

ORIGINAL

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

JUL 06 2015

BY, KRISTEN BROWN
KRISTEN BROWN, DEPUTY

1 **INFM**
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8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, STATE OF NEVADA**

11 THE STATE OF NEVADA,

Case No.: C-15-307604-1

12 Plaintiff,

Dept. No.: IV

13 vs.

14 BRYAN MICON,

15 Defendant.

16 **INFORMATION**

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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Attorney General's Office
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Las Vegas, NV 89101

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.

DATED this 10th day of July, 2015.

SUBMITTED BY

ADAM PAUL LAXALT
Attorney General

By:


SAMUEL R. KERN
Senior Deputy Attorney General
Nevada Bar No.: 10638

Attorneys for State of Nevada