



NEVADA GAMING CONTROL BOARD

DISPOSITION NOVEMBER 2022 MEETING

NEVADA GAMING CONTROL BOARD MEETING
GAMING CONTROL BOARD OFFICES
GRANT SAWYER BUILDING
HEARING ROOM 2450
555 EAST WASHINGTON AVENUE
LAS VEGAS, NV 89101

Wednesday, November 2, 2022

- 9:00 a.m.** • Public Comments
- Approval of Prior Month GCB Disposition
- Nonrestricted Items **#01-11-22** through **#06-11-22**
- 12:00 p.m.** • Restricted Items **#01-11-22** through **#18-11-22**
- Public Comments

Members Present:

Brin Gibson, Chair
Phil Katsaros, Member
Brittnie Watkins, Member

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7-11 Store #22070	R #6	Madigan, Jody Christopher	NR #2
7-11 Store #42064	R #5	Meister, Keith Arlin	NR #5
A.J. and Suzette Hicks Family Trust, The	R #2, 4	MGNV Holding, LLC	NR #2
Bennett, Diana Lee	NR #3	MGNV, LLC	NR #2
BetMGM, LLC	NR #5	Mohegan Tribal Gaming Authority (PTC) (dba Mohegan Gaming & Entertainment)	NR #2
Brown, Mark Francis	NR #2	Moscove, Justin Seth	R #3
Century Gaming Technologies	R #6, 16, 17	Paragon Gaming Management LLC	NR #3
Crawford Coin, Inc.	R #7	Paragon HRLT HIC LLC	NR #3
Dhaliwal Enterprises 3, Inc.	R #1	Paragon HRLT Holdings LLC	NR #3
DI ARCO AM/PM	R #1	Paragon Tavern LLC	NR #3
Eclipse Gaming	R #18	Pioneer TopCo, L.P. (PIC)	NR #1
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Finnegan, Jr., Charles William	R #5, 6	Saso, Masami	NR #4
Finnegan, Martha Dianne	R #5, 6	Singh, Gurpreet	R #1
Flowing Tide Pub, Inc.	R #2, 4	St. Rose Pkwy Holdings LLC	R #5
FT Pub V LLC	R #4	Terrible's #434	R #8
FTP Holding Company, LLC	R #3, 4	Terrible's #435	R #9
FTP VIII, LLC	R #3	Terrible's #436	R #10
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Green Valley Grocery #74	R #7	Terrible's #440	R #14
JCT Special Trust, The	R #2, 4	Terrible's #441	R #15
JETT Gaming LLC	R #8, 9, 10, 11, 12, 13, 14, 15	Terrible's Gaming	R #8, 9, 10, 11, 12, 13, 14, 15
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Justin Seth Moscove Family Trust, The	R #2, 4	Tolotti, Mary Gastanaga	R #4
Konami Gaming, Inc.	NR #4	United Coin Machine Co.	R #6, 16, 17
Las Vegas Blvd. Holdings LLC	R #6	Wadhams II, James Lawrence	R #4
Lucky 7's Lounge	R #18	Wadhams, Daniel Paul	R #4
		XO Liquor MLK	R #16

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PUBLIC COMMENTS AGENDA
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This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(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.

PUBLIC COMMENTS AND DISCUSSION:

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

**DISPOSITION
APPROVAL OF PRIOR MONTH GCB DISPOSITION
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FOR POSSIBLE ACTION:

Pursuant to NRS 241.035, approval of:

Nevada Gaming Control Board Disposition for October 2022.

GCB DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

01-11-22 N22-0704 Re: 35563-01
PIONEER TOPCO, L.P. (PIC)
ONE MANHATTANVILLE RD STE 201
PURCHASE, NY 10577

APPLICATION FOR APPROVAL OF A DISTRIBUTION

GCB RECOMMENDS: APPROVAL, CONDITIONED:

(1) THE DISTRIBUTION IS LIMITED TO 620 MILLION.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

02-11-22 N22-0268 Re: 35147-01
N22-0261 MOHEGAN TRIBAL GAMING AUTHORITY (PTC), dba
N22-0248 MOHEGAN GAMING & ENTERTAINMENT
1 MOHEGAN SUN BLVD
UNCASVILLE, CT 06382

APPLICATION FOR AMENDMENT TO ORDER OF REGISTRATION

MARK FRANCIS BROWN
Board Member

JODY CHRISTOPHER MADIGAN
Chief Operating Officer

APPLICATIONS FOR FINDING OF SUITABILITY AS A CONTROLLING PERSON OR OFFICER

Re: 35292-01
MGNV HOLDING, LLC
(Mohegan Tribal Gaming Authority (PTC) – 100%)
1 MOHEGAN SUN BLVD
UNCASVILLE, CT 06382

JODY CHRISTOPHER MADIGAN
President

APPLICATION FOR FINDING OF SUITABILITY AS A KEY EXECUTIVE

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Re: 35145-01
MGNV, LLC
(MGNV Holding, LLC – 100%)
(dba Mohegan Sun Casino Las Vegas)
4455 PARADISE RD
LAS VEGAS, NV 89169

JODY CHRISTOPHER MADIGAN
President

APPLICATION FOR LICENSURE AS A KEY EXECUTIVE

GCB RECOMMENDS: APPROVAL, FOURTH REVISED ORDER OF REGISTRATION, DRAFT #1.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

03-11-22 N22-0648 Re: 30713-01
THE G. SCOTT MENKE GAMING TRUST
6700 VIA AUSTI PKWY STE D
LAS VEGAS, NV 89119

DIANA LEE BENNETT
Trustee/Beneficiary

APPLICATION FOR FINDING OF SUITABILITY AS TRUSTEE AND BENEFICIARY

Re: 32528-01
PARAGON GAMING MANAGEMENT LLC
(The G. Scott Menke Gaming Trust – 50%)
(The Diana L. Bennett Gaming Trust – 50%)
6700 VIA AUSTI PKWY STE D
LAS VEGAS, NV 89119

and

33729-01
PARAGON HRLT HOLDINGS LLC
(The G. Scott Menke Gaming Trust – 50%)
(The Diana L. Bennett Gaming Trust – 50%)
6700 VIA AUSTI PKWY STE D
LAS VEGAS, NV 89119

and

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34110-01
PARAGON HRLT HIC LLC
(The G. Scott Menke Gaming Trust – 50%)
(The Diana L. Bennett Gaming Trust – 50%)
6700 VIA AUSTI PKWY STE D
LAS VEGAS, NV 89119

and

30297-01
PARAGON TAVERN LLC
(dba THE DEN LV)
(The G. Scott Menke Gaming Trust – 50%)
(The Diana L. Bennett Gaming Trust – 50%)
9837 W TROPICANA AVE
LAS VEGAS, NV 89147

APPLICATION BY THE G. SCOTT MENKE GAMING TRUST DATED DECEMBER 2, 2008, TO PLEDGE ITS MEMBERSHIP INTERESTS IN PARAGON GAMING MANAGEMENT LLC, PARAGON HRLT HIC LLC, PARAGON HRLT HOLDINGS LLC, AND PARAGON TAVERN LLC, TO DIANA LEE BENNETT, THE DIANA L. BENNETT LIVING TRUST, U/T/D MAY 22, 2006, AS RESTATED AND AMENDED MAY 22, 2007, AND THE DIANA L. BENNETT GAMING TRUST DATED NOVEMBER 18, 2008, IN CONJUNCTION WITH A LOAN AGREEMENT

GCB RECOMMENDS: APPROVAL, CONDITIONED:

(2) THE G. SCOTT MENKE GAMING TRUST SHALL NOT DECLARE OR ISSUE ANY DIVIDENDS OR DISTRIBUTIONS OF ANY TYPE, WHETHER IT BE INCOME DERIVED FROM GAMING, OR ANY INTEREST, STOCK, OR SECURITIES IN A LICENSED GAMING OPERATION OR HOLDING COMPANY, TO ANY BENEFICIARY, OR THE BENEFICIARY'S HEIRS, TRANSFEREES, OR ASSIGNS UNLESS SUCH PERSON IS LICENSED OR FOUND SUITABLE BY THE NGC.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

**04-11-22 N21-0365 Re: 23719-01
KONAMI GAMING, INC.
585 KONAMI CIR
LAS VEGAS, NV 89119**

**MASAMI SASO
Senior Vice President of Corporate Planning, Manufacturing & Information Technology/
Director**

APPLICATION FOR LICENSURE AS A KEY EXECUTIVE AND DIRECTOR

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

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FOR POSSIBLE ACTION:

05-11-22 N21-0051 Re: 34823-01
BETMGM, LLC
6385 S RAINBOW BLVD
LAS VEGAS, NV 89118

KEITH ARLIN MEISTER
Member of the Board of Members' Representatives

APPLICATION FOR LICENSURE AS A KEY EXECUTIVE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

06-11-22 N22-0669 Re: 34526-01
34529-01 (IO)
GNLV, LLC, dba
GOLDEN NUGGET
129 FREMONT ST
LAS VEGAS, NV 89101

APPLICATION FOR A FIFTH 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 LICENSURE AS AN OPERATOR OF INTERACTIVE GAMING AS GRANTED IN MAY 2018

GCB RECOMMENDS: APPROVAL, CONDITIONED:

(1) THE WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080, IN CONNECTION WITH THE APPROVAL GRANTED IN MAY 2018, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED NGC MEETING IN NOVEMBER 2023.

NGC DISPOSITION:

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FOR POSSIBLE ACTION:

01-11-22 **R21-0396** **Re:** 35512-01
 06-22 35513-01
7 Machines DHALIWAL ENTERPRISES 3, INC., dba
 DI ARCO AM/PM
 3820 E DESERT INN RD
 LAS VEGAS, NV 89121

GURPREET SINGH
President/Secretary/Treasurer/Director/Shareholder

100%

APPLICATION FOR A RESTRICTED GAMING LICENSE

**APPLICATION FOR LICENSURE AS A SOLE OFFICER, DIRECTOR, AND
SHAREHOLDER**

GCB RECOMMENDS:

**APPROVAL, LIMITED LICENSE TO EXPIRE AT MIDNIGHT OF THE NOVEMBER 2025 NGC MEETING ON THE DAY
THE ITEM IS HEARD; CONDITIONED:**

- (1) THE SURVEILLANCE SYSTEM AND/OR MIRROR(S) MUST BE INSPECTED AND APPROVED BY THE NGCB
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:

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FOR POSSIBLE ACTION:

02-11-22 R22-0399 Re: 21485-01
FLOWING TIDE PUB, INC.
(dba Flowing Tide Pub)
10580 N MCCARRAN BLVD STE 109
RENO, NV 89503

THE JCT SPECIAL TRUST	24%
(Transferor)	(5,487.34 Shares Common Stock)

THE A.J. AND SUZETTE HICKS FAMILY TRUST	1%
(Transferor)	(242 Shares Common Stock)

THE JUSTIN SETH MOSCOVE FAMILY TRUST	25%
(Transferee)	(5,729.34 Shares Common Stock)

APPLICATIONS FOR A TRANSFER OF INTEREST

**APPLICATION BY THE JUSTIN SETH MOSCOVE FAMILY TRUST TO PLEDGE
EQUITY INTEREST IN FLOWING TIDE PUB, INC., TO THE JCT SPECIAL TRUST IN
CONNECTION WITH A STOCK PLEDGE AGREEMENT AND SECURED
PROMISSORY NOTE**

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

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Re: 32969-01
FTP HOLDING COMPANY, LLC
(FT PUB II LLC – 100%)
(FT PUB III LLC – 100%)
(FT PUB IV LLC – 100%)
(FT PUB VII LLC – 100%)
10580 N MCCARRAN BLVD STE 109
RENO, NV 89503

THE JCT SPECIAL TRUST 4%
(Transferor)

THE JUSTIN SETH MOSCOVE FAMILY TRUST 4%
(Transferor)

MARY GASTANAGA TOLOTTI 20%
(Transferor)

THE A.J. AND SUZETTE HICKS FAMILY TRUST 20%
(Transferor)

DANIEL PAUL WADHAMS 24%
(Transferee)
Member

JAMES LAWRENCE WADHAMS II 24%
(Transferee)
Member

APPLICATIONS FOR A TRANSFER OF INTEREST

APPLICATIONS FOR FINDING OF SUITABILITY AS A MEMBER

APPLICATIONS BY DANIEL PAUL WADHAMS AND JAMES LAWRENCE WADHAMS II, TO PLEDGE MEMBERSHIP INTERESTS IN FTP HOLDING COMPANY, LLC, TO THE JCT SPECIAL TRUST, THE JUSTIN SETH MOSCOVE FAMILY TRUST, MARY GASTANAGA TOLOTTI, AND THE A.J. AND SUZETTE HICKS FAMILY TRUST, IN CONJUNCTION WITH A PLEDGE AND SECURITY AGREEMENT

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Re: 34219-01
FT PUB V LLC
(dba Flowing Tide Pub & Grill)
4680 S DECATUR BLVD
LAS VEGAS, NV 89103

THE JCT SPECIAL TRUST (Transferor)	26%
THE JUSTIN SETH MOSCOVE FAMILY TRUST (Transferor)	26%
DANIEL PAUL WADHAMS (Transferor)	24%
JAMES LAWRENCE WADHAMS II (Transferor)	24%
FTP HOLDING COMPANY, LLC (Transferee) Member	100%

APPLICATIONS FOR A TRANSFER OF INTEREST

APPLICATION FOR LICENSURE AS A MEMBER

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Re: 21485-01
FLOWING TIDE PUB, INC.
(dba Flowing Tide Pub)
10580 N MCCARRAN BLVD STE 109
RENO, NV 89503

THE JCT SPECIAL TRUST (Transferor)	21% (4,853.82 Shares Common Stock)
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MARY GASTANAGA TOLOTTI (Transferor)	27% (6,187.50 Shares Common Stock)
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DANIEL PAUL WADHAMS (Transferee) Shareholder	24% (5,520.66 Shares Common Stock)
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JAMES LAWRENCE WADHAMS II (Transferee) Shareholder	24% (5,520.66 Shares Common Stock)
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APPLICATIONS FOR A TRANSFER OF INTEREST

APPLICATIONS FOR LICENSURE AS A SHAREHOLDER

APPLICATIONS BY DANIEL PAUL WADHAMS AND JAMES LAWRENCE WADHAMS II, TO PLEDGE EQUITY INTEREST IN FLOWING TIDE PUB, INC., TO THE JCT SPECIAL TRUST AND MARY GASTANAGA TOLOTTI, IN CONJUNCTION WITH A PLEDGE AND SECURITY AGREEMENT

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

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POSSIBLE ACTION:

06-11-22 R22-0499 Re: 04789-01
03849-04
UNITED COIN MACHINE CO., dba
CENTURY GAMING TECHNOLOGIES, db at
7-11 STORE #22070
7291 LAS VEGAS BLVD S
LAS VEGAS, NV 89119

LAS VEGAS BLVD. HOLDINGS LLC 100%
Business Operator

CHARLES WILLIAM FINNEGAN, JR.)
Member/Manager) 100%
) JT
MARTHA DIANNE FINNEGAN)
Member/Manager)

**APPLICATION FOR LICENSURE OF LAS VEGAS BLVD. HOLDINGS LLC, TO
RECEIVE A PERCENTAGE OF GAMING REVENUE FROM UNITED COIN MACHINE
CO., DBA CENTURY GAMING TECHNOLOGIES, DB AT 7-11 STORE #22070**

APPLICATIONS FOR LICENSURE AS A MEMBER AND MANAGER

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

07-11-22 R23-0071 Re: 10559-01
35597-01
7 Machines CRAWFORD COIN, INC., db at
GREEN VALLEY GROCERY #74
4885 W RUSSELL RD
LAS VEGAS, NV 89118

**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 GRANTED IN MAY 2022**

GCB RECOMMENDS: APPROVAL, CONDITIONED:

- (1) THE WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080, IN CONNECTION WITH THE APPROVAL GRANTED IN MAY 2022, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED NGC MEETING IN MAY 2023.

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FOR POSSIBLE ACTION:

08-11-22 R22-0474 Re: 31072-01
28330-02
7 Machines JETT GAMING LLC, dba
 TERRIBLE'S GAMING, db at
 TERRIBLE'S #434
 3061 SAINT ROSE PKWY
 HENDERSON, NV 89052

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

09-11-22 R22-0479 Re: 31072-01
33311-02
7 Machines JETT GAMING LLC, dba
 TERRIBLE'S GAMING, db at
 TERRIBLE'S #435
 21 E SILVERADO RANCH BLVD
 LAS VEGAS, NV 89183

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

10-11-22 R22-0470 Re: 31072-01
20732-03
7 Machines JETT GAMING LLC, dba
 TERRIBLE'S GAMING, db at
 TERRIBLE'S #436
 2200 W HORIZON RIDGE PKWY
 HENDERSON, NV 89052

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

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FOR POSSIBLE ACTION:

11-11-22 R22-0469 Re: 31072-01
29901-02
7 Machines JETT GAMING LLC, dba
TERRIBLE'S GAMING, db at
TERRIBLE'S #437
5685 LOSEE RD
NORTH LAS VEGAS, NV 89081

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

12-11-22 R22-0468 Re: 31072-01
27883-04
7 Machines JETT GAMING LLC, dba
TERRIBLE'S GAMING, db at
TERRIBLE'S #438
1450 W CHEYENNE AVE
NORTH LAS VEGAS, NV 89030

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

13-11-22 R22-0471 Re: 31072-01
17297-04
7 Machines JETT GAMING LLC, dba
TERRIBLE'S GAMING, db at
TERRIBLE'S #439
2816 W CRAIG RD
NORTH LAS VEGAS, NV 89032

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

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FOR POSSIBLE ACTION:

14-11-22 R22-0472 Re: 31072-01
24938-02
7 Machines JETT GAMING LLC, dba
TERRIBLE'S GAMING, db at
TERRIBLE'S #440
10611 S EASTERN AVE
HENDERSON, NV 89052

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

15-11-22 R22-0473 Re: 31072-01
30870-02
7 Machines JETT GAMING LLC, dba
TERRIBLE'S GAMING, db at
TERRIBLE'S #441
3366 SAINT ROSE PKWY
HENDERSON, NV 89052

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

FOR POSSIBLE ACTION:

16-11-22 R23-0053 Re: 04789-01
36093-01
4 Machines UNITED COIN MACHINE CO., dba
CENTURY GAMING TECHNOLOGIES, db at
XO LIQUOR MLK
1374 W CHEYENNE AVE STE 107 & 108
NORTH LAS VEGAS, NV 89030

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION:

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This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(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 matter restriction, but may not be limited based upon viewpoint.

PUBLIC COMMENTS AND DISCUSSION: No comments.

My name is Casiano Corpus. I have worked at Palace Station as a Utility Porter for 30 years. I am here to speak to you again.

I am a union committee leader inside Palace Station. I talk to my coworkers and organize them to fight for a union contract. I am doing this for the good of my family, for my wife and two boys.

I want to have better pay, a pension, and better health insurance.

I want a union contract that guarantees those things.

We want Station Casinos to respect us and sign a union contract.

We are not going to stop fighting until we win.

Please help us.

Thank you very much, and God bless.

My name is Ken Liu. I'm with the Culinary Union. First of all, it's election season. Please make sure you vote. Every vote counts.

And today I want to bring your attention to potential violations of federal election law by Frank Fertitta III and Lorenzo Fertitta, who are controlling owners of Station Casinos and holders of suitability findings.

The Fertittas made \$756,300 in political contributions at the federal level between 2019 and 2021. The Federal Election Commission reports by the recipients of these donations contain false, outdated information.

For example, in December 2019, Lorenzo Fertitta made a contribution of \$147,000 to the McConnell Victory Committee. The receipt lists his employer as UFC and occupation as CEO. The Fertittas sold the UFC in 2016 and sold their remaining minority stake in 2017, so the information on Mr. Fertitta's donation receipt is years out of date and as a result false. There are 24 other similar reports of false, outdated information about employer and occupation on the receipts of Fertittas' donations between 2019 and 2021.

The Culinary Union submitted a letter to the FEC in April to ask for a determination as to whether this inaccurate information was knowingly submitted in violation of Title 52 of the US Code on voting and elections. The FEC has numbered this as a matter under review. As of today, we have not been notified of any final action.

While federal regulators review this matter, we urge you to directly ask Station Casinos about such false, outdated information related to political contributions by its controlling owners. We think it is important to find out whether Frank Fertitta and Lorenzo Fertitta might have been responsible for inaccurate information being reported to the FEC.

Specifically, we ask you to consider whether Frank and Lorenzo Fertitta might have failed to "comply with or make provision for compliance with all federal, state, or local laws and regulations" under Nevada Gaming Regulation 5.¹

Thank you.

1ST PUBLIC COMMENT - ATTACHMENT 2
NOVEMBER 2, 2022

¹ <https://gaming.nv.gov/Modules/ShowDocument.aspx?documentid=18660>