



1 NGC 20-07
2 NGC 20-09

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5
6 STATE OF NEVADA
7 BEFORE THE NEVADA GAMING COMMISSION

8 NEVADA GAMING CONTROL BOARD,

9 Complainant,

10 vs.

**JOINT STIPULATION FOR
SETTLEMENT AND ORDER**

11 SB GAMING, LLC, dba
12 SAHARA LAS VEGAS,

13 And

14 MEI-GSR HOLDINGS, LLC, dba
15 GRAND SIERRA RESORT AND CASINO,

16 Respondents.

17 The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD
18 (BOARD), filed and served Complaints in NGC Case No. 20-07 against SB GAMING, LLC,
19 dba SAHARA LAS VEGAS, and in NGC Case No. 20-09 against MEI-GSR HOLDINGS,
20 LLC, dba GRAND SIERRA RESORT, RESPONDENTS herein, alleging certain violations
21 of the Nevada Gaming Control Act and Regulations of the Nevada Gaming Commission
22 (Commission or NGC).

23 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and
24 RESPONDENTS that the Complaints, NGC Case No. 20-07 and NGC Case No. 20-09, filed
25 against RESPONDENTS in the above-entitled cases, shall be settled on the following terms
26 and conditions:

27 1. RESPONDENTS do not admit nor deny that the factual allegations set forth in
28 the Complaints, NGC Case No. 20-07 and NGC Case No. 20-09, are true and correct, but

1 enter into this Joint Stipulation for Settlement and Order (Stipulation for Settlement)
2 because they believe the BOARD could meet its burden of proof if these matters were to
3 proceed to evidentiary hearings before the Commission.

4 2. RESPONDENTS fully understand and voluntarily waive the right to a public
5 hearing on the charges and allegations set forth in the Complaints, the right to present and
6 cross-examine witnesses, the right to a written decision on the merits of the Complaints,
7 and the right to obtain judicial review of the Commission's decision.

8 3. RESPONDENTS agree to pay a fine in the amount of SEVENTY-FIVE
9 THOUSAND AND 00/100 DOLLARS (\$75,000.00) electronically transferred to the *State of*
10 *Nevada-Nevada Gaming Commission*. RESPONDENTS agree to pay one-half of the fine
11 on or before the date this Stipulation for Settlement is accepted by the Commission and
12 pay the remaining balance of the fine on or before October 24, 2020. Said payments shall
13 be made by a method of electronic payment approved by the Tax and License Division of
14 the BOARD pursuant to NRS 353.1467. Interest on the fine shall accrue pursuant to NRS
15 17.130 on any unpaid balance computed from the date the respective payments are due
16 until payment of the fine, and any accrued interest, is made in full.

17 4. In consideration for the execution of this Stipulation for Settlement,
18 RESPONDENTS for themselves, their heirs, executors, administrators, successors, and
19 assigns, hereby releases and forever discharge the State of Nevada, the Commission, the
20 BOARD, the Nevada Attorney General, and each of their members, agents, and employees,
21 in their individual and representative capacities, from any and all manner of actions,
22 causes of action, suits, debts, judgments, execution, claims, and demands whatsoever,
23 known or unknown, in law and equity, that RESPONDENTS ever had, now have, may
24 have, or claim to have against any and all of the persons or entities named in this
25 paragraph arising out of, or by reason of, the investigation of the allegations of the
26 Complaints filed in these disciplinary actions, NGC Case No. 20-07 and NGC Case
27 No. 20-09, or any matter relating thereto.

28 ...

1 5. In further consideration for the execution of this Stipulation for Settlement,
2 RESPONDENTS hereby indemnify and hold harmless the State of Nevada, the
3 Commission, the BOARD, the Nevada Attorney General, and each of their members,
4 agents, and employees, in their individual and representative capacities, from any and all
5 claims, suits, and actions brought against the persons named in this paragraph by reason
6 of the investigation of the allegations in the Complaints filed in these disciplinary actions,
7 NGC Case No. 20-07 and NGC Case No. 20-09, and all other matters relating thereto, and
8 against any and all expenses, damages, charges, and costs, including court costs and
9 attorney fees, which have been or may be sustained by the persons and entities named in
10 this paragraph as a result of said claims, suits, and actions.

11 6. RESPONDENTS enter into this Stipulation for Settlement freely and
12 voluntarily and acknowledge that this Stipulation for Settlement is not the product of force,
13 threats, or any other form of coercion or duress, but is the product of discussions between
14 RESPONDENTS and the attorney for the BOARD.

15 7. RESPONDENTS and the BOARD acknowledge that this Stipulation for
16 Settlement is made to avoid litigation and economize resources.

17 8. RESPONDENTS and the BOARD recognize and agree that the Commission has
18 the sole and absolute discretion to determine whether to accept this Stipulation for
19 Settlement.

20 9. RESPONDENTS and the BOARD hereby waive any right they may have to
21 challenge the impartiality of the Commission to hear the above-entitled cases on the
22 matters embraced in the Complaints, NGC Case No. 20-07 and NGC Case No. 20-09, if the
23 Commission determines not to accept this Stipulation for Settlement.

24 10. RESPONDENTS and the BOARD agree and understand that if the Commission
25 does not accept this Stipulation for Settlement, it shall be withdrawn as null and void and
26 RESPONDENTS' admissions, if any, that certain violations of the Nevada Gaming Control
27 Act or the regulations adopted thereunder had occurred shall be withdrawn.

28 ...

1 11. RESPONDENTS and the BOARD agree and understand that this Stipulation
2 for Settlement is intended to operate as full and final settlement of the Complaints filed
3 against RESPONDENTS in the above-entitled disciplinary cases, NGC Case No. 20-07 and
4 NGC Case No. 20-09.

5 12. RESPONDENTS and the BOARD agree and understand that any oral
6 representations are superseded by this Stipulation for Settlement and that only those
7 terms memorialized in writing herein shall be effective.

8 13. RESPONDENTS agree and understand that, although this Stipulation for
9 Settlement, if approved by the Commission, will settle the Complaints filed in the above-
10 entitled disciplinary cases, NGC Case No. 20-07 and NGC Case No. 20-09, the allegations
11 contained in the Complaints and the terms of this Stipulation for Settlement may be
12 considered by the BOARD or Commission with regards to any and all applications filed by
13 RESPONDENTS with the BOARD in the future, or that are currently pending before the
14 BOARD or Commission, and with regard to any future disciplinary action that may be
15 brought against the RESPONDENTS.

16 14. RESPONDENTS and the BOARD shall each bear their own costs incurred in
17 these disciplinary actions, NGC Case No. 20-07 and NGC Case No. 20-09, including, but
18 not limited to, attorney costs, if any.

19 15. RESPONDENTS, by executing this Stipulation for Settlement, affirmatively
20 waive all notice required by law for these matters including, but not limited to, notice
21 concerning consideration of the character or misconduct of a person (Nevada Revised
22 Statute (NRS) 241.033), notice concerning consideration of administrative action against a
23 person (NRS 241.034), and notice concerning hearings before the Commission (NRS
24 463.312). Regardless of this waiver of the applicable legal notice requirements, the BOARD
25 or Commission will attempt to provide reasonable notice of the time and place of any
26 hearing relating to these disciplinary actions, NGC Case No. 20-07 and NGC Case
27 No. 20-09.

28 ...

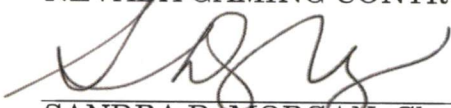
1 16. This Stipulation for Settlement shall become effective immediately upon
2 approval by the Commission.

3 Dated this 23rd day of September 2020.

4 SB GAMING, LLC, dba
5 SAHARA LAS VEGAS

NEVADA GAMING CONTROL BOARD

6 By: _____
7 PAUL HOBSON
8 Senior VP and General Manager


9 SANDRA D. MORGAN, Chairwoman

10 MEI-GSR Holdings, LLC, dba
11 GRAND SIERRA RESORT AND CASINO



12 TERRY JOHNSON, Member

13 By: _____
14 SHANNON KEEL
15 General Manager


16 PHILIP KATSAROS, Member

17 Submitted by:

18 AARON D. FORD
19 Attorney General


20 By: 
21 EDWARD L. MAGAW
22 Senior Deputy Attorney General
23 Office of the Nevada Attorney General
24 Gaming Division
25 Attorneys for the Nevada Gaming Control Board
26 Telephone: (702) 486-3420

27 **ORDER**

28 IT IS SO ORDERED in NGC Case No. 20-07 and NGC Case No. 20-09.

Dated this 24th day of September 2020.

NEVADA GAMING COMMISSION

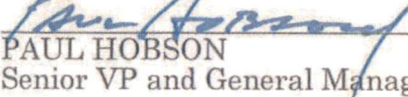

JOHN T. MORAN, JR., Chairman

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NEVADA GAMING CONTROL BOARD

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Senior VP and General Manager

SANDRA D. MORGAN, Chairwoman

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9 GRAND SIERRA RESORT AND CASINO

TERRY JOHNSON, Member

10 By: _____
11 SHANNON KEEL
General Manager

PHILIP KATSAROS, Member

12
13 Submitted by:

14 AARON D. FORD
15 Attorney General

16 By: _____
17 EDWARD L. MAGAW
18 Senior Deputy Attorney General
19 Office of the Nevada Attorney General
20 Gaming Division
Attorneys for the Nevada Gaming Control Board
Telephone: (702) 486-3420

21 **ORDER**

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23 Dated this ___ day of _____ 2020.

24 NEVADA GAMING COMMISSION

25
26 _____
27 JOHN T. MORAN, JR., Chairman
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8 MEI-GSR Holdings, LLC, dba GRAND SIERRA RESORT AND CASINO TERRY JOHNSON, Member

10 By: SHANNON KEEL General Manager PHILIP KATSAROS, Member

13 Submitted by:
14 AARON D. FORD
15 Attorney General

16 By: EDWARD L. MAGAW
17 Senior Deputy Attorney General
18 Office of the Nevada Attorney General
19 Gaming Division
20 Attorneys for the Nevada Gaming Control Board
21 Telephone: (702) 486-3420

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23 Dated this ___ day of _____ 2020.

24 NEVADA GAMING COMMISSION

26 JOHN T. MORAN, JR., Chairman