



## **DISPOSITION DECEMBER 2024 AGENDA**

### **NEVADA GAMING COMMISSION**

City Hall, Boulder City  
Council Chamber  
401 California Avenue  
Boulder City, NV 89005

**December 19, 2024**

#### **Members Present:**

**Hon. Jennifer Togliatti (Ret.), Chair**  
**Hon. Brian Krolicki (Ret.), Member**  
**George M. Markantonis, Member**  
**Justice Abbi Silver (Ret.), Member**

#### **Members Absent:**

**Rosa Solis-Rainey, Member**

## MEETING AGENDA

10:00 A.M.

- I. **PUBLIC COMMENTS:** This public comment agenda item is provided in accordance NRS 241.020(3)(d)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

**Comments taken from members of the Culinary and Bartenders Unions regarding Station Casinos. Refer to Public Comments Attachment 1, Attachment 2, and Attachment 3.**

II. **APPROVAL OF PRIOR MONTH NGC DISPOSITION**

FOR POSSIBLE ACTION: Pursuant to NRS 241.035, approval of Nevada Gaming Commission Disposition for November 2024.

**Approved.**

III. **NONRESTRICTED AGENDA ITEMS**

FOR POSSIBLE ACTION: Consideration of Nonrestricted Items listed in the following pages.

**Action taken as reflected on the following material.**

IV. **RESTRICTED AGENDA ITEMS**

FOR POSSIBLE ACTION: Consideration of Restricted Items listed in the following pages.

**Action taken as reflected on the following material.**

V. **NEW GAME(S)**

FOR POSSIBLE ACTION: Consideration of New Game Item listed in the following pages.

**Action taken as reflected on the following material.**

## VI. COMPLAINT(S)

FOR POSSIBLE ACTION:

1. Consideration of the Stipulation for Settlement and Order, settling the Complaint filed in the matter of the **NEVADA GAMING CONTROL BOARD** vs. **SCOTT MARTIN SIBELLA**, Case No. 24-02.

**Stipulation adopted as the Order of the NGC.  
(Silver Recused)**

## VII. GAMING EMPLOYEE REGISTRATION APPEALS, PURSUANT TO NRS 463.335(13)

FOR POSSIBLE ACTION: Consideration regarding appeal of:

1. Jian Hu, Case No. 23LV01354 – **Continued to January 2025 NGC meeting.**
2. Miguel Robinson, Case No. 24LV00259 – **Objection reversed.**
1. Raquel Beltran, Case No. 21LV11205 – **Objection sustained.**

## VIII. REGULATION(S)

FOR POSSIBLE ACTION:

1. **FOR FINAL ADOPTION  
2024-02R: POSSIBLE ADOPTION, AMENDMENT, AND REPEAL OF PERMANENT REGULATIONS OF THE NEVADA GAMING COMMISSION RELATING TO THE ADMINISTRATION OF THE LIVE ENTERTAINMENT TAX.**

**PURPOSE:** To receive comments from all interested persons regarding the adoption, amendment, and repeal of regulations that pertain to Chapter 368A of the *Nevada Administrative Code* (NAC) (Nevada's Live Entertainment Tax). The NGC will receive testimony from all interested persons and consider and take action on the adoption, amendment, and repeal of proposed permanent regulations of the NAC as identified in **LCB File No. R063-24P**. If no person directly affected by the proposed action appears to request time to make an oral presentation, the NGC may proceed immediately to act upon written submissions.

### **A. The Need for, and Purpose of, the Proposed Permanent Regulations.**

The need and purpose of the proposed permanent regulations identified in LCB File No. R063-24P are to: (1) remove the provision requiring a group I gaming licensee that provides live entertainment to include in its system of internal control a description of the procedures adopted by the licensee to comply with NAC 368A.300 to 368A.540; (2) remove the provision requiring a group I gaming licensee that provides live entertainment to direct its independent accountant to perform certain actions and report the finding resulting therefrom to the Nevada Gaming Control Board; (3) remove the provision requiring the internal auditor of a group I gaming licensee to perform certain acts and report the findings therefrom to the Nevada Gaming Control Board; and (4) provide other matters properly relating thereto.

### **B. Terms, or Substance of the Proposed Permanent Regulations or Description of the Subjects and Issues Involved.**

1. **Section 1** of the proposed regulation: **a.** Removes the provision requiring a group I gaming licensee that provides live entertainment to include in its system of internal control a description of the procedures adopted by the licensee to comply with NAC 368A.300 to 368A.540.

**a.** Removes the provision requiring a group I gaming licensee that provides live entertainment to include in its system of internal control a description of the procedures adopted by the licensee to comply with NAC 368A.300 to 368A.540.

b. Removes the provision requiring a group I gaming licensee that provides live entertainment to direct its independent accountant to perform certain actions and report the finding resulting therefrom to the Nevada Gaming Control Board.

c. Removes the provision requiring the internal auditor of a group I gaming licensee to perform certain acts and report the findings therefrom to the Nevada Gaming Control Board.

d. Provide other matters properly relating to the above.

**C. How to Obtain the Approved or Revised Text of the Proposed Regulation Prepared by the Legislative Counsel Bureau.**

The text of the proposed regulation is attached to this notice (**Attachment A**) and may be obtained online by visiting the State of Nevada Register of Administrative Regulations at:  
<https://www.leg.state.nv.us/Register/2024Register/R063-24P.pdf>

**D. Estimated Economic Effect of the Proposed Permanent Regulation on the Businesses which it will Regulate and the Public.**

**1. Adverse and Beneficial Effects:**

The proposed permanent regulation presents no reasonably foreseeable or anticipated adverse economic effects to the businesses or to the general public beyond the effects, if any, presented by Chapter 368A of the NRS. The proposed permanent regulation removes or reduces certain requirements under the LET. Such removal or reduction will reduce burdens on taxpayers and should have a positive impact. The regulation does not impose a direct and significant economic burden upon small businesses or restrict the formation, operation, or expansion of small businesses beyond the burdens, if any, presented by Chapter 368A of the NRS.

**2. Immediate and Long-Term Effects:**

There are no anticipated immediate or long-term economic effects on facilities located on the premises of a gaming licensee that provide live entertainment beyond the effects, if any, presented by Chapter 368A of the NRS.

**E. The Methods Used by the Agency in Determining the Impact on a Small Business.**

The proposed amendments presented in LCB File No. R063-24P only affects group I gaming licensees that offer live entertainment. The staff of the Nevada Gaming Control Board determined which group I gaming licensees qualified as small businesses pursuant to NRS 233B.0608(1). Once that was determined, staff reached out via telephone to each qualifying group I gaming licensee to inquire whether the property offered live entertainment. Based on this inquiry, it was determined that none of the qualifying group I gaming licensees offered live entertainment, thus none would be impacted by the proposed amendments.

Based on the results described above, staff reached the conclusion that the proposed permanent regulations, LCB File No. R063-24P, will not impose a direct and significant economic burden upon any small businesses under the Nevada Gaming Commission's jurisdiction, nor directly restrict the formation, operation, or expansion of said businesses.

**F. Estimated Cost to Agency for Enforcement of the Proposed Permanent Regulation.**

The enforcement of the proposed permanent regulations will not increase the costs already expended by the agency relating to the administration of the LET.

**G. Regulations of Other State or Local Governmental Agencies which the Proposed Permanent Regulation Overlaps or Duplicates and their Necessity.**

The Nevada Gaming Commission is the sole agency charged with the administration of the LET for live entertainment events that occur on the premises of a licensed gaming establishment. While the Nevada Tax Commission also has a set of regulations governing its administration of the LET, those regulations only pertain to live entertainment events occurring on the premises of establishments that are not licensed to offer gaming in this State. Because the two agencies administer the LET for different taxpayers, the proposed permanent regulations do not overlap or duplicate any regulations administered by the Nevada Tax Commission.

**H. If the Regulation is Required Pursuant to Federal Law, a Citation and Description of the Federal Law.**

The proposed permanent regulation is not required pursuant to federal law.

**I. If the Regulation Includes Provisions that are More Stringent than a Federal Regulation that Regulates the Same Activity, a Summary of Such Provisions.**

The proposed permanent regulation does not include provisions that are more stringent than a federal law.

**J. Establishment of New Fees or Existing Fee Increases.**

The proposed permanent regulations do not establish new fees or increase existing fees.

**Regulation adopted, draft dated June 25, 2024, effective upon approval by the Legislative Commission.**

FOR POSSIBLE ACTION:

**1. FOR FINAL ADOPTION**

**2024-07R: CONSIDERATION OF ADOPTION OF PROPOSED AMENDMENTS TO NGC REGULATION 5.225 REGARDING, WITHOUT LIMITATION, EXPANDING THE USE OF WAGERING ACCOUNTS.**

**PURPOSE:** To allow wagering accounts to be used more broadly than placing wagers, including, without limitation, to be used for retail purchases; to except certain electronic ledgers used in conjunction with a cashless wagering system from the definition of wagering account; and to take such additional action as may be necessary and proper to effectuate these stated purposes.

**Regulation adopted, draft dated November 6, 2024, effective upon adoption.**

**2. FOR FINAL ADOPTION**

**2024-09R: CONSIDERATION OF ADOPTION OF PROPOSED AMENDMENTS TO NGC REGULATION 8.130 REGARDING, WITHOUT LIMITATION, EXEMPTING FROM REPORTING ALL TRANSACTIONS PREVIOUSLY REVIEWED BY THE BOARD.**

**PURPOSE:** To clarify that certain transactions previously reviewed as part of an investigation are exempt from the required transaction reports; and to take such additional action as may be necessary and proper to effectuate this stated purpose.

**Regulation adopted, draft dated October 9, 2024, effective upon adoption.**

**3. FOR FINAL ADOPTION**

**2024-08R: CONSIDERATION OF ADOPTION OF PROPOSED AMENDMENTS TO NGC REGULATION 14.025(2) REGARDING, WITHOUT LIMITATION, ALLOWING ENTITIES TO SEEK A DETERMINATION BEFORE ACQUIRING INTELLECTUAL PROPERTY RIGHTS.**

**PURPOSE:** To amend NGC Regulation 14.025(2) to allow entities or persons who have a good faith intention to acquire the rights to a theme to seek a determination from the Nevada Gaming Control Board Chair as to whether such theme is prohibited by NGC regulation 14.025(1) – currently that ability is limited to entities or persons who already possess such rights; And to take such additional actions as may be necessary and proper to effectuate this stated purpose.

**Regulation adopted, draft dated September 24, 2024, effective upon adoption.**

**IX. OTHER:**

Administrative Reports

- Board Chair - Update on January Agenda.
- Commission Chairman - No report.
- Attorney General - No report.

- X. PUBLIC COMMENTS:** This public comment agenda item is provided in accordance with NRS 241.020(3)(d)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

**No comments.**

**DISPOSITION  
INDEX  
DECEMBER 2024**

i

|  |         |   |          |
|--|---------|---|----------|
| 7-Eleven Store #19220E .....             | R #5    | Galaxy Gaming, Inc. (PTC).....                | NR #12   |
| Aldabbagh, Joshua Ussama .....           | R #7    | Golden Nugget Lake Tahoe Hotel & Casino ..... | NR #7    |
| Ann H. Berg Trust .....                  | R #6    | Golden Route Operations LLC .....             | R #11    |
| Aria Resort & Casino.....                | NR #8   | Golden Tavern Group, LLC. ....                | NR #11   |
| Aria Resort & Casino Holdings, LLC ..... | NR #8   | Green Valley Grocery #91 .....                | R #12    |
| Atkinson, Clifford William .....         | NR #2   |   |          |
|  |         | Henzlik, Donald Paul .....                    | R #1     |
| Baca, Justin Michael .....               | R #1    | J Resort.....                                 | NR #3    |
| Basilotta, Heather Suzan .....           | NR #11  | J Resort, LLC .....                           | NR #3    |
| Bellagio.....                            | NR #8   | JETT Gaming LLC .....                         | R #10    |
| Bellagio, LLC .....                      | NR #8   |   |          |
| BetMGM .....                             | NR #8   | Kahn, Aran William .....                      | R #7     |
| BetMGM, LLC.....                         | NR #8   | Kaur, Mandeep .....                           | R #5     |
| Black Willow Corporation .....           | R #6    | Konrad, Chad Eric.....                        | NR #2    |
| Blanco, Victor Keith.....                | NR #5   |   |          |
| Boley, Thomas David .....                | R #7    | Lake Tahoe Gaming Corporation .....           | NR #1    |
| Bonanza Inn and Casino.....              | NR #1   | LeVesque, Craig Richard.....                  | NR #3    |
| BSAG, Corp.....                          | R #5    | Light & Wonder, Inc. (PTC).....               | NR #5    |
|  |         | Little Bonanza, Inc. ....                     | NR #13   |
| C & C 4455, LLC .....                    | NR #2   | Lucky Strike .....                            | NR #1    |
| C.O.D. Casino Corporation .....          | NR #1   | Luxor Hotel and Casino .....                  | NR #8    |
| Carson Bonanza Corporation.....          | NR #1   |   |          |
| Carson Cactus Jack's Corporation .....   | NR #1   | Mandalay Bay Resort & Casino .....            | NR #8    |
| Carson City Gaming Company, LLC.....     | NR #1   | Mandalay Bay, LLC.....                        | NR #8    |
| Carson Lucky Strike Corporation .....    | NR #1   | Mandalay Resort Group, LLC (PTC) .....        | NR #8    |
| Carson Comstock Casino Corporation ..... | NR #1   | Mekha, Aram Mateka.....                       | R #4     |
| Comstock Casino .....                    | NR #1   | MGM Grand Hotel, LLC .....                    | NR #8    |
| Corner Market .....                      | R #4    | MGM Grand Hotel/Casino .....                  | NR #8    |
| Cosmopolitan of Las Vegas, The .....     | NR #8   | MGM Resorts International (PTC) .....         | NR #8    |
| Coyote's Cafe and Cantina .....          | R #11   | MGNV Holding, LLC .....                       | NR #2    |
| Crawford Coin, Inc. ....                 | R #12   | MGNV, LLC.....                                | NR #2    |
|  |         | Mirage – Race Book and Sports Pool, The ..... | NR #8    |
| David Scott Tate Gaming Trust.....       | NR #1   | Mohegan Sun Casino Las Vegas .....            | NR #2    |
| Desimone Gaming Inc.....                 | NR #4   | Mountainside Restaurant & Tavern .....        | R #1     |
|  |         |   |          |
| Entain plc (PTC) .....                   | NR #8   | Neubecker, Michael Norman .....               | NR #9    |
| Evoke plc (PTC) .....                    | NR #10  | Neva One, LLC .....                           | NR #6, 7 |
| Excalibur Hotel and Casino.....          | NR #8   | Nevada Property 1 LLC .....                   | NR #8    |
|  |         | New Castle, LLC .....                         | NR #8, 9 |
| Fallon Bonanza Corporation .....         | NR #1   | New York – New York Hotel & Casino.....       | NR #8    |
| Fallon Comstock Casino Corporation ..... | NR #1   | New York – New York Hotel & Casino, LLC.....  | NR #8    |
| Fallon Gaming Corporation .....          | NR #1   |   |          |
| Fallon Nugget.....                       | NR #1   | Old Vegas Lounge .....                        | R #2     |
| Fernley Bonanza Corporation .....        | NR #1   | Old Vegas Tavern .....                        | R #3     |
| Fernley Nugget.....                      | NR #1   | Ole Nugget Corporation .....                  | NR #1    |
| Fernley Nugget Casino Corporation .....  | NR #1   |   |          |
| Fernley Nugget Corporation .....         | NR #1   | Park MGM.....                                 | NR #8    |
| Fine, Jonathan Michael .....             | NR #14  | Park MGM, LLC .....                           | NR #8    |
| Flowing Tide Lounge.....                 | R #8    | PKWY Management LLC.....                      | NR #14   |
| Flowing Tide Pub & Grill.....            | R #9    | PKWY Reno LLC .....                           | NR #14   |
| FT Pub 10, LLC .....                     | R #9    | PKWY Tavern .....                             | NR #14   |
| FT Pub 11, LLC .....                     | R #8    |   |          |
| FTP Holding Company, LLC .....           | R #8, 9 |   |          |

**DISPOSITION  
INDEX  
DECEMBER 2024**  
ii

---

|   |         |                                  |         |
|---|---------|----------------------------------|---------|
| Ramparts, LLC .....                               | NR #8   | Svoboda, Gary Wayne, Sr. ....    | R #6    |
| Reback, Matthew David .....                       | NR #12  | Svoboda, Tanya Berg .....        | R #6    |
| Rush Hour Bar & Grill.....                        | R #3    | TAJ Group LLC .....              | R #7    |
| Rush Hour II Inc .....                            | R #3    | Tate, David Scott .....          | NR #1   |
| Rush Hour III, Inc. ....                          | R #2    | Tate, Kristie Lynn .....         | NR #1   |
| Rush Hour Inc .....                               | R #3    | Terrible's Gaming.....           | R #10   |
| Russell G. Sheltra, Jr. Gaming Trust .....        | NR #13  | Tolotti, Jason Christopher ..... | R #8, 9 |
| Ryan L. Sheltra Irrevocable Gaming Trust, The ... | NR #13  |                                  |         |
| Sartini Gaming, LLC .....                         | R #5    | Vegas Store LLC.....             | R #4    |
| SC Taverns, LLC.....                              | R #1    | W.C.W. Corporation.....          | NR #1   |
| Shaba, Cecilio .....                              | R #4    | Widerström, Per Evald .....      | NR #10  |
| Sides, Jason Keith .....                          | NR #6   | WSKY .....                       | R #10   |
| Silver Springs Nugget .....                       | NR #1   |                                  |         |
| Silver Springs Nugget Corporation .....           | NR #1   |                                  |         |
| Slark, James Frederick .....                      | R #2, 3 |                                  |         |



**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 1**

---

**FOR POSSIBLE ACTION:**

**01-12-24      N24-0249    Re:** 30469-01  
FERNLEY NUGGET CORPORATION  
52 N MAINE ST  
FALLON, NV 89406

and

05916-01  
W.C.W. CORPORATION  
52 N MAINE ST  
FALLON, NV 89406

and

28319-01  
CARSON CITY GAMING COMPANY, LLC  
52 N MAINE ST  
FALLON, NV 89406

**APPLICATIONS FOR REGISTRATION AS A HOLDING COMPANY**

**Re:** 36613-01  
03819-08 (NR)  
CARSON LUCKY STRIKE CORPORATION, dba  
LUCKY STRIKE  
2811 S CARSON ST  
CARSON CITY, NV 89701

DAVID SCOTT TATE GAMING TRUST  
Shareholder

100%

DAVID SCOTT TATE  
Director/President/Treasurer

KRISTIE LYNN TATE  
Secretary

**APPLICATION FOR LICENSURE AS SOLE SHAREHOLDER**

**APPLICATIONS FOR LICENSURE AS AN OFFICER AND/OR DIRECTOR**

**APPLICATION FOR A NONRESTRICTED GAMING LICENSE**

----- ITEM CONTINUED NEXT PAGE -----

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 2**

---

**Re:** 36612-01  
30470-02 (NR)  
FERNLEY NUGGET CASINO CORPORATION, dba  
FERNLEY NUGGET  
1190 E MAIN ST  
FERNLEY, NV 89408

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

FERNLEY NUGGET CORPORATION 100%  
(Transferee)  
Shareholder

**APPLICATION FOR A TRANSFER OF INTEREST**

**APPLICATION FOR LICENSURE AS SOLE SHAREHOLDER**

**APPLICATION FOR A NONRESTRICTED GAMING LICENSE**

DAVID SCOTT TATE  
Director/President/Treasurer

KRISTIE LYNN TATE  
Secretary

**APPLICATIONS FOR LICENSURE AS AN OFFICER AND/OR DIRECTOR**

**Re:** 31146-01  
FERNLEY BONANZA CORPORATION  
(dba Jackpot Crossing)  
(dba Wigwam Casino)  
70 S MAINE ST  
FALLON, NV 89406

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

FERNLEY NUGGET CORPORATION 100%  
(Transferee)  
Shareholder

**APPLICATION FOR A TRANSFER OF INTEREST**

**APPLICATION FOR LICENSURE AS SOLE SHAREHOLDER**

**Re:** 36622-01  
01111-02 (NR)  
OLE NUGGET CORPORATION, dba  
FALLON NUGGET  
70 S MAINE ST  
FALLON, NV 89406

and

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 3**

---

36609-01  
03074-02 (NR)  
FALLON BONANZA CORPORATION, dba  
BONANZA INN AND CASINO  
855 W WILLIAMS AVE  
FALLON, NV 89406

and

36621-01  
24988-02 (NR)  
SILVER SPRINGS NUGGET CORPORATION, dba  
SILVER SPRINGS NUGGET  
1280 US HWY 95A N  
SILVER SPRINGS, NV 89429

and

36611-01  
31563-02 (NR)  
FALLON COMSTOCK CASINO CORPORATION, dba  
COMSTOCK CASINO  
1975 S TAYLOR ST  
FALLON, NV 89406

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

W.C.W. CORPORATION 100%  
(Transferee)  
Shareholder

**APPLICATIONS FOR A TRANSFER OF INTEREST**

**APPLICATIONS FOR LICENSURE AS SOLE SHAREHOLDER**

**APPLICATIONS FOR A NONRESTRICTED GAMING LICENSE**

DAVID SCOTT TATE  
Director/President/Treasurer

KRISTIE LYNN TATE  
Secretary

**APPLICATIONS FOR LICENSURE AS AN OFFICER AND/OR DIRECTOR**

----- ITEM CONTINUED NEXT PAGE -----

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 4**

---

**Re:** 29174-01  
FALLON GAMING CORPORATION  
(dba Headquarters Bar & Casino)  
134 S MAINE ST  
FALLON, NV 89406

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

W.C.W. CORPORATION 100%  
(Transferee)  
Shareholder

**APPLICATION FOR A TRANSFER OF INTEREST**

**APPLICATION FOR LICENSURE AS SOLE SHAREHOLDER**

**Re:** 36608-01  
24951-04 (NR)  
CARSON COMSTOCK CASINO CORPORATION, dba  
COMSTOCK CASINO  
3680 GONI RD  
CARSON CITY, NV 89706

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

CARSON CITY GAMING COMPANY, LLC 100%  
(Transferee)  
Shareholder

**APPLICATION FOR A TRANSFER OF INTEREST**

**APPLICATION FOR LICENSURE AS SOLE SHAREHOLDER**

**APPLICATION FOR A NONRESTRICTED GAMING LICENSE**

DAVID SCOTT TATE  
Director/President/Treasurer

KRISTIE LYNN TATE  
Secretary

**APPLICATIONS FOR LICENSURE AS AN OFFICER AND/OR DIRECTOR**

----- ITEM CONTINUED NEXT PAGE -----

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 5**

---

**Re:** 30808-01  
CARSON BONANZA CORPORATION  
(dba Jackpot Crossing Casino)  
1897 N EDMONDS DR  
CARSON CITY, NV 89701

and

29743-01  
CARSON CACTUS JACK'S CORPORATION  
(dba Cactus Jack's Senator Club)  
420 N CARSON ST  
CARSON CITY, NV 89701

and

32645-01  
C.O.D. CASINO CORPORATION  
(dba COD Casino)  
1595 ESMERALDA AVE  
MINDEN, NV 89423

and

36500-01  
LAKE TAHOE GAMING CORPORATION  
(dba Tahoe Nugget)  
177 HWY 50  
STATELINE, NV 89449

DAVID SCOTT TATE GAMING TRUST 100%  
(Transferor)

CARSON CITY GAMING COMPANY, LLC 100%  
(Transferee)  
Shareholder

**APPLICATIONS FOR A TRANSFER OF INTEREST**

**APPLICATIONS FOR LICENSURE AS SOLE SHAREHOLDER**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

FOR ALL SEVEN LOCATIONS

- **THE SURVEILLANCE SYSTEM MUST BE MAINTAINED AS PREVIOUSLY APPROVED BY THE NEVADA GAMING CONTROL BOARD ENFORCEMENT DIVISION.**

FOR LUCKY STRIKE:

- **THE LOCATION IS LIMITED TO THE OPERATION OF SLOT MACHINES.**

----- ITEM CONTINUED NEXT PAGE -----

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 6**

---

FOR FERNLEY NUGGET:

- **THE LOCATION IS LIMITED TO THE OPERATION OF GAMING DEVICES, ONE (1) TWENTY-ONE GAME AND ONE (1) ROULETTE GAME AND THE NUMBER OR TYPE OF TABLE GAMES MAY BE ADDED WITH THE PRIOR ADMINISTRATIVE APPROVAL OF THE NEVADA GAMING CONTROL BOARD CHAIR OR CHAIR'S DESIGNEE.**

FOR SILVER SPRINGS NUGGET:

- **THE LOCATION IS LIMITED TO THE OPERATION OF SLOT MACHINES. THE NUMBER OF SLOT MACHINES IS LIMITED TO 150, AND THE NUMBER MAY BE ADDED WITH THE PRIOR ADMINISTRATIVE APPROVAL OF THE NEVADA GAMING CONTROL BOARD CHAIR OR CHAIR'S DESIGNEE.**

FOR COMSTOCK CASINO (FALLON, NV):

- **A KEY EMPLOYEE APPLICATION MUST BE ON FILE WITH THE NEVADA GAMING CONTROL BOARD AT ALL TIMES AND REFILED WITHIN 60 DAYS OF A CHANGE IN THE PERSON OCCUPYING THAT POSITION.**
- **THE LOCATION IS LIMITED TO THE OPERATION OF 50 SLOT MACHINES. THE NUMBER OF SLOT MACHINES AND LIVE GAMES MAY BE ADDED WITH THE PRIOR ADMINISTRATIVE APPROVAL OF THE NEVADA GAMING CONTROL BOARD CHAIR OR CHAIR'S DESIGNEE.**

FOR COMSTOCK CASINO (CARSON CITY, NV):

- **THE LOCATION IS LIMITED TO THE OPERATION OF 250 SLOT MACHINES. THE NUMBER OF SLOT MACHINES AND LIVE GAMES MAY BE ADDED WITH THE PRIOR ADMINISTRATIVE APPROVAL OF THE NEVADA GAMING CONTROL BOARD CHAIR OR CHAIR'S DESIGNEE.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 7**

---

**FOR POSSIBLE ACTION:**

**02-12-24**     **N24-0515**   **Re:** 36806-01  
                  **N24-0540**            C & C 4455, LLC  
                  **N25-0060**            4455 PARADISE RD  
                                     LAS VEGAS, NV 89169

CLIFFORD WILLIAM ATKINSON 51%  
Member/Manager

CHAD ERIC KONRAD 49%  
Member/Manager

**APPLICATION FOR REGISTRATION AS A HOLDING COMPANY**

**APPLICATIONS FOR FINDING OF SUITABILITY AS A MEMBER AND MANAGER**

**Re:** 35145-01  
       17586-11  
       35148-01 (M)  
       35149-01 (D)  
       MGNV, LLC, dba  
       MOHEGAN SUN CASINO LAS VEGAS  
       4455 PARADISE RD  
       LAS VEGAS, NV 89169

MGNV HOLDING, LLC 100%  
(Transferor)

C & C 4455, LLC 100%  
(Transferee)  
Member

**APPLICATION FOR A TRANSFER OF INTEREST**

**APPLICATION FOR LICENSURE AS A MEMBER**

**APPLICATION TO ADD, REMOVE, OR MODIFY CONDITIONS TO LICENSE**

CLIFFORD WILLIAM ATKINSON  
Manager/Chief Executive Officer

CHAD ERIC KONRAD  
Manager/Chief Financial Officer

**APPLICATIONS FOR LICENSURE AS A MANAGER AND KEY EMPLOYEE**

----- ITEM CONTINUED NEXT PAGE -----

DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 8

---

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

TO REMOVE:

- ANY CHANGE IN ANY AGREEMENT OR THE CREATION OF ANY NEW AGREEMENT BETWEEN MGNV, LLC, AND BETFRED SPORTS (NEVADA) LLC, MUST BE REPORTED TO THE NEVADA GAMING CONTROL BOARD WITHIN 30 DAYS OF SUCH CHANGE.
- MOHEGAN SUN CASINO LAS VEGAS SHALL ENSURE ALL SIGNS CONCERNING THE RACE BOOK AND SPORTS POOL, ALL WAGERING TICKETS AND BETTING SHEETS, AND THE HOME PAGE OF ANY WEBSITE OR MOBILE APP PROMINENTLY INDICATE THAT MOHEGAN SUN CASINO LAS VEGAS IS THE OPERATOR OF THE RACE BOOK, SPORTS POOL, AND OFF-TRACK PARI-MUTUEL RACE WAGERING, AS THE CASE MAY BE. BETFRED SPORTS MAY BE IDENTIFIED ON SUCH POSTINGS AS THE MANAGER OF THE RACE BOOK OR SPORTS POOL OR BY OTHER TERMS THAT SUGGEST ITS ROLE AS PROVIDING SERVICES FOR THE OPERATOR, SUCH AS “POWERED BY” OR “BY” BETFRED SPORTS, OR “BETFRED AT MOHEGAN SUN SPORTSBOOK”.
- BETFRED GROUP LIMITED SHALL ESTABLISH AND MAINTAIN A GAMING COMPLIANCE PLAN FOR THE PURPOSE OF, AT A MINIMUM, PERFORMING DUE DILIGENCE, DETERMINING THE SUITABILITY OF RELATIONSHIPS WITH OTHER ENTITIES AND INDIVIDUALS, AND TO REVIEW AND ENSURE COMPLIANCE BY BETFRED GROUP LIMITED AND ANY AFFILIATED ENTITIES, WITH THE NEVADA GAMING CONTROL ACT, THE COMMISSION’S REGULATIONS AND THE LAWS AND REGULATIONS OF ANY OTHER JURISDICTION IN WHICH BETFRED GROUP LIMITED, AND ANY AFFILIATED ENTITIES OPERATE. THE PLAN, ANY AMENDMENTS THERETO, AND THE MEMBERS OF THE GAMING COMPLIANCE COMMITTEE, ONE SUCH MEMBER WHO SHALL BE INDEPENDENT AND KNOWLEDGEABLE OF THE ACT AND REGULATIONS, SHALL BE ADMINISTRATIVELY REVIEWED AND APPROVED BY THE CHAIR OF THE NEVADA GAMING CONTROL BOARD OR THE CHAIR’S DESIGNEE. BETFRED GROUP LIMITED SHALL AMEND THE PLAN, OR ANY ELEMENT THEREOF, AND PERFORM SUCH DUTIES AS MAY BE REQUESTED OR ASSIGNED BY THE CHAIR OF THE NEVADA GAMING CONTROL BOARD OR THE CHAIR’S DESIGNEE RELATING TO A REVIEW OF ACTIVITIES RELEVANT TO THE CONTINUING QUALIFICATIONS OF BETFRED GROUP LIMITED UNDER THE PROVISIONS OF THE ACT AND REGULATIONS.
- BETFRED GROUP LIMITED SHALL FUND AND MAINTAIN WITH THE NEVADA GAMING CONTROL BOARD A REVOLVING FUND IN THE AMOUNT OF \$50,000 FOR THE PURPOSE OF FUNDING INVESTIGATIVE REVIEWS BY THE NEVADA GAMING CONTROL BOARD. WITHOUT LIMITING THE FOREGOING, THE NEVADA GAMING CONTROL BOARD SHALL HAVE THE RIGHT, WITHOUT NOTICE, TO DRAW UPON THE FUNDS OF SAID ACCOUNT FOR THE PAYMENT OF COSTS AND EXPENSES INCURRED BY THE NEVADA GAMING CONTROL BOARD AND ITS STAFF IN THE SURVEILLANCE, MONITORING, AND INVESTIGATIVE REVIEW OF ALL ACTIVITIES OF BETFRED GROUP LIMITED, AND ITS AFFILIATED COMPANIES.
- EACH SETTLOR, TRUSTEE, BENEFICIARY, OR OTHER PERSON ASSOCIATED WITH A SETTLEMENT/TRUST WHO HAS OR OBTAINS ANY APPROVAL FROM THE NEVADA GAMING COMMISSION OR NEVADA GAMING CONTROL BOARD SHALL BE RESPONSIBLE FOR ENSURING ANY SUCCESSOR, OR POTENTIAL SUCCESSOR, TRUSTEE, BENEFICIARY, OR OTHER PERSON WHO MAY BECOME ASSOCIATED WITH A SETTLEMENT/TRUST RECEIVES NOTICE THAT THE PERSON IS SUBJECT TO THE NEVADA GAMING CONTROL ACT AND REGULATIONS PROMULGATED THERETO SPECIFICALLY INCLUDING, WITHOUT LIMITATION, NOTICE REGARDING APPROVAL REQUIREMENTS AND TRANSFER OF INTEREST REQUIREMENTS.



**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 9**

---

- **THE F DONE 2007 FAMILY DISCRETIONARY SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **THE PE DONE 2007 FAMILY DISCRETIONARY SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **THE FRED DONE 1991 NO. 1 LIFE INTEREST SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **THE FRED DONE 1991 NO. 3 LIFE INTEREST SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **PETER ERIC DONE 1991 NO. 1 LIFE INTEREST SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **PETER ERIC DONE 1991 NO. 4 LIFE INTEREST SETTLEMENT AND DEED OF ACKNOWLEDGEMENT SHALL OPERATE IN ACCORDANCE WITH THE NEVADA GAMING CONTROL ACT AND REGULATIONS OF THE NEVADA GAMING COMMISSION PROMULGATED PURSUANT THERETO.**
- **EXCEPT AS OTHERWISE PROVIDED FOR BY THE NEVADA GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE, THE TICKET WRITERS MUST BE EMPLOYEES OF MGNV, LLC, DBA MOHEGAN SUN CASINO LAS VEGAS.**

**TO ADD:**

- **THE APPROVALS REGARDING CHAD ERIC KONRAD ARE LIMITED TO EXPIRE AT MIDNIGHT OF THE DECEMBER 2026 NEVADA GAMING COMMISSION MEETING ON THE DAY THE ITEM IS HEARD.**
- **EXCEPT AS OTHERWISE PROVIDED FOR BY THE NEVADA GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE, THE TICKET WRITERS MUST BE EMPLOYEES OF MGNV, LLC.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 10**

---

**FOR POSSIBLE ACTION:**

**03-12-24      N24-0121    Re:** 34125-01  
01635-05  
J RESORT, LLC, dba  
J RESORT  
345 N ARLINGTON AVE  
RENO, NV 89501

CRAIG RICHARD LEVESQUE  
General Manager

**APPLICATION FOR LICENSURE AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**04-12-24      N25-0038    Re:** 32940-01  
36805-01 (SO)  
DESIMONE GAMING INC.  
50 S STEPHANIE ST STE 101  
HENDERSON, NV 89012

**APPLICATION FOR LICENSURE AS AN OPERATOR OF A  
SLOT MACHINE ROUTE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**05-12-24      N23-0149    Re:** 32018-01  
LIGHT & WONDER, INC. (PTC)  
6601 BERMUDA RD  
LAS VEGAS, NV 89119

VICTOR KEITH BLANCO  
Executive Vice President/Chief Technology Officer

**APPLICATION FOR FINDING OF SUITABILITY AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 11**

---

**FOR POSSIBLE ACTION:**

**06-12-24      N24-0271    Re:** 32644-01  
NEVA ONE, LLC  
(dba Golden Nugget Lake Tahoe Hotel & Casino)  
50 HWY 50  
STATELINE, NV 89449

JASON KEITH SIDES  
Senior Vice President/General Manager

**APPLICATION FOR LICENSURE AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**07-12-24      N25-0065    Re:** 32644-01  
01190-05  
NEVA ONE, LLC, dba  
GOLDEN NUGGET LAKE TAHOE HOTEL & CASINO  
50 HWY 50  
STATELINE, NV 89449

**APPLICATION FOR THE ADDITION OF A RACE BOOK AND SPORTS POOL**

**APPLICATION FOR LICENSURE TO CONDUCT OFF-TRACK PARI-MUTUEL RACE  
AND SPORTS WAGERING**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**PRIOR NOTIFICATION TO THE NEVADA GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE IS REQUIRED BY NEVA ONE, LLC, DBA GOLDEN NUGGET LAKE TAHOE HOTEL & CASINO, BEFORE CONVERTING A LOCATION FROM A KIOSK OPERATION TO A MANNED SATELLITE OPERATION, OR FROM A MANNED SATELLITE OPERATION TO A KIOSK OPERATION. IF ANY LICENSED LOCATION UTILIZES BOTH A MANNED SATELLITE OPERATION AND A KIOSK OPERATION, PRIOR NOTIFICATION TO THE NEVADA GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE IS REQUIRED BEFORE CLOSING OR REOPENING A MANNED SATELLITE OPERATION.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 12**

---

**FOR POSSIBLE ACTION:**

**08-12-24**    **N24-0221**   **Re:** 10434-01  
                 **N25-0198**            MGM RESORTS INTERNATIONAL (PTC)  
                 **N25-0199**            3600 LAS VEGAS BLVD S  
                                    LAS VEGAS, NV 89109

and

35680-01  
MANDALAY RESORT GROUP, LLC (PTC)  
3950 LAS VEGAS BLVD S  
LAS VEGAS, NV 89119

**APPLICATIONS FOR AMENDMENT TO ORDER OF REGISTRATION**

**Re:** 34602-01  
      ENTAIN PLC (PTC)  
      25 CHARTERHOUSE SQ  
      LONDON, ENGLAND EC1M 6AE  
      UNITED KINGDOM

**APPLICATION FOR AMENDMENT TO ORDER OF REGISTRATION**

**Re:** 30813-01  
      30814-01  
      ARIA RESORT & CASINO HOLDINGS, LLC, dba  
      ARIA RESORT & CASINO  
      3730 LAS VEGAS BLVD S  
      LAS VEGAS, NV 89158

and

26394-01  
00655-05  
BELLAGIO, LLC, dba  
BELLAGIO  
3600 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

and

30954-01  
30955-01  
NEVADA PROPERTY 1 LLC, dba  
THE COSMOPOLITAN OF LAS VEGAS  
3708 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

and

----- ITEM CONTINUED NEXT PAGE -----

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 13**

---

33222-01  
14727-01  
NEW CASTLE, LLC, dba  
EXCALIBUR HOTEL AND CASINO  
3850 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

and

33223-01  
17041-01  
RAMPARTS, LLC, dba  
LUXOR HOTEL AND CASINO  
3900 LAS VEGAS BLVD S  
LAS VEGAS, NV 89119

and

33221-01  
00022-03  
MANDALAY BAY, LLC, dba  
MANDALAY BAY RESORT & CASINO  
3950 LAS VEGAS BLVD S  
LAS VEGAS, NV 89119

and

26535-01  
02982-07  
MGM GRAND HOTEL, LLC, dba  
MGM GRAND HOTEL/CASINO  
3799 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

and

20401-01  
19590-01  
NEW YORK – NEW YORK HOTEL & CASINO, LLC, dba  
NEW YORK – NEW YORK HOTEL & CASINO  
3790 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

and

----- ITEM CONTINUED NEXT PAGE -----

DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 14

---

35370-01  
20682-01  
PARK MGM, LLC, dba  
PARK MGM  
3770 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109

BETMGM, LLC  
Key Employee

**APPLICATIONS FOR LICENSURE AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL, 60<sup>TH</sup> REVISED ORDER OF REGISTRATION, DRAFT #1, AND 6<sup>TH</sup> REVISED ORDER OF REGISTRATION, DRAFT #1. CONDITIONED AS FOLLOWS:**

- **PRIOR TO BETMGM, LLC COMMENCING KEY EMPLOYEE DUTIES AT THE RACE BOOK AND SPORTS POOL, AN ADEQUATE WRITTEN INTERNAL CONTROL SYSTEM THAT DOCUMENTS COMPLIANCE WITH MINIMUM INTERNAL CONTROL STANDARDS MUST BE RECEIVED AND APPROVED BY THE NEVADA GAMING CONTROL BOARD (AUDIT DIVISION)**
- **EXCEPT AS OTHERWISE PROVIDED FOR BY THE NEVADA GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE, THE TICKET WRITERS MUST BE EMPLOYEES OF THE LICENSED OPERATOR OF THE RACE BOOK AND SPORTS POOL**
- **ANY CHANGE IN ANY AGREEMENT OR THE CREATION OF ANY NEW AGREEMENT BETWEEN MGM RESORTS INTERACTIVE, LLC, THE LICENSED OPERATOR OF THE RACE BOOK AND SPORTS POOL, AND BETMGM, LLC, MUST BE REPORTED TO THE NEVADA GAMING CONTROL BOARD WITHIN 30 DAYS OF SUCH CHANGE**
- **BETMGM, LLC SHALL ESTABLISH AND MAINTAIN A GAMING COMPLIANCE PLAN FOR THE PURPOSE OF, AT A MINIMUM, PERFORMING DUE DILIGENCE, DETERMINING THE SUITABILITY OF RELATIONSHIPS WITH OTHER ENTITIES AND INDIVIDUALS, AND TO REVIEW AND ENSURE COMPLIANCE BY BETMGM, LLC AND ANY AFFILIATED ENTITIES, WITH THE NEVADA GAMING CONTROL ACT, THE COMMISSION'S REGULATIONS AND THE LAWS AND REGULATIONS OF ANY OTHER JURISDICTION IN WHICH BETMGM, LLC, AND ANY AFFILIATED ENTITIES OPERATE. THE PLAN, ANY AMENDMENTS THERETO, AND THE MEMBERS OF THE GAMING COMPLIANCE COMMITTEE, ONE SUCH MEMBER WHO SHALL BE INDEPENDENT AND KNOWLEDGEABLE OF THE ACT AND REGULATIONS, SHALL BE ADMINISTRATIVELY REVIEWED AND APPROVED BY THE CHAIR OF THE NEVADA GAMING CONTROL BOARD OR THE CHAIR'S DESIGNEE. BETMGM, LLC SHALL AMEND THE PLAN, OR ANY ELEMENT THEREOF, AND PERFORM SUCH DUTIES AS MAY BE REQUESTED OR ASSIGNED BY THE CHAIR OF THE NEVADA GAMING CONTROL BOARD OR THE CHAIR'S DESIGNEE RELATING TO A REVIEW OF ACTIVITIES RELEVANT TO THE CONTINUING QUALIFICATIONS OF BETMGM, LLC UNDER THE PROVISIONS OF THE ACT AND REGULATIONS.**
- **BETMGM, LLC SHALL FUND AND MAINTAIN WITH THE NEVADA GAMING CONTROL BOARD A REVOLVING FUND IN THE AMOUNT OF \$50,000 FOR THE PURPOSE OF FUNDING INVESTIGATIVE REVIEWS BY THE NEVADA GAMING CONTROL BOARD. WITHOUT LIMITING THE FOREGOING, THE NEVADA GAMING CONTROL BOARD SHALL HAVE THE RIGHT, WITHOUT NOTICE, TO DRAW UPON THE FUNDS OF SAID ACCOUNT FOR THE PAYMENT OF COSTS AND EXPENSES INCURRED BY THE NEVADA GAMING CONTROL BOARD AND ITS STAFF IN THE SURVEILLANCE, MONITORING, AND INVESTIGATIVE REVIEW OF ALL ACTIVITIES OF BETMGM, LLC, AND ITS AFFILIATED COMPANIES.**

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 15**

---

- **BETMGM, LLC IS REQUIRED TO REPORT TO MGM RESORTS INTERNATIONAL'S SUPERTRADER, AKA DIRECTOR OF SPORTS BOOK TRADING OPERATIONS, OR OTHER AUTHORIZED MGM RESORTS INTERNATIONAL EMPLOYEE AS APPROVED BY THE GAMING CONTROL BOARD CHAIR OR THE CHAIR'S DESIGNEE.**

**NGC DISPOSITION:**

**APPROVED, 60<sup>TH</sup> REVISED ORDER OF REGISTRATION, AND 6<sup>TH</sup> REVISED ORDER OF REGISTRATION;  
CONDITIONED – SAME.**

---

**FOR POSSIBLE ACTION:**

**09-12-24      N22-0585    Re: 33222-01  
NEW CASTLE, LLC  
(dba Excalibur Hotel and Casino)  
3850 LAS VEGAS BLVD S  
LAS VEGAS, NV 89109**

**MICHAEL NORMAN NEUBECKER  
President/Chief Operating Officer**

**APPLICATION FOR LICENSURE AS A KEY EXECUTIVE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**10-12-24      N24-0203    Re: 31716-01  
EVOKE PLC (PTC)  
601-701 EUROPORT  
GIBRALTAR GX11-1AA**

**PER EVALD WIDERSTRÖM  
Chief Executive Officer/Executive Director**

**APPLICATION FOR FINDING OF SUITABILITY AS AN OFFICER AND DIRECTOR**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 16**

---

**FOR POSSIBLE ACTION:**

**11-12-24      N24-0338    Re:** 27436-01  
GOLDEN TAVERN GROUP, LLC.  
6595 S JONES BLVD  
LAS VEGAS, NV 89118

HEATHER SUZAN BASILOTTA  
Regional Operations Manager

**APPLICATION FOR FINDING OF SUITABILITY AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**12-12-24      N24-0305    Re:** 32671-01  
GALAXY GAMING, INC. (PTC)  
6480 CAMERON ST STE 305  
LAS VEGAS, NV 89118

MATTHEW DAVID REBACK  
Chief Executive Officer/President

**APPLICATION FOR LICENSURE AS AN OFFICER**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---



**DISPOSITION  
NONRESTRICTED AGENDA  
DECEMBER 2024  
PAGE 17**

---

**FOR POSSIBLE ACTION:**

**13-12-24      N24-0548    Re:** 05379-01  
LITTLE BONANZA, INC.  
(dba Bonanza Casino)  
4720 N VIRGINIA ST  
RENO, NV 89506

RUSSELL G. SHELTRA, JR. GAMING TRUST 12%  
(Transferor) (511.98 Shares Common Stock)

THE RYAN L. SHELTRA IRREVOCABLE GAMING TRUST 12%  
(Transferee) (511.98 Shares Common Stock)

**APPLICATION FOR A TRANSFER OF INTEREST**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**14-12-24      N24-0552    Re:** 35927-01  
00718-04  
35928-01 (M)  
35929-01 (D)  
PKWY RENO LLC, dba  
PKWY TAVERN  
219 UNIVERSITY WY  
RENO, NV 89501

PKWY MANAGEMENT LLC 100%  
Member

JONATHAN MICHAEL FINE  
Manager

**APPLICATION FOR A SECOND WAIVER OF THE PROVISIONS OF NGC  
REGULATION 4.080 (WHICH IMPOSES A SIX-MONTH TIME LIMITATION WITHIN  
WHICH COMMISSION ACTION IS EFFECTIVE), IN CONNECTION WITH APPROVAL  
FOR A NONRESTRICTED GAMING LICENSE, AS GRANTED IN JUNE 2023**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**THE WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080, IN CONJUNCTION WITH THE APPROVALS  
GRANTED IN JUNE 2023, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED NGC MEETING IN  
DECEMBER 2025.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

**(TOGLIATTI RECUSED)**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 18**

---

**01-12-24      REFERRED BACK TO STAFF.**

---

**FOR POSSIBLE ACTION:**

**02-12-24      R24-0489    Re: 35533-01  
08328-03**  
15 Machines      RUSH HOUR III, INC., dba  
                         OLD VEGAS LOUNGE  
                         4130 S SANDHILL RD STE A1-A2  
                         LAS VEGAS, NV 89121

JAMES FREDERICK SLARK      100%  
Director/President/Secretary/Treasurer/Shareholder      (5,000 Shares Common Stock)

**APPLICATION FOR A RESTRICTED GAMING LICENSE**

**APPLICATION FOR LICENSURE AS AN OFFICER, DIRECTOR, AND  
SHAREHOLDER**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**FREDERICK WILLIAM SLARK SHALL HAVE NO INVOLVEMENT NOR INFLUENCE IN THE OPERATIONS OF RUSH HOUR III, INC., DOING BUSINESS AS OLD VEGAS LOUNGE.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 19**

---

**FOR POSSIBLE ACTION:**

**03-12-24      R24-0204      30104-01  
06402-04  
RUSH HOUR INC, dba  
RUSH HOUR BAR & GRILL  
3985 E SUNSET RD STE A  
LAS VEGAS, NV 89120**

and

34106-01  
03024-07  
RUSH HOUR II INC, dba  
OLD VEGAS TAVERN  
3850 E DESERT INN RD  
LAS VEGAS, NV 89121

JAMES FREDERICK SLARK  
Manager

**APPLICATIONS FOR LICENSURE AS A KEY EMPLOYEE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 20**

---

**\*AMENDED**

**FOR POSSIBLE ACTION:**

04-12-24      R24-0167    Re: 36542-01  
07-24                              33237-03  
5 Machines                      VEGAS STORE LLC, dba  
    CORNER MARKET  
    6700 W CHARLESTON BLVD STE F  
    LAS VEGAS, NV 89146

ARAM MATEKA MEKHA 100%  
Member/Manager/Chief Executive Officer/Chief Financial Officer/Chief  
Operations Officer/Chief Marketing Officer

**APPLICATION FOR A RESTRICTED GAMING LICENSE**

**APPLICATION FOR LICENSURE AS A MEMBER, MANAGER, AND KEY EXECUTIVE**

**\*GCB RECOMMENDS: APPROVAL, CONDITIONED:**

- 1) THE SURVEILLANCE SYSTEM AND/OR MIRROR(S) MUST BE INSPECTED AND APPROVED BY THE NEVADA GAMING CONTROL BOARD ENFORCEMENT DIVISION WITHIN 60 DAYS OF ISSUANCE OF THE STATE GAMING LICENSE AND THEREAFTER BE MAINTAINED AT OR ABOVE THE STANDARD THAT IS APPROVED.
  
- 2) CECILIO SHABA SHALL HAVE NO INVOLVEMENT NOR INFLUENCE IN THE OPERATION OF VEGAS STORE LLC, DOING BUSINESS AS CORNER MARKET.

**NGC DISPOSITION: APPROVED, CONDITIONED - SAME.**

**(SILVER VOTED NO)**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 21**

---

**FOR POSSIBLE ACTION:**

**05-12-24      R24-0290    Re:** 10753-01  
01251-05  
SARTINI GAMING, LLC, db at  
7-ELEVEN STORE #19220E  
710 BARING BLVD  
SPARKS, NV 89434

BSAG, CORP.  
Business Operator

MANDEEP KAUR 100%  
Director/President/Secretary/Treasurer/Shareholder    (5,000 Shares Common Stock)

**APPLICATION FOR LICENSURE OF BSAG, CORP., TO RECEIVE A PERCENTAGE  
OF GAMING REVENUE FROM SARTINI GAMING, LLC, DB AT 7- ELEVEN STORE  
#19220E**

**APPLICATION FOR LICENSURE AS AN OFFICER, DIRECTOR, AND  
SHAREHOLDER**

**GCB RECOMMENDS: APPROVAL**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 22**

---

**FOR POSSIBLE ACTION:**

**06-12-24      R24-0456    Re:** 05037-01  
BLACK WILLOW CORPORATION  
(dba Shoshone Market)  
52660 NEVADA HWY 376  
ROUND MOUNTAIN, NV 89045

ANN H. BERG TRUST 100%  
(Transferor) (100 Shares Common Stock)

TANYA BERG SVOBODA 50%  
(Transferee) (50 Shares Common Stock)  
President/Treasurer/Secretary/Director/Shareholder

GARY WAYNE SVOBODA, SR. 50%  
(Transferee) (50 Shares Common Stock)  
Director/Shareholder

**APPLICATIONS FOR A TRANSFER OF INTEREST**

**APPLICATIONS FOR LICENSURE AS AN OFFICER, DIRECTOR, AND/OR  
SHAREHOLDER**

**APPLICATIONS BY TANYA BERG SVOBODA AND GARY WAYNE SVOBODA, SR.  
TO PLEDGE EQUITY INTEREST OF BLACK WILLOW CORPORATION, TO ANN H.  
BERG TRUST IN CONNECTION WITH A STOCK PLEDGE AND SECURITY  
AGREEMENT AND SECURED PROMISSORY NOTE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 23**

---

**FOR POSSIBLE ACTION:**

**07-12-24     R24-0494   Re:** 35600-01  
TAJ GROUP LLC  
(dba Stake Out Bar & Grill)  
4800 S MARYLAND PARKWAY STE A  
LAS VEGAS, NV 89119

THOMAS DAVID BOLEY 33.33%  
(Transferor)

ARAN WILLIAM KAHN 33.33%  
(Transferor)

JOSHUA USSAMA ALDABBAGH 66.66%  
(Transferee)

**APPLICATIONS FOR A TRANSFER OF INTEREST**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**A KEY EMPLOYEE APPLICATION MUST BE FILED WITHIN 60 DAYS, AND THEREAFTER BE REFILED WITHIN 60 DAYS OF ANY CHANGE IN THE PERSON OCCUPYING THAT POSITION.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 24**

---

**FOR POSSIBLE ACTION:**

**08-12-24 R25-0162** Re: 36412-01  
28597-03  
15 Machines FT PUB 11, LLC, dba  
FLOWING TIDE LOUNGE  
9724 PYRAMID WY  
SPARKS, NV 89441

FTP HOLDING COMPANY, LLC  
Member

100%

JASON CHRISTOPHER TOLOTTI  
Manager

**APPLICATION FOR A WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080  
(WHICH IMPOSES A SIX-MONTH TIME LIMITATION WITHIN WHICH COMMISSION  
ACTION IS EFFECTIVE), IN CONNECTION WITH APPROVAL FOR A RESTRICTED  
GAMING LICENSE, AS GRANTED IN JUNE 2024**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**THE WAIVER OF THE PROVISIONS OF NEVADA GAMING COMMISSION REGULATION 4.080, IN CONJUNCTION  
WITH THE APPROVAL GRANTED IN JUNE 2024, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED  
NEVADA GAMING COMMISSION MEETING IN JUNE 2025.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---



**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 25**

---

**FOR POSSIBLE ACTION:**

**09-12-24      R25-0163    Re:** 36411-01  
23723-02  
15 Machines      FT PUB 10, LLC, dba  
                         FLOWING TIDE PUB & GRILL  
                         9716 PYRAMID WY  
                         SPARKS, NV 89441

FTP HOLDING COMPANY, LLC      100%  
Member

JASON CHRISTOPHER TOLOTTI  
Manager

**APPLICATION FOR A WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080  
(WHICH IMPOSES A SIX-MONTH TIME LIMITATION WITHIN WHICH COMMISSION  
ACTION IS EFFECTIVE), IN CONNECTION WITH APPROVAL FOR A RESTRICTED  
GAMING LICENSE, AS GRANTED IN JUNE 2024**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**THE WAIVER OF THE PROVISIONS OF NEVADA GAMING COMMISSION REGULATION 4.080, IN CONJUNCTION WITH THE APPROVAL GRANTED IN JUNE 2024, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED NEVADA GAMING COMMISSION MEETING IN JUNE 2025.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**FOR POSSIBLE ACTION:**

**10-12-24      R24-0355    Re:** 31072-01  
27600-02  
15 Machines      JETT GAMING LLC, dba  
                         TERRIBLE'S GAMING, db at  
                         WSKY  
                         2992 W CHEYENNE AVE  
                         NORTH LAS VEGAS, NV 89032

**APPLICATION FOR A RESTRICTED GAMING LICENSE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**DISPOSITION  
RESTRICTED AGENDA  
DECEMBER 2024  
PAGE 26**

---

**FOR POSSIBLE ACTION:**

**11-12-24 R25-0032 Re:** 14180-01  
13374-06  
10 Machines GOLDEN ROUTE OPERATIONS LLC, dba  
GOLDEN ROUTE OPERATIONS, db at  
COYOTE'S CAFE AND CANTINA  
4350 E SUNSET RD STE 104  
HENDERSON, NV 89014

**APPLICATION FOR A RESTRICTED GAMING LICENSE**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: APPROVED.**

---

**FOR POSSIBLE ACTION:**

**12-12-24 R24-0166 Re:** 10559-01  
36540-01  
7 Machines CRAWFORD COIN, INC., db at  
GREEN VALLEY GROCERY #91  
6985 S BUFFALO DR  
LAS VEGAS, NV 89113

**APPLICATION FOR A RESTRICTED GAMING LICENSE**

**GCB RECOMMENDS: APPROVAL, CONDITIONED AS FOLLOWS:**

**THE SURVEILLANCE SYSTEM AND/OR MIRROR(S) MUST BE INSPECTED AND APPROVED BY THE NEVADA GAMING CONTROL BOARD ENFORCEMENT DIVISION WITHIN 60 DAYS OF ISSUANCE OF THE STATE GAMING LICENSE AND THEREAFTER BE MAINTAINED AT OR ABOVE THE STANDARD THAT IS APPROVED.**

**NGC DISPOSITION: APPROVED, CONDITIONED – SAME.**

---

**DISPOSITION  
NEW GAME – FINAL APPROVAL ITEM  
DECEMBER 2024  
PAGE 27**

---

**FOR POSSIBLE ACTION:**

**NG01-12-24 D2024-0043**

**NEW GAME:**

**“TAKE 2 BACK POKER”**

**SUBMITTED BY:**

32786-01  
AGS, A DELAWARE LIMITED-LIABILITY COMPANY  
6775 S EDMUND ST STE 300  
LAS VEGAS, NV 89118

**TRIAL LOCATION:**

NOT APPLICABLE

**REQUEST FOR FINAL APPROVAL**

**GCB RECOMMENDS: APPROVAL.**

**NGC DISPOSITION: FINAL APPROVAL GRANTED.**

---

Good morning. My name is Robert Franz. I am here today to tell you about my experience working at Red Rock Casino.

I started working at Red Rock as a banquet server back in November 2006. I worked there for 14 years, and I worked my way up from on-call to full-time. Full-time meant that I was scheduled first when events were booked. I was loyal to the company and passed on opportunities to go work at new properties such as Resorts World and Caesars Forum. I even bought a house near Red Rock.

In 2020, everything changed. When Red Rock reopened after the shutdown, I was not brought back to work despite my years of service and excellent performance. Instead of bringing me back, they hired new people in the banquet department who had no experience with the company. I was told to interview for my old job, and I was not offered the job.

I was eventually rehired in the summer of 2021, but I lost all my seniority, and I would only be working on-call.

Every Tuesday I get an email about banquet shifts at Red Rock. On Thursday I compete with other banquet workers for work despite my 14 years with the company before 2020. This is something I have to go through every week and would not have to suffer it if the company had done the right thing in 2020.

I am still fighting for a union contract at Red Rock. It is not fair what this company did to me and other workers who never got their jobs back.

Good morning. Briana Carbajal for the Culinary Union. I want to put the size and scale of the Station Casinos workers pro-union movement in some perspective. Over 5,300 workers unionized at eight Station Casinos properties over three years, winning elections by a combined average of 65%. Pro-union workers won an election at Boulder Station involving 577 workers in September 2016 by 62%. Pro-union workers won an election at Green Valley Ranch involving 833 workers in November 2017 by 67%. Pro-union workers won an election at the Palms involving 910 workers in April 2018 by 84%. Pro-union workers won an election at Sunset Station involving 588 workers in June 2019 by 83%. Pro-union workers won an election at Fiesta Rancho involving 195 workers in June 2019 by 85%. Pro-union workers won at Fiesta Henderson involving 315 workers in September 2019 by 57%. And the union won recognition at Palace Station in 2017 and at Red Rock Casino after an election in 2019.

For workers in the one the largest gaming markets in the country those years marked clear pro-union power, with workers putting their families and their union first. But in 2020 Station Casinos made a decision to put their workers' union last.

For example, on a Station Casinos company operational timeline dated May 1, 2020 the union is put last at the very end of what would be a consequential day for so many workers and their families. May 1 was the day Station Casinos announced permanent mass layoffs, including the closure of four properties. According to an internal company timeline for May 1, the events would roll out as follows: 11:30 am —“corporate leadership notification”, 11:45 am “GM Notification”, 12:30 pm “property GM keeper list notification”, 12-12:45 pm “state/city official notification”, 1 pm “PR rollout and property and corporate leaders to make term calls” and finally, as the very last task for the day at 4 pm: “Union Notification.” Station Casinos had the

legal obligation to notify and bargain with the certified bargaining representatives well prior to these layoffs of represented workers, but for the company, notifying the union was just an afterthought.

Again, over 5,300 workers unionized at eight Station Casinos properties won union elections by a combined average of 65%. Yet in 2020, the union is last on company's list for May 1.

This disregard for workers' collective voice and action in the locals market by Station Casinos still has consequences for gaming employees and their families to this day. Robert made this clear in his remarks. We urge you to ask Station Casinos how its workers' pro-union movement related to its actions against the union in 2020. And we urge you to ask Station Casinos why it would terminate unionized employees without first notifying and bargaining with the workers' union.

We are here again today to ask Nevada gaming regulators to take a closer look at the owners of Virgin Las Vegas. We sent all of you a letter last week outlining our concerns. Today we want to recap those concerns on the record and elaborate on them a little bit.

Cliff Atkinson and Chad Konrad are before you today for approval to operate the casino at Virgin Las Vegas through their company C & C 4455, LLC. They have said they would retain their executive positions with JC Hospitality, which operates the Virgin Las Vegas and will be landlord to C & C 4455, LLC. Fengate Asset Management and Juniper Capital are owners of Virgin Las Vegas.

It defies common sense that Fengate and Juniper would not have ultimate influence and control over executives who they've hired to run the property, including the casino.

Cliff Atkinson said he would still have "a role" on the property side. Will that "role" be his current one as president? Will Cliff Atkinson the Virgin Las Vegas casino operator to have an agreement with Cliff Atkinson the Virgin Las Vegas property president, whereby president Cliff Atkinson will not have influence or control over Cliff Atkinson the casino operator? Is president Atkinson not going to hold casino operator Atkinson accountable for the casino's success or failure under his watch – under the casino operator Atkinson's watch? How will the casino managed by Atkinson be "completely independent" from the property managed by president Atkinson?<sup>1</sup> Is president Atkinson not going to have to answer to the owners of Virgin Las Vegas with regards to the success or failure of casino operator Cliff Atkinson? Is this really an arrangement we want to allow under Nevada's "gold standard" of gaming regulations?

When Deutsche Bank owned a resort on the Las Vegas Strip, the bank put four of their executives as member of the Voteco LLC that had ultimate control over the entire property, including casino operations. And these executives went through Nevada's rigorous licensing process and were found suitable.<sup>2</sup> They all had to sign a non-interference agreement:<sup>3</sup>

The Letter Agreement, by and among Deutsche Bank and the Voteco Members, provides that Deutsche Bank will not take any action to influence the Voteco Members in the exercise of their management or voting rights

in respect of the gaming-related activities at The Cosmopolitan, and authorizes the Voteco Members to exercise such rights independently of Deutsche Bank.

That is, the owner would not directly intervene in the casino, but its executives would. Here at Virgin Las Vegas, you are being asked to believe that no one from the ownership group would interfere in the casino.

Fengate on its own website says the firm invests by taking “influential equity positions”.<sup>4</sup> Juniper Capital says on its website the firm is “active in all aspects of real estate investment and ownership.”<sup>5</sup> These owners tell you they exercise active influence in their investments. Have Nevada regulators asked them what that means with respect to Virgin Las Vegas?

Finally, given Nevada’s mixed record of holding billionaires accountable in the gaming industry, which we list in our letter to you, we believe Nevada gaming regulators should do everything possible to avoid any future surprises about owners of Virgin Las Vegas.

---

<sup>1</sup> Transcript, 12/4/24 Gaming Control Board #2, p.10.

<sup>2</sup> <https://www.sec.gov/Archives/edgar/data/1485589/000119312512129767/d286859d10k.htm>, p.7.

<sup>3</sup> <https://www.sec.gov/Archives/edgar/data/1485589/000119312512129767/d286859d10k.htm>. P.14.

<sup>4</sup> <https://fengate.com/private-equity/>

<sup>5</sup> <https://junipercapital.com/about/>





December 11, 2024

Nevada Gaming Commission  
7 State of Nevada Way  
Las Vegas, NV 89119

Re: Applications by Cliff Atkinson, Chad Konrad, and C & C 4455, LLC

Dear Chair Togliatti, Commissioners Solis-Rainey, Krolicki, Markantonis, Justice Silver,

We write to raise concerns about the gaming license applications by Cliff Atkinson, Chad Konrad, and C & C 4455, LLC.

Atkinson and Konrad are executives at Virgin Hotels Las Vegas (“Virgin Las Vegas”). Their application, through C & C 4455, LLC, to take over gaming operations from the Mohegan Sun Casino at Virgin Las Vegas went before the Gaming Control Board on December 4. At the hearing, the Culinary Union raised questions about ultimate control at Virgin Las Vegas. We now ask you to take a closer look and urge you to return the application to the Board for further review before you decide whether to approve the application of Atkinson, Konrad, and C & C 4455, LLC.

The transaction contemplates transfer of the ownership of MGNV, LLC (which is currently dba Mohegan Sun Casino Las Vegas) from MGNV Holding, LLC to C & C 4455, LLC, if approved by the Nevada Gaming Commission. JC Hospitality LLC is the direct owner of Virgin Las Vegas and will continue to be the landlord to MGNV, LLC, even if it becomes owned by C & C 4455.

JC Hospitality does not have a website but has a LinkedIn page.<sup>1</sup> According to Nevada corporate records, its LLC managers are Cliff Atkinson, Chad Konrad, and Kate Hay, and its only listed LLC member is JC Vegas Mezz Co, LLC.<sup>2</sup> With respect to JC Hospitality, the Gaming Control failed to distinguish between the types of institutional investors and forms of corporate entities.<sup>3</sup>

Member Assad: Are they [entities comprising JC Hospitality] private equity or hedge fund or LLC? What’s their status?

Mr. Konrad: LLC.

This line of confused questioning was followed by a question about the identity of the general partner of JC Hospitality, and an even less clear explanation of the ownership structure of Virgin Las Vegas.<sup>4</sup>

Member Assad: And is – who is the general partner?

Mr. Konrad: The structure above JC Hospitality is JC Vegas Mezz Co. is the holding – intermediate holding company. [JCLPF] Vegas is the partnership of the investors, the tax filer, if you will.

Member Assad: And are they the Canadian company mentioned earlier today [in our public comments before the Board]?

Mr. Konrad: No. That’s an American, U.S. LLC.

Mr. Gutwald: The Canadian company is Fengate. From what I understand, it handles the pension funds in Canada. Sean, if you want to add anything if I’m incorrect, let me know.

Mr. McGuiness: That’s correct.

Mr. Gutwald: There’s a big real estate investment fund that owns the property.

Mr. Konrad: Fengate is the major investor in the JCLPF Vegas partnership.

Member Assad: Got it.

Unfortunately, Member Assad and the rest of the Board chose not to ask any questions about Fengate and what kind of control the firm, being the “major investor”, would have over Atkinson and Konrad. The discussion then moved on to marketing plans if Atkinson and Konrad are approved to take over the casino.

Showing an uncanny lack of curiosity of the sources of funds that made a very public and very large investment in a Nevada casino, the Board did not ask any follow-up questions about nor even made any mention of the “pension funds in Canada” whose money Fengate “handles” during the entire proceedings on December 4. The Fengate client whose funds have been invested in Virgin Las Vegas is the LIUNA Pension Fund of Central and Eastern Canada (“LPF”), based in Hamilton, Ontario, an hour west of Toronto. It covers several LIUNA or Laborers locals in that region of the country, including Local 183, Local 837, Local 506, Local 527, Local 1059, and Local 1115. Its board of trustees includes of representatives from some of these local unions.<sup>5</sup>

Fengate itself is, of course, Fengate Asset Management, one of the largest private equity investment managers in North America, with offices in Toronto, Oakville (near Toronto), Vancouver, and Houston.<sup>6</sup> Like many other private equity investment firms, it manages money on behalf of pension funds, such as LPF and the Saskatchewan Pension Plan.<sup>7</sup>

There are three main reasons for concern regarding the suitability of Atkinson and Konrad to hold a Nevada gaming license.

**1. It defies common sense that the owners of a Nevada casino resort would not have ultimate influence and control over executives who run the property, including the casino.**

At the hearing on December 4, the Board Members asked Atkinson how he would both take on the work of operating the casino full-time, if granted a gaming license, and continue in his role as president of Virgin Las Vegas overall. The Members did not ask the obvious question: who will he report to as the person responsible for the operation of the casino and presumably its P&L?

When the resort's casino is leased to a third party, in this case the Mohegan Sun Casino, it is conceivable that Atkinson, in his role as property president, would take a passive role with respect to gaming operations and merely accept the lease payments on behalf of the landlord and the owners. However, if he is in charge of the casino, too, would he not be held responsible for its success or failure by the entities and persons he ultimately answers to? Who exactly then will be these entities and persons? Who will be able to exert influence over him to task him with generating more revenue, from the casino and the resort overall, creating more profits, and producing a greater return on investment for the multi-billion-dollar enterprise that owns Virgin Las Vegas? We believe these questions must be asked and investigated before you approve for Atkinson and his colleague Konrad to take over casino operations at Virgin Las Vegas.

Moreover, while Atkinson and Konrad are going to take on greater responsibilities if they are approved to run the casino at Virgin LV, will Kate Hay, the third LLC Manager of JC Hospitality, take on a greater role at the landlord company? She is listed on her LinkedIn page as the "Chief Legal and Human Resources Officer" of JC Hospitality since January 2022, and was previously "Chief Operating Officer/Chief Investment Officer" for the company.<sup>8</sup> And how might her expected increase in workload impact the relationship between the casino and the landlord, especially when it comes to legal, regulatory, and other compliance matters? Kate Hay is listed as located in Toronto on her LinkedIn profile is also a "Vice President – Client Strategy" for Colliers International from April 2011 to present.

## **2. Nevada would not want any surprises down the road about the owners of Virgin Las Vegas, who would presumably have influence and power over Atkinson and Konrad**

Specifically, we ask you to investigate Joseph S. Mancinelli, David D'Agostini, Lou Serafini Jr., Jay Wolf, Alex Kryz, and Armand Reale as to whether they exert significant influence over operations at Virgin Las Vegas and are therefore required to apply for a gaming license. They are key individuals associated with the multi-billion-dollar enterprise behind Virgin Las Vegas.

### LIUNA Pension Fund of Central and Eastern Canada

Mancinelli is the board chair of the LIUNA Pension Fund of Central and Eastern Canada and D'Agostini is the fund's CEO. This 11-billion-Canadian-dollar Laborers pension fund is the majority owner of Virgin Las Vegas. Do Atkinson and Konrad answer to Mancinelli and D'Agostini?

### Fengate Asset Management

Do Atkinson and Konrad answer to Lou Serafini, Jr., the CEO of Fengate Asset Management, which invested in Virgin Las Vegas on behalf of the Laborers pension fund? Fengate manages other private funds up to 63% of beneficial ownership by non-U.S. persons.<sup>9</sup> Who are these foreign investors of Fengate? Do they influence Fengate's decision-making?

### Juniper Capital

Do Atkinson and Konrad answer to Jay Wolf and Alex Kryz of Juniper Capital? Wolf and Kryz sit on the board of the corporate entity that owns Virgin Las Vegas, according to Juniper's website.<sup>10</sup>

Moreover, Juniper's third managing director, Armand Reale, is president of a company called Buena Vista Development Corp. in Canada.<sup>11</sup> That company was in the news last year when it was listed as the primary developer of a property for sale against regulations in Toronto's protected Greenbelt, according to a report by the Ontario Auditor-General. However, Reale claimed he was not the owner or developer of the land, and the actual owner turned out to be a Chinese investor living in China. The ultimate Chinese owner claimed the whole matter was a "misunderstanding".<sup>12</sup>

We should strive to avoid any misunderstandings about the sources of funds and issues of control at a Nevada casino resort like Virgin Las Vegas. The public deserves to know more about who is ultimately in charge at Virgin Las Vegas.

### **3. Given Nevada's a mixed record of holding billionaires accountable in the gaming industry, the state should strive to avoid any future surprises about owners of Virgin Las Vegas.**

Nevada has a complicated relationship with wealthy investors in the state's gaming industry, especially those with billions of dollars under their control. The state often pays deference to billionaire institutions and individuals, which has sometimes resulted in regulatory failures or inactions.

- Station Casinos paid \$38 million to settle a lawsuit by an unsuccessful casino applicant and the town in Missouri where the applicant planned to establish the casino.<sup>13</sup> Nevada regulators didn't take any action against the company, and the company sold its casinos in Missouri in 2000.<sup>14</sup>
- Nevada never took away the Tropicana's gaming license, even though its billionaire-owned parent company from 2007 to 2009 lost their gaming license in Atlantic City in 2008.<sup>15,16</sup>
- Nevada let Deutsche Bank own a 25% stake in Stations Casinos even though a subsidiary of the bank pled guilty to a felony charge related to global interest rate manipulation in 2015.<sup>17,18</sup>
- Nevada failed to bring a billionaire casino owner to account for sexual misconduct before the Wall Street Journal published a series of investigative reports in 2018.<sup>19</sup> After Massachusetts gaming regulators began to hold the billionaire and his company accountable in 2019,<sup>20</sup> Nevada finally took disciplinary action against the billionaire in late 2019.<sup>21</sup>
- In early 2024, the Culinary Union raised the issue of a deceased gaming license holder in Nevada.<sup>22</sup> The deceased in question also was a member of a billionaire family.<sup>23</sup>
- In August 2024, the Nevada Independent reported that Nevada gaming regulators filed a complaint against a major Strip resort owned by multi-billion dollar investment company for allegedly failing to comply with anti-money laundering laws by "allowing known

illegal bookmakers to gamble millions of dollars at the Strip resort for more than a year.”<sup>24</sup>

On the other hand, Nevada has successfully investigated and found suitable billionaires and leaders of multi-billion-dollar institutions. Many wealthy individual and large institutional investors in the state’s gaming industry have subjected themselves to the state’s rigorous licensing process and obtained a gaming license.

- Billionaire owners of casino resorts on the Strip have long held Nevada gaming licenses.<sup>25,26</sup>
- A top executive from one of the largest private equity firms applied for a gaming license and showed up for his licensing hearing when the firm bought one of the largest resorts on the Strip in 2022.<sup>27</sup> He was approved for a gaming license.
- Even Deutsche Bank in 2010 sent four top executives to be licensed as board members of the entity that owned a large resort on the Strip on the bank’s behalf. Nevada was able to require the global bank to sign a letter agreement to promise not to influence these board members when it comes to gaming-related activities.<sup>28</sup>


With the state’s gold standard of gaming regulation, why would Nevada *not* require the owners of Virgin Las Vegas to be included in a review of the resort’s own casino license application?

In conclusion, we believe Nevada gaming regulators should ask more, broader, and deeper questions of sources of funds and ultimate control at Virgin Las Vegas. We urge you to task the Gaming Control Board to investigate fully the ownership entities behind Virgin Las Vegas before you make a final determination on whether Atkinson and Konrad are approved to run the casino at the property.

Sincerely,



Ted Pappageorge  
Secretary-Treasurer



Diana Valles  
President

---

<sup>1</sup> <https://www.linkedin.com/company/jc-hospitality/about/>; accessed 12/10/2024.

<sup>2</sup> <https://esos.nv.gov/EntitySearch/BusinessInformation>. Search for “JC Hospitality LLC”. Last accessed 12/10/2024.

<sup>3</sup> Transcript of item #2, Nevada Gaming Control Board meeting, 12/24/2024, p. 24.

<sup>4</sup> Transcript of item #2, Nevada Gaming Control Board meeting, 12/24/2024, pp. 24-25.

---

<sup>5</sup> <https://lpfcec.org/pension-fund-information/about-lpf/>

<sup>6</sup> <https://fengate.com/about/who-we-are/>

<sup>7</sup> Saskatchewan Pension Plan, "Saskatchewan Pension Plan hires investment managers," 6/1/2022; at [https://www.saskpension.com/wp-content/uploads/2022/06/SPP\\_hires\\_investment\\_managers.pdf](https://www.saskpension.com/wp-content/uploads/2022/06/SPP_hires_investment_managers.pdf)

<sup>8</sup> <https://www.linkedin.com/in/kate-hay-05245684/> (accessed 12/10/2024).

<sup>9</sup> <https://reports.adviserinfo.sec.gov/reports/ADV/297333/PDF/297333.pdf>. It was filing as an "exempt reporting adviser" because it solely acts an adviser to private funds and has AUM in the U.S. of less than \$150 million, per Item 2, B.(2).

<sup>10</sup> <https://junipercapital.com/team-members/jay-wolf/> and <https://junipercapital.com/team-members/alex-krysz/>

<sup>11</sup> <https://www.linkedin.com/in/armand-reale-9219571a/?originalSubdomain=ca>

<sup>12</sup> Laura Stone, "Ontario may return portions of Greenbelt land after two sites listed for sale, Ford says," The Globe and Mail, 8/29/2023; updated 9/8/2023; at <https://www.theglobeandmail.com/canada/article-ford-ontario-greenbelt-land-statement/> (accessed 12/9/2024).

<sup>13</sup> Sun staff and wire reports, "Station settlement details reports," Las Vegas Sun, 2/12/2004, at <https://lasvegassun.com/news/2004/feb/12/station-settlement-details-reported/> (accessed 12/9/2024).

<sup>14</sup> David Strow, "Station Casinos leaves Missouri in its wake," Las Vegas Sun, 12/20/2000; at <https://lasvegassun.com/news/2000/dec/20/station-casinos-leaves-missouri-in-its-wake/> (accessed 12/9/2024).

<sup>15</sup> "N.J. appeals court upholds denial of Tropicana license", Las Vegas Review-Journal, 6/2/2008; at <https://www.reviewjournal.com/business/n-j-appeals-court-upholds-denial-of-tropicana-license/> (accessed 12/9/2024).

<sup>16</sup> Liz Benston, Michael Mishak, "Trop dragging down gaming, Culinary says", Las Vegas Sun, at <https://lasvegassun.com/news/2008/feb/01/trop-dragging-down-gaming-culinary-says/> (accessed 12/9/2024).

<sup>17</sup> "UNITE HERE Calls on Nevada Gaming Regulators to Investigate Deutsche Bank's Suitability to Own Nevada Casinos", 9/2/2015, at <https://www.businesswire.com/news/home/20150902006358/en/UNITE-HERE-Calls-on-Nevada-Gaming-Regulators-to-Investigate-Deutsche-Bank%E2%80%99s-Suitability-to-Own-Nevada-Casinos> (accessed 12/9/2024); J.D. Morris, "Culinary Union targets bank's ownership stake in Station Casinos", Vegas Inc., at <https://vegasinc.lasvegassun.com/business/gaming/2015/jul/13/culinary-union-targets-banks-ownership-stake-stati/> (accessed 12/9/2024).

<sup>18</sup> U.S. Department of Justice, "Deutsche Bank's London Subsidiary Sentenced for Manipulation of LIBOR", 3/28/2017; at <https://www.justice.gov/opa/pr/deutsche-bank-s-london-subsiary-sentenced-manipulation-libor> (accessed 12/9/2024).

<sup>19</sup> "The Fall of Steve Wynn," Wall Street Journal; at <https://www.wsj.com/articles/the-fall-of-steve-wynn-11545349795> (accessed 12/9/2024). The page is a collection of the newspaper's investigative articles on Steve Wynn in 2024.

<sup>20</sup> Shira Schoenberg, "Rape, pregnancy and 'sensual massage': Here are the allegations against Steve Wynn -- and why they matter for the Wynn Resorts Massachusetts casino license", 4/2/2019, Mass Live, at <https://www.masslive.com/news/2019/04/rape-pregnancy-and-sensual-massage-here-are-the-allegations-against-steve-wynn-and-why-they-matter-for-the-wynn-resorts-massachusetts-casino-license.html> (accessed 12/9/2024).

<sup>21</sup> Howard Stutz, "Steve Wynn to pay a \$10M fine to settle a 4-year-old complaint with Nevada gaming regulators", 7/19/2023, The Nevada Independent; at <https://thenevadaindependent.com/article/steve-wynn-to-pay-a-10m-fine-to-settle-a-4-year-old-complaint-with-nevada-gaming-regulators> (accessed 12/9/2024).

<sup>22</sup> "Culinary Union and UNITE HERE announce boycott of Rampart Casino, inquire about gaming license," 3/28/2024, at <https://m.culinaryunion226.org/news/press/culinary-union-and-unite-here-announce-boycott-of-rampart-casino-inquire-about-gaming-license> (accessed 12/10/2024).

<sup>23</sup> Kelly Egan, "The secretive billionaires behind the Chateau addition," 7/27/2019, Ottawa Citizen, at <https://ottawacitizen.com/news/local-news/egan-the-secretive-billionaires-behind-the-chateau-addition> (accessed 12/10/2024).

<sup>24</sup> Howard Stutz, "Resorts World facing millions in fines for allegedly violating anti-money laundering laws," 8/15/2024, The Nevada Independent; at <https://thenevadaindependent.com/article/resorts-world-facing-millions-in-fines-for-violating-anti-money-laundering-laws> (accessed 12/10/2024).

<sup>25</sup> SLS Las Vegas, "Nevada Gaming Commission Approves SLS Las Vegas® Hotel & Casino Gaming License for Alex Meruelo", 3/22/2018; at <https://www.prnewswire.com/news-releases/nevada-gaming-commission-approves-sls-las-vegas-hotel--casino-gaming-license-for-alex-meruelo-300618452.html> (accessed 12/9/2024).

<sup>26</sup> "Circus Circus sale finalized by Nevada Gaming Commission, 12/23/2019, 8 News Now; at <https://www.8newsnow.com/news/local-news/circus-circus-sale-finalized-by-nevada-gaming-commission/> (accessed 12/9/2024).

---

<sup>27</sup> Howard Stutz, "Gaming Commission: Apollo purchase of Sands 'a different scenario' than Caesars", 2/17/2022, The Nevada Independent; at <https://thenevadaindependent.com/article/gaming-commission-apollo-purchase-of-sands-a-different-scenario-than-caesars> (accessed 12/9/2024).

<sup>28</sup> Nevada Property 1 LLC, Form 10-K, for the fiscal year ended 12/31/2011; at <https://www.sec.gov/Archives/edgar/data/1485589/000119312512129767/d286859d10k.htm>, p. 23 (accessed 12/9/2024).



## Operational Timeline

May 1, 2020

- Thursday, April 30<sup>th</sup>, 2020
  - Mail to be sent to impacted team members
- Friday, May 1<sup>st</sup>, 2020
  - 11:30 am – PR mmbargo
  - 11:30 am – Corporate leadership notification
    - Corp conference room 3-1
      - Packet distribution
      - Corporate leaders begin calls 1pm (*no voicemail, do not call until 1pm*)
        - *Complete termination contact sheet*
        - *Send emails to former team members with scanned documents attached*
      - Corporate leaders call salaried TMs being retained after termination calls have been completed
  - 11:45 am – GM Notification
    - Corp conference room 3-3
    - Phase I and phase II properties
      - Packet distribution
      - Property leaders begin calls 1pm (*no voicemail, do not call until 1pm*)
        - *Complete termination contact sheet*
        - *Send emails to former team members with scanned documents attached*
      - Property next steps
        - Call retained team members between 12:30 – 1:00pm
        - Call termination list at 1pm
        - Call new team members after termination calls
  - *Notes:*
    - *Human resources will contact impacted human resource TMs at properties*
    - *Lockers and office clean-up will be coordinated by each property or corporate leader*
    - *All PR inquiries are to be forwarded to Michael Britt or Alex Acuna*
  - 12:30 pm – Property GM keeper list notification
  - 12:00 – 12:45pm – State/city official notification
  - 1:00 pm – PR rollout, website up, IT access cut
    - PBX and STN Solution Center are scripted
    - Property and corporate leaders to make term calls
  - 4:00 pm – Union Notification