

JUN 17 2010

NEVADA GAMING COMMISSION
CARSON CITY, NEVADA

1 NGC 09-15

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4 **STATE OF NEVADA**

5 **BEFORE THE NEVADA GAMING COMMISSION**

6 STATE GAMING CONTROL BOARD,

7 Complainant,

8 vs.

9 M & M POCKET CHANGE, INC.,
10 dba POCKET CHANGE,

11 and

12 SALAM MATTI RAZUKI,

13 Respondents.

**STIPULATION FOR
SETTLEMENT AND ORDER**

14 The State of Nevada, on relation of its STATE GAMING CONTROL BOARD (BOARD),
15 Complainant herein, filed a Complaint, NGC Case No. 09-15, against the above-captioned
16 RESPONDENTS, M & M POCKET CHANGE, INC., dba POCKET CHANGE and SALAM
17 MATTI RAZUKI, alleging certain violations of the Nevada Gaming Control Act and Regulations
18 of the Nevada Gaming Commission.

19 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENTS
20 that the Complaint, NGC Case No. 09-15, filed against RESPONDENTS in the above-entitled
21 case shall be settled on the following terms and conditions:

- 22 1. RESPONDENTS admit each and every allegation set forth in the Complaint, NGC
23 Case No. 09-15.
- 24 2. RESPONDENTS fully understand and voluntarily waive the right to a public hearing
25 on the charges and allegations set forth in the Complaint, the right to present and cross-
26 examine witnesses, the right to a written decision on the merits of the Complaint, which must
27 contain findings of fact and a determination of the issues presented, and the right to obtain
28 judicial review of the Nevada Gaming Commission's decision.

1 3. RESPONDENTS agree to pay a fine in the total amount of THREE THOUSAND
2 DOLLARS (\$3,000.00) made payable to the State of Nevada-Nevada Gaming Commission.
3 RESPONDENTS may pay the full amount of the fine on the date the Nevada Gaming
4 Commission accepts this stipulated agreement or may make up to six payments. If the
5 RESPONDENTS elect to make payments:

6 a. RESPONDENTS shall execute a confession of judgment and make a
7 minimum payment of \$500.00 upon or prior to acceptance by the Nevada Gaming
8 Commission of this stipulated agreement on or about July 22, 2010.

9 b. The five remaining payments shall be at least \$500.00 each, unless the
10 unpaid balance of the fine is less than \$500.00, in which case the balance of the fine
11 shall be paid. The payments shall be made on or before the following dates: August
12 22, 2010; September 22, 2010; October 22, 2010; November 22, 2010; and December
13 22, 2010.

14 c. All payments shall be made by cashier's check or money order delivered
15 to the Las Vegas offices of the BOARD and made payable to the State of Nevada-
16 Nevada Gaming Commission.

17 d. Interest on the fine shall accrue pursuant to NRS 17.130 on any unpaid
18 payment or unpaid portion of payment computed from the date said payment is due
19 until said payment is made in full.

20 e. RESPONDENT'S failure to make payments pursuant to the payment
21 schedule set forth herein shall constitute grounds for further discipline pursuant to NRS
22 463.310.

23 4. In consideration for the execution of this settlement agreement, RESPONDENTS,
24 for themselves, their heirs, executors, administrators, successors, and assigns, hereby
25 releases and forever discharges the State of Nevada, the Nevada Gaming Commission, the
26 Nevada Gaming Control Board, the Nevada Attorney General and each of their members,
27 agents, and employees in their individual and representative capacities, from any and all
28 manner of actions, causes of action, suits, debts, judgments, executions, claims, and

1 demands whatsoever known or unknown, in law and equity, that RESPONDENTS ever had,
2 now have, may have, or claim to have against any and all of the persons or entities named in
3 this paragraph arising out of, or by reason of, the investigation of the allegations in the
4 Complaint and this disciplinary action, NGC Case No. 09-15, or any other matter relating
5 thereto.

6 5. In consideration for the execution of this settlement agreement, RESPONDENTS
7 hereby indemnify and hold harmless the State of Nevada, the Nevada Gaming Commission,
8 the State Gaming Control Board, the Nevada Attorney General, and each of their members,
9 agents, and employees in their individual and representative capacities against any and all
10 claims, suits and actions, brought against the persons named in this paragraph by reason of
11 the investigation of the allegations in the Complaint, filed in this disciplinary action, NGC Case
12 No. 09-15, and all other matters relating thereto, and against any and all expenses, damages,
13 charges and costs, including court costs and attorney fees, which may be sustained by the
14 persons and entities named in this paragraph as a result of said claims, suits and actions.

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

21 7. RESPONDENTS and the BOARD acknowledge that this settlement is made to
22 avoid litigation and economize resources. The parties agree and understand that this
23 Stipulation for Settlement is intended to operate as full and final settlement of the Complaint
24 filed against RESPONDENTS in the above-entitled disciplinary case, NGC Case No. 09-15.

25 8. RESPONDENTS and the BOARD recognize and agree that the Nevada Gaming
26 Commission has the sole and absolute discretion to determine whether to accept this
27 stipulated settlement agreement. RESPONDENTS and the BOARD hereby waive any right
28 they may have to challenge the impartiality of the Nevada Gaming Commission to hear the

1 above-entitled case on the matters embraced in the Complaint if the Nevada Gaming
2 Commission determines not to accept this stipulated settlement agreement. If the Nevada
3 Gaming Commission does not accept the Stipulation for Settlement, it shall be withdrawn as
4 null and void and RESPONDENTS' admissions, if any, that certain violations of the Nevada
5 Gaming Control Act and the Regulations of the Nevada Gaming Commission occurred shall
6 be withdrawn.

7 9. RESPONDENTS and the BOARD agree and understand that this settlement
8 agreement is intended to operate as full and final settlement of the Complaint filed in NGC
9 Case No. 09-15. The parties further agree and understand that any oral representations are
10 superseded by this settlement agreement and that only those terms memorialized in writing
11 herein shall be effective.

12 10. RESPONDENTS agree and understands that although this settlement, if approved
13 by the Nevada Gaming Commission, will settle the Complaint filed in NGC Case No. 09-15,
14 that the allegations contained in the Complaint file in NGC Case No. 09-15 and the terms of
15 this settlement agreement may be considered by the BOARD and/or the Nevada Gaming
16 Commission, with regards to any and all applications by RESPONDENTS that are currently
17 pending before the BOARD or the Nevada Gaming Commission, or that are filed in the future
18 with the BOARD.

19 11. RESPONDENTS and the BOARD shall each bear their own costs incurred in this
20 disciplinary action, NGC Case No. 09-15.

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

3 DATED this 17TH day of JUNE, 2010.

4 M & M POCKET CHANGE, INC.,
5 dba POCKET CHANGE
6 and SALAM MATTI RAZUKI

STATE GAMING CONTROL BOARD


7 DENNIS K. NEILANDER, Chairman


8 SALAM MATTI RAZUKI, an individual
9 and President, Secretary and
10 Director of M & M POCKET
11 CHANGE, INC.



12 RANDALL E. SAYRE, Member


13 MARK A. LIPPARELLI, Member

14 Submitted by:

15 CATHERINE CORTEZ MASTO
16 Attorney General

17 By:


18 MICHAEL P. SOMPS
19 Senior Deputy Attorney General
20 Gaming Division

21 Attorneys for State Gaming Control Board

22 **ORDER**

23 IT IS SO ORDERED in NGC Case No. 09-15.

24 DATED this 22 day of July, 2010.

25 NEVADA GAMING COMMISSION

26 PETER BERNHARD, Chairman