operations in accordance  
17 with proper standards of custom, decorum, and decency, or  
18 permit a type of conduct in a gaming establishment that reflects  
19 or tends to reflect on the repute of the State of Nevada and act  
20 as a detriment to the gaming industry.

21 . . . .

22 Nev. Gaming Comm'n Reg. 5.011(1)(a) and (k).

23 9. Commission Regulation 5.030 provides as follows:

24 Violation of any provision of the Nevada Gaming Control  
25 Act or of these regulations by a licensee, the licensee's agent or  
26 employee shall be deemed contrary to the public health, safety,  
27 morals, good order, and general welfare of the inhabitants of the  
28 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.

## **BACKGROUND ALLEGATIONS**

### **I. Background - Federal Law**

10. Prior to July 1, 2007, the Commission and the BOARD regulated cash  
transaction prohibitions, reporting, and record keeping for nonrestricted licensees  
pursuant to Commission Regulation 6A. Regulation 6A was adopted pursuant to an

1 exemption from the U.S. Secretary of the Treasury, allowing such exemption if the laws of  
2 a state for a class of transactions were substantially similar to those imposed under federal  
3 law concerning records and reports on monetary instrument transactions.

4 11. In the early 2000s, several years of discussion took place, both internally and  
5 with the U.S. Department of the Treasury's Financial Crimes Enforcement Network  
6 (FinCEN), regarding the elimination of the exemption. As a result of these discussions, the  
7 BOARD and Commission, with input from the industry, decided that maintaining  
8 Regulation 6A in a manner sufficient to keep the exemption in effect was becoming an  
9 increasing and unnecessary burden.

10 12. Based on the increasing burdens, the Commission and the BOARD decided to  
11 relinquish the exemption and allow the U.S. Department of the Treasury to exclusively  
12 regulate cash transactions, suspicious activity reporting, and anti-money laundering  
13 (AML) programs.

14 13. Thus, on September 21, 2006, the Commission repealed Regulation 6A,  
15 effective June 30, 2007, and reverted control of the regulation of cash transactions,  
16 suspicious activity reporting, and AML programs concerning nonrestricted licensees to the  
17 U.S. Department of the Treasury.

18 14. The U.S. Bank Secrecy Act (BSA) authorizes the U.S. Department of the  
19 Treasury to impose reporting and other requirements on financial institutions, including  
20 casinos, to help detect and prevent money laundering.

21 15. In furtherance of the BSA, 31 C.F.R. § 1021.210 requires casinos to develop  
22 and implement a written AML compliance program reasonably designed to assure and  
23 monitor compliance with the requirements of 31 U.S.C. Chapter 53, subchapter II and  
24 specified regulations.

25 16. As part of satisfying a casino's obligations under the BSA and as part of a  
26 reasonable AML compliance plan, casinos must know their customers and inquire about  
27 source of funds (SOF) as appropriate to a risk-based approach.

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1           17. Although the federal government has exclusive jurisdiction over Nevada  
2 casinos to enforce federal requirements pertaining to cash transactions, suspicious activity  
3 reporting, and AML programs, the Commission and the BOARD remain concerned with  
4 these issues despite the repeal of former Regulation 6A. The Commission and the BOARD  
5 remain concerned because nonrestricted gaming licensees are expected and relied upon to  
6 comply with their obligations under federal law, to self-regulate, and implement sufficient  
7 and appropriate policies, controls, and procedures to ensure proper oversight of their  
8 operations and to ensure they are not used to facilitate money laundering or other criminal  
9 activity.

## 10 **II. Background – BOARD Investigation**

11           18. The BOARD initiated an investigation into the VENETIAN in relation to  
12 Mathew Bowyer (Bowyer) who was a patron of the VENETIAN until approximately March  
13 2024. Bowyer pleaded guilty in federal court on August 9, 2024, to operating an unlawful  
14 gambling business, money laundering, and subscribing to a false tax return.

15           19. During its investigation, the BOARD reviewed extensive amounts of  
16 documents including policies, procedures and other records. The BOARD further  
17 conducted numerous interviews and investigative hearings of executives, casino hosts,  
18 employees and/or other individuals.

19           20. As more fully alleged herein, the BOARD determined that there were  
20 instances of failures of control within the VENETIAN where information of suspicious or  
21 illegal activity in relation to Bowyer was disregarded.

22           21. As more fully alleged herein, the BOARD further found that the VENETIAN  
23 failed to fulfill its obligations as a holder of privileged Nevada gaming approvals and caused  
24 damage to the reputation of the State of Nevada and Nevada's gaming industry.

25           22. Previously, on or about August 23, 2013, the U.S. Department of Justice  
26 entered into a non-prosecution agreement with Las Vegas Sands Corp. (PTC) (LVS)  
27 concerning LVS's failure to file suspicious activity reports, where LVS agreed to "return"  
28 \$47,400,300 to the United States Treasury. LVS further agreed to strengthen its Casino

1 Suspicious Activity Report program. LVS was the parent company of Las Vegas Sands,  
2 LLC, dba Venetian Casino Resort (LVS Venetian), which is the prior entity holding a  
3 nonrestricted gaming license at the location where the VENETIAN is the current  
4 nonrestricted gaming licensee.

5 23. On or about May 19, 2016, the Commission approved a Stipulation for  
6 Settlement resolving a complaint filed by the BOARD against LVS, LVS Venetian, and  
7 Venetian Casino Resort, LLC (NGC 14-10) alleging violations related, in part, to the non-  
8 prosecution agreement the LVS entered into with the U.S. Department Justice where they  
9 agreed to pay a fine in the amount of \$2,000,000.

10 24. The current owners of the VENETIAN closed on the purchase of the operating  
11 assets of the VENETIAN from LVS in February 2022 and assumed all liabilities relevant  
12 to this matter relating to the business.

13 25. Unless the context otherwise requires, all references to the VENETIAN  
14 include the LVS Venetian.

15 **A. BOARD Investigation - The VENETIAN's AML Program**

16 26. At all times relevant herein, the VENETIAN adopted and had in place an  
17 Anti-Money Laundering Policy (AML Policy).

18 27. The VENETIAN's AML Policy created an "AML Program" comprising of "the  
19 set of policies, standard operating procedures ("SOPs") and other program documents,  
20 including systems of internal controls and training programs, which comprise the body of  
21 The Venetian's AML protocols."

22 28. The VENETIAN's AML Policy applied to all "covered persons" which "includes  
23 all managers, officers, and Team Members of The Venetian and its affiliates."

24 29. The VENETIAN's AML Policy provided, in part, that the "Venetian and all  
25 Covered Persons must comply with Applicable AML Law and that neither The Venetian  
26 nor any Covered Person has authority to engage in any activity inconsistent with, or in  
27 violation of the AML Program, this Policy, or Applicable AML Law."

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1           30. The VENETIAN's AML Policy provided, in part, that any "[c]overed Person  
2 with knowledge of a violation of the AML Program, this Policy, or Applicable AML Law  
3 shall report such violation to their superiors and, if the matter is not appropriately  
4 resolved, to the Compliance Officer, the General Counsel, or through the Ethics Hotline."

5           31. The VENETIAN's AML Policy further provided, in part, that all covered  
6 persons are responsible for "following procedures that discourage and detect the use of the  
7 Company to engage in Money Laundering or Structuring activities" and "[r]eporting to  
8 superiors any violations or suspected violations of the AML Program, this Policy, or  
9 Applicable AML Law . . ."

10           32. The VENETIAN's AML Program, through an SOP, stated, in part, that  
11 "[p]atron funds shall never be accepted, and a supervisor must be contacted immediately  
12 if a team member has any suspicion of impropriety with respect to the patron or the  
13 funds."

14           33. The VENETIAN's AML Program, through an SOP, stated, in part, the  
15 following:

16  
17           [T]he Company will maintain Customer Due Diligence (CDD)  
18 guidelines and controls in order to detect and prevent the  
19 laundering of criminally derived funds or other illegal financial  
20 activity. These guidelines and controls will be risk-based for high-  
21 volume credit and/or cash patrons and include: collection,  
22 validation, and analysis of basic identity and source of funds  
23 information, including verifying the patron's link to any entity  
24 transferring funds on the patron's behalf; name matching against  
25 watchlists and public source databases (such as Politically  
26 Exposed Persons); reviews of both front money/marker payments  
27 and play patterns for SAR reporting requirements; and  
28 examination of whether the patron's transaction had a business  
or apparent lawful purpose or was the sort in which the particular  
patron would normally be expected to engage.

Compliance will conduct CDD reviews and be responsible for  
ensuring compliance with applicable anti-money laundering laws  
and regulations through reviewing public source databases and,  
as appropriate, available internal information. The objective of  
the CDD and data analysis will be preparation of preliminary  
SAR recommendations as well as helping inform credit decisions,  
marketing efforts, and a determination of the Company's  
continuing relationship with the patron.

1 34. The VENETIAN's AML Program, through an SOP, stated, in part, the  
2 following:

3 Consistent with a risk-based approach, the casino will review  
4 patrons who have been the subject of multiple SARs to determine  
5 whether banning that patron from further gaming, or increased  
6 monitoring, is appropriate. Compliance will decide which further  
measures are appropriate, if any, and document the results of  
such reviews.

7 **B. BOARD Investigation – Mathew Bowyer**

8 35. Bowyer was a patron of the VENETIAN, from approximately May 1999 until  
9 March 2024 when Bowyer was banned by the VENETIAN, with a two-year hiatus from  
10 2017 – 2018.

11 36. The BOARD's investigation of the VENETIAN related to Bowyer focused on  
12 the years 2019 – 2024.

13 37. On or about April 30, 2019, a Vice President of Player Development employed  
14 by the VENETIAN, (Casino Host) communicated with the Compliance Department to  
15 advise that Bowyer intended to resume gaming at the VENETIAN. Casino Host indicated  
16 that he recalled "some concern regarding [Bowyer's source of wealth]."

17 38. On or about May 28, 2019, the Director of AML Compliance communicated to  
18 Casino Host that "[w]e have completed our review of Mr. Bowyer and, at this time, we find  
19 no information which prevents us from continuing a business relationship with him . . ."  
20 and recognized that additional information may be needed to establish his source of wealth.

21 39. On or about June 11, 2019, in anticipation of a coming trip to the VENETIAN,  
22 Bowyer prepared a Guest Information form representing that he was the "C.E.O." of Green  
23 Forever, a "synthetic turf/grass" business, and that his other assets were comprised of a  
24 \$200,000 Sep IRA and real estate valued at \$3.2 million. Further, Bowyer represented his  
25 income at \$500,000 to \$1 million and that his net worth exceeded \$5 million. Bowyer did  
26 not identify any additional assets, such as investments or banking accounts.

27 40. The VENETIAN's review of the information provided by Bowyer related to  
28 Green Forever showed inconsistencies as compared to information obtained from other

1 sources. The VENETIAN's review also indicated Green Forever's annual sales at no more  
2 than approximately \$94,000.

3 41. On or about June 12, 2019, despite the information and/or lack of information  
4 regarding Bowyer's assets, employment, and source of funds, the VENETIAN concluded  
5 that Bowyer's business and real estate holdings supported his upcoming trip but that an  
6 updated source of wealth review would be conducted.

7 42. Bowyer visited the VENETIAN in June 2019, provided a \$1 million cashier's  
8 check and was allowed to wager. However, because this visit resulted in a net win for  
9 Bowyer, the cashier's check was never negotiated and was returned to him at the conclusion  
10 of his visit.

11 43. Subsequent to June 2019 until Bowyer was banned in March 2024, the  
12 VENETIAN regularly noted suspicions regarding Bowyer, including that there was a lack  
13 of information regarding his source of funds and/or that his source of funds did not support  
14 his level of play.

15 44. From 2019 to 2022, Bowyer provided varying information to the VENETIAN  
16 regarding his employment including that he was i) the CEO of Green Forever, a synthetic  
17 turf business; ii) self-employed in the wagering business; iii) the owner of Pick Enterprises,  
18 Inc., a "wagering/real-estate investor" business; iv) the CEO of PCT Medical, a California  
19 medical business; and/or v) the CEO of Pick, LLC, a "real estate investor/professional  
20 gambler" business.

21 45. From 2019 to 2024, the VENETIAN researched the employment information  
22 provided by Bowyer and was regularly unable to verify the information or noted that  
23 employment information was inconsistent.

24 46. In or around October 2021, the VENETIAN requested a third-party conduct  
25 enhanced due diligence (EDD) regarding Bowyer and regarding an associate of Bowyer who  
26 frequently accompanied Bowyer. The VENETIAN typically only conducted third-party  
27 EDD on international patrons.

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1           47. Among the information in an October 26, 2021, third-party EDD report  
2 provided to the VENETIAN, it noted Bowyer's 2011 bankruptcy, a 2012 monetary  
3 judgment against Bowyer in favor of a Las Vegas casino, and that Bowyer's primary assets  
4 consisted of real estate. Further, the EDD report assessed Bowyer's source of wealth as a  
5 "significant concern" and "identified a lack of concrete public record information about  
6 Bowyer's source of income or current financial standing."

7           48. On or about October 13, 2023, the VENETIAN noted that Bowyer was "a  
8 person of interest in Resorts World investigation and had been approached by law  
9 enforcement." The VENETIAN decided "to stop booking Bowyer and his associates."

10          49. On or about March 11, 2024, the VENETIAN formally banned Bowyer after  
11 receiving negative information regarding Bowyer, including law enforcement inquiries, and  
12 after learning that Bowyer may be an illegal bookmaker.

13          50. Aside from the VENETIAN's failures to fulfill its obligations under its AML  
14 Program as described herein, the BOARD found that Casino Host had actual knowledge  
15 that Bowyer was an illegal bookmaker and failed to comply with the VENETIAN's AML  
16 Program. Specifically:

- 17           a. Casino Host became Bowyer's casino host upon Bowyer returning to the  
18 VENETIAN in 2019.
- 19           b. Sometime in 2019 or early 2020, Bowyer informed Casino Host that  
20 Bowyer "takes bets" and that if Casino Host has anybody to refer to  
21 Bowyer, then Bowyer would "take care" of Casino Host.
- 22           c. Casino Host understood that Bowyer was an illegal bookmaker.
- 23           d. Casino Host understood he had an obligation to report that Bowyer was an  
24 illegal bookmaker pursuant to the VENETIAN's AML Programs but failed  
25 to report the information to anyone at the VENETIAN.

26          51. From 2019 through 2023, the VENETIAN failed to substantiate Bowyer's  
27 source of funds and/or that his source of funds did not support his level of play despite

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1 possessing evidence warranting suspicions regarding his source of funds and/or source of  
2 wealth.

3 52. From 2019 through 2021, Bowyer made approximately 30 trips to the  
4 VENETIAN, made front money deposits totaling approximately \$22.3 million, wagered  
5 millions of dollars, and lost at least \$3.6 million to the VENETIAN. However, beginning  
6 in 2022, Bowyer's play at the VENETIAN decreased significantly, resulting in a loss of  
7 \$137,500 in 2022 and a win of \$49,000 in 2023.

8 53. At some point subsequent to the execution of a federal search warrant to  
9 search Bowyer's home in October 2023, media outlets began to report extensively on  
10 Bowyer, including his activities in Las Vegas casinos, his operation of an illegal  
11 bookmaking business, and his money laundering activities.

12 **COUNT ONE**  
13 **FAILURE TO ESTABLISH BOWYER'S SOURCE OF FUNDS**

14 **VIOLATION OF NRS 463.170 and/or COMMISSION REGULATIONS**  
15 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

18 55. Bowyer was a patron of the VENETIAN and wagered and lost millions of  
19 dollars there.

20 56. Over a period of approximately five years, from 2019 to March 2024, when the  
21 VENETIAN finally banned Bowyer, the VENETIAN failed to conduct adequate due  
22 diligence to substantiate Bowyer's source of funds and/or that his source of funds supported  
23 his level of play.

24 57. The VENETIAN's failure to conduct adequate due diligence to substantiate  
25 Bowyer's source of funds and/or that his source of funds supported his level of play over the  
26 course of approximately five years violated and/or undermined the VENETIAN's AML  
27 Program resulting in the VENETIAN failing to prevent the possible laundering of money  
28 derived from an illegal bookmaking business.

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1 58. The conduct, as described herein, is in violation of NRS 463.170 and/or  
2 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

3 59. The VENETIAN's failure to comply with NRS 463.170 and/or Commission  
4 Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary action  
5 against the VENETIAN. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, and  
6 Commission Regs. 5.010(2) and 5.030.

7 **COUNT TWO**  
8 **FAILURE TO BAN BOWYER**

9 **VIOLATION OF NRS 463.170 and/or COMMISSION REGULATIONS**  
10 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

13 61. Bowyer was a patron of the VENETIAN and wagered and lost millions of  
14 dollars there.

15 62. Over a period of approximately five years, from 2019 to 2024, when the  
16 VENETIAN finally banned Bowyer, the VENETIAN failed to substantiate Bowyer's source  
17 of funds and/or that his source of funds supported his level of play.

18 63. The VENETIAN's failure to timely ban Bowyer violated and/or undermined  
19 the VENETIAN's AML Program, resulting in the VENETIAN's failure to prevent the  
20 possible laundering of money derived from an illegal bookmaking business.

21 64. The conduct, as described herein, is in violation of NRS 463.170 and/or  
22 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

23 65. Each day that Bowyer was allowed to play at the VENETIAN after Casino  
24 Host was informed by Bowyer that Bowyer was an illegal bookmaker constitutes a separate  
25 violation of the Gaming Control Act and its regulations.

26 66. The VENETIAN's failure to comply with NRS 463.170 and/or Commission  
27 Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary action  
28 against the VENETIAN. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, and  
Commission Regs. 5.010(2) and 5.030.



**COUNT FOUR**  
**FAILURE TO CONDUCT AN INVESTIGATION**

**VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS 5.011(1),  
5.011(1)(a), and/or 5.011(1)(k)**

1  
2  
3  
4       75.    The BOARD realleges and incorporates the above paragraphs by reference as  
5 though set forth in full herein.

6       76.    Bowyer was a patron of the VENETIAN and wagered and lost millions of  
7 dollars there.

8       77.    The VENETIAN banned Bowyer in March 2024 after receiving negative  
9 information regarding Bowyer and after learning that Bowyer may be an illegal  
10 bookmaker.

11       78.    The United States Attorney's Office for the Central District of California  
12 (USAO) issued a press release on August 1, 2024, informing the public that Bowyer agreed  
13 to plead guilty to operating an illegal gambling business, money laundering, and  
14 subscribing to a false tax return.

15       79.    Despite banning Bowyer in March 2024 based on negative information and  
16 allegations that Bowyer was an illegal bookmaker, and despite Bowyer ultimately pleading  
17 guilty to operating an illegal bookmaking business, money laundering, and subscribing to  
18 a false tax return, the VENETIAN subsequently failed to conduct an investigation to  
19 determine how and/or why Bowyer was allowed to patronize the VENETIAN and wager  
20 millions of dollars over approximately five years.

21       80.    The conduct, as described herein, is in violation of NRS 463.170 and/or  
22 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

23       81.    The VENETIAN's failure to comply with NRS 463.170 and/or Commission  
24 Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary action  
25 against the VENETIAN.    *See* NRS 463.1405(4), NRS 463.170, NRS 463.615, and  
26 Commission Regs. 5.010(2) and 5.030.

27    ///

28    ///

1 **PRAYER FOR RELIEF**

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

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


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

10 3. That the Commission take action against RESPONDENT'S license(s),  
11 registration(s), and/or finding(s) of suitability pursuant to the parameters defined in NRS  
12 463.310(4); and

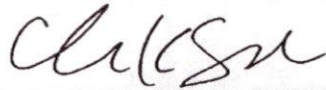
13 4. For such other and further relief as the Commission may deem just and  
14 proper.

15 DATED this 11<sup>th</sup> day of June 2026.

16 NEVADA GAMING CONTROL BOARD

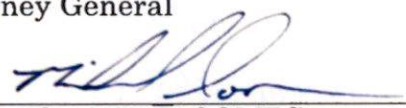
17   
18 MIKE DREITZER, Chairman

19   
20 HON. GEORGE ASSAD (RET.), Member

21   
22 CHANDENI K. SENDALL, Member

23 Submitted by:

24 AARON D. FORD  
Attorney General

25 By:   
26 MICHAEL P. SOMPS  
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