



1 NGC 20-12

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5 STATE OF NEVADA

6 BEFORE THE NEVADA GAMING COMMISSION

7 NEVADA GAMING CONTROL BOARD,

8 Complainant,

9 vs.

10 BETTE M. LARSEN  
11 (100% Owner of The Timbers)

12 Respondent.

**STIPULATION FOR SETTLEMENT  
AND ORDER**

13 The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD  
14 (BOARD), Complainant herein, filed a Complaint in case No. NGC Case No. 20-12, against  
15 BETTE M. LARSEN (100% Owner of The Timbers), RESPONDENT herein, alleging  
16 certain violations of the Nevada Gaming Control Act and Regulations of the Nevada  
17 Gaming Commission.

18 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENT  
19 that the Complaint, NGC Case No. 20-12, filed against RESPONDENT in the above-  
20 entitled case, shall be settled on the following terms and conditions:

21 1. RESPONDENT admits each and every allegation set forth in the Complaint,  
22 NGC Case No. 20-12.

23 2. RESPONDENT fully understands and voluntarily waives the right to a public  
24 hearing on the charges and allegations set forth in the Complaint, the right to present and  
25 cross-examine witnesses, the right to a written decision on the merits of the Complaint  
26 which must contain findings of fact and a determination of the issues presented, and the  
27 right to obtain judicial review of the Nevada Gaming Commission's (Commission) decision.

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1           3.     RESPONDENT agrees to pay a fine in the total amount of FIVE THOUSAND  
2 DOLLARS and NO CENTS (\$5,000.00) electronically transferred to the *State of Nevada-*  
3 *Nevada Gaming Commission* on the date this Stipulation for Settlement is accepted by the  
4 Commission. Interest on the fine shall accrue in accordance with Nevada Revised Statute  
5 (NRS) 17.130 on any unpaid balance computed from the date payment is due until payment  
6 is made in full.

7           4.     RESPONDENT agrees that the following condition shall be placed on her  
8 restricted gaming license:

9                   A KEY EMPLOYEE APPLICATION MUST BE FILED WITHIN  
10                   60 DAYS FROM THE DATE THIS STIPULATION FOR  
11                   SETTLEMENT IS ACCEPTED BY THE NEVADA GAMING  
12                   COMMISSION, AND THEREAFTER BE REFILED WITHIN 60  
13                   DAYS OF ANY CHANGE IN THE PERSON OCCUPYING THAT  
14                   POSITION.

15           5.     In consideration for the execution of this Stipulation for Settlement,  
16 RESPONDENT, for herself, her heirs, executors, administrators, successors, and assigns,  
17 hereby releases and forever discharges the State of Nevada, the Commission, the BOARD,  
18 the Nevada Attorney General and each of their members, agents, and employees in their  
19 individual and representative capacities, from any and all manner of actions, causes of  
20 action, suits, debts, judgments, executions, claims, and demands whatsoever known or  
21 unknown, in law and equity, that RESPONDENT ever had, now has, may have, or claim  
22 to have against any and all of the persons or entities named in this paragraph arising out  
23 of, or by reason of, the investigation of the allegations in the Complaint and this  
24 disciplinary action, NGC Case No. 20-12, or any other matter relating thereto.

25           6.     In consideration for the execution of this Stipulation for Settlement,  
26 RESPONDENT hereby indemnifies and holds harmless the State of Nevada, the  
27 Commission, the BOARD, the Nevada Attorney General, and each of their members,  
28 agents, and employees in their individual and representative capacities against any and

1 all claims, suits and actions, brought against the persons named in this paragraph by  
2 reason of the investigation of the allegations in the Complaint, filed in this disciplinary  
3 action, NGC Case No. 20-12, and all other matters relating thereto, and against any and  
4 all expenses, damages, charges and costs, including court costs and attorney fees, which  
5 may be sustained by the persons and entities named in this paragraph as a result of said  
6 claims, suits and actions.

7         7.     RESPONDENT enters into this Stipulation for Settlement freely and  
8 voluntarily and with the opportunity to seek the assistance of legal counsel.  
9 RESPONDENT further acknowledges that this Stipulation for Settlement is not the  
10 product of force, threats, or any other form of coercion or duress, but is the product of  
11 discussions between RESPONDENT and the attorney for the BOARD.

12         8.     RESPONDENT affirmatively represents that if RESPONDENT, this  
13 Stipulation for Settlement and Order, and/or any amounts distributed under this  
14 Stipulation for Settlement and Order are subject to, or will become subject to, the  
15 jurisdiction of any bankruptcy court, the bankruptcy court's approval is not necessary for  
16 this Stipulation for Settlement and Order to become effective, or that the bankruptcy court  
17 has already approved this Stipulation for Settlement and Order.

18         9.     RESPONDENT and the BOARD acknowledge that this Stipulation for  
19 Settlement is made to avoid litigation and economize resources. The parties agree and  
20 understand that this Stipulation for Settlement is intended to operate as full and final  
21 settlement of the Complaint filed against RESPONDENT in the above-entitled disciplinary  
22 case, NGC Case No. 20-12.

23         10.    RESPONDENT and the BOARD recognize and agree that the Commission  
24 has the sole and absolute discretion to determine whether to accept this Stipulation for  
25 Settlement. RESPONDENT and the BOARD hereby waive any right they may have to  
26 challenge the impartiality of the Commission to hear the above-entitled case on the matters  
27 embraced in the Complaint if the Commission determines not to accept this Stipulation for  
28 Settlement. If the Commission does not accept the Stipulation for Settlement, it shall be

1 withdrawn as null and void and RESPONDENT'S admissions, if any, that certain  
2 violations of the Nevada Gaming Control Act and the Regulations of the Commission  
3 occurred shall be withdrawn.

4 11. RESPONDENT and the BOARD agree and understand that this Stipulation  
5 for Settlement is intended to operate as full and final settlement of the Complaint filed in  
6 NGC Case No. 20-12. The parties further agree and understand that any oral  
7 representations are superseded by this Stipulation for Settlement and that only those  
8 terms memorialized in writing herein shall be effective.

9 12. RESPONDENT agrees and understands that although this Stipulation for  
10 Settlement, if approved by the Commission, will settle the Complaint filed in NGC Case  
11 No. 20-12, that the allegations contained in the Complaint filed in NGC Case No. 20-12 and  
12 the terms of this Stipulation for Settlement may be considered by the BOARD and/or the  
13 Commission, with regards to any and all applications by RESPONDENT that are currently  
14 pending before the BOARD or the Commission, or that are filed in the future with the  
15 BOARD.

16 13. RESPONDENT and the BOARD shall each bear their own costs incurred in  
17 this disciplinary action, NGC Case No. 20-12.

18 14. RESPONDENT, by executing this Stipulation for Settlement, affirmatively  
19 waives all notices required by law for this matter including, but not limited to, notices  
20 concerning consideration of the character or misconduct of a person (NRS 241.033), notices  
21 concerning consideration of administrative action against a person (NRS 241.034), and  
22 notices concerning hearings before the Commission (NRS 463.312). Regardless of the  
23 waiver of legal notice requirements, the BOARD and Commission will attempt to provide  
24 reasonable notice of the time and place of the hearing. Further, in negotiating this  
25 Stipulation for Settlement, RESPONDENT acknowledges that the BOARD has provided  
26 RESPONDENT with the date and time of the Commission hearing during which the  
27 BOARD anticipates the Commission will consider approving this Stipulation for  
28 Settlement.



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

3 DATED this 22 day of October, 2020.

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5  
6 Bette M. Larsen  
7 BETTE M. LARSEN  
(100% Owner of The Timbers)

NEVADA GAMING CONTROL BOARD

SANDRA MORGAN, Chairwoman

TERRY JOHNSON, Member

PHILIP KATSAROS, Member

Submitted by:

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Attorney General

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*Attorneys for the Nevada Gaming Control Board*

**ORDER**

IT IS SO ORDERED in NGC Case No. 20-12.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

NEVADA GAMING COMMISSION

JOHN T. MORAN, Jr., Chairman