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STATE OF NEVADA

5

BEFORE THE NEVADA GAMING COMMISSION

6

NEVADA GAMING CONTROL BOARD, )

7

Complainant,

8

vs.

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HAROLD DOUGLAS HOLDER;  
THE HOLDER GROUP, LLC;  
THE HOLDER GROUP SHARKEY'S, LLC,  
dba SHARKEY'S NUGGET;  
THE HOLDER GROUP SUNDANCE, LLC,  
dba SUNDANCE CASINO,

COMPLAINT

12

Respondents.

13

The State of Nevada, on relation of its Nevada Gaming Control Board (BOARD),  
Complainant herein, by and through its counsel, ADAM PAUL LAXALT, Attorney General, and  
JOHN S. MICHELA, Senior Deputy Attorney General, hereby files this Complaint for  
disciplinary action against Respondents pursuant to Nevada Revised Statute  
(NRS) 463.310(2) and alleges as follows:

19

1. Complainant, BOARD, is an administrative agency of the State of Nevada duly  
organized and existing under and by virtue of chapter 463 of NRS and is charged with the  
administration and enforcement of the gaming laws of this state as set forth in Title 41 of NRS  
and the Regulations of the Nevada Gaming Commission.

23

2. Respondent THE HOLDER GROUP SHARKEY'S, LLC, dba SHARKEY'S NUGGET  
(SHARKEY'S), located at 1440 North US 395 Highway, Gardnerville, Nevada is a  
nonrestricted licensee and is licensed to operate gaming in Nevada.

26

3. Respondent THE HOLDER GROUP SUNDANCE, LLC, dba SUNDANCE CASINO  
(SUNDANCE) located at 33 West Winnemucca Boulevard, Winnemucca, Nevada is a  
nonrestricted licensee and is licensed to operate gaming in Nevada.

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Office of the Attorney General  
Gaming Division  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511

1 4. Respondent THE HOLDER GROUP, LLC (HOLDER GROUP) is a holding company  
2 registered with the Nevada Gaming Commission to hold a 100 percent interest in SHARKEY'S  
3 and a 100 percent interest in SUNDANCE.

4 5. Respondent HAROLD DOUGLAS HOLDER (HOLDER) has been approved by the  
5 Nevada Gaming Commission to hold a 100 percent interest in HOLDER GROUP and to be the  
6 member and manager of both SHARKEY'S and SUNDANCE.

7 **RELEVANT LAW**

8 6. The Nevada Legislature has declared under NRS 463.0129(1) that:

9 (a) The gaming industry is vitally important to the economy  
10 of the State and the general welfare of the inhabitants.

11 (b) The continued growth and success of gaming is  
12 dependent upon public confidence and trust that licensed gaming  
13 and the manufacture, sale and distribution of gaming devices and  
14 associated equipment are conducted honestly and competitively,  
15 that establishments which hold restricted and nonrestricted licenses  
16 where gaming is conducted and where gambling devices are  
17 operated do not unduly impact the quality of life enjoyed by  
18 residents of the surrounding neighborhoods, that the rights of the  
19 creditors of licensees are protected and that gaming is free from  
20 criminal and corruptive elements.

21 (c) Public confidence and trust can only be maintained by  
22 strict regulation of all persons, locations, practices, associations  
23 and activities related to the operation of licensed gaming  
24 establishments, the manufacture, sale or distribution of gaming  
25 devices and associated equipment and the operation of inter-  
26 casino linked systems.

27 (d) All establishments where gaming is conducted and  
28 where gaming devices are operated, and manufacturers, sellers  
and distributors of certain gaming devices and equipment, and  
operators of inter-casino linked systems must therefore be  
licensed, controlled and assisted to protect the public health,  
safety, morals, good order and general welfare of the inhabitants of  
the State, to foster the stability and success of gaming and to  
preserve the competitive economy and policies of free competition  
of the State of Nevada.

(e) To ensure that gaming is conducted honestly,  
competitively and free of criminal and corruptive elements, all  
gaming establishments in this state must remain open to the  
general public and the access of the general public to gaming  
activities must not be restricted in any manner except as provided  
by the Legislature.

NRS 463.0129(1).

.....

.....

1           7. The Nevada Gaming Commission has full and absolute power and authority to limit,  
2 condition, restrict, revoke or suspend any license, or fine any person licensed, for any cause  
3 deemed reasonable. See NRS 463.1405(4).

4           8. The BOARD is authorized to observe the conduct of licensees in order to ensure  
5 that the gaming operations are not being conducted in an unsuitable manner. See  
6 NRS 463.1405(1).

7           9. This continuing obligation is repeated in Nevada Gaming Commission Regulation  
8 5.040, which provides as follows:

9                   A gaming license is a revocable privilege, and no holder  
10 thereof shall be deemed to have acquired any vested rights therein  
11 or thereunder. The burden of proving his qualifications to hold any  
12 license rests at all times on the licensee. The board is charged by  
13 law with the duty of observing the conduct of all licensees to the  
14 end that licenses shall not be held by unqualified or disqualified  
15 persons or unsuitable persons or persons whose operations are  
16 conducted in an unsuitable manner.

17 Nev. Gaming Comm'n Reg. 5.040.

18           10. Nevada Gaming Commission Regulation 5.010 further provides that:

19                   1. It is the policy of the commission and the board to require  
20 that all establishments wherein gaming is conducted in this state be  
21 operated in a manner suitable to protect the public health, safety,  
22 morals, good order and general welfare of the inhabitants of the  
23 State of Nevada.

24                   2. Responsibility for the employment and maintenance of  
25 suitable methods of operation rests with the licensee, and willful or  
26 persistent use or toleration of methods of operation deemed  
27 unsuitable will constitute grounds for license revocation or other  
28 disciplinary action.

Nev. Gaming Comm'n Reg. 5.010.

11. NRS 463.170 states in relevant part the following:

2. An application to receive a license or be found suitable  
must not be granted unless the Commission is satisfied that the  
applicant is:

- (a) A person of good character, honesty and integrity;
- (b) A person whose prior activities, criminal record, if any,  
reputation, habits and associations do not pose a threat to the  
public interest of this State or to the effective regulation and control  
of gaming or charitable lotteries, or create or enhance the dangers

1 of unsuitable, unfair or illegal practices, methods and activities in  
2 the conduct of gaming or charitable lotteries or in the carrying on of  
the business and financial arrangements incidental thereto; and

3 (c) In all other respects qualified to be licensed or found  
suitable consistently with the declared policy of the State.

4 3. A license to operate a gaming establishment or an inter-  
casino linked system must not be granted unless the applicant has  
5 satisfied the Commission that:

6 (a) The applicant has adequate business probity,  
competence and experience, in gaming or generally; and

7 (b) The proposed financing of the entire operation is:

8 (1) Adequate for the nature of the proposed operation; and

(2) From a suitable source.

9 → Any lender or other source of money or credit which the  
Commission finds does not meet the standards set forth in  
10 subsection 2 may be deemed unsuitable.

11 4. An application to receive a license or be found suitable  
constitutes a request for a determination of the applicant's general  
12 character, integrity, and ability to participate or engage in, or be  
associated with gaming or the operation of a charitable lottery, as  
13 appropriate. Any written or oral statement made in the course of an  
official proceeding of the Board or Commission by any member  
14 thereof or any witness testifying under oath which is relevant to the  
purpose of the proceeding is absolutely privileged and does not  
15 impose liability for defamation or constitute a ground for recovery in  
any civil action.

16 . . . .

17 8. Any person granted a license or found suitable by the  
Commission shall continue to meet the applicable standards and  
18 qualifications set forth in this section and any other qualifications  
established by the Commission by regulation. The failure to  
19 continue to meet such standards and qualifications constitutes  
20 grounds for disciplinary action.

21 NRS 463.170(2), (3), (4), and (8).

22 12. Nevada Revised Statute 368A.160 states, in relevant part, as follows:

23 1. Each person responsible for maintaining the records of a  
taxpayer shall:

24 (a) Keep such records as may be necessary to determine  
the amount of the liability of the taxpayer pursuant to the provisions  
25 of this chapter;

(b) Preserve those records for:

26 (1) At least 5 years if the taxpayer is a licensed gaming  
establishment or until any litigation or prosecution pursuant to this  
chapter is finally determined, whichever is longer; or

27 (2) At least 4 years if the taxpayer is not a licensed  
gaming establishment or until any litigation or prosecution pursuant  
28 to this chapter is finally determined, whichever is longer; and

1 (c) Make the records available for inspection by the Board  
2 or the Department upon demand at reasonable times during regular  
3 business hours.

4 2. The Commission and the Department may adopt  
5 regulations pursuant to NRS 368A.140 specifying the types of  
6 records which must be kept to determine the amount of the liability  
7 of a taxpayer for the tax imposed by this chapter.

8 NRS 368A.160 (1) and (2).

9 13. Nevada Administrative Code 368A.500 states:

10 A taxpayer shall:

11 1. Record all sales which are taxable pursuant to chapter  
12 368A of NRS in a manner that reflects the amount of each taxable  
13 sale, unless the taxpayer uses an alternative accounting procedure  
14 approved by the Chairman.

15 2. Keep records evidencing any exemption from the tax  
16 imposed by chapter 368A of NRS of live entertainment provided at  
17 the licensed gaming establishment of the taxpayer.

18 3. Make its records available for audit by the Board at any  
19 reasonable time.

20 NAC 368A.500.

21 14. Nevada Gaming Commission Regulation 5.011 states, in relevant part, as follows:

22 The board and the commission deem any activity on the part  
23 of any licensee, his agents or employees, that is inimical to the  
24 public health, safety, morals, good order and general welfare of the  
25 people of the State of Nevada, or that would reflect or tend to  
26 reflect discredit upon the State of Nevada or the gaming industry, to  
27 be an unsuitable method of operation and shall be grounds for  
28 disciplinary action by the board and the commission in accordance  
with the Nevada Gaming Control Act and the regulations of the  
board and the commission. Without limiting the generality of the  
foregoing, the following acts or omissions may be determined to be  
unsuitable methods of operation:

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

.....

8. Failure to comply with or make provision for compliance  
with all federal, state and local laws and regulations pertaining to  
the operations of a licensed establishment including, without  
limiting the generality of the foregoing, payment of all license fees,  
withholding any payroll taxes, liquor and entertainment taxes and  
antitrust and monopoly statutes.

Nev. Gaming Comm'n Regs. 5.011(1), and (8).

1 15. Nevada Gaming Commission Regulation 5.110 states, in relevant part, as follows:

2 2. The amount of a progressive payoff schedule shall be  
3 conspicuously displayed at or near the games or machines to which  
4 the payoff schedule applies. Each licensee shall record the base  
5 amount of each progressive payoff schedule when first exposed for  
6 play and subsequent to each payoff. At least once a day each  
7 licensee shall log the amount of each progressive payoff schedule  
8 at the licensee's establishment except for those that can be paid  
9 directly from a slot machine's hopper or those offered in conjunction  
10 with an inter-casino linked system. Explanations for reading  
11 decreases shall be maintained with the progressive logs. When the  
12 reduction is attributable to a payoff, the licensee shall record the  
13 payoff form number on the log or have the number reasonably  
14 available.

15 . . . .

16 5. A licensee shall not reduce the amount of a progressive  
17 payoff schedule or otherwise eliminate a progressive payoff  
18 schedule unless:

19 (a) A player wins the progressive payoff schedule;

20 (b) The licensee adjusts the progressive payoff schedule to  
21 correct a malfunction or to prevent the display of an amount greater  
22 than a limit imposed pursuant to subsection 4, and the licensee  
23 documents the adjustment and the reasons for it;

24 (c) The licensee distributes the entire incremental amount to  
25 another single progressive payoff schedule on similar game(s) or  
26 machine(s) at the licensee's establishment and:

27 (1) The licensee documents the distribution;

28 (2) Any game or slot machine offering the payoff schedule  
to which the licensee distributes the incremental amount does not  
require that more money be played on a single play to win the  
payoff schedule than the game or slot machine from which the  
incremental amount is distributed unless the incremental amount  
distributed is increased in proportion to the increase in the amount  
of the wager required to win the payoff schedule;

(3) If from a slot machine, any slot machine offering the  
payoff schedule to which the incremental amount is distributed  
complies with the minimum theoretical payout requirement of  
Regulation 14.040(1); and

(4) The distribution is completed within 30 days after the  
progressive payoff schedule is removed from play or within such  
longer period as the chairman may for good cause approve;

(d) For games other than slot machines, the incremental  
amount may be distributed within 90 days of removal through a  
concluding contest, tournament or promotion and the contest,  
tournament or promotion is conducted with a game(s) similar to the  
game(s) from which the amounts are distributed; or

1 (e) The chairman, upon a showing of exceptional  
2 circumstances, approves a reduction, elimination, distribution, or  
3 procedure not otherwise described in this subsection, which  
approval is confirmed in writing.

4 Nev. Gaming Comm'n Reg. 5.110 (2) and (5).

5 16. Nevada Gaming Commission Regulation 6.040 states, in relevant part, as follows:

6 1. Each licensee, in such manner as the chairman may  
7 approve or require, shall keep accurate, complete, legible, and  
8 permanent records of all transactions pertaining to revenue that is  
taxable or subject to fees under chapters 463 and 464 of NRS. . . .

9 2. Each nonrestricted licensee shall keep general accounting  
10 records on a double entry system of accounting, maintaining  
detailed, supporting, subsidiary records, including:

11 (a) Detailed records identifying revenues, expenses, assets,  
12 liabilities, and equity for each establishment; . . .

13 Nev. Gaming Comm'n Reg. 6.040(1) and (2)(a).

14 17. Nevada Gaming Commission Regulation 6.060 states:

15 Each licensee shall provide the audit division, or the tax and  
16 license division, upon request, with the records required to be  
17 maintained by Regulation 6. Unless the chairman approves or  
18 requires otherwise in writing, each licensee shall retain all such  
19 records within Nevada for at least 5 years after they are made.  
20 Failure to keep and provide such records is an unsuitable method of  
21 operation.

22 Nev. Gaming Comm'n Reg. 6.060.

23 18. Nevada Gaming Commission Regulation 6.100 states, in relevant part, as follows:

24 As used in this section "licensees" mean Group II licensees  
25 and "chairman" means the chairman or other member of the state  
26 gaming control board.

27 . . . .

28 6. Not later than 30 days after service of written notice that  
the internal control procedures adopted or revised pursuant to this  
section are effective, each licensee shall comply with the  
procedures. The chairman, in his sole and absolute discretion, may  
extend the time for complying with this subsection.

7. A licensee may not implement internal control procedures  
that deviate from the published internal control procedures unless  
the deviations are approved in writing by the chairman.

8. Failure to follow the internal control procedures issued by  
the chairman, or approved deviations from the procedures, is an  
unsuitable method of operation.

Nev. Gaming Comm'n Reg. 6.100(6), (7), and (8).

1 19. Internal Control Procedures Slots (ICP Slots) and Internal Control  
2 Procedures Cage and Credit (ICP C&C) apply to Group II licensees. All citations  
3 to ICP Slots refer to Version 3.1. Version 3.1 of ICP Slots and ICP C&C have an  
4 effective date of February 14, 2009.

5 20. ICP Slots No. 83 states:

6 A report is produced at least monthly showing accurate  
7 month-to-date, year-to-date, and if practicable, life-to-date actual  
8 hold percentage computations for individual machines and a  
9 comparison to each machine's theoretical hold percentage  
10 previously discussed.

11 Note 1: Actual hold = dollar amount of slot machine  
12 statistical win divided by dollar amount of coin-in. The wagering  
13 activity recorded on the coin-in meter of the slot machine includes  
14 all cashable and non-cashable credits wagered. The slot machine  
15 statistical win represents all drop and payout activity occurring  
16 through the slot machine regardless of whether the activity is  
17 subject to gross gaming revenue taxation. The drop and payout  
18 activity occurring through the slot machine includes the following:

- 19 a. The payout activity represents only slot machine payouts  
20 associated with the manufacturer's payable of the slot  
21 machine. Jackpot payouts (as defined by Regulation 1.140)  
22 and fills recorded in the slot analysis report do not include  
23 promotional payouts and/or bonus payouts that are not  
24 reflected on the payable of the slot machine and/or not  
25 included in the calculation of the slot machine's theoretical hold  
26 percentage.
- 27 b. The drop activity recorded in the slot analysis report includes all  
28 amounts placed into the coin or bill acceptor of the slot machine  
(e.g., free play wagering instruments accepted by the bill  
validator of the slot machine are included in the drop amount) or  
electronic money transfers made to the slot machine for  
wagering purposes.

As a result, the slot machine statistical win recorded in the slot  
analysis report may not equal the amount of win reported on the  
NGC tax returns.

Note 2: All categories required in Section A of the NGC-31  
must be reflected in this report.

Note 3: "Life-to-Date" represents at least a previous two-year  
cumulative basis.

ICP Slots No. 83.

21. Nevada Gaming Commission Regulation 6.110 states, in relevant part, as follows:

12. For payout receipts and wagering vouchers issued at a  
slot machine offered for play at a gaming establishment that  
operates under a nonrestricted license:



1 (a) The redemption value shall be deducted from gross  
2 revenue as a jackpot payout in the month the receipt or voucher is  
3 issued at the slot machine.

4 (b) Such receipts and wagering vouchers shall be deemed  
5 expired if not redeemed on or before the expiration date printed on  
6 the payout receipt or wagering voucher or within 180 days of  
7 issuance, whichever period is less. For payout receipts or wagering  
8 vouchers that have been deemed expired under this section, the  
9 licensee shall:

10 (1) Include 25 percent of the redemption value in reported  
11 gross revenue in the month that the payout receipt or wagering  
12 voucher expired; and

13 (2) On or before the 15th day of the month following the end  
14 of each calendar quarter:

15 (i) Report to the Commission the total redemption value of all  
16 unredeemed payout receipts and wagering vouchers that expired  
17 during the preceding calendar quarter; and

18 (ii) Remit to the Commission 75 percent of the total  
19 redemption value of all unredeemed payout receipts and wagering  
20 vouchers that expired during the preceding calendar quarter.

21 (c) While under no legal obligation to do so, a licensee may  
22 allow a patron to redeem a payout receipt or wagering voucher that  
23 has been deemed expired pursuant to this section. In such cases:

24 (1) If any portion of the redemption value of the expired  
25 payout receipt or wagering voucher had been included in reported  
26 gross revenue, the licensee shall deduct that amount from reported  
27 gross revenue for the month the receipt or voucher was redeemed.

28 (2) If redeemed in the same quarter it expired, no portion of  
the redemption value of the payout receipt or wagering voucher is to  
be remitted to the Commission, nor is any portion of the redemption  
value to be included in the quarterly report to the Commission.

(3) If any portion of the redemption value of the expired  
payout receipt or wagering voucher was previously remitted to the  
Commission, the licensee shall deduct that amount from the next  
quarterly payment due the Commission up to the total amount due  
for that quarter. Any remaining amount shall be deducted in the  
same manner from amounts due in subsequent quarters until the  
amount has been fully deducted.

(d) A record of all expired payout receipts and wagering  
vouchers shall be created and maintained in accordance with the  
record keeping requirements set forth in regulations 6.040 and  
6.060.

(e) For purposes of this section, the term "slot machine"  
means a gaming device for which gross revenue is calculated  
pursuant to the method described under section 2 above.

(f) This section only applies to payout receipts and wagering  
vouchers issued at a slot machine after June 30, 2011. For payout

1 receipts and wagering vouchers issued at a slot machine on or  
2 before June 30, 2011, the requirements of section 11 apply.

3 Nev. Gaming Comm'n Reg. 6.110 (12).

4 22. Nevada Gaming Commission Regulation 6.150 states in relevant part as follows:

5 1. The chairman may adopt or revise a bankroll formula that  
6 specifies the minimum bankroll requirements applicable to restricted  
7 gaming licensees, nonrestricted gaming licensees and persons  
8 licensed as an operator of an inter-casino linked system or as an  
operator of a slot machine route, along with instructions for  
computing available bankroll.

9 . . . .

10 5. Each restricted gaming licensee, nonrestricted gaming  
11 licensee and each person licensed as an operator of an inter-casino  
12 linked system or as an operator of a slot machine route shall  
13 maintain in accordance with the bankroll formula adopted by the  
14 chairman pursuant to the requirements of this section, cash or cash  
15 equivalents in an amount sufficient to reasonably protect the  
16 licensee's or operator's patrons against defaults in gaming debts  
17 owed by the licensee or operator. If at any time the licensee's or  
18 operator's available cash or cash equivalents should be less than the  
amount required by this section, the licensee or operator shall  
immediately notify the board of this deficiency and shall also detail  
the means by which the licensee shall comply with the minimum  
bankroll requirements. Failure to maintain the minimum bankroll  
required by this section, or a higher bankroll as required by the  
chairman pursuant to this section, or failure to notify the board as  
required by this section, is an unsuitable method of operation.

19 Nev. Gaming Comm'n Reg. 6.150(1) and (5).

20 23. Nevada Gaming Commission Regulation 5.030 provides as follows:

21 *Violation of any provision of the Nevada Gaming Control Act*  
22 *or of these regulations by a licensee, his agent or employee shall*  
23 *be deemed contrary to the public health, safety, morals, good order*  
24 *and general welfare of the inhabitants of the State of Nevada and*  
25 *grounds for suspension or revocation of a license. Acceptance of a*  
26 *state gaming license or renewal thereof by a licensee constitutes*  
27 *an agreement on the part of the licensee to be bound by all of the*  
28 *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 himself informed of the content of all such*  
*regulations, and ignorance thereof will not excuse violations.*

Nev. Gaming Comm'n Reg. 5.030 (emphasis added).

1 24. NRS 463.310(4)(d)(2) states in relevant part that the Commission may:

2 (d) Fine each person or entity or both, which is licensed,  
3 registered or found suitable pursuant to this chapter or chapter 464  
4 of NRS or which previously obtained approval for any act or  
5 transaction for which Commission approval was required or  
6 permitted under the provisions of this chapter or chapter 464 of  
7 NRS:

8 . . . .

9 (2) Except as otherwise provided in subparagraph (1), not  
10 more than \$100,000 for each separate violation of the provisions of  
11 this chapter or chapter 464 or 465 of NRS or of the regulations of  
12 the Commission which is the subject of an initial complaint and not  
13 more than \$250,000 for each separate violation of the provisions of  
14 this chapter or chapter 464 or 465 of NRS or of the regulations of  
15 the Commission which is the subject of any subsequent complaint.

16 NRS 463.310(4)(d)(2).

17 **FACTUAL BACKGROUND**

18 25. Pursuant to the BOARD'S minimum bankroll formula, gaming licensees are  
19 required to maintain sufficient "Cash on Hand" and "Next Business Day" amounts.

20 26. "Cash on Hand" generally means cash readily available on the business premises  
21 for immediate use.

22 27. "Next Business Day" generally means "Cash on Hand" amounts plus items that  
23 could be converted to cash by the end of the next business day.

24 28. The BOARD sent a violation letter to Sharkey's Nugget on May 8, 2014, citing  
25 SHARKEY'S for a bankroll deficiency of "Next Business Day" amounts in the amount of \$7,282  
26 for April 24, 2014.

27 29. On or about November 4, 2014, the Chief of the BOARD's Tax and License  
28 Division spoke to HOLDER concerning the noncompliance of SHARKEY'S and SUNDANCE  
with the requirements of Nevada Gaming Commission Regulation 6.150. The Chief of the  
BOARD's Tax and License Division informed HOLDER that the bankroll deficiencies needed to  
be corrected immediately either through an infusion of cash and/or a reduction in the number  
of slot machines and/or a reduction of the payouts available to the public.

. . . .



1 38. The actions, as described herein, constitute a failure to comply with or make  
2 provision for compliance with all federal, state and local laws and regulations pertaining to the  
3 operations of a licensed establishment in violation of Nevada Gaming Commission  
4 Regulation 5.011(8).

5 39. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
6 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
7 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
8 Regs. 5.010(2) and 5.030.

9 **COUNT TWO**  
10 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
11 **NEVADA GAMING COMMISSION**  
**REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

12 40. Complainant BOARD realleges and incorporates by reference as though set forth in  
13 full herein paragraphs 1 through 39 above.

14 41. On October 10, 2014, the BOARD performed another bankroll verification. The  
15 bankroll verification revealed SHARKEY'S was deficient in regards to its "Cash On Hand" and  
16 "Next Business Day" requirement in the amount of \$15,124 and \$14,619, respectively.

17 42. The actions, as described herein, constitute a failure to continue to meet the  
18 applicable standards and qualifications necessary to hold a gaming license in violation of  
19 NRS 463.170(8).

20 43. The actions, as described herein, constitute a failure to comply with Nevada  
21 Gaming Commission Regulation 6.150.

22 44. The actions, as described herein, constitute activity that is inimical to the public  
23 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
24 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
25 industry in violation of Nevada Gaming Commission Regulation 5.011.

26 45. The actions, as described herein, constitute a failure to exercise discretion and  
27 sound judgment to prevent incidents which might reflect on the repute of the State of Nevada  
28 . . . .

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 46. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 47. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT THREE**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 48. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 47 above.

17 49. SHARKEY'S self-reported deficiencies for "Cash on Hand" in the amount of \$291  
18 for October 15, 2014.

19 50. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 51. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 52. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 53. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 54. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 55. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT FOUR**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 56. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 55 above.

17 57. SHARKEY'S self-reported deficiencies for its "Cash On Hand" and "Next Business  
18 Day" requirement in the amount of \$13,718 and \$7,385, respectively for October 22, 2014.

19 58. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 59. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 60. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 61. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 62. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 63. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT FIVE**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 64. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 63 above.

17 65. SHARKEY'S weekly bankroll submission for October 29, 2014 revealed "Cash on  
18 Hand" and "Next Business Day" deficiencies of \$17,378 and \$16,579, respectively.

19 66. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 67. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 68. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 69. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada



1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 70. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 71. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT SIX**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 72. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 71 above.

17 73. SUNDANCE self-reported deficiencies for its "Next Business Day" requirement in  
18 the amount of \$1,638 for October 15, 2014.

19 74. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 75. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 76. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 77. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 78. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 79. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SUNDANCE. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT SEVEN**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 80. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 79 above.

17 81. SHARKEY'S bankroll submission for November 5, 2014 revealed "Cash on Hand"  
18 and "Next Business Day" deficiencies of \$14,202 and \$14,861, respectively.

19 82. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 83. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 84. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 85. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 86. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 87. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SHARKEY'S. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT EIGHT**  
12 **VIOLATION OF NEVADA REVISED STATUTE 463.170 and/or**  
13 **NEVADA GAMING COMMISSION**  
14 **REGULATIONS 6.150, 5.011, 5.011(1) and/or (8)**

15 88. Complainant BOARD realleges and incorporates by reference as though set forth in  
16 full herein paragraphs 1 through 87 above.

17 89. SUNDANCE's bankroll submission for November 26, 2014 revealed a "Next  
18 Business Day" deficiency \$4,960.

19 90. The actions, as described herein, constitute a failure to continue to meet the  
20 applicable standards and qualifications necessary to hold a gaming license in violation of  
21 NRS 463.170(8).

22 91. The actions, as described herein, constitute a failure to comply with Nevada  
23 Gaming Commission Regulation 6.150.

24 92. The actions, as described herein, constitute activity that is inimical to the public  
25 health, safety, morals, good order and general welfare of the people of the State of Nevada, or  
26 activity that would reflect or tend to reflect discredit upon the State of Nevada or the gaming  
27 industry in violation of Nevada Gaming Commission Regulation 5.011.

28 93. The actions, as described herein, constitute a failure to exercise discretion and  
sound judgment to prevent incidents which might reflect on the repute of the State of Nevada

1 and act as a detriment to the development of the industry in violation of Nevada Gaming  
2 Commission Regulation 5.011(1).

3 94. The actions, as described herein, constitute a failure to comply with or make  
4 provision for compliance with all federal, state and local laws and regulations pertaining to the  
5 operations of a licensed establishment in violation of Nevada Gaming Commission  
6 Regulation 5.011(8).

7 95. The failure to comply with NRS 463.170(8) and/or Nevada Gaming Commission  
8 Regulations 6.150, 5.011, 5.011(1) and/or 5.011(8) is an unsuitable method of operation and is  
9 grounds for disciplinary action against SUNDANCE. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT NINE**  
12 **VIOLATION OF NEVADA GAMING COMMISSION REGULATIONS**  
13 **6.040, 6.060, and/or 6.110**

14 96. Complainant BOARD realleges and incorporates by reference as though set forth in  
15 full herein paragraphs 1 through 95 above.

16 97. SUNDANCE's slot cashless wagering vouchers have a 60-day expiration period.  
17 SUNDANCE has not produced any reports reporting expired wagering vouchers to the  
18 BOARD from September through November 2014. SUNDANCE did not report 25 percent of  
19 expired slot wagering vouchers as reported revenue to the BOARD for the September through  
20 November 2014 time period.

21 98. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
22 Commission Regulations 6.040, 6.060, and/or 6.110. This constitutes an unsuitable method of  
23 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
24 Regs. 5.010(2) and 5.030.

25 **COUNT TEN**  
26 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and/or (10)**

27 99. Complainant BOARD realleges and incorporates by reference as though set forth in  
28 full herein paragraphs 1 through 98 above.

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1 100. SUNDANCE operated a players' club for the benefit of its patrons. Through the  
2 players club, the patrons of SUNDANCE have accumulated points which they may redeem for  
3 cash. SUNDANCE's system for keeping track of players' club points went down on or around  
4 September 29, 2014. SUNDANCE initially told its patrons to wait a few days for the system to  
5 be restored. SUNDANCE subsequently informed its patrons that their accumulated points had  
6 been lost.

7 101. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
8 Commission Regulation 5.011(1) and (10). This constitutes an unsuitable method of  
9 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
10 Regs. 5.010(2) and 5.030.

11 **COUNT ELEVEN**  
12 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 6.100**  
13 **(ICP SLOTS NO. 83)**

14 102. Complainant BOARD realleges and incorporates by reference as though set forth  
15 in full herein paragraphs 1 through 101 above.

16 103. Since September 29, 2014, SUNDANCE has not produced slot analysis reports  
17 comparing actual hold to theoretical hold for individual slot machines.

18 104. RESPONDENT's failure to comply with ICP Slots No. 83 is a violation of Nevada  
19 Gaming Commission Regulation 6.100. This constitutes an unsuitable method of operation,  
20 and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
21 Regs. 6.100 (8), 5.010(2), and 5.030.

22 **COUNT TWELVE**  
23 **VIOLATION OF NEVADA GAMING COMMISSION**  
24 **REGULATIONS 6.040, 6.060, and/or 6.110**

25 105. Complainant BOARD realleges and incorporates by reference as though set forth  
26 in full herein paragraphs 1 through 104 above.

27 106. SHARKEY'S slot cashless wagering vouchers have a 60-day expiration period.  
28 During its closing audit, the BOARD found SHARKEY'S did not possess any reports  
concerning expired wagering vouchers for September 2013, October 2013, December 2013,  
.....

1 January, 2014, February 2014, March 2014, September 2014, October 2014, and November  
2 2014.

3 107. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
4 Commission Regulations 6.040, 6.060, and/or 6.110. This constitutes an unsuitable method of  
5 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
6 Regs. 5.010(2) and 5.030.

7 **COUNT THIRTEEN**  
8 **VIOLATION OF NEVADA GAMING COMMISSION**  
9 **REGULATIONS 6.040 and/or 6.060**

10 108. Complainant BOARD realleges and incorporates by reference as though set forth  
11 in full herein paragraphs 1 through 107 above.

12 109. During its closing audit, the BOARD found SHARKEY'S did not possess  
13 drop/count paperwork and payout information for April 28, 2013, through June 25, 2013, and  
14 April 17, 2014, through November 15, 2014.

15 110. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
16 Commission Regulations 6.040 and/or 6.060. This constitutes an unsuitable method of  
17 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
18 Regs. 5.010(2) and 5.030.

19 **COUNT FOURTEEN**  
20 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and/or (10)**

21 111. Complainant BOARD realleges and incorporates by reference as though set forth  
22 in full herein paragraphs 1 through 110 above.

23 112. SHARKEY'S operated a players' club for the benefit of its patrons. Through the  
24 players club, the patrons of SHARKEY'S have accumulated points which they may redeem for  
25 cash. SHARKEY's system for keeping track of players' club points went down on or around  
26 September 29, 2014. SHARKEY'S initially told its patrons to wait a few days for the system to  
27 be restored. SHARKEY'S subsequently informed its patrons that their accumulated points had  
28 been lost.

.....

1 113. A patron reported this issue to the BOARD's Enforcement Division on October 16,  
2 2014.

3 114. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
4 Commission Regulation 5.011(1) and (10). This constitutes an unsuitable method of  
5 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
6 Regs. 5.010(2) and 5.030.

7 **COUNT FIFTEEN**  
8 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 6.100**  
9 **(ICP SLOTS NO. 83)**

10 115. Complainant BOARD realleges and incorporates by reference as though set forth  
11 in full herein paragraphs 1 through 114 above.

12 116. SHARKEY'S does not have slot analysis reports that compare the actual hold  
13 percentage computations to the theoretical hold percentage for individual machines for the  
14 period of May 2013 through November 2014.

15 117. RESPONDENT's failure to comply with ICP Slots No. 83 is a violation of Nevada  
16 Gaming Commission Regulation 6.100. This constitutes an unsuitable method of operation,  
17 and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n Regs. 6.100 (8),  
18 5.010(2), and 5.030.

19 **COUNT SIXTEEN**  
20 **VIOLATION OF NEVADA GAMING**  
21 **COMMISSION REGULATIONS 6.040 and/or 6.060**

22 118. Complainant BOARD realleges and incorporates by reference as though set forth  
23 in full herein paragraphs 1 through 117 above.

24 119. During its closing audit, the BOARD found SHARKEY'S did not maintain original  
25 cage documents for the period of April 2013 through November 2014.

26 120. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
27 Commission Regulations 6.040 and/or 6.060. This constitutes an unsuitable method of  
28 operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n  
29 Regs. 5.010(2) and 5.030.

.....

1                                 **COUNT SEVENTEEN**  
2                                 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.110**

3             121. Complainant BOARD realleges and incorporates by reference as though set forth  
4 in full herein paragraphs 1 through 120 above.

5             122. During its closing audit, the BOARD found SHARKEY'S did not possess  
6 progressive meter logs for the months of September 2014, October 2014, and November  
7 2014.

8             123. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
9 Commission Regulations 5.110. This constitutes an unsuitable method of operation, and, as  
10 such, is grounds for disciplinary action. See Nev. Gaming Comm'n Regs. 5.010(2) and 5.030.

11                                 **COUNT EIGHTEEN**  
12                                 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.110**

13             124. Complainant BOARD realleges and incorporates by reference as though set forth  
14 in full herein paragraphs 1 through 123 above.

15             125. During its closing audit, the BOARD discovered SHARKEY'S reduced the amount  
16 of its progressive payoff schedules to zero without a player winning the progressive payoff  
17 schedules; without documenting a malfunction; without distributing the progressive payoff  
18 schedules to similar machines at SHARKEY'S establishment; and without obtaining BOARD  
19 chairman approval to reduce the amount of its progressive payoff schedules in another  
20 manner.

21             126. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
22 Commission Regulations 5.110. This constitutes an unsuitable method of operation, and, as  
23 such, is grounds for disciplinary action. See Nev. Gaming Comm'n Regs. 5.010(2) and 5.030.

24                                 **COUNT NINETEEN**  
25                                 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011,**  
26                                 **NEVADA REVISED STATUTE 368A.160 AND**  
27                                 **NEVADA ADMINISTRATIVE CODE 368A.500**

28             127. Complainant BOARD realleges and incorporates by reference as though set forth  
in full herein paragraphs 1 through 126 above.



1           128. During its closing audit, the BOARD found SHARKEY'S did not maintain detailed  
2 cash register tapes or Point of Sale (POS) system records listing all taxable sales during  
3 periods of live entertainment, as well as sales summaries and applicable cash turn-in  
4 documentation.

5           129. RESPONDENT's actions as set out above are a violation of Nevada Gaming  
6 Commission Regulations 5.011, Nevada Revised Statute 368A.160, and Nevada  
7 Administrative Code 368A.500. This constitutes an unsuitable method of operation, and, as  
8 such, is grounds for disciplinary action. See Nev. Gaming Comm'n Regs. 5.010(2) and 5.030.

9           WHEREFORE, based upon the allegations contained herein which constitute  
10 reasonable cause for disciplinary action against Respondents, pursuant to Nevada Revised  
11 Statute 463.310, and Nevada Gaming Commission Regulations 5.010, 5.011 and 5.030, the  
12 NEVADA GAMING CONTROL BOARD prays for the relief as follows:

13           1. That the Nevada Gaming Commission serve a copy of this Complaint on  
14 Respondents pursuant to Nevada Revised Statute 463.312(2);

15           2. That the Nevada Gaming Commission fine Respondents a monetary sum pursuant  
16 to the parameters defined at Nevada Revised Statute 463.310(4) for each separate violation of  
17 the provisions of the Nevada Gaming Control Act or the Regulations of the Nevada Gaming  
18 Commission;

19           3. That the Nevada Gaming Commission take action against Respondents' license or  
20 licenses pursuant to the parameters defined in Nevada Revised Statute 463.310(4); and

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28 . . . .

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

3 DATED this 30<sup>th</sup> day of June, 2015.

4 NEVADA GAMING CONTROL BOARD

5   
6 \_\_\_\_\_  
A.G. BURNETT, Chairman

7   
8 \_\_\_\_\_  
SHAWN R. REID, Member

9   
10 \_\_\_\_\_  
TERRY JOHNSON, Member

11 Submitted by:

12 ADAM PAUL LAXALT  
13 Attorney General

14 By:

  
15 \_\_\_\_\_  
JOHN S. MICHELA  
16 Senior Deputy Attorney General  
Gaming Division  
17 (775) 850-4153