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STATE OF NEVADA

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BEFORE THE NEVADA GAMING COMMISSION

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NEVADA GAMING CONTROL BOARD,

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Complainant,

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vs.

AMENDED COMPLAINT

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GENTING BERHAD,
PEAK AVENUE LIMITED,
SUASANA DUTA Sdn. Bhd.,
GENTING ASSETS, Inc.,
RWLV HOLDINGS, LLC,

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11

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And

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RESORTS WORLD LAS VEGAS, LLC,
dba RESORTS WORLD LAS VEGAS,

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Respondents.

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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, MICHAEL P. SOMPS, Senior Deputy Attorney General, and NONA ML LAWRENCE, Deputy Attorney General, hereby files this Amended Complaint before the Nevada Gaming Commission (Commission) for disciplinary action against RESPONDENTS, GENTING BERHAD, PEAK AVENUE LIMITED, SUASANA DUTA Sdn. Bhd., GENTING ASSETS, Inc., RWLV HOLDINGS, LLC, and RESORTS WORLD LAS VEGAS, LLC, dba RESORTS WORLD LAS VEGAS (RESORTS WORLD or RWLV), pursuant to Nevada Revised Statute (NRS) 463.310(2), and alleges as follows:

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JURISDICTION

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1. Complainant, BOARD, is a regulatory agency of the State of Nevada duly organized and existing under and by virtue of Chapter 463 of NRS and is charged with the

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1 administration and enforcement of the gaming laws of this State as set forth in Title 41 of
2 NRS (Nevada Gaming Control Act) and the Regulations of the Commission.

3 2. GENTING BERHAD is registered by the Commission as a Publicly Traded
4 Corporation and is found suitable by the Commission as the sole shareholder of SUASANA
5 DUTA Sdn. Bhd. and a shareholder of PEAK AVENUE LIMITED.

6 3. SUASANA DUTA Sdn. Bhd. is registered by the Commission as an
7 intermediary company and found suitable by the Commission as a shareholder of PEAK
8 AVENUE LIMITED.

9 4. PEAK AVENUE LIMITED is registered by the Commission as an
10 intermediary company and found suitable by the Commission as the sole shareholder of
11 GENTING ASSETS, Inc.

12 5. GENTING ASSETS, Inc. is registered by the Commission as an intermediary
13 company and found suitable by the Commission as the sole member and manager of RWLV
14 HOLDINGS, LLC.

15 6. RWLV HOLDINGS, LLC is registered by the Commission as an intermediary
16 company and licensed by the Commission as the sole member of RESORTS WORLD.

17 7. RESORTS WORLD, located at 3000 Las Vegas Boulevard, Las Vegas,
18 Nevada, holds a nonrestricted gaming license issued by the Commission and is licensed to
19 operate gaming in Nevada.

20 RELEVANT LAW

21 8. The Nevada Legislature set forth the importance of the gaming industry to
22 the State of Nevada and its responsibility to the State's inhabitants in NRS 463.0129. The
23 Legislature specifically set out that the continued growth and success of gaming is
24 dependent on public confidence and trust and that such "[p]ublic confidence and trust can
25 only be maintained by strict regulation of all persons, locations, practices, associations and
26 activities related to the operation of licensed gaming establishments" See NRS
27 463.0129.

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

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

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

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

19 13. NRS 463.615 provides the following:

20 If any corporation, partnership, limited partnership,
21 limited-liability company or other business organization holding
22 a license or if any holding company or intermediary company
23 with respect thereto, does not comply with the laws of this state
24 and the regulations of the Commission, the Commission may, in
25 its discretion, do any one, all or a combination of the following:

26 1. Revoke, limit, condition or suspend the license of the
27 corporation, partnership, limited partnership, limited-liability
28 company or other business organization; or

 2. Fine the persons involved, or the corporation,
partnership, limited partnership, limited-liability company or
other business organization holding a license or such holding
company or intermediary company,
in accordance with the laws of this state and the regulations of
the Commission.

NRS 463.615.

1 14. NRS 463.641 provides the following:

2 If any corporation, partnership, limited partnership,
3 limited-liability company or other business organization holding
4 a license is owned or controlled by a publicly traded corporation
5 subject to the provisions of this chapter, or that publicly traded
6 corporation, does not comply with the laws of this state and the
7 regulations of the Commission, the Commission may in its
8 discretion do any one, all or a combination of the following:

1. Revoke, limit, condition or suspend the license of the
licensee; or

2. Fine the persons involved, the licensee or the publicly
traded corporation,
in accordance with the laws of this state and the regulations of
the Commission.

9 NRS 463.641.

10 15. Commission Regulation 5.010 provides the following:

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

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

21 Nev. Gaming Comm'n Reg. 5.010.

22 16. Commission Regulation 5.011(1) provides in relevant part the following:

23 The Board and the Commission deem any activity on the
24 part of a licensee, registrant, or person found suitable by the
25 Commission, or an agent or employee thereof, that is inimical to
26 the public health, safety, morals, good order, or general welfare
27 of the people of the State of Nevada, or that would reflect or tend
28 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. The following acts or omissions,
without limitation, may be determined to be unsuitable methods
of operation:

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

....

1 (e) Catering to, assisting, employing, or associating with,
2 either socially or in business affairs, persons of notorious or
3 unsavory reputation or who have extensive police records, or
4 persons who have defied congressional investigative committees,
5 or other officially constituted bodies acting on behalf of the
6 United States, or any state or jurisdiction of the United States,
7 or persons who are associated with or support subversive
8 movements, or the employing either directly or through a
9 contract, or any other means, of any firm or individual in any
10 capacity where the repute of the State of Nevada or the gaming
11 industry is liable to be damaged because of the unsuitability of
12 the firm or individual or because of the unethical methods of
13 operation of the firm or individual.

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

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21 Nev. Gaming Comm'n Reg. 5.011(1)(a), (e), and (k).

22 17. Commission Regulation 5.030 provides as follows:

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

GENERAL BACKGROUND ALLEGATIONS

I. General Background – Federal Law

18. 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
exemption from the U.S. Secretary of the Treasury allowing such exemption if the laws of

1 a state for a class of transactions were substantially similar to those imposed under federal
2 law concerning records and reports on monetary instruments transactions.

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

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

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

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

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

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

27 25. Although the federal government has exclusive jurisdiction over Nevada
28 casinos to enforce federal requirements pertaining to cash transactions, suspicious activity

1 reporting, and AML programs, the Commission and the BOARD remain concerned with
2 these issues despite the repeal of former regulation 6A. The Commission and the BOARD
3 remain concerned because nonrestricted gaming licensees are expected and relied upon to
4 comply with their obligations under federal law, to self-regulate, and implement sufficient
5 and appropriate policies, controls, and procedures to ensure proper oversight of their
6 operations and to ensure they are not used to facilitate money laundering or other criminal
7 activity.

8 **II. General Background – Board Investigation**

9 26. The BOARD initiated an investigation of RESORTS WORLD, its parent
10 companies, and the activities of Mathew Bowyer (Bowyer) and other individuals who were
11 patrons of RESORTS WORLD while being suspected of engaging in illegal bookmaking, or
12 who had federal felony convictions related to illegal gambling businesses.

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

17 28. As more fully alleged herein, the BOARD's investigation revealed that
18 RESORTS WORLD welcomed certain individuals to wager at its casino over a period of
19 numerous months while RESORTS WORLD executives and employees knew, or should
20 have known, that certain individuals were likely illegal bookmakers.

21 29. As more fully alleged herein, RESORTS WORLD's AML Compliance
22 Committee (AML Committee) and certain RESORTS WORLD executives and employees
23 not only failed to fulfill the purpose and spirit of RESORTS WORLD's AML Program, but
24 also failed to comply with various specific provisions of RESORTS WORLD's AML Program
25 as well as with the Commission's regulations.

26 30. As more fully alleged herein, the BOARD's investigation further revealed that
27 there exists an overall lack of control within RESORTS WORLD and acceptance among
28 RESORTS WORLD executives of a culture where information of suspicious or illegal

1 activity is, at a minimum, negligently disregarded, or, at worst, willfully ignored for
2 financial gain given the overall pressure for RESORTS WORLD to generate revenue and
3 that the bonuses of RESORTS WORLD's executives are directly tied to the financial success
4 of RESORTS WORLD.

5 31. As more fully alleged herein, the BOARD's investigation further revealed that
6 RESORTS WORLD failed to fulfill its obligations as the holder of a privileged Nevada
7 gaming license and caused damage to the reputation of the State of Nevada and Nevada's
8 gaming industry.

9 32. The BOARD recognizes that various media outlets have reported on the
10 individuals related to the matters alleged herein, including allegations of ongoing federal
11 investigations. The BOARD's investigation remains open and on-going, and should the
12 federal government exercise its exclusive jurisdiction as a result of violations of federal law
13 in the context of the BSA and AML laws, RESORTS WORLD, its owners, executives and
14 culpable employees also will be held accountable for any such future actions.

15 **III. General Background - RESORTS WORLD's AML Program and AML**
16 **Committee**

17 33. RESORTS WORLD adopted an AML Program that was approved by
18 RESORTS WORLD's executive management team and that applies to RESORTS WORLD,
19 its officers and employees, and all of RESORTS WORLD's branch/marketing offices.

20 34. RESORTS WORLD's AML Program provides the following:

21 RWLV is committed to maintaining a risk-based AML program
22 that includes effective internal controls and procedures to
23 comply with Title 31 requirements and regulatory guidance and
24 measures reasonably designed to prevent its casinos from being
25 used for money laundering or other criminal activity.

26 Legal compliance and ethical business practices are at the core
27 of our business. The Company regards attempts at money
28 laundering as a threat to the integrity of the company, the
gaming industry, and on the entire financial system. The
Company will not enter into any business relationship or engage
in any activity if it knows or suspects that business relationship
or activity is, in any way, connect [sic] with or facilitates money
laundering, or the funding of terrorist or criminal activities. No
business opportunity is worth the potential risk of becoming

1 involved in money laundering. The Company and its executive
2 management are strongly committed to compliance with all laws
3 and regulations designed to combat money laundering including
4 those rules and regulations requiring the reporting of
5 transactions involving currency, certain money instruments, and
6 suspicious activity.

7 The Company is committed to the education and training of its
8 employees in money laundering prevention. In turn, it is the
9 responsibility of every Company employee to protect the
10 Company from exploitation by money launderers.

11 35. RESORTS WORLD's AML Program requires its employees to internally
12 report unusual and suspicious activity and violations of the AML Program, including
13 violations of internal controls, to their supervisor or the AML Compliance Officer.

14 36. RESORTS WORLD designated an AML Compliance Officer with full
15 responsibility for, and enforcement of, RESORTS WORLD's AML Program, including
16 ensuring the filing of Suspicious Activity Reports (SARs) with FinCEN.

17 37. RESORTS WORLD established an AML Compliance Committee to coordinate
18 implementation of the AML Program and to advise the AML Compliance Officer on matters
19 that include the filing of SARs with FinCEN and making "recommendations on terminating
20 or restricting customer relationships." The AML Committee was comprised of RESORTS
21 WORLD executive leadership and included the AML Officer, President, Chief Financial
22 Officer (CFO), General Counsel (GC), Senior Vice President (V.P.) of Operations, Senior
23 V.P. of Player Development, Director of Surveillance, and Director of Compliance.

24 38. At all times relevant herein, all AML Committee members should have
25 received training regarding Title 31 and AML.

26 39. At all times relevant herein, each member of the AML Committee received, or
27 otherwise had access to, copies of the minutes and/or comments related to all AML
28 Committee meetings.

35 40. RESORTS WORLD's AML Program describes different types of suspicious
36 activities specified by Title 31 and it includes suspicions regarding a patron's source of
37 funds.

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1 41. RESORTS WORLD's AML Program requires that a patron "with incomplete
2 BSA information will be considered barred . . . [and] will be restricted from gaming activity
3 until the required information is obtained." Further, if a patron "poses a significant AML
4 risk, the Company may ban the patron from further activities with the Company."

5 **BACKGROUND ALLEGATIONS**
6 **RELATED TO MATHEW BOWYER**

7 42. On or about December 18, 2021, Bowyer submitted to RESORTS WORLD a
8 \$5,000 credit application, later converted to a \$1 million front-money application. The
9 application listed his personal information, including his bank account information and
10 that he was self-employed as a real estate investor.

11 43. On or about December 18, 2021, RESORTS WORLD conducted a source of
12 funds review on Bowyer which identified a California real estate investment business
13 owned by Bowyer, but it did not include any information regarding the number of
14 employees for the business, a date the business was established, its annual sales, or its
15 legitimacy.

16 44. On or about December 22, 2021, RESORTS WORLD prepared a due diligence
17 report in relation to Bowyer's \$1 million front-money application. There was limited
18 information available regarding Bowyer's business or income and the report indicates
19 Bowyer had a previous bankruptcy and foreclosure. Bowyer was categorized as "medium
20 risk", and the comments indicate "[u]nable to confirm SOF. Applicant owns his own home
21 but no other assets."

22 45. Bowyer first visited RESORTS WORLD in February 2022. He made a \$1
23 million front-money deposit and was allowed to wager even though RESORTS WORLD had
24 not established his source of funds.

25 46. On or about April 14, 2022, RESORTS WORLD entered into an Independent
26 Agent Agreement with Nicole Bowyer. Nicole Bowyer is the spouse of Mathew Bowyer.
27 Sometime in 2022, RESORTS WORLD, at the request of Bowyer, changed Bowyer's casino
28 host to Nicole Bowyer.

1 47. On July 19, 2022, the AML Committee first evaluated Bowyer.
2 Documentation provided to the BOARD by RESORTS WORLD related to the AML
3 Committee meeting on that date reflects, in part, the following regarding Bowyer:

- 4 a. June Total In: \$5,178,804;¹
5 b. June F/M Deposit: \$2,513,000;²
6 c. June Loss: \$642,434;
7 d. Average wager: \$31,815;
8 e. "Unable to confirm SOF. Patron owns his home valued at
9 \$2,203,200 and a condominium valued at \$679,173";
10 f. "Bowyer was listed as a partner for Pick Enterprises, LLC -
11 No information was found online for the business";
12 g. "Patron's spouse, Nicole Bowyer (Sandoval) is an
13 Independent Agent and owns a clothing line . . . with an
14 annual revenue of \$75,000 2021"; and
15 h. "Director of Cage stated that patron is a known 'bookie' and
16 is using his spouse's Independent Host business as a cover."

17 48. The AML Committee was obligated to make recommendations to bar, ban, or
18 otherwise restrict patrons from RESORTS WORLD in accordance with the AML Program.
19 However, despite the information available as of July 19, 2022, the AML Committee did
20 not fulfill its duty to make such a recommendation to bar, ban, or otherwise restrict Bowyer
21 and, instead, Bowyer was allowed to wager millions of dollars at RESORTS
22 WORLD.

23 49. Certain executives had the unilateral authority to bar, ban, or otherwise
24 restrict patrons from RESORTS WORLD. However, despite the information available as of
25 July 19, 2022, RESORTS WORLD executives did not exercise their authority to bar, ban,
26 or otherwise restrict Bowyer from RESORTS WORLD and he was allowed to continue to
27 play and wager millions of dollars.

28 50. Bowyer was again evaluated during the August 17, 2022 AML Committee
meeting. Documentation provided to the BOARD by RESORTS WORLD related to the
AML Committee meeting on that date reflects, in part, the following regarding Bowyer:

....
....

¹ Comprised of cash, "FM/Marker," and "Chips/Churn."
² Comprised of cash and "Travel Comp."

- 1 a. July Total In: \$1,420,013;³
- 2 b. July F/M Deposit: \$565,000;⁴
- 3 c. July Loss: \$551,843;
- 4 d. Average wager: \$17,854;
- 5 e. Reiterated information from prior AML committee meeting,
including "[u]nable to confirm SOF";
- 6 f. Mr. Bowyer's possible spouse is a registered independent
agent under Coco Gaming, LLC and its annual revenue
cannot be determined; and
- 7 g. "VP Compliance requested further review by Director of
Casino Operations and SVP of Casino Operations, for possible
sports betting business affiliation."

8 51. Bowyer lost almost \$1.2 million over a two-month period, while RESORTS
9 WORLD failed to verify his source of funds in support of such losses and while RESORTS
10 WORLD knew, or should have known, that Bowyer was likely engaged in illegal
11 bookmaking.

12 52. The AML Committee was obligated to make recommendations to bar, ban, or
13 otherwise restrict patrons from RESORTS WORLD in accordance with the AML Program.
14 However, despite the information available as of August 17, 2022, the AML Committee did
15 not fulfill its duty to make such a recommendation to bar, ban, or otherwise restrict Bowyer
16 from play and, instead, Bowyer was allowed to continue to wager millions of dollars at
17 RESORTS WORLD.

18 53. Certain executives had the unilateral authority to bar, ban, or otherwise
19 restrict patrons from RESORTS WORLD. However, despite the information available as of
20 August 17, 2022, RESORTS WORLD executives did not exercise their authority to bar,
21 ban, or otherwise restrict Bowyer from RESORTS WORLD and he was allowed to continue
22 to play and wager millions of dollars.

23 54. Bowyer was again evaluated by the AML Committee at its February 21, 2023
24 meeting. Documentation provided to the BOARD by RESORTS WORLD related to the
25 AML Committee meeting on that date reflects, in part, the following regarding Bowyer:

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27 ³ Comprised of "FM" and "Chips/Churn."

28 ⁴ Comprised of cash, chips, and a check.

- 1 a. January Total In: \$1,170,000;⁵
- 2 b. January Loss: \$298,408;
- 3 c. Average wager: \$13,433;
- 4 d. "Mr. Bowyer has been previously reviewed by the Committee
- 5 in June 2022 for CTR analytics. Allegedly, according to the
- 6 Director of the Cage patron is a known 'bookie' and is using
- 7 his spouse's business as a cover." And
- 8 e. "Patron SOF not established other than spouse's income."

9 55. As of February 21, 2023, Bowyer had been wagering and losing millions of
10 dollars at RESORTS WORLD for approximately one year while RESORTS WORLD failed
11 to verify his source of funds and while RESORTS WORLD knew, or should have known,
12 that Bowyer was likely engaged in illegal bookmaking.

13 56. The AML Committee was obligated to make recommendations to bar, ban, or
14 otherwise restrict patrons from RESORTS WORLD in accordance with the AML Program.
15 However, despite the information available as of February 21, 2023, the AML Committee
16 did not fulfill its duty to make such a recommendation to bar, ban, or otherwise restrict
17 Bowyer from play and, instead, Bowyer was allowed to continue to wager millions of dollars
18 at RESORTS WORLD.

19 57. Certain executives had the unilateral authority to bar, ban, or otherwise
20 restrict patrons from RESORTS WORLD. However, despite the information available as of
21 February 21, 2023, RESORTS WORLD executives did not exercise their authority to bar,
22 ban, or otherwise restrict Bowyer from RESORTS WORLD and he was allowed to continue
23 to play and wager millions of dollars.

24 58. Mr. Bowyer was again evaluated during the March 21, 2023, AML Committee
25 meeting. Documentation provided to the BOARD by RESORTS WORLD related to the
26 AML Committee meeting on that date reflects, in part, the following regarding Bowyer:

- 27 a. "Mr. Bowyer was discussed at the previous meeting for CTR
- 28 and Sports Book analytics." Doni Taube "requested that Mr.
- 29 Bowyer's host be changed from himself to his wife Nicole
- 30 Bowyer." Doni Taube "also requested that the word 'bookie'
- 31 be stricken from the January 2023 agenda as that was one
- 32 person's opinion and there was no evidence of such behavior";

⁵ Comprised of "Cash TG" and chips.

- b. "Mr. Bowyer's host is now reported as Nicole Bowyer on the agenda and the word 'bookie' has been stricken from January 2023 agenda";
- c. February Totals In: \$3,779,600;⁶
- d. February Loss: \$426,151;
- e. Average wager: \$31,017;
- f. "Patron has been previously reviewed by the Committee on June 2022" and "again last month"
- g. "Patron SOF established but inconsistent with the level of play."

59. As of March 21, 2023, Bowyer had been wagering and losing millions of dollars at RESORTS WORLD for more than a year while, during that time, RESORTS WORLD failed to verify his source of funds and/or that his source of funds was consistent with his level of play, and while RESORTS WORLD knew, or should have known, that Bowyer was likely engaged in illegal bookmaking.

60. The AML Committee was obligated to make recommendations to bar, ban, or otherwise restrict patrons from RESORTS WORLD in accordance with the AML Program. However, despite the information available as of March 21, 2023, the AML Committee did not fulfill its duty to make such a recommendation to bar, ban, or otherwise restrict Bowyer from play and, instead, Bowyer was allowed to continue to wager millions of dollars at RESORTS WORLD until he was banned in October 2023.

61. Certain executives had the unilateral authority to bar, ban, or otherwise restrict patrons from RESORTS WORLD. However, despite the information available as of March 21, 2023, RESORTS WORLD executives did not exercise their authority to bar, ban, or otherwise restrict Bowyer from RESORTS WORLD and he was allowed to continue to play and wager millions of dollars.

62. RESORTS WORLD executives explained to BOARD agents that it should take no longer than 90 days to complete a source of funds investigation. However, Bowyer was allowed to play at RESORTS WORLD for approximately 20 months without establishing his source of funds and/or that his source of funds was consistent with his level of play.

....

⁶ Comprised of "Cash TG," "FM/Mkr," and chips.

1 63. AML Committee members acknowledged and/or admitted during
2 investigative hearings that the information presented to the AML Committee during its
3 meetings where Bowyer was evaluated reflect that Bowyer's source of funds did not justify
4 his level of play and/or that Bowyer should have been barred.

5 64. RESORTS WORLD and its AML Committee failed to exercise proper due
6 diligence and follow-up to establish Bowyer's source of funds and failed to adequately
7 perform "know-your-customer" (KYC) on Bowyer.

8 65. Aside from failures by the AML Committee and others to fulfill their
9 obligations under RESORTS WORLD's AML Program, certain identified casino hosts
10 employed by RESORTS WORLD, also failed to comply with the AML Program upon
11 learning that Bowyer may be an illegal bookmaker as follows:

12 a. On or about October 1, 2023, RWLV Host 1 and Bowyer, amongst
13 others, were on a RESORTS WORLD arranged marketing trip to an NFL football game in
14 Dallas, Texas.

15 b. On or about October 1, 2023, Bowyer informed RWLV Host 1 that
16 Bowyer "runs a book" and asked RWLV Host 1 to refer clients to Bowyer. Bowyer offered
17 RWLV Host 1 money in return for referring clients to Bowyer. RWLV Host 1 understood
18 that Bowyer was an illegal bookmaker.

19 c. On or about October 1, 2023, RWLV Host 1 provided the name of one of
20 his RESORTS WORLD clients to Bowyer through a text message.

21 d. RWLV Host 1 felt "uneasy" about referring his RESORTS WORLD
22 client to Bowyer and subsequently sent a text message to the client telling him to stay away
23 from Bowyer.

24 e. RWLV Host 1 did not report to RESORTS WORLD that Bowyer
25 informed RWLV Host 1 that Bowyer "runs a book."

26 f. At some point while Damien LeForbes (LeForbes) was a patron at
27 RESORTS WORLD, he informed RWLV Host 2, his casino host, that Bowyer was "taking
28 action" and was an apparent illegal bookmaker.

1 g. RWLV Host 2 did not report to RESORTS WORLD that Bowyer may
2 be an illegal bookmaker.

3 66. A federal search warrant was executed in October 2023 to search Bowyer's
4 home.

5 67. On or about October 6, 2023, Bowyer was banned from RESORTS WORLD.

6 68. On or about March 21, 2024, a media outlet reported that Bowyer's attorney
7 confirmed that Bowyer was a bookmaker.

8 69. At no time prior to approximately October 6, 2023, had Bowyer been barred,
9 banned, or otherwise restricted from RESORTS WORLD.

10 70. At no time between February 2022 and when Bowyer was banned did
11 RESORTS WORLD substantiate that Bowyer's source of funds was consistent with his play
12 or exercise adequate KYC regarding Bowyer.

13 71. RESORTS WORLD allowed Bowyer to play 80 separate days between
14 approximately July 22, 2022, and October 1, 2023. During that period, RESORTS WORLD
15 extended numerous benefits to Bowyer to encourage him to play at RESORTS WORLD
16 including comps, promo chips, gifts, discounts and flights on RESORTS WORLD's jet.
17 Ultimately, over that period, Bowyer lost in excess of \$6.6 million.

18 72. Over the entire time Bowyer was a patron of RESORTS WORLD, Bowyer lost
19 over \$7.9 million.

20 73. On August 9, 2024, in the U.S. District Court for the Central District of
21 California, Bowyer pleaded guilty to federal criminal charges of operating an unlawful
22 gambling business, money laundering, and subscribing to a false tax return.

23 **COUNT ONE**
24 **RELATED TO MATHEW BOWYER - FAILURE TO ESTABLISH SUSPECTED**
BOOKMAKER'S SOURCE OF FUNDS

25 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
26 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

1 75. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
2 dollars at RESORTS WORLD.

3 76. For a period of approximately 20 months, from February 2022, when Bowyer
4 first visited RESORTS WORLD, to October 2023, when RESORTS WORLD finally banned
5 Bowyer, RESORTS WORLD failed to substantiate Bowyer’s source of funds and/or that his
6 source of funds was consistent with his level of play.

7 77. RESORTS WORLD’s failure to establish Bowyer’s source of funds and/or that
8 his source of funds was consistent with his level of play over the course of approximately
9 20 months violated and/or undermined RESORTS WORLD’s AML Program resulting in
10 RESORTS WORLD failing to prevent the possible laundering of money derived from an
11 illegal bookmaking business.

12 78. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
13 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

14 79. RESORTS WORLD’s failure to comply with NRS 463.170(8) and/or
15 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
16 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
17 463.641, and Commission Regs. 5.010(2), and 5.030.

18 **COUNT TWO**
19 **RELATED TO MATHEW BOWYER – FAILURE TO BAR, BAN, OR OTHERWISE**
20 **RESTRICT SUSPECTED ILLEGAL BOOKMAKER**

21 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
22 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

25 81. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
26 dollars at RESORTS WORLD.

27 82. RESORTS WORLD knew, or should have known, no later than July 19, 2022,
28 that Bowyer was likely engaged in an illegal bookmaking business.

.....

1 83. RESORTS WORLD never established Bowyer's source of funds and/or that
2 his source of funds was consistent with his level of play.

3 84. Between on or about July 19, 2022, and on or about October 1, 2023, Bowyer
4 visited RESORTS WORLD 80 separate days and was allowed to wager.

5 85. From on or about July 19, 2022, to October 1, 2023, Bowyer lost over \$6.6
6 million at RESORTS WORLD.

7 86. At no time from on or about July 19, 2022, until on or about October 6, 2023,
8 did RESORTS WORLD bar, ban, or otherwise restrict Bowyer from RESORTS WORLD.

9 87. RESORTS WORLD's failure to bar, ban, or otherwise restrict Bowyer violated
10 and/or undermined RESORTS WORLD's AML Program resulting in RESORTS WORLD
11 failing to prevent the possible laundering of money derived from an illegal bookmaking
12 business.

13 88. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
14 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k):

15 89. Each day that Bowyer was allowed to play at RESORTS WORLD after July
16 19, 2022, constitutes a separate violation of the Gaming Control Act and its regulations.

17 90. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
18 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
19 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
20 463.641, and Commission Regs. 5.010(2), and 5.030.

21 **COUNT THREE**
22 **RELATED TO MATHEW BOWYER - FAILURE OF RWLV HOST 1 TO REPORT**
23 **SUSPECTED BOOKMAKER**

24 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
25 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

28 92. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
dollars at RESORTS WORLD.

1 93. RWLV Host 1, while employed as a RESORTS WORLD casino host, learned
2 on or about October 1, 2023, from Bowyer that Bowyer was an apparent illegal bookmaker.

3 94. RWLV Host 1 failed to report to his supervisor or to the AML Compliance
4 Officer that Bowyer was an apparent illegal bookmaker in violation of RESORTS WORLD's
5 AML Program.

6 95. RESORTS WORLD is responsible for the actions of its agents and employees.
7 See Commission Regulation 5.030.

8 96. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
9 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

10 97. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
11 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
12 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
13 463.641, and Commission Regs. 5.010(2), and 5.030.

14 **COUNT FOUR**
15 **RELATED TO MATHEW BOWYER -RWLV HOST 1 REFERRING PROSPECTIVE**
16 **CUSTOMER TO SUSPECTED ILLEGAL BOOKMAKER**

17 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
18 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

21 99. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
22 dollars at RESORTS WORLD.

23 100. RWLV Host 1, while employed as a RESORTS WORLD casino host, referred
24 a RESORTS WORLD patron and prospective customer to Bowyer for purposes of wagering
25 through Bowyer's apparent illegal bookmaking operation.

26 101. RESORTS WORLD is responsible for the actions of its agents and employees.
27 See Commission Regulation 5.030.

28 102. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

1 103. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
2 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
3 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
4 463.641, and Commission Regs. 5.010(2), and 5.030.

5 **COUNT FIVE**
6 **RELATED TO MATHEW BOWYER - FAILURE OF RWLV HOST 2 TO REPORT**
7 **SUSPECTED ILLEGAL BOOKMAKER**

8 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
9 **5.011(1), 5.011(1)(a), and/or 5.011(1)(k)**

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

12 105. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
13 dollars at RESORTS WORLD.

14 106. RWLV Host 2, while a RESORTS WORLD casino host for LeForbes, was
15 informed at some point by LeForbes that Bowyer was an apparent illegal bookmaker.

16 107. RWLV Host 2 failed to report to his supervisor or to the AML Compliance
17 Officer that Bowyer was an apparent illegal bookmaker in violation of RESORTS WORLD's
18 AML Program.

19 108. RESORTS WORLD is responsible for the actions of its agents and employees.
20 See Commission Regulation 5.030.

21 109. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
22 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

23 110. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
24 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
25 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
26 463.641, and Commission Regs. 5.010(2), and 5.030.

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1 **COUNT SIX**
2 **RELATED TO MATHEW BOWYER - USE OF SUSPECTED BOOKMAKER'S**
3 **SPOUSE AS INDEPENDENT AGENT**

4 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS**
5 **5.011(1), 5.011(1)(a), 5.011(1)(e), and/or 5.011(1)(k)**

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

8 112. Bowyer was a patron of RESORTS WORLD and wagered and lost millions of
9 dollars at RESORTS WORLD.

10 113. On or about April 14, 2022, RESORTS WORLD entered into an independent
11 agent agreement with Nicole Bowyer, who is the spouse of Bowyer.

12 114. RESORTS WORLD knew, or should have known, no later than July 19, 2022,
13 that Nicole Bowyer was the spouse of Bowyer.

14 115. RESORTS WORLD, at the request of Bowyer, changed Bowyer's casino host
15 to his wife, Nicole Bowyer.

16 116. RESORTS WORLD contracted with and continued to use the services of
17 Nicole Bowyer although RESORTS WORLD knew, or should have known, that her spouse,
18 Mathew Bowyer, was a suspected illegal bookmaker and that Bowyer's source of funds was
19 not established.

20 117. RESORTS WORLD failed to prevent Bowyer's spouse, as an independent
21 agent for RESORTS WORLD with Bowyer as her client, from earning substantial
22 commissions derived, in part, from Bowyer's losses at RESORTS WORLD that could have
23 been, or were in fact, derived from an illegal bookmaking business. Thus, RESORTS
24 WORLD failed to prevent the possible illegal laundering of money.

25 118. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
26 Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(e), and/or 5.011(1)(k).

27 119. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
28 Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(e), and/or 5.011(1)(k) is grounds for

1 disciplinary action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS
2 463.615, NRS 463.641, and Commission Regs. 5.010(2), and 5.030.

3 **BACKGROUND ALLEGATIONS**
4 **RELATED TO DAMIEN LeFORBES**

5 120. Damien LeForbes (LeForbes) became a patron of RESORTS WORLD at the
6 time, or soon after, RESORTS WORLD opened in 2021.

7 121. At all times relevant herein, RWLV Host 2 was employed by RESORTS
8 WORLD as a casino host.

9 122. RWLV Host 2 was LeForbes' casino host at RESORTS WORLD.

10 123. In early 2022, LeForbes informed RWLV Host 2 that LeForbes "takes action."
11 RWLV Host 2 understood that LeForbes was an illegal bookmaker but did not report the
12 information to his supervisors at RESORTS WORLD. RWLV Host 2 testified to BOARD
13 agents that he did not tell his supervisors because he "thought that [he] was not the only
14 one that kind of knew and it was kind of looked over."

15 124. According to RWLV Host 2, LeForbes "marketed aggressively" and asked
16 RWLV Host 2 to refer clients to him. RWLV Host 2 referred at least one prospective
17 customer to LeForbes to wager with LeForbes.

18 125. LeForbes was not banned until on or about March 12, 2024, when, as a result
19 of a RESORTS WORLD internal investigation, RWLV Host 2 acknowledged that LeForbes
20 was an illegal bookmaker.

21 126. In or around May 2024, media outlets reported that LeForbes was being
22 investigated by federal authorities in connection with illegal sports betting. Subsequently,
23 on or about August 26, 2024, LeForbes entered into a federal plea agreement for operation
24 of an illegal bookmaking business and related money laundering charges, which was also
25 widely reported.

26 127. On or about May 9, 2024, RWLV Host 2 resigned from RESORTS WORLD.

27 128. From September 1, 2022, to December 16, 2023, LeForbes wagered a total of
28 150 separate days. During that period, RESORTS WORLD extended numerous benefits to

1 LeForbes to encourage him to play there including comps, promo chips, and gifts.
2 Ultimately, over that period, LeForbes lost in excess of \$10 million at RESORTS WORLD.

3 **COUNT SEVEN**
4 **RELATED TO DAMIEN LeFORBES- FAILURE OF RWLV HOST 2 TO REPORT**
5 **SUSPECTED ILLEGAL BOOKMAKER**
6 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS 5.011(1),**
7 **5.011(1)(a), and/or 5.011(1)(k)**

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

10 130. LeForbes was a patron of RESORTS WORLD and wagered and lost millions
11 of dollars at RESORTS WORLD.

12 131. RWLV Host 2, while employed as a RESORTS WORLD casino host for
13 LeForbes, learned in early 2022 from LeForbes that LeForbes was an apparent illegal
14 bookmaker.

15 132. RWLV Host 2 failed to report to his supervisor or to the AML Compliance
16 Officer that LeForbes was an apparent illegal bookmaker in violation of RESORTS
17 WORLD's AML Program.

18 133. RESORTS WORLD is responsible for the actions of its agents and employees.
19 See Commission Regulation 5.030.

20 134. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
21 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

22 135. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
23 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
24 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
25 463.641, and Commission Regs. 5.010(2), and 5.030.

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1 144. LeForbes was a patron of RESORTS WORLD and wagered and lost millions
2 of dollars at RESORTS WORLD.

3 145. RWLV Host 2, while employed as a RESORTS WORLD casino host for
4 LeForbes, learned in early 2022 from LeForbes that LeForbes was an apparent illegal
5 bookmaker.

6 146. RESORTS WORLD knew, or should have known, that LeForbes was an
7 apparent illegal bookmaker.

8 147. At no time from early 2022, until March 2024, did RESORTS WORLD bar,
9 ban, or otherwise restrict LeForbes from RESORTS WORLD resulting in RESORTS
10 WORLD failing to prevent the possible laundering of money derived from an illegal
11 bookmaking business.

12 148. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
13 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

14 149. Each day that LeForbes was allowed to play at RESORTS WORLD after
15 RESORTS WORLD knew, or should have known, that LeForbes was an apparent illegal
16 bookmaker constitutes a separate violation of the Gaming Control Act and its regulations.

17 150. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
18 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
19 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
20 463.641, and Commission Regs. 5.010(2), and 5.030.

21 **COUNT TEN**
22 **RELATED TO RESORTS WORLD'S CULTURE**

23 **VIOLATION OF NRS 463.170(8) and/or COMMISSION REGULATIONS 5.011(1),**
24 **5.011(1)(a), and/or 5.011(1)(k)**

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

27 152. Despite having an AML Program and having apparently trained its
28 employees, RESORTS WORLD allowed a culture to exist at its gaming establishment
where individuals with suspected and actual ties to illegal bookmaking are i) welcomed at

1 RESORTS WORLD, ii) provided comps, gifts, and discounts in an effort to obtain their
2 business, and iii) allowed to wager and lose substantial sums of money at RESORTS
3 WORLD. This culture results in the perception and/or reality that RESORTS WORLD is
4 an avenue to launder funds derived from illegal activity and/or to further criminal activity
5 causing damage to the reputation of the State of Nevada and Nevada's gaming industry.

6 153. The conduct, as described herein, is in violation of NRS 463.170(8) and/or
7 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k).

8 154. RESORTS WORLD's failure to comply with NRS 463.170(8) and/or
9 Commission Regulations 5.011(1), 5.011(1)(a), and/or 5.011(1)(k) is grounds for disciplinary
10 action against RESPONDENTS. See NRS 463.1405(4), NRS 463.170(8), NRS 463.615, NRS
11 463.641, and Commission Regs. 5.010(2), and 5.030.

12 **PRAYER FOR RELIEF**

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

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

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

22 3. That the Commission take action against RESPONDENTS' license(s),
23 registrations, and/or finding(s) of suitability pursuant to the parameters defined in NRS
24 463.310(4); and

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


3 DATED this 20 day of March 2025.

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NEVADA GAMING CONTROL BOARD


KIRK D. HENDRICK, Chairman

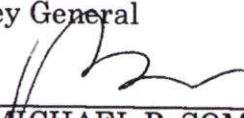

HON. GEORGE ASSAD (RET.), Member


CHANDENI K. SENDALL, Member

Submitted by:

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By:


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