

1 NGC 13-04

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**STATE OF NEVADA**

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**BEFORE THE NEVADA GAMING COMMISSION**

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STATE GAMING CONTROL BOARD, )

7

Complainant,

8

vs.

**STIPULATION FOR SETTLEMENT  
AND ORDER**

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JITTERBUG, LLC, dba THE BIKINI BAR;  
LONNY JOSEPH CAMPOS,

10

Respondents )

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12 The State of Nevada, on relation of its STATE GAMING CONTROL BOARD (BOARD),  
13 Complainant herein, filed and served a Complaint, NGC Case No. 13-04, against the above-  
14 captioned RESPONDENTS alleging certain violations of the Nevada Gaming Control Act and  
15 Regulations of the Nevada Gaming Commission.

16 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENTS  
17 that the Complaint, NGC Case No. 13-04, filed against RESPONDENTS in the above-entitled  
18 case shall be settled on the following terms and conditions:

19 1. RESPONDENTS admit each and every allegation set forth in the Complaint, NGC  
20 Case No. 13-04.

21 2. RESPONDENTS fully understand and voluntarily waive the right to a public hearing  
22 on the charges and allegations set forth in the Complaint, the right to present and cross-  
23 examine witnesses, the right to a written decision on the merits of the Complaint, which must  
24 contain findings of fact and a determination of the issues presented, and the right to obtain  
25 judicial review of the Nevada Gaming Commission's decision.

26 3. RESPONDENTS agree to pay FIVE THOUSAND DOLLARS and NO CENTS  
27 (\$5,000.00) to the *State of Nevada-Nevada Gaming Commission* on the date this stipulated  
28 settlement agreement is accepted by the Nevada Gaming Commission in full settlement and

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Gaming Division  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511

1 satisfaction of the allegations set forth in the Complaint, NGC Case No. 13-04. Interest on the  
2 fine shall accrue pursuant to NRS 17.130 on any unpaid balance computed from the date  
3 payment is due until payment is made in full.

4 4. RESPONDENTS have tendered the surrender of their licenses to the BOARD. Due  
5 to the pending administrative complaint against RESPONDENTS in this matter, the BOARD  
6 placed an administrative hold on the licenses and, to date, has not accepted the surrender.  
7 Upon approval of this settlement agreement by the Nevada Gaming Commission and  
8 RESPONDENTS' payment in full of the fine set forth in paragraph 3 of this settlement  
9 agreement, RESPONDENTS and the BOARD agree RESPONDENTS have tendered the  
10 surrender of all of their gaming related licenses to the BOARD, and the BOARD will accept the  
11 surrender of all of RESPONDENTS' gaming-related licenses.

12 5. In consideration for the execution of this settlement agreement, RESPONDENTS,  
13 for itself, its heirs, executors, administrators, successors, and assigns, hereby release and  
14 forever discharge the State of Nevada, the Nevada Gaming Commission, the Nevada Gaming  
15 Control Board, the Nevada Attorney General and each of their members, agents, and  
16 employees in their individual and representative capacities, from any and all manner of  
17 actions, causes of action, suits, debts, judgments, executions, claims, and demands  
18 whatsoever known or unknown, in law and equity, that RESPONDENTS ever had, now has,  
19 may have, or claim to have against any and all of the persons or entities named in this  
20 paragraph arising out of, or by reason of, the investigation of the allegations in the Complaint  
21 and this disciplinary action, NGC Case No. 13-04, or any other matter relating thereto.

22 6. In consideration for the execution of this settlement agreement, RESPONDENTS  
23 hereby indemnify and hold harmless the State of Nevada, the Nevada Gaming Commission,  
24 the State Gaming Control Board, the Nevada Attorney General, and each of their members,  
25 agents, and employees in their individual and representative capacities against any and all  
26 claims, suits and actions, brought against the persons named in this paragraph by reason of  
27 the investigation of the allegations in the Complaint, filed in this disciplinary action, NGC Case  
28 No. 13-04, and all other matters relating thereto, and against any and all expenses, damages,

1 charges and costs, including court costs and attorney fees, which may be sustained by the  
2 persons and entities named in this paragraph as a result of said claims, suits and actions.

3 7. RESPONDENTS enter into this Stipulation for Settlement freely and voluntarily and  
4 acknowledge that RESPONDENTS had an opportunity to consult with counsel prior to  
5 entering into this Stipulation for Settlement. RESPONDENTS further acknowledge that this  
6 stipulated settlement is not the product of force, threats, or any other form of coercion or  
7 duress, but is the product of discussions between RESPONDENTS and the attorney for the  
8 BOARD.

9 8. RESPONDENTS and the BOARD acknowledge that this settlement is made to  
10 avoid litigation and economize resources. The parties agree and understand that this  
11 Stipulation for Settlement is intended to operate as full and final settlement of the Complaint  
12 filed against RESPONDENTS in the above-entitled disciplinary case, NGC Case No. 13-04.

13 9. RESPONDENTS and the BOARD recognize and agree that the Nevada Gaming  
14 Commission has the sole and absolute discretion to determine whether to accept this  
15 stipulated settlement agreement. RESPONDENTS and the BOARD hereby waive any right  
16 they may have to challenge the impartiality of the Nevada Gaming Commission to hear the  
17 above-entitled case on the matters embraced in the Complaint if the Nevada Gaming  
18 Commission determines not to accept this stipulated settlement agreement. If the Nevada  
19 Gaming Commission does not accept the Stipulation for Settlement, it shall be withdrawn as  
20 null and void and RESPONDENTS' admissions, if any, that certain violations of the Nevada  
21 Gaming Control Act and the Regulations of the Nevada Gaming Commission occurred shall  
22 be withdrawn.

23 10. RESPONDENTS and the BOARD agree and understand that this settlement  
24 agreement is intended to operate as full and final settlement of the Complaint filed in NGC  
25 Case No. 13-04. The parties further agree and understand that any oral representations are  
26 superseded by this settlement agreement and that only those terms memorialized in writing  
27 herein shall be effective.

28 . . . .

1           11. RESPONDENTS agree and understand that although this settlement, if approved  
2 by the Nevada Gaming Commission, will settle the Complaint filed in NGC Case No. 13-04,  
3 that the allegations contained in the Complaint filed in NGC Case No. 13-04 and the terms of  
4 this settlement agreement may be considered by the BOARD and/or the Nevada Gaming  
5 Commission, with regards to any and all applications by RESPONDENT that are currently  
6 pending before the BOARD or the Nevada Gaming Commission, or that are filed in the future  
7 with the BOARD.

8           12. RESPONDENTS and the BOARD shall each bear their own costs incurred in this  
9 disciplinary action, NGC Case No. 13-04.

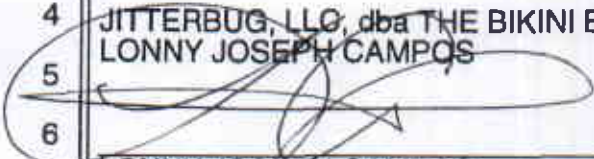
10           13. LONNY JOSEPH CAMPOS, by executing this stipulation on behalf of  
11 RESPONDENTS, affirmatively represents that he has full authority to settle this matter for  
12 RESPONDENTS.

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1 14. This stipulated settlement agreement shall become effective immediately upon  
2 approval by the Nevada Gaming Commission.

3 DATED this 28<sup>th</sup> day of March, 2013.

4 JITTERBUG, LLC, dba THE BIKINI BAR;  
5 LONNY JOSEPH CAMPOS



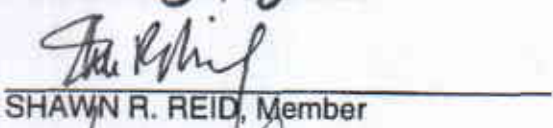
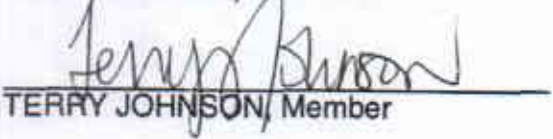
6 LONNY JOSEPH CAMPOS

7 LIONEL SAWYER & COLLINS



8 JENNIFER ROBERTS  
9 Attorney for Respondents

STATE GAMING CONTROL BOARD

  
A.G. BURNETT, Chairman  
SHAWN R. REID, Member  
TERRY JOHNSON, Member

Submitted by:  
CATHERINE CORTEZ MASTO  
Attorney General

By:   
JOHN S. MICHELA  
Senior Deputy Attorney General  
Gaming Division  
Attorneys for State Gaming Control Board

ORDER

IT IS SO ORDERED in NGC Case No. 13-04.

DATED this 18 day of April, 2013.

NEVADA GAMING COMMISSION  
  
PETER C. BERNHARD, Chairman

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Gaming Division  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511