

FILED

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JUSTICE COURT  
LAS VEGAS NEVADA  
JA DEPUTY

8 IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP  
9 CLARK COUNTY, STATE OF NEVADA

10 THE STATE OF NEVADA, )  
11 ) Case No.: 15F06274X  
Plaintiff, )  
12 ) Dept. No.: 4  
vs. )  
13 )  
14 BRYAN MICON, )  
15 )  
Defendant. )

16 CRIMINAL COMPLAINT

17 ADAM PAUL LAXALT, Attorney General of the State of Nevada, by and through his  
18 deputy, SAMUEL R. KERN, complains and charges that the above-named defendant, **BRYAN**  
19 **MICON** (hereinafter "**MICON**"), has committed one (1) count of OPERATING AN  
20 UNLICENSED INTERACTIVE GAMING SYSTEM, a category "B" felony in violation of NRS  
21 463.160(1)(f) and 463.360(3).

22 All of the acts alleged herein have been committed on or between about March 1, 2014  
23 and February 9, 2015, by the above-named Defendant, within the County of Clark, State of  
24 Nevada, in the following manner:

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**COUNT I**  
**OPERATING AN UNLICENSED INTERACTIVE GAMING SYSTEM**  
**CATEGORY "B" FELONY – NRS 463.160(1)(f), 463.360(3)**

That the defendant, **MICON**, in the County of Clark, State of Nevada, did willfully and unlawfully, as owner, lessee, and/or employee, whether for hire or not, either solely or in conjunction with others, operate, carry on, conduct, maintain or expose for play in or from the State of Nevada an interactive gaming system without having first procured, and thereafter maintaining in effect, all federal, state, county and municipal gaming licenses as required by statute, regulation or ordinance or by the governing board of any unincorporated town, to wit:

Between about March 1, 2014, and February 9, 2015, **MICON** willfully operated, carried on, conducted, maintained and/or exposed for play in the State of Nevada an internet gaming poker site under the name "Seals with Clubs," without first procuring and thereafter maintaining in effect the required licenses. The poker site accepted wagers in the form of a digital currency known as Bitcoin.

These actions constitute the crime of Operating An Unlicensed Interactive Gaming System, a category "B" felony in violation of NRS 463.160(1)(f) and 463.360(3), and are a technological crime as defined by NRS 205A.030.

***The Complainant requests an Arrest Warrant be issued at this time pursuant to NRS 171.106.***

That Complainant knows that said crimes occurred and that the Defendant, **BRYAN MICON** committed the same based upon the following: Because Complainant is a Senior Deputy Attorney General, and is in possession of, among other things, a declaration written by Special Agent Ricardo Lopez, known to Complainant to be employed with the Gaming Control Board, a copy of which is attached hereto and hereby incorporated by reference herein, for the limited purpose of securing a warrant of arrest.

All of which is contrary to the form, force and effect of the statutes in such cases made

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1 and provided, and against the peace and dignity of the State of Nevada. Said Complainant  
2 makes this declaration under penalty of perjury.

3  
4 DATED this 25<sup>th</sup> day of April, 2015.

5 SUBMITTED BY

6 ADAM PAUL LAXALT  
7 Attorney General

8 By:   
9 SAMUEL R. KERN  
10 Senior Deputy Attorney General  
11 Nevada Bar No.: 10638

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