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

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STATE GAMING CONTROL BOARD, )  
Complainant, )

7

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vs.

**COMPLAINT**

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HARRAH'S LAS VEGAS, LLC, dba )  
HARRAH'S CASINO HOTEL LAS VEGAS; )  
DESERT PALACE, INC., dba CAESARS )  
PALACE; CAESARS ENTERTAINMENT )  
CORPORATION, fka HARRAH'S )  
ENTERTAINMENT, INC. )

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Respondents.

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

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The State of Nevada, on relation of its State Gaming Control Board (BOARD),  
Complainant herein, by and through its counsel, CATHERINE CORTEZ MASTO, Attorney  
General, by JOHN S. MICHELA, Senior Deputy Attorney General, hereby files this Complaint  
for disciplinary action against RESPONDENT pursuant to Nevada Revised Statute (NRS)  
463.310(2) and alleges as follows:

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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 NRS  
and the Regulations of the Nevada Gaming Commission.

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2. HARRAH'S LAS VEGAS, LLC, dba HARRAH'S CASINO HOTEL LAS VEGAS  
(HARRAH'S), located at 3475 South Las Vegas Boulevard, Las Vegas, Nevada, holds a  
nonrestricted gaming license.

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3. DESERT PALACE, INC., dba CAESARS PALACE (PALACE), located at 3570 Las  
Vegas Boulevard, Las Vegas, Nevada, holds a nonrestricted gaming license.

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1           8. This continuing obligation is repeated in Nevada Gaming Commission Regulation  
2 5.040, which provides as follows:

3                   A gaming license is a revocable privilege, and no holder  
4 thereof shall be deemed to have acquired any vested rights therein  
5 or thereunder. The burden of proving his qualifications to hold any  
6 license rests at all times on the licensee. The board is charged by  
7 law with the duty of observing the conduct of all licensees to the  
8 end that licenses shall not be held by unqualified or disqualified  
9 persons or unsuitable persons or persons whose operations are  
10 conducted in an unsuitable manner.

11 Nev. Gaming Comm'n Reg. 5.040.

12           9. Nevada Gaming Commission Regulation 5.010 provides as follows:

13                   1. It is the policy of the commission and the board to require  
14 that all establishments wherein gaming is conducted in this state be  
15 operated in a manner suitable to protect the public health, safety,  
16 morals, good order and general welfare of the inhabitants of the State  
17 of Nevada.

18                   2. Responsibility for the employment and maintenance of  
19 suitable methods of operation rests with the licensee, and willful or  
20 persistent use or toleration of methods of operation deemed  
21 unsuitable will constitute grounds for license revocation or other  
22 disciplinary action.

23 Nev. Gaming Comm'n Reg. 5.010.

24           10. Nevada Gaming Commission Regulation 5.011 states, in relevant part, as follows:

25                   The board and the commission deem any activity on the part  
26 of any licensee, his agents or employees, that is inimical to the  
27 public health, safety, morals, good order and general welfare of the  
28 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  
board and the commission. Without limiting the generality of the  
foregoing, the following acts or omissions may be determined to be  
unsuitable methods of operation:

1. Failure to exercise discretion and sound judgment to  
prevent incidents which might reflect on the repute of the State of  
Nevada and act as a detriment to the development of the industry.

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8. Failure to comply with or make provision for compliance  
with all federal, state and local laws and regulations pertaining to  
the operations of a licensed establishment including, without

1 limiting the generality of the foregoing, payment of all license fees,  
2 withholding any payroll taxes, liquor and entertainment taxes and  
3 antitrust and monopoly statutes.

4 . . . .

5 Failure to conduct gaming operations in accordance with  
6 proper standards of custom, decorum and decency, or permit any  
7 type of conduct in the gaming establishment which reflects or tends  
8 to reflect on the repute of the State of Nevada and act as a  
9 detriment to the gaming industry.

10 Nev. Gaming Comm'n Reg. 5.011 (1), (8), and (10).

11 11. Nevada Revised Statute 463.350 states:

12 1. A person under the age of 21 years shall not:

13 (a) Play, be allowed to play, place wagers at, or collect  
14 winnings from, whether personally or through an agent, any  
15 gambling game, slot machine, race book, sports pool or pari-mutuel  
16 operator.

17 (b) Loiter, or be permitted to loiter, in or about any room or  
18 premises wherein any licensed game, race book, sports pool or  
19 pari-mutuel wagering is operated or conducted.

20 (c) Be employed as a gaming employee except in a  
21 counting room.

22 2. Any licensee, employee, dealer or other person who  
23 violates or permits the violation of any of the provisions of this  
24 section and any person, under 21 years of age, who violates any of  
25 the provisions of this section is guilty of a misdemeanor.

26 3. In any prosecution or other proceeding for the violation of  
27 any of the provisions of this section, it is no excuse for the licensee,  
28 employee, dealer or other person to plead that he or she believed  
the person to be 21 years old or over.

NRS 463.350.

12. NRS 202.055 provides in relevant part as follows:

1. Every person who knowingly:

(a) Sells, gives or otherwise furnishes an alcoholic beverage  
to any person under 21 years of age;

(b) Leaves or deposits any alcoholic beverage in any place  
with the intent that it will be procured by any person under 21 years  
of age; or

. . . .

1 (c) Furnishes, gives, or causes to be given any money or  
2 thing of value to any person under 21 years of age with the  
3 knowledge that the money or thing of value is to be used by the  
4 person under 21 years of age to purchase or procure any alcoholic  
5 beverage,  
6 → is guilty of a misdemeanor.

7 NRS 202.055(1).

8 13. Clark County Code 8.20.340 provides as follows:

9 It is unlawful for any licensee or any person employed in a  
10 place of business which sells alcoholic liquor to sell, serve, give  
11 away or dispense alcoholic liquor to any minor. For the purpose of  
12 this section a person shall be deemed to be employed in a place of  
13 business which sells alcoholic liquor if he is clothed or vested with  
14 ostensible authority to make sales, whether actually receiving a  
15 wage or not.

16 Clark County, Nev., County Code 8.20.340.

17 14. Nevada Gaming Commission Regulation 5.030 provides as follows:

18 ***Violation of any provision of the Nevada Gaming Control***  
19 ***Act or of these regulations by a licensee, his agent or employee***  
20 ***shall be deemed*** contrary to the public health, safety, morals, good  
21 order and general welfare of the inhabitants of the State of Nevada  
22 and ***grounds for suspension or revocation of a license.***  
23 Acceptance of a state gaming license or renewal thereof by a  
24 licensee constitutes an agreement on the part of the licensee to be  
25 bound by all of the regulations of the commission as the same now  
26 are or may hereafter be amended or promulgated. ***It is the***  
27 ***responsibility of the licensee to keep himself informed of the***  
28 ***content of all such regulations, and ignorance thereof will not***  
***excuse violations.***

Nev. Gaming Comm'n Reg. 5.030 (emphasis added).

#### BACKGROUND

15. The BOARD has worked vigorously to address with RESPONDENTS their  
deficiencies with regard to NRS 463.350. This, together with NRS 463.350, placed  
RESPONDENTS on notice concerning RESPONDENTS' deficiencies. Specifically:

a. On February 24, 2010, the BOARD sent CAESARS a violation letter  
concerning the ability of an 18-year-old minor gambling at a table game at PALACE for  
almost one-half hour on January 3, 2010, without being asked to present identification.











1 development of the gaming industry and/or reflects or tends to reflect discredit upon the State  
2 of Nevada or the gaming industry.

3 41. The failure of the actions taken by CAESARS to prevent the incidents set out  
4 above is a violation of Nevada Gaming Commission Regulation 5.010 and 5.011 (1) and (10).  
5 This constitutes an unsuitable method of operation, and, as such, is grounds for disciplinary  
6 action. See Nev. Gaming Comm'n Regs. 5.010(2), 5.011, and 5.030.

7 WHEREFORE, based upon the allegations contained herein which constitute  
8 reasonable cause for disciplinary action against RESPONDENTS, pursuant to NRS 463.310,  
9 and Nevada Gaming Commission Regulations 5.010 and 5.030 the STATE GAMING  
10 CONTROL BOARD prays for the relief as follows:

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

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

17 3. That the Nevada Gaming Commission take action against RESPONDENTS' license  
18 or licenses pursuant to the parameters defined in NRS 463.310(4); and

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