



1 NGC 08-18

2
3
4 STATE OF NEVADA

5 BEFORE THE NEVADA GAMING COMMISSION

6 STATE GAMING CONTROL BOARD,)
7 Complainant,)
8 vs.)
9 OPBIZ, LLC, dba PLANET HOLLYWOOD)
10 RESORT & CASINO,)
11 Respondent.)

COMPLAINT

12 The State of Nevada, on relation of its State Gaming Control Board (BOARD),
13 Complainant herein, by and through its counsel, CATHERINE CORTEZ MASTO, Attorney
14 General, by JOHN S. MICHELA, Deputy Attorney General, hereby files this Complaint for
15 disciplinary action against RESPONDENT pursuant to Nevada Revised Statute (NRS)
16 463.310(2) and alleges as follows:

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

21 2. OPBIZ, LLC, dba PLANET HOLLYWOOD RESORT & CASINO (PH), located at
22 3667 South Las Vegas Boulevard, Las Vegas, Nevada holds a nonrestricted gaming license.

23 RELEVANT LAW

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

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

27 (b) The continued growth and success of gaming is
dependent upon public confidence and trust that licensed gaming and

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

1 the manufacture, sale and distribution of gaming devices and
2 associated equipment are conducted honestly and competitively, that
3 establishments which hold restricted and nonrestricted licenses
4 where gaming is conducted and where gambling devices are
5 operated do not unduly impact the quality of life enjoyed by residents
6 of the surrounding neighborhoods, that the rights of the creditors of
7 licensees are protected and that gaming is free from criminal and
8 corruptive elements.

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

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

23 NRS 463.0129(1)(a), (b), (c) and (d).

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

27 5. The Nevada Gaming Commission may also place "such conditions as it may deem
28 necessary in the public interest upon any registration, finding of suitability or approval for
29 which application has been made." NRS 463.220(3).

30 6. The BOARD is authorized to observe the conduct of licensees in order to ensure
31 that the gaming operations are not being conducted in an unsuitable manner. See NRS
32 463.1405(1).

33 7. This continuing obligation is repeated in Nevada Gaming Commission Regulation
34 5.040, which provides as follows:

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

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

3 Nev. Gaming Comm'n Reg. 5.040.

4 8. Nevada Gaming Commission Regulation 5.010 provides as follows:

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

8 2. Responsibility for the employment and maintenance of
9 suitable methods of operation rests with the licensee, and willful or
10 persistent use or toleration of methods of operation deemed
disciplinatory action.

11 Nev. Gaming Comm'n Reg. 5.010.

12 9. Nevada Gaming Commission Regulation 5.011 states, in relevant part, as follows:

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

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

21

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

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

26

27

1 10. Clark County Code 8.20.300 provides as follows:

2 It is unlawful for any licensee under the provisions of this
3 chapter, or any of his servants or employees, to sell, serve or give
4 away alcoholic liquor to any intoxicated person.

Clark County, Nev., County Code 8.20.300.

5 11. Clark County Code 8.20.340 provides as follows:

6 It is unlawful for any licensee or any person employed in a
7 place of business which sells alcoholic liquor to sell, serve, give
8 away or dispense alcoholic liquor to any minor. For the purpose of
9 this section a person shall be deemed to be employed in a place of
10 business which sells alcoholic liquor if he is clothed or vested with
11 ostensible authority to make sales, whether actually receiving a
12 wage or not.

Clark County, Nev., County Code 8.20.340.

11 12. Clark County Code 8.20.465 provides as follows:

12 It is the affirmative duty of each holder of an alcoholic liquor
13 license to strictly enforce all the provisions of this code and state
14 statutes in the licensed establishment, and without limiting the
15 generality of the foregoing, each holder of a liquor license must:

16 (a) Maintain and conduct all activities upon the premises in
17 a decent, orderly and respectful manner and shall not knowingly
18 permit within or upon the licensed premises any lewd activity,
19 nudity, or topless activity (except in those limited circumstances
20 which are enumerated in Section 8.20.570), disorder,
21 disturbances, or other activities which endanger the health or
22 safety of the patrons or disrupt the peace or order of the
23 neighborhood;

24 (b) Except for live entertainment venues properly licensed
25 for the sale of alcohol, public facility clubs, and showrooms
26 operated by resort hotel licensees, refuse admittance to all minors
27 to any room of the licensed premises wherein alcoholic liquor is
28 sold for on-premises consumption, unless it is in a restaurant,
29 category 2 restaurant, or supper club that are not operated in
30 conjunction with an adult entertainment cabaret; and

31 (c) Maintain adequate security to ensure compliance with
32 requirements of subsections (a) and (b) of this section and remain
33 qualified to hold a liquor license as provided in Section 8.20.010.
34 For the purpose of this section, "premises" means all portions of
35 the building in which the licensee is located and over which it has
36 control and that area of the parking lot over which the licensee has
37 ownership or contractual parking privileges. For the purposes of
38 this section and Section 8.20.570, use of the word "premises" for
39 liquor licenses that also offer "transient lodging" (as that term is
40 defined in CCC Chapter 4.08) shall not include private rooms
41 designed and used for sleeping purposes.

Clark County, Nev., County Code 8.20.465.

1 13. Clark County Code 8.20.475 provides as follows:

2 It is the responsibility of the licensee to keep himself
3 informed of the content of all liquor ordinances, and comply
4 therewith, and ignorance thereof will not excuse violations. Every
5 licensee has a duty to cooperate with county licensing officials and
6 members of the Las Vegas metropolitan police department in their
7 enforcement responsibilities under this title.

8 Clark County, Nev., County Code 8.20.475.

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

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

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

22 **BACKGROUND**

23 15. All events and activities contained herein took place on the premises of PH.

24 16. On or about April 13, 2007, PH entered into an agreement with The Opium Group,
25 LLC, dba Privé (Privé).

26 17. Under this agreement, PH granted Privé a lease over three areas on the premises
27 of PH in which to operate a night club. Two of the areas are comprised of space to be
exclusively used by Privé as a nightclub. One of the areas, referred to herein as the Living
Room, is for the non-exclusive use of Privé as a bar and queuing area for the nightclub.

18 18. PH and Privé also agreed to do certain cross-brand marketing under the
19 agreement.

20 19. The location of Privé inside of and on the premises of PH and the cross-brand
21 marketing of Privé and PH makes it appear that Privé is a part of PH.

22

1 20. On or about February 7, 2006, and prior to PH entering the agreement with Privé,
2 the Board sent a letter to nonrestricted gaming licensees (the letter) concerning nightclub
3 activities. The Board, through its Enforcement Division, also conducted a number of industry
4 classes concerning nightclubs in casinos. PH both received this letter and had
5 representatives attend the class.

6 21. The letter and class were concerned with what were becoming recurring events
7 surrounding nightclubs located on the premises of nonrestricted gaming licensees and how
8 these events constituted situations which could bring discredit to the State and act as a
9 detriment to the development of the gaming industry. Among the events with which the Board
10 was concerned in the letter included "incidences of excessive inebriation, drug distribution and
11 abuse, violence, the involvement of minors, and the handling of those individuals who became
12 incapacitated while at the club."

13 22. The management of PH had knowledge of many incidents of the type with which
14 the BOARD was concerned in the letter.

15 23. The letter also set out that the Board would hold licensees responsible for any
16 incidents resulting from activities on the premises of a licensee that the licensee knew, or
17 should have known, the activity would cause.

18 24. As such, PH is responsible for all inappropriate incidents that have occurred on the
19 premises of PH based upon its responsibility as a licensee and its duty to oversee all activities
20 which occur at its establishment.

21 **COUNT ONE**

22 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

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

25 26. Privé has removed Privé patrons who over consumed alcohol and/or controlled
26 substances while in Privé. Specifically, Privé employees have removed Privé patrons from
27 Privé and left them unattended in the Casino in various states of consciousness or contacted
PH security to remove the individuals.

1 27. PH knew, or should have known, about this conduct and failed to take action to
2 prevent it from occurring.

3 28. By itself and/or in conjunction with the actions contained in the other counts of this
4 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
5 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
6 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
7 industry.

8 29. PH's acts and failures to act as set out above are a violation of Nevada Gaming
9 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
10 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
11 Regs. 5.010(2), 5.011 and 5.030.

12 **COUNT TWO**

13 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

14 30. Complainant BOARD realleges and incorporates by reference as though set forth
15 in full herein paragraphs 1 through 29 above.

16 31. There have been a large number of Privé patrons who have demonstrated
17 excessive inebriation and/or had to be hospitalized for overconsumption of alcoholic
18 beverages while at Privé.

19 32. PH knew, or should have known, about this conduct and failed to take action to
20 prevent it from occurring.

21 33. By itself and/or in conjunction with the actions contained in the other counts of this
22 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
23 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
24 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
25 industry.

26 34. PH's acts and failures to act as set out above are a violation of Nevada Gaming
27 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method

1 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
2 Regs. 5.010(2), 5.011 and 5.030.

3 **COUNT THREE**

4 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

5 35. Complainant BOARD realleges and incorporates by reference as though set forth
6 in full herein paragraphs 1 through 34 above.

7 36. A number of instances have been documented concerning Privé patrons using
8 and/or being under the influence of controlled substances while at Privé.

9 37. PH knew, or should have known, about this conduct and failed to take action to
10 prevent it from occurring.

11 38. By itself and/or in conjunction with the actions contained in the other counts of this
12 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
13 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
14 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
15 industry.

16 39. PH's acts and failures to act as set out above are a violation of Nevada Gaming
17 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
18 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
19 Regs. 5.010(2), 5.011 and 5.030.

20 **COUNT FOUR**

21 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

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

24 41. There have been a number of allegations from Privé patrons that employees of
25 Privé have assaulted and/or battered, both physically and sexually, the patrons.

26 42. PH knew, or should have known, about this conduct and failed to take action to
27 prevent it from occurring.

1 43. By itself and/or in conjunction with the actions contained in the other counts of this
2 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
3 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
4 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
5 industry.

6 44. PH's acts and failures to act as set out above are a violation of Nevada Gaming
7 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
8 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
9 Regs. 5.010(2), 5.011 and 5.030.

10 **COUNT FIVE**

11 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

12 45. Complainant BOARD realleges and incorporates by reference as though set forth
13 in full herein paragraphs 1 through 44 above.

14 46. There have been many assaults and/or batteries and/or altercations between
15 patrons of Privé including at least one instance of alleged sexual assault.

16 47. PH knew, or should have known, about this conduct and failed to take action to
17 prevent it from occurring.

18 48. By itself and/or in conjunction with the actions contained in the other counts of this
19 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
20 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
21 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
22 industry.

23 49. PH's acts and failures to act as set out above are a violation of Nevada Gaming
24 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
25 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
26 Regs. 5.010(2), 5.011 and 5.030.

27

COUNT SIX

VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)

50. Complainant BOARD realleges and incorporates by reference as though set forth in full herein paragraphs 1 through 49 above.

51. On or about May 14, 2008, agents of the Clark County Department of Business License issued Privé citations for allowing topless and lewd activity and failing to cooperate with its agents.

52. PH knew, or should have known, about this conduct and failed to take action to prevent it from occurring.

53. By itself and/or in conjunction with the actions contained in the other counts of this complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming industry.

54. PH's acts and failures to act as set out above are a violation of Nevada Gaming Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n Regs. 5.010(2), 5.011 and 5.030.

COUNT SEVEN

VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)

55. Complainant BOARD realleges and incorporates by reference as though set forth in full herein paragraphs 1 through 54 above.

56. Privé has allowed entrance by minors and to serve and over-serve these minors alcoholic beverages.

57. PH knew, or should have known, about this conduct and failed to take action to prevent it from occurring.

.....

1 58. By itself and/or in conjunction with the actions contained in the other counts of this
2 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
3 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
4 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
5 industry.

6 59. PH's acts and failures to act as set out above are a violation of Nevada Gaming
7 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
8 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
9 Regs. 5.010(2), 5.011 and 5.030.

10 **COUNT EIGHT**

11 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

12 60. Complainant BOARD realleges and incorporates by reference as though set forth
13 in full herein paragraphs 1 through 59 above.

14 61. An analysis of Clark County Fire Department Emergency Medical Service (CCFD
15 EMS) calls for service shows a sharp increase in calls for service at PH upon the opening of
16 Privé. For the twelve-month period prior to the opening of Privé (November 1, 2006, to
17 October 31, 2007), CCFD EMS responded to 61 calls for service at PH concerning the
18 following categories: hemorrhage/laceration, overdose/ingest poison, traumatic injuries,
19 unconscious/faint, assault/rape, breathing problems, and unknown problems. For the
20 approximately eight-month period commencing the month Privé opened (November 1, 2007,
21 to June 18, 2008), CCFD EMS responded to 106 calls for service at PH concerning the
22 following categories: hemorrhage/laceration, overdose/ingest poison, traumatic injuries,
23 unconscious/faint, assault/rape, breathing problems, and unknown problems.

24 62. An analysis of Metro calls for service shows a sharp increase in calls for service at
25 PH upon the opening of Privé. For all of 2007, Metro responded to zero calls for service
26 regarding intoxicated individuals, four calls for service regarding guns, 52 calls for service
27 regarding assault and/or battery, 14 calls for service regarding fights, and two calls for service

1 regarding narcotics. For the first six months of 2008, after Privé opened, Metro responded to
2 three calls for service regarding intoxicated individuals, four calls for service regarding guns (a
3 100% annualized increase), 37 calls for service regarding assault and/or batter (a 42%
4 annualized increase), 14 calls for service regarding fights (a 100% annualized increase), and
5 six calls for service regarding narcotics (a 500% annualized increase).

6 63. Metro has also noted significant prostitution activity on the premises of PH around
7 Privé. PH has failed to require that Privé take steps to discourage and prevent this
8 prostitution activity.

9 64. PH has failed to make itself aware of Privé employee criminal records and exercise
10 oversight concerning whether Privé employees with criminal records are suitable to be
11 associated with PH as a gaming licensee.

12 65. PH knew, or should have known, about this conduct and failed to take action to
13 prevent it from occurring.

14 66. By itself and/or in conjunction with the actions contained in the other counts of this
15 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
16 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
17 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
18 industry.

19 67. PH's acts and failures to act as set out above are a violation of Nevada Gaming
20 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
21 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
22 Regs. 5.010(2), 5.011 and 5.030.

23 **COUNT NINE**

24 **VIOLATION OF NEVADA GAMING COMMISSION REGULATION 5.011(1) and (10)**

25 68. Complainant BOARD realleges and incorporates by reference as though set forth
26 in full herein paragraphs 1 through 67 above.

27

1 69. PH has not maintained sufficient control over the portion of its premises leased to
2 Privé to prevent incidents which reflect or tend to reflect poorly on the reputation of gaming in
3 the State of Nevada and/or act as a detriment to the development of the gaming industry
4 and/or reflect or tend to reflect discredit upon the State of Nevada or the gaming industry.

5 70. PH's agreement with Privé does not maintain sufficient control over Privé
6 concerning aspects of Privé that reflect or tend to reflect poorly on the reputation of gaming in
7 Nevada and/or act as a detriment to the development of the gaming industry and/or reflect or
8 tend to reflect discredit upon the State of Nevada or the gaming industry.

9 71. PH's agreement with Privé forces the Board and Commission to control Privé with
10 respect to protecting gaming in Nevada, protecting the welfare of the gaming industry, and
11 protecting the welfare of the inhabitants of the State of Nevada.

12 72. The only gaming related control in the agreement is that Privé must comply with a
13 call forward by the Commission which has the effect of shifting the responsibility of addressing
14 Privé conduct to the Board and Commission instead of PH .

15 73. PH does retain broad control to terminate the agreement if Privé jeopardizes PH's
16 business or licenses, however, PH has not, to date, exercised this control.

17 74. PH's lack of control over incidents related to Privé extends to PH's security officers
18 not being allowed to enter Privé during Privé's business hours without the escort of a Privé
19 employee.

20 75. Most of the incidents underlying the allegations in this Complaint were contained in
21 PH security reports. Therefore, PH management knew, or should have known, about these
22 incidents and failed to take appropriate action against Privé.

23 76. By itself and/or in conjunction with the actions contained in the other counts of this
24 complaint, this failure to prevent the above reflects or tends to reflect poorly on the reputation
25 of gaming in the State of Nevada and/or acts as a detriment to the development of the gaming
26 industry and/or reflects or tends to reflect discredit upon the State of Nevada or the gaming
27 industry.

1 77. PH's acts and failures to act as set out above are a violation of Nevada Gaming
2 Commission Regulations 5.010 and 5.011 (1) and (10). This constitutes an unsuitable method
3 of operation, and, as such, is grounds for disciplinary action. See Nev. Gaming Comm'n
4 Regs. 5.010(2), 5.011 and 5.030.

5 WHEREFORE, based upon the allegations contained herein which constitute
6 reasonable cause for disciplinary action against RESPONDENT, pursuant to NRS 463.310,
7 and Nevada Gaming Commission Regulations 5.010 and 5.030 the STATE GAMING
8 CONTROL BOARD prays for the relief as follows:

- 9 1. That the Nevada Gaming Commission serve a copy of this Complaint on
10 RESPONDENT pursuant to NRS 463.312(2);
- 11 2. That the Nevada Gaming Commission fine RESPONDENT a monetary sum
12 pursuant to the parameters defined at NRS 463.310(4) for each separate violation of the
13 provisions of the Nevada Gaming Control Act or the Regulations of the Nevada Gaming
14 Commission;
- 15 3. That the Nevada Gaming Commission take action against RESPONDENT'S license
16 or licenses pursuant to the parameters defined in NRS 463.310(4); and

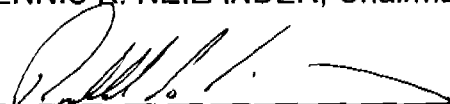
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1 4. For such other and further relief as the Nevada Gaming Commission may deem just
2 and proper.

3 DATED this 9th day of July, 2009.

4 STATE GAMING CONTROL BOARD

5 
6 DENNIS K. NEILANDER, Chairman

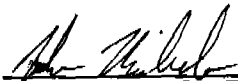
7 
8 RANDALL E. SAYRE, Member

9 
10 MARK A. LIPPARELLI, Member

Submitted by:

11 CATHERINE CORTEZ MASTO
12 Attorney General

13 By:


14 JOHN S. MICHELA
15 Deputy Attorney General
16 Gaming Division
17 (775) 850-4154