



1 NGC Case No. 18-07

2
3 STATE OF NEVADA
4 BEFORE THE NEVADA GAMING COMMISSION

5 NEVADA GAMING CONTROL BOARD,)
6 Complainant,)
7 vs.)
8 GREGORY WALTER NORRIS,)
9 Respondent.)
10

**COMPLAINT FOR REVOCATION OF
REGISTRATION AS GAMING
EMPLOYEE**

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

16 **JURISDICTION**

17 1. Complainant, BOARD, is an administrative agency of the State of Nevada
18 duly organized and existing under and by virtue of Chapter 463 of NRS and is charged
19 with the administration and enforcement of the Nevada Gaming Control Act and the
20 Regulations of the Nevada Gaming Commission.

21 2. Respondent, GREGORY WALTER NORRIS, at all times relevant hereto was
22 and is registered with the BOARD as a gaming employee and, as such, is subject to the
23 provisions of the Nevada Gaming Control Act and the Regulations of the Nevada Gaming
24 Commission.

25 **FACTUAL ALLEGATIONS**

26 3. Nevada Property 1, LLC, dba The Cosmopolitan of Las Vegas
27 (Cosmopolitan), at all times relevant hereto, was and is a Nevada licensed gaming
28 establishment holding a nonrestricted gaming license.

1 4. From approximately May 2013 to February 2017, Respondent was employed
2 by the Cosmopolitan working as a Pit Supervisor.

3 5. On or about December 16, 2016, the Cosmopolitan commenced an
4 investigation of Respondent due to the suspicious actions of Respondent and Jacqueline
5 Iannotti. Jacqueline Iannotti was subsequently identified as Jacqueline Norris who is the
6 wife of Respondent.

7 6. The Cosmopolitan's investigation revealed that Respondent, over the course
8 of approximately three (3) years, created fraudulent ratings for his wife in the
9 Cosmopolitan's player tracking system using another pit supervisor's logon. In fact,
10 Respondent's wife never actually played during the time that Respondent entered ratings
11 for her.

12 7. Generally, a rating is created by a supervisor who inputs data into the
13 player tracking system regarding a patron's gaming activity that includes items such as
14 the patron's buy in, the patron's average bet, and the patron's losses.

15 8. Ratings result in the accumulation of points for a patron. Points can then be
16 redeemed by a patron in the Cosmopolitan for "comps" such as hotel room nights, food
17 and beverages, free promotional gaming chips, transportation, and entertainment.

18 9. As a result of Respondent's fraudulent activity, Respondent's wife
19 accumulated approximately \$50,000 worth of illegitimate points.

20 10. Respondent's wife redeemed points for "comps" valued at approximately
21 \$17,000 for items such as food and beverages, hotel room nights, and free promotional
22 gaming chips.

23 11. On or about January 19, 2017, BOARD agents responded to the
24 Cosmopolitan and were informed of the findings of the Cosmopolitan's internal
25 investigation of Respondent.

26 12. On or about May 22, 2017, criminal charges were brought against
27 Respondent and, on or about April 10, 2018, Respondent pled guilty to Conspiracy to
28 Commit a Crime – Theft (a Gross Misdemeanor).

 13. Respondent is currently employed by the Tropicana Las Vegas working as a
Table Games Supervisor.

VIOLATION

1
2 14. An individual's registration as a gaming employee may be revoked by the
3 Nevada Gaming Commission if that individual has committed, attempted, or conspired to
4 commit larceny or embezzlement against a gaming licensee or upon the premises of a
5 licensed gaming establishment, or if that individual has been convicted of any gross
6 misdemeanor. Specifically, NRS 463.337(2) provides in relevant part the following:

7 2. The Commission may revoke the registration of a
8 gaming employee if the Commission finds, after a hearing as
9 provided in NRS 463.310 and 463.312 to 463.3145, inclusive,
10 that the gaming employee . . . , subsequent to being registered as
11 a gaming employee:

12
13 (d) Committed, attempted or conspired to commit larceny
14 or embezzlement against a gaming licensee or upon the
15 premises of a licensed gaming establishment;

16
17 (j) Been convicted of any felony or gross misdemeanor,
18 other than one constituting a violation of this chapter or
19 chapter 463B, 464 or 465 of NRS.

20 15. NRS 205.0833(1) provides in relevant part that "[c]onduct denominated theft
21 in NRS 205.0821 to 205.0835, inclusive, constitutes a single offense embracing the
22 separate offenses commonly known as larceny . . . embezzlement . . . and other similar
23 offenses.

24 16. Respondent, a registered gaming employee, committed, attempted or
25 conspired to commit larceny or embezzlement against the Cosmopolitan or upon
26 the premises of the Cosmopolitan, and/or was convicted of a gross misdemeanor.

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

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

