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NEVADA GAMING COMMISSION  
CLERK OF COURT, NEVADA

1 NGC 21-02

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STATE OF NEVADA

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BEFORE THE NEVADA GAMING COMMISSION

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NEVADA GAMING CONTROL BOARD,

8

Complainant,

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vs.

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LV STATION MANAGEMENT, INC, dba  
COUNTRY CLUB AUTO SPA; and ALI  
POURDASTAN,

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Respondents.

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STIPULATION FOR SETTLEMENT  
AND ORDER

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The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD  
(BOARD), filed and served a Complaint in NGC Case No. 21-02 against LV STATION  
MANAGEMENT, INC, dba COUNTRY CLUB AUTO SPA (AUTO SPA); and ALI  
POURDASTAN (POURDASTAN), collectively RESPONDENTS herein, alleging certain  
violations of the Nevada Gaming Control Act and Regulations of the Nevada Gaming  
Commission (Commission or NGC).

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IT IS HEREBY STIPULATED AND AGREED to by the BOARD and  
RESPONDENTS that the Complaint, NGC Case no. 21-02, filed against RESPONDENTS  
in the above-entitled case, shall be settled on the following terms and conditions:

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1. RESPONDENTS admit each and every allegation set forth in the Complaint,  
NGC Case No. 21-02.

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

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1           3.   RESPONDENTS agree to pay a fine in the amount of TEN THOUSAND AND  
2 00/100 DOLLARS (\$10,000.00) electronically transferred to the *State of Nevada-Nevada*  
3 *Gaming Commission* on or before the date this Stipulation for Settlement and Order  
4 (Stipulation for Settlement) is accepted by the Commission. Said payment shall be made  
5 by a method of electronic payment approved by the Tax and License Division of the BOARD  
6 pursuant to NRS 353.1467. Interest on the fine shall accrue pursuant to NRS 17.130 on  
7 any unpaid balance computed from the date the payment is due until payment of the fine,  
8 and any accrued interest, is made in full.

9           4.   In consideration for the execution of this Stipulation for Settlement,  
10 RESPONDENTS for themselves, their heirs, executors, administrators, successors, and  
11 assigns, hereby release and forever discharge the State of Nevada, the Commission, the  
12 BOARD, the Nevada Attorney General, and each of their members, agents, and employees,  
13 in their individual and representative capacities, from any and all manner of actions,  
14 causes of action, suits, debts, judgments, execution, claims, and demands whatsoever,  
15 known or unknown, in law and equity, that RESPONDENTS ever had, now have, may  
16 have, or claim to have against any and all of the persons or entities named in this  
17 paragraph arising out of, or by reason of, the investigation of the allegations of the  
18 Complaint filed in this disciplinary action, NGC Case No. 21-02, or any matter relating  
19 thereto.

20           5.   In further consideration for the execution of this Stipulation for Settlement,  
21 RESPONDENTS hereby indemnify and hold harmless the State of Nevada, the  
22 Commission, the BOARD, the Nevada Attorney General, and each of their members,  
23 agents, and employees, in their individual and representative capacities, from any and all  
24 claims, suits, and actions brought against the persons named in this paragraph by reason  
25 of the investigation of the allegations in the Complaint filed in this disciplinary action,  
26 NGC Case No. 21-02, and all other matters relating thereto, and against any and all  
27 expenses, damages, charges, and costs, including court costs and attorney fees, which have  
28 .....

1 been or may be sustained by the persons and entities named in this paragraph as a result  
2 of said claims, suits, and actions.

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

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

9 8. RESPONDENTS and the BOARD recognize and agree that the Commission has  
10 the sole and absolute discretion to determine whether to accept this Stipulation for  
11 Settlement.

12 9. RESPONDENTS and the BOARD hereby waive any right they may have to  
13 challenge the impartiality of the Commission to hear the above-entitled case on the matters  
14 embraced in the Complaint, NGC Case No. 21-02, if the Commission determines not to  
15 accept this Stipulation for Settlement.

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

20 11. RESPONDENTS and the BOARD agree and understand that this Stipulation  
21 for Settlement and Order is intended to operate as full and final settlement of the  
22 Complaint filed against RESPONDENTS in the above-entitled disciplinary case, NGC  
23 Case No. 21-02.

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

27 13. RESPONDENTS agree and understand that, although this Stipulation for  
28 Settlement, if approved by the Commission, will settle the Complaint filed in the above-

1 entitled disciplinary case, NGC Case No. 21-02, the allegations contained in the Complaint  
2 and the terms of this Stipulation for Settlement may be considered by the BOARD or  
3 Commission with regards to any and all applications filed by either RESPONDENT with  
4 the BOARD in the future, or that are currently pending before the BOARD or Commission,  
5 and with regard to any future disciplinary action that may be brought against either  
6 RESPONDENT.

7       14. RESPONDENTS and the BOARD shall each bear their own costs incurred in  
8 this disciplinary action, NGC Case No. 21-02, including, but not limited to, attorney costs,  
9 if any.

10       15. RESPONDENTS, by executing this Stipulation for Settlement, affirmatively  
11 waive all notice required by law for this matter including, but not limited to, notice  
12 concerning consideration of the character or misconduct of a person (Nevada Revised  
13 Statute (NRS) 241.033), notices concerning consideration of administrative action against  
14 a person (NRS 241.034), and notices concerning hearings before the Commission (NRS  
15 463.312). Regardless of this waiver of the applicable legal notice requirements, the BOARD  
16 or Commission will attempt to provide reasonable notice of the time and place of any  
17 hearing relating to this disciplinary action, NGC Case No. 21-02.

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

3 Dated this 11<sup>th</sup> day of June 2021.

Dated this 11<sup>th</sup> day of June 2021.

4 LV STATION MANAGEMENT, INC,  
5 dba COUNTRY CLUB AUTO SPA;  
6 and ALI POURDASTAN

NEVADA GAMING CONTROL BOARD

6 By: [Signature]  
7 ALI POURDASTAN  
8 Sole Owner and Officer

[Signature]  
BRIN GIBSON, Chairman

9 PRESTON B. HOWARD, P.C.

[Signature]  
PHILIP KATSAROS, Member

10 By: [Signature]  
11 PRESTON B. HOWARD, ESQ.  
12 Attorney for Respondents

[Signature]  
BRITTNIIE WATKINS, Member

Submitted by:

AARON D. FORD  
Attorney General

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

**ORDER**

22 IT IS SO ORDERED in NGC Case No. 21-02.

23 Dated this 24<sup>th</sup> day of June 2021.

24 NEVADA GAMING COMMISSION  
25 [Signature]  
26 JOHN T. MORAN, Chairman  
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