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JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW MARTIN
MYKELL ROBINSON
STEVEN VASQUEZ
Defendant(s).

JC CASE NO: 26-CR-074765-001
JC DEPT NO: 10

CRIMINAL COMPLAINT

That the Defendant(s) above named, within the County of Clark, State of Nevada, on or about January 7, 2025 through and including January 11, 2025, committed one or more of the following crime(s), as follows to wit:

COMMISSION OF A FRAUDULENT ACT IN A GAMING ESTABLISHMENT (Category C Felony - NRS 465.070, 465.088 - NOC 62330), CONSPIRACY TO CHEAT AT GAMBLING GAME (Category C Felony - NRS NRS 465.015, 465.083, 465.088 - NOC 62344) and LAUNDER OR ATTEMPT TO LAUNDER MONEY OR PROPERTY (Category C Felony - NRS 207.195(1) - NOC 61694)

COUNT 1 - COMMISSION OF A FRAUDULENT ACT IN A GAMING ESTABLISHMENT

MATTHEW MARTIN, MYKELL ROBINSON, and STEVEN VASQUEZ did on or between January 7, 2025 , through and included January 11, 2025, willfully, unlawfully and feloniously, at BETMGM LLC, 3400 South Las Vegas Boulevard, Las Vegas, Clark County, Nevada, did play college basketball and claim, collect or take, or attempt to claim, collect or

1 take, money or anything of value, \$15,950 U.S. Currency, in or from a gambling game, with
2 intent to defraud, by using the BETMGM, LLC Sports Betting Mobile Application to place
3 college basketball wagers while having conspired with a player in those games such that the
4 player altered his game performance such that defendant could claim wins on those wagers
5 and collect \$15,950 U.S. Currency in proceeds and doing so with intent to defraud BETMGM,
6 LLC, the defendant(s) being criminally liable under one or more of the following principles
7 of criminal liability, to wit: (1) by directly committing this crime; and/or (2) by aiding or
8 abetting in the commission of this crime, with the intent that this crime be committed, by
9 counseling, encouraging, hiring, commanding, inducing and/or otherwise procuring the other
10 to commit the crime; and/or (3) pursuant to a conspiracy to commit this crime, with the intent
11 that this crime be committed, defendant and unnamed co-conspirator(s) aiding or abetting
12 and/or conspiring by defendant and unnamed co-conspirator(s) acting in concert throughout.

13 COUNT 2 - CONSPIRACY TO CHEAT AT GAMBLING GAME

14 MATTHEW MARTIN, MYKELL ROBINSON and STEVEN VASQUEZ did on or
15 between January 7, 2025, through and included January 11, 2025, willfully, unlawfully, and
16 feloniously conspire with each other and another unnamed person to commit a crime Cheating
17 at Gambling, by the defendant(s) and/or the conspirator(s) committing the acts as set forth in
18 Count(s) 1, said acts being incorporated by this reference as though fully set forth herein.

19 COUNT 3 - LAUNDER OR ATTEMPT TO LAUNDER MONEY OR PROPERTY

20 with ROBINSON AND STEVEN VASQUEZ did on or about January 7, 2025,
21 willfully, unlawfully, and feloniously conduct financial transactions involving a monetary
22 instrument with the intent to further any unlawful activity and/or with the knowledge that the
23 transaction concealed the location, source, ownership or control of the monetary instrument or
24 other property and/or with the knowledge that the transaction evaded any provision of federal
25 or state law that requires the reporting of a financial transaction, by transferring money through
26 outside parties to avoid a link between the two for purposes of sports betting with the
27 knowledge that the transactions concealed the location, source, ownership, or control of the
28 monetary instrument.

1 All of which is contrary to the form, force and effect of Statutes in such cases made and
2 provided and against the peace and dignity of the State of Nevada. Complainant makes this
3 declaration subject to the penalty of perjury.
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