



1 **NGC 13-13**

6 **STATE OF NEVADA**

7 **BEFORE THE NEVADA GAMING COMMISSION**

8 STATE GAMING CONTROL BOARD,)

9 Complainant,)

10 vs.)

11 GOLDEN ROUTE OPERATIONS LLC,)
12 dba GOLDEN ROUTE OPERATIONS,)

13 Respondent.)

COMPLAINT

14 The State of Nevada, on relation of its STATE GAMING CONTROL BOARD
15 (hereinafter "BOARD"), Complainant herein, by and through its counsel, CATHERINE
16 CORTEZ MASTO, Attorney General, and EDWARD L. MAGAW, Deputy Attorney General,
17 hereby files this Complaint for disciplinary action against GOLDEN ROUTE OPERATIONS
18 LLC, dba GOLDEN ROUTE OPERATIONS (hereinafter "GRO"), Respondent herein, pursuant
19 to Nevada Revised Statute (NRS) 463.310(2) and alleges as follows:

20 1. Complainant, BOARD, is an administrative agency of the State of Nevada duly
21 organized and existing under and by virtue of chapter 463 of NRS and is charged with the
22 administration and enforcement of the gaming laws of this State as set forth in Title 41 of NRS
23 (Nevada Gaming Control Act) and the Regulations of the Nevada Gaming Commission
24 (hereinafter "Commission" or "NGC").

25 2. Respondent, GRO, located at 6595 South Jones Boulevard, Las Vegas, Nevada, holds
26 a nonrestricted gaming license for a slot machine route, and, as such, is charged with the
27 responsibility of complying with all of the provisions of the Nevada Gaming Control Act and the
28 Regulations of the Commission.

RELEVANT LAW

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

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

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

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

(d) All establishments where gaming is conducted and 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.

NRS 463.0129(1)(a)-(d).

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

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

6. This continuing obligation is repeated in NGC Regulation 5.040, which provides as follows:

A gaming license is a revocable privilege, and no holder thereof shall be deemed to have acquired any vested rights therein or thereunder. The burden of proving his qualifications to hold any license rests at all times on the licensee. The board is charged by law with the duty of observing the conduct of all licensees to the

1 end that licenses shall not be held by unqualified or disqualified
2 persons or unsuitable persons or persons whose operations are
3 conducted in an unsuitable manner.

4 Nev. Gaming Comm'n Reg. 5.040.

5 7. Nevada Gaming Commission Regulation 5.010 provides as follows:

6 1. It is the policy of the commission and the board to
7 require that all establishments wherein gaming is conducted in this
8 state be operated in a manner suitable to protect the public health,
9 safety, morals, good order and general welfare of the inhabitants of
10 the State of Nevada.

11 2. Responsibility for the employment and maintenance of
12 suitable methods of operation rests with the licensee, and willful or
13 persistent use or toleration of methods of operation deemed
14 unsuitable will constitute grounds for license revocation or other
15 disciplinary action.

16 Nev. Gaming Comm'n Reg. 5.010.

17 8. Nevada Gaming Commission Regulation 5.011 states, in relevant part, as follows:

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

The Nevada gaming commission in the exercise of its sound
discretion can make its own determination of whether or not the
licensee has failed to comply with the aforementioned, but any
such determination shall make use of the established precedents
in interpreting the language of the applicable statutes. Nothing in
this section shall be deemed to affect any right to judicial review.

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1 10. Failure to conduct gaming operations in accordance
2 with proper standards of custom, decorum and decency, or permit
3 any type of conduct in the gaming establishment which reflects or
tends to reflect on the repute of the State of Nevada and act as a
detriment to the gaming industry.

4 Nev. Gaming Comm'n Reg. 5.011(1), (8), and (10).

5 9. Nevada Gaming Commission Regulation 5.030 provides as follows:

6 ***Violation of any provision of the Nevada Gaming***
7 ***Control Act or of these regulations by a licensee***, his agent or
8 employee ***shall be deemed*** contrary to the public health, safety,
9 morals, good order and general welfare of the inhabitants of the
10 State of Nevada and ***grounds for suspension or revocation of a***
11 ***license***. Acceptance of a state gaming license or renewal thereof
12 by a licensee constitutes an agreement on the part of the licensee
to be bound by all of the regulations of the commission as the
same now are or may hereafter be amended or promulgated. ***It is***
13 ***the responsibility of the licensee to keep himself informed of***
14 ***the content of all such regulations, and ignorance thereof will***
15 ***not excuse violations.***

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

17 10. Nevada Revised Statutes 463.310 states in relevant part as follows:

18 1. The Board shall make appropriate investigations:

19 (a) To determine whether there has been any violation of
20 this chapter or chapter 462, 464, 465 or 466 of NRS or any
21 regulations adopted thereunder.

22 (b) To determine any facts, conditions, practices or matters
23 which it may deem necessary or proper to aid in the enforcement
24 of any such law or regulation.

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26 2. If, after any investigation the Board is satisfied that a
27 license, registration, finding of suitability, pari-mutuel license or
28 prior approval by the Commission of any transaction for which the
approval was required or permitted under the provisions of this
chapter or chapter 462, 464 or 466 of NRS should be limited,
conditioned, suspended or revoked, it shall initiate a hearing before
the Commission by filing a complaint with the Commission in
accordance with NRS 463.312 and transmit therewith a summary
of evidence in its possession bearing on the matter and the
transcript of testimony at any investigative hearing conducted by or
on behalf of the Board.

29 NRS 463.310(1)(a) and (b), and (2).

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1 11. In response to a Complaint brought by the BOARD, NRS 463.310(4) provides in
2 relevant part that the Commission may:

3 (a) Limit, condition, suspend or revoke the license of any
4 licensed gaming establishment or the individual license of any
5 licensee without affecting the license of the establishment;

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7 (d) Fine each person or entity or both, who was licensed,
8 registered or found suitable pursuant to this chapter or chapter 464
9 of NRS:

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11 (2) . . . [N]ot more than \$100,000 for each separate
12 violation of the provisions of this chapter or chapter 464 or 465 of
13 NRS or of the regulations of the Commission which is the subject
14 of an initial complaint and not more than \$250,000 for each
15 separate violation of the provisions of this chapter or chapter 464
16 or 465 of NRS or of the regulations of the Commission which is the
17 subject of any subsequent complaint.

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19 NRS 463.310(4)(a) and (d)(2).

20 12. Nevada Revised Statute 463.160(1) provides in relevant part:

21 1. Except as otherwise provided in subsection 4 and NRS
22 463.172, it is unlawful for any person, either as owner, lessee or
23 employee, whether for hire or not, either solely or in conjunction
24 with others:

25 (a) To deal, operate, carry on, conduct, maintain or expose
26 for play in the State of Nevada any gambling game, gaming
27 device, inter-casino linked system, mobile gaming system, slot
28 machine, race book or sports pool;

. . . .

(d) To receive, directly or indirectly, any compensation or
reward or any percentage or share of the money or property
played, for keeping, running or carrying on any gambling game,
slot machine, gaming device, mobile gaming system, race book or
sports pool;

. . . .

↳ 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.

NRS 463.160(1).

1 13. An "operator of a slot machine route" is defined under NRS 463.018 as:

2 . . . a person who, under any agreement whereby
3 consideration is paid or payable for the right to place slot
4 machines, engages in the business of placing and operating slot
5 machines upon the business premises of others at three or more
6 locations.

5 NRS 463.018.

6 14. Nevada Revised Statute 463.0189 defines a "restricted license" and "restricted
7 operation" as:

8 . . . a state gaming license for, or an operation consisting of,
9 not more than 15 slot machines and no other game or gaming
10 device at an establishment in which the operation of slot machines
11 is incidental to the primary business of the establishment.

11 NRS 463.0189.

12 15. Nevada Revised Statute 463.161 provides for a restricted gaming license and reads
13 as follows:

14 **A license to operate 15 or fewer slot machines** at an
15 establishment in which the operation of slot machines is incidental
16 to the primary business conducted at the establishment **may only
be granted to the operator of the primary business or to a
licensed operator of a slot machine route.**

17 NRS 463.161 (emphasis added).

18 16. Nevada Gaming Commission Regulation 4.060 states as follows:

19 Notwithstanding the provisions of Regulation 4.050, a
20 license may be issued to an applicant as a slot machine operator
21 after the applicant has been licensed for three locations or has firm
22 commitments to place machines at three licensed locations. An
23 applicant for such a license shall file a single application showing
24 the name and address of each lessee, the number of machines to
be maintained at each location and such other information as may
be required by the board or the commission. **This regulation
does not alter or negate the requirement that each location of
such operator must also be separately licensed.**

25 Nev. Gaming Comm'n Reg. 4.060 (emphasis added).

26 17. Nevada Revised Statute 463.162(1)(c) states:

27 1. Except as otherwise provided in subsections 2 and 3, it
28 is unlawful for any person to:

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(c) Furnish services or property, real or personal, on the basis of a contract, lease or license, pursuant to which that person receives payments based on earnings or profits from any gambling game, including any slot machine, without having first procured a state gaming license.

NRS 463.162(1)(c).

18. Pursuant to Nevada Gaming Commission Regulation 5.050:

Every licensee shall report to the board quarterly the full name and address of every person, including lending agencies, who has any right to share in the profits of such licensed games, whether as an owner, assignee, landlord or otherwise, or to whom any interest or share in the profits of any licensed game has been pledged or hypothecated as security for a debt or deposited as a security for the performance of any act or to secure the performance of a contract of sale. Such report shall be submitted concurrently with application for renewal of license.

Nev. Gaming Comm'n Reg. 5.050.

19. Lastly, pursuant to NRS 463.220(2), no state gaming license may be assigned either in whole or in part. NRS 463.220(2).

BACKGROUND

20. On or about September 8, 2011, GRO, a Nevada licensed slot route operator, entered into a Participation Agreement (hereinafter "Participation Agreement") with Million Dollar Entertainment & Advertising, Inc. (hereinafter "MDEA") to place and/or operate slot machines at The 25 Bar & Grill, located at 4531 North Las Vegas Boulevard, in Las Vegas, Nevada (hereinafter also referred to as "the location").¹

21. Under the terms of the Participation Agreement, GRO was required to remit a certain percentage of the gaming revenue generated from the slot machines placed at The 25 Bar & Grill to MDEA.

22. On or about September 19, 2011, GRO placed four (4) slot machines at the location, and on or about December 1, 2011, GRO added six (6) additional machines, bringing the total number at the location to ten (10).

...

¹ In the Participation Agreement, the location was incorrectly referred to as The New 25 Club.

1 23. According to representations made by GRO to the BOARD, the transaction from which
2 the Participation Agreement originated was initiated by the President of MDEA, Paul Bowman.

3 24. According to GRO, Paul Bowman approached GRO and made false and/or misleading
4 representations that he was the General Manager of The 25 Bar & Grill and that he had
5 authority to enter into the Participation Agreement on behalf of the owner, BJ Property, LLC
6 (hereinafter "BJP").

7 25. However, prior to entering into the Participation Agreement with GRO, MDEA had
8 entered into a management/sales agreement with BJP (hereinafter "BJP Agreement"), which
9 assigned the entire operation of The 25 Bar & Grill over to MDEA.

10 26. Based on the terms of the BJP Agreement, when MDEA and GRO entered into the
11 Participation Agreement, Paul Bowman was acting in his capacity as President of MDEA and
12 not as a representative of BJP, as GRO claims he had represented to it.

13 27. GRO has stated to the Board that it had no knowledge of the BJP Agreement or the
14 arrangement between BJP and MDEA prior to entering into the Participation Agreement.

15 28. Under the terms of the BJP Agreement, MDEA was given full control over the
16 operation of The 25 Bar & Grill in exchange for making certain set monthly payments to BJP.

17 29. On the date the BJP Agreement took effect, which was on or about July 20, 2011,
18 MDEA became the operator of The 25 Bar & Grill, replacing BJ Property, LLC, in that
19 capacity.

20 30. Accordingly, on the date the Participation Agreement was entered into between MDEA
21 and GRO, MDEA was the operator of the primary business at the location, not BJP.

22 31. Under NRS 463.161, a restricted gaming license may only be issued to the operator of
23 the primary business where the slot machines are operated, or to a licensed slot route
24 operator.

25 32. At all times relevant to this Complaint, neither the operator of the primary business
26 (MDEA) nor the slot route operator (GRO) had been issued a gaming license for the location.

27 33. The only entity that was licensed at the time to operate slot machines at the location
28 was the owner of the business, BJP, which was not a party to the Participation Agreement.

1 34. In what appears to be an addendum to the BJP Agreement, signed solely by Paul
2 Bowman, BJP purports to assign the rights to “run the gambling under BJ Property's (*sic*) LLC
3 Burdet (*sic*) Jones (*sic*) license” to MDEA.

4 35. However, under Nevada law, a gaming license issued by the State of Nevada is
5 nontransferable. NRS 463.220(2).

6 36. Accordingly, to the extent that the addendum to the BJP Agreement purported to
7 transfer the BJP's gaming license, and the right to expose gaming to the public under that
8 license, the aforementioned addendum to the BJP Agreement had no legal effect. *Id.*

9 37. To have lawfully operated the slot machines at the location, either MDEA or GRO
10 would have had to have obtained a restricted gaming license for the location, but neither had
11 done so.

12 38. Accordingly, at all times relevant to this Complaint, the slot machines at issue in this
13 Complaint were operated for play at the location without the proper state gaming license
14 having been issued.

15 39. In addition, at no time relevant to this Complaint was MDEA authorized by the NGC to
16 receive a share of the gaming revenue from those machines, yet GRO remitted such funds to
17 MDEA pursuant to the Participation Agreement.

18 40. Over the period of time relevant to this Complaint, GRO remitted a total of \$20,552.65
19 (Twenty Thousand Five Hundred Fifty-Two and 65/100 Dollars) of the gaming revenue from
20 the slot machines at the location to MDEA.

21 41. In or around December 2011, due to MDEA's alleged breach of the BJP Agreement,
22 BJP resumed control over the business operations at the location from MDEA. As a result,
23 BJP once again became the operator of the primary business.

24 42. Thereafter, on or about January 23, 2012, BJP entered into an “Assignment of
25 Agreement” with GRO under which BJP fully accepted the assignment of the Participation
26 Agreement entered into between GRO and MDEA for the location.

27 43. According to statements made by GRO to the BOARD regarding the events discussed
28 in this Complaint, at no time prior to entering into the Participation Agreement with MDEA did

1 GRO contact the BOARD to inquire as to whether MDEA was licensed to expose slot
2 machines to the public for play at the location. The only inquiry to the BOARD was whether or
3 not the location was current on its annual taxes and quarterly fees, which it was.

4 44. According to further statements made by GRO to the BOARD regarding the events
5 discussed in this Complaint, when MDEA requested GRO increase in the number of slot
6 machines from four (4) to ten (10) at the location, GRO personnel examined certain
7 documents obtained from the BOARD, which are believed to have included a letter from Frank
8 Streshley, Chief of the BOARD's Tax and License Division, approving the increase in the
9 number of slot machines at the location upon the payment of the additional annual taxes and
10 quarterly fees required for the additional slot machines, and/or the relevant tax and fee reports
11 submitted to the BOARD with the payment of those additional taxes and fees. On each of
12 those documents the licensee for the location is designated as BJ Property LLC, dba (doing
13 business as) The 25 Bar & Grill, not MDEA. Upon reviewing those documents GRO had
14 actual and/or constructive notice that MDEA was not the licensee at the location.

15 45. Additionally, when BJP resumed control over the operation of the primary business at
16 the location and GRO entered into the Assignment of Agreement with BJP, GRO had actual
17 and/or constructive notice that MDEA had never been licensed at the location to expose slot
18 machines for play to the public or to share in the gaming revenue generated therefrom.

19 46. At no time relevant to this Complaint did GRO take steps to notify the BOARD of what
20 had occurred between GRO and MDEA.

21 **COUNT ONE**
22 **VIOLATION OF NRS 463.160(1)(a) – UNLAWFULLY OPERATING AND/OR ASSISTING**
23 **ANOTHER IN UNLAWFULLY OPERATING SLOT MACHINES FOR PLAY IN NEVADA.**

24 47. Complainant BOARD realleges and incorporates by reference as though set forth in
25 full herein paragraphs 1 through 46 above.

26 48. Nevada Revised Statute 463.160(1)(a) states that it is unlawful to operate slot
27 machines for play in the State of Nevada without having first procured, and thereafter maintain
28 all gaming licenses required by statute.

...

1 49. Under NRS 463.161, a gaming license is required to operate 15 or fewer slot
2 machines at an establishment where the operation of the slot machines is incidental to the
3 primary business.

4 50. Such gaming license is classified as a "restricted license" under NRS 463.0189.

5 51. Pursuant to NRS 463.161, a restricted gaming license may only be issued to the
6 operator of the primary business at the location where the machines are operated or to a
7 licensed operator of a slot machine route.

8 52. As with all state gaming licenses, a restricted gaming license may not be transferred in
9 whole or in part. NRS 463.222(2).

10 53. Because the ten (10) slot machines placed and operated by GRO were incidental to
11 the primary business operation at The 25 Bar & Grill, NRS 463.161, a restricted license was
12 required in order to lawfully expose those slot machines for play.

13 54. According to NRS 463.161, the restricted license would have had to been procured
14 and maintained by either MDEA, as the operator of the primary business, or by GRO, as the
15 licensed slot route operator that placed and operated the slot machines, in order for those slot
16 machines to have been lawfully operated for play at The 25 Bar & Grill.

17 55. However, at no time relevant to this Complaint did either MDEA or GRO hold such a
18 license.

19 56. By entering into the Participation Agreement with MDEA and placing slot machines for
20 play at The 25 Bar & Grill when neither it nor MDEA had procured the statutorily required
21 restricted gaming license to do so, GRO violated NRS 463.160(1)(a) and/or assisted MDEA in
22 violating NRS 463.160(1)(a).

23 57. By violating NRS 463.160(1)(a), and/or assisting MDEA in violating NRS
24 463.160(1)(a), GRO demonstrated an unsuitable method of operation under NGC Regulations
25 5.011 and 5.011(1) and (8).

26 58. Such a violation provides grounds for the BOARD to take disciplinary action against
27 GRO. See Nev. Gaming Comm'n Reg. 5.010(1) and (2) and 5.030.

28 . . .

1 COUNT TWO
2 VIOLATION OF NRS 463.160(1)(d) – RECEIVING SHARE OF GAMING REVENUE FROM
3 AN UNLICENSED GAMING OPERATION

4 59. Complainant BOARD realleges and incorporates by reference as though set forth in
5 full herein paragraphs 1 through 58 above.

6 60. Nevada Revised Statute 463.160(1)(d) states that it is unlawful for a person to receive,
7 directly or indirectly, any share of the revenue derived from the offering of slot machines for
8 play without first procuring, and thereafter maintaining, all required gaming licenses required
9 under statute or regulation.

10 61. As discussed above, GRO placed and operated, and/or assisted MDEA to operate,
11 ten (10) slot machines for play at The 25 Bar & Grill without MDEA or itself having procured,
12 and thereafter maintained, the required restricted gaming license to do so.

13 62. Under the Participation Agreement, as compensation for the placement and operation,
14 and/or assistance to MDEA in the operation, of the slot machines at The 25 Bar & Grill, GRO
15 received a share of the revenue generated therefrom.

16 63. Because GRO received a share of the revenue from the unlicensed gaming operation
17 at The 25 Bar & Grill, it violated NRS 463.160(1)(d).

18 64. By violating NRS 463.160(1)(d), GRO demonstrated an unsuitable method of
19 operation under NGC Regulations 5.011 and 5.011(1) and (8).

20 65. Such a violation provides grounds for the BOARD to take disciplinary action against
21 GRO. See Nev. Gaming Comm'n Reg. 5.010(1) and (2) and 5.030.

22 COUNT THREE
23 VIOLATION OF NRS 463.160(1)(d) AND NRS 463.162(1)(c) – PERMITTING A PERSON TO
24 SHARE IN GAMING REVENUE WITHOUT THE PERSON BEING PROPERLY LICENSED.

25 66. Complainant BOARD realleges and incorporates by reference as though set forth in
26 full herein paragraphs 1 through 65 above.

27 67. Under NRS 463.160(1)(d), it is unlawful for a person to receive, directly or indirectly,
28 any share of the gaming revenue from a slot machine without first procuring, and thereafter
maintaining, all required gaming licenses required under statute or regulation.

...

1 68. In addition, under NRS 463.162(1)(c), it is unlawful for a person to furnish "services or
2 property, real or personal, on the basis of a contract, lease or license, pursuant to which that
3 person receives payments based on earnings or profits from any gambling game, including
4 any slot machine, without having first procured a state gaming license."

5 69. Under the Participation Agreement entered into between MDEA and GRO, MDEA was
6 entitled to, and did in fact receive a share of the gaming revenue generated from the ten (10)
7 slot machines GRO placed and operated, and/or assisted MDEA in operating, at The 25 Bar &
8 Grill.

9 70. MDEA, however, was not licensed by the State of Nevada to receive any share of the
10 gaming revenue from the operation of those slot machines, as it was required to be under
11 NRS 463.162(1)(d).

12 71. Nor was MDEA licensed by the State of Nevada to receive any payments based on
13 gaming revenue for allowing GRO to place slot machines on the premises of The 25 Bar &
14 Grill as MDEA was required to be under NRS 463.162(1)(c).

15 72. Over the period of time relevant to this Complaint, GRO remitted a total of \$20,552.65
16 (Twenty Thousand Five Hundred Fifty-Two and 65/100 Dollars) to MDEA in gaming revenue
17 from the slot machines GRO placed and operated at The 25 Bar & Grill as provided for under
18 the Participation Agreement.

19 73. By providing MDEA a share of the gaming revenue from the slot machines it placed
20 and operated, and/or assisted MDEA in operating, at The 25 Bar & Grill, GRO effectively
21 aided MDEA in its violation of NRS 463.160(1)(d) and NRS 463.162(1)(c).

22 74. Such conduct by GRO constitutes an unsuitable method of operation under NGC
23 Regulations 5.011 and 5.011(1) and (8) and thus provides the BOARD with grounds upon
24 which to seek disciplinary action against it. See Nev. Gaming Comm'n Reg. 5.010(1) and (2)
25 and 5.030.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, based upon the allegations contained herein, which constitute
28 reasonable cause for disciplinary action against GOLDEN ROUTE OPERATIONS LLC, dba

1 GOLDEN ROUTE OPERATIONS, pursuant to NRS 463.310, and NGC Regulations 5.010,
2 5.011 and 5.030 the BOARD prays for the relief set forth as follows:

3 1. That the Nevada Gaming Commission serve a copy of this Complaint on GOLDEN
4 ROUTE OPERATIONS LLC, dba GOLDEN ROUTE OPERATIONS, pursuant to NRS
5 463.312(2);

6 2. That the Nevada Gaming Commission fine GOLDEN ROUTE OPERATIONS LLC, dba
7 GOLDEN ROUTE OPERATIONS, a monetary sum pursuant to the parameters defined at
8 NRS 463.310(4) for each separate violation of the provisions of the Nevada Gaming Control
9 Act or the Regulations of the Nevada Gaming Commission Regulations;

10 3. That the Nevada Gaming Commission take action against GOLDEN ROUTE
11 OPERATIONS LLC, dba GOLDEN ROUTE OPERATIONS, license or licenses pursuant to the
12 parameters defined at NRS 463.310(4); and

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

15 DATED this 15th day of October, 2013.

16 STATE GAMING CONTROL BOARD

17 
18 A.G. BURNETT, Chairman

19 
20 SHAWN R. REID, Member

21 
22 TERRY JOHNSON, Member

23 Submitted by:

24 CATHERINE CORTEZ MASTO
25 Attorney General

26 By: 
27 EDWARD L. MAGAW
28 Deputy Attorney General
Gaming Division
(702) 486-3224