



1 NGC Case No.18-04

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STATE OF NEVADA
BEFORE THE NEVADA GAMING COMMISSION

NEVADA GAMING CONTROL BOARD,)
Complainant,)
vs.)
TERESA SERRANO,)
Respondent.)

COMPLAINT FOR REVOCATION OF
REGISTRATION AS GAMING
EMPLOYEE

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

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 Nevada Gaming Control Act and the Regulations of the Nevada Gaming Commission.

2. Respondent, TERESA SERRANO, at all times relevant hereto was and is registered with the BOARD as a gaming employee and, as such, is subject to the provisions of the Nevada Gaming Control Act and the Regulations of the Nevada Gaming Commission.

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1 FACTUAL ALLEGATIONS

2 3. The Las Vegas Sands, LLC, dba Venetian Resort Hotel Casino/Palazzo Resort
3 Hotel Casino (Venetian), is a Nevada licensed gaming establishment holding a
4 nonrestricted gaming license.

5 4. On or about December 25, 2017, Respondent, TERESA SERRANO, redeemed
6 several TITO vouchers using a Venetian TITO redemption kiosk.

7 5. After redeeming the TITO vouchers, Respondent walked away from the TITO
8 redemption kiosk with the resulting cash.

9 6. Venetian video surveillance and TITO transaction reports evidence that the
10 TITO vouchers redeemed by Respondent were improperly obtained by Respondent's
11 husband, Romeo Serrano, during his employment at the Venetian as a slot manager. An
12 example of how one of the TITO vouchers was improperly obtained is as follows:

13 a. On or about December 14, 2017, a patron of the Venetian was playing a
14 slot machine as it went into a tilt mode. Various Venetian slot personnel
15 responded to assist the patron and the patron was eventually hand paid. The slot
16 machine was placed out of service until it could be repaired.

17 b. On or about December 15, 2017, a Venetian slot technician serviced the
18 slot machine. While servicing the slot machine, the Venetian slot technician
19 printed out TITO voucher No. 611355 in the amount of \$921.00 and handed it to
20 Venetian slot manager Romeo Serrano.

21 c. Venetian Slot manager Romeo Serrano placed the \$921.00 TITO voucher
22 in his jacket pocket.

23 d. Venetian Slot manager Romeo Serrano did not place the \$921.00 TITO
24 voucher with the voided tickets during the remainder of his shift as is required
25 pursuant to Venetian policy.

26 e. TITO voucher No. 611355 in the amount of \$921.00 was one of the TITO
27 vouchers redeemed by Respondent on December 25, 2017.

1 7. On or about December 25, 2017, Respondent was detained by Venetian security
2 personnel and BOARD agents responded.

3 8. Respondent admitted that all of the TITO vouchers redeemed by her were
4 provided to her from her husband, Romeo Serrano, to be redeemed.

5 9. Respondent admitted that she knew her husband, Romeo Serrano, found the
6 TITO vouchers on the Venetian gaming floor.

7 10. BOARD agents discovered two (2) stacks of U.S. currency in the amounts of
8 \$1,052.00 and \$879.00 in Respondent's purse that equate to the dollar amount of TITO
9 vouchers redeemed by Respondent on December 25, 2017.

10 11. The TITO vouchers redeemed by Respondent on December 25, 2017 were not
11 the property of Respondent or her husband.

12 12. On or about December 25, 2017, Respondent was arrested by BOARD agents
13 on charges of theft and conspiracy to commit theft.

14 13. Respondent is currently, and was on December 25, 2017, employed by and
15 working as a cage cashier at the Hard Rock Hotel and Casino.

16 **VIOLATION**

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

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

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

1 15. SERRANO, a registered gaming employee, committed, attempted or conspired
2 to commit larceny or embezzlement against the Venetian or upon the premises of the
3 Venetian.

4 WHEREFORE, based upon the allegations contained herein, which constitute
5 grounds for the revocation of Respondent's registration as a gaming employee pursuant to
6 NRS 463.337, the BOARD prays for relief as follows:

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

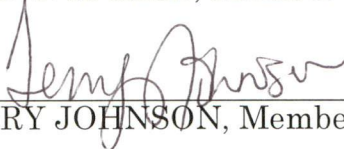
9 2. That the Nevada Gaming Commission revoke Respondent's registration as a
10 gaming employee pursuant to the parameters defined in NRS 463.337.

11 DATED this 4th day of April, 2018.

12 STATE GAMING CONTROL BOARD

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14 _____
15 BECKY HARRIS, Chairwoman

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17 _____
18 SHAWN R. REID, Member

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20 _____
21 TERRY JOHNSON, Member

22 Submitted by:

23 ADAM PAUL LAXALT
24 Attorney General

25 By: 
26 MICHAEL P. SOMPS, ESQ.
27 Senior Deputy Attorney General
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