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STATE OF NEVADA

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BEFORE THE NEVADA GAMING COMMISSION

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NEVADA GAMING CONTROL BOARD,

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Complainant,

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vs.

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ARTESIAN PARTNERS, LLC,
dba PEAVINE TAPHOUSE EATS
AND BEATS,
ANITA MARIE NOBLE, and
MATTHEW TODD REARDON,

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Respondents.

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COMPLAINT

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The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD
(BOARD), Complainant herein, by and through its counsel, AARON D. FORD, Attorney
General, and MICHAEL P. SOMPS, Senior Deputy Attorney General, hereby files this
Complaint before the Nevada Gaming Commission (Commission) for disciplinary action
against Respondents, ARTESIAN PARTNERS, LLC, dba PEAVINE TAPHOUSE EATS
AND BEATS, ANITA MARIE NOBLE, and MATTHEW TODD REARDON pursuant to
Nevada Revised Statute (NRS) 463.310(2), and alleges as follows:

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JURISDICTION

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1. Complainant, BOARD, is an administrative agency of the State of Nevada
duly organized and existing under and by virtue of Chapter 463 of NRS and is charged with
the administration and enforcement of the gaming laws of this State as set forth in Title
41 of NRS (Nevada Gaming Control Act) and the Regulations of the Commission.

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2. Respondent, ARTESIAN PARTNERS, LLC, dba PEAVINE TAPHOUSE
EATS AND BEATS (ARTESIAN PARTNERS), located at 7665 Town Square Lane, Suite
101, Reno, Nevada 89523, currently holds a restricted gaming license and, as such, is
charged with the responsibility of complying with all provisions of the Nevada Gaming

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1 Control Act and the Regulations of the Commission.

2 3. Respondent, ANITA MARIE NOBLE, is licensed by the Commission as a 50%
3 member and manager of ARTESIAN PARTNERS.

4 4. Respondent, MATTHEW TODD REARDON, is licensed by the Commission as
5 a 50% member and manager of ARTESIAN PARTNERS.

6 5. The Nevada Legislature set forth the importance of the gaming industry to
7 the State of Nevada and its responsibility to the State's inhabitants in NRS 463.0129. The
8 Legislature specifically set out that the continued growth and success of gaming is
9 dependent on public confidence and trust and that such public confidence and trust "can
10 only be maintained by strict regulation of all persons, locations, practices, associations and
11 activities related to the operation of licensed gaming establishments..." See NRS 463.0129.

12 6. To ensure proper oversight and control over the gaming industry, the Nevada
13 Legislature has granted the Commission "full and absolute power and authority to . . .
14 limit, condition, restrict, revoke or suspend any license . . . or fine any person licensed . . .
15 for any cause deemed reasonable by the Commission." See NRS 463.1405(4).

16 7. The BOARD is statutorily charged with determining whether a violation of
17 the Gaming Control Act has occurred. See NRS 463.310(1). If the BOARD is satisfied that
18 discipline is warranted, it shall initiate disciplinary action by filing a complaint with the
19 Commission. See NRS 463.310(2).

20 8. The BOARD is authorized to observe the conduct of licensees in order to
21 ensure that gaming operations are not being operated in an unsuitable manner or by an
22 unqualified or unsuitable person. See NRS 463.1405(1) and Commission Regulation 5.040.

23 9. A person approved by the Commission has an ongoing obligation to meet the
24 standards required to obtain such approval including, without limitation, to be a person of
25 good character, honesty and integrity and to refrain from activities and associations which
26 may impact the interests of Nevada, the regulation of gaming, or the reputation of gaming
27 in Nevada. See NRS 463.170.

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1 10. Commission Regulation 5.011(1) provides in relevant part the following:

2 The Board and the Commission deem any activity on the
3 part of a licensee, registrant, or person found suitable by the
4 Commission, or an agent or employee thereof, that is inimical to
5 the public health, safety, morals, good order, or general welfare of
6 the people of the State of Nevada, or that would reflect or tend to
7 reflect discredit upon the State of Nevada or the gaming industry,
8 to be an unsuitable 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 Commission. The following acts or omissions,
without limitation, may be determined to be unsuitable methods
of operation:

9 (a) Failure to exercise discretion and sound judgment to
10 prevent incidents which might reflect on the repute of the State
11 of Nevada and act as a detriment to the development of the
industry.

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13 (h) Failure to comply with or make provision for
14 compliance with all federal, state, or local laws and regulations
15 and with all conditions and limitations approved by the
Commission relating to the operations of a licensed gaming
establishment or other gaming business . . .

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17 (k) Failure to conduct gaming operations in accordance
18 with proper standards of custom, decorum, and decency, or permit
a type of conduct in a gaming establishment that reflects or tends
to reflect on the repute of the State of Nevada and act as a
detriment to the gaming industry.

19 Nev. Gaming Comm'n Reg. 5.011(1)(a), (h), and (k).

20 11. Commission Regulation 5.030 provides as follows:

21 Violation of any provision of the Nevada Gaming Control
22 Act or of these regulations by a licensee, the licensee's agent or
23 employee shall be deemed contrary to the public health, safety,
24 morals, good order and general welfare of the inhabitants of the
25 State of Nevada and grounds for suspension or revocation of a
26 license. Acceptance of a state gaming license or renewal thereof
27 by a licensee constitutes an agreement on the part of the licensee
to be bound by all of the regulations of the Commission as the
same now are or may hereafter be amended or promulgated. It
is the responsibility of the licensee to keep informed of the
content of all such regulations, and ignorance thereof will not
excuse violations.

28 Nev. Gaming Comm'n Reg. 5.030.

1 GENERAL ALLEGATIONS

2 12. On or about May 6, 2020, ARTESIAN PARTNERS submitted its application
3 for a restricted gaming license. In addition, applications were submitted for licensure of
4 ANITA MARIE NOBLE (50%) and MATTHEW TODD REARDON (50%) as members and
5 managers of ARTESIAN PARTNERS.

6 13. On or about July 10, 2020, Ms. NOBLE and Mr. REARDON entered into a
7 Membership Interest Purchase Agreement (Agreement) whereby Ms. NOBLE and Mr.
8 REARDON agreed to transfer Mr. REARDON's 50% interest in ARTESIAN PARTNERS
9 to Ms. NOBLE for total consideration of \$150,000.00 in two installments.

10 14. On or about July 10, 2020, Ms. NOBLE caused a \$75,000.00 payment to be
11 made to Mr. REARDON as the first installment pursuant to the Agreement.

12 15. On or about April 21, 2021, the Commission approved ARTESIAN
13 PARTNERS' application for a restricted gaming license and approved Ms. NOBLE's and
14 Mr. REARDON's applications for licensure as members and managers of ARTESIAN
15 PARTNERS.

16 16. On or about June 3, 2021, Ms. NOBLE caused an additional \$75,000.00
17 payment to be made to Mr. REARDON as the second installment pursuant to the
18 Agreement. Further, Ms. NOBLE and Mr. REARDON signed an "Assignment of
19 Membership Interest in Artesian Partners, LLC" whereby Mr. REARDON purportedly
20 assigned and transferred his interest in ARTESIAN PARTNERS to Ms. NOBLE.

21 17. On or about August 16, 2022, an application was submitted to the BOARD for
22 a transfer of interest of Mr. REARDON's 50% interest in ARTESIAN PARTNERS to Ms.
23 NOBLE. With the application, Respondents first disclosed the Agreement and a violation
24 of Commission Regulation 8.050.

25 COUNT ONE
26 VIOLATION OF NRS 463.170 and/or COMMISSION REGULATIONS
27 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 8.050

28 18. The BOARD realleges and incorporates the above paragraphs by reference as
though set forth in full herein.

1 19. On or about April 22, 2021, ARTESIAN PARTNERS' application for a
2 restricted gaming license was approved by the Commission.

3 20. On or about June 3, 2021, \$75,000.00 was paid by Ms. NOBLE to Mr.
4 REARDON for Mr. REARDON's 50% interest in ARTESIAN PARTNERS.

5 21. As of June 3, 2021, the Commission had not approved any transfer of interest
6 in ARTESIAN PARTNERS from Ms. NOBLE to Mr. REARDON and no such application
7 had been filed.

8 22. Unless it is placed in escrow, no money constituting any part of the
9 consideration for the transfer or acquisition of any interest in a licensed gaming operation
10 shall be paid over, received or used until complete compliance has been had with all
11 prerequisites set forth in the law and the Commission's regulations for the consummation
12 of such transaction. See Commission Regulation 8.050.

13 23. The purported transfer of an interest in a limited liability company which
14 holds a gaming license is void unless approved in advance by the Commission. See NRS
15 463.5733 and Commission Regulation 8.020.

16 24. Respondents' conduct, as described herein, is in violation of NRS 463.170
17 and/or Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 8.050.

18 25. Respondents' failure to comply with NRS 463.170 and/or Commission
19 Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 8.050 is grounds for
20 disciplinary action against Respondents. See NRS 463.1405(4), NRS 463.170(8) and
21 Commission Regs. 5.010(2), and 5.030.

22 **COUNT TWO**
23 **VIOLATION OF NRS 463.170 and/or NRS 463.5733 and/or**
24 **COMMISSION REGULATIONS 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k),**
and/or 8.020

25 26. The BOARD realleges and incorporates the above paragraphs by reference as
26 though set forth in full herein.

27 27. On or about June 3, 2021, Mr. REARDON purportedly transferred his 50%
28 interest in ARTESIAN PARTNERS to Ms. NOBLE.

1 28. As of June 3, 2021, the Commission had not approved any transfer of interest
2 in ARTESIAN PARTNERS from Ms. NOBLE to Mr. REARDON and no such application
3 had been filed.

4 29. The purported transfer of an interest in a limited liability company which
5 holds a gaming license is void unless approved in advance by the Commission. See NRS
6 463.5733 and Commission Regulation 8.020.

7 30. Respondents' conduct, as described heréin, is in violation of NRS 463.170
8 and/or NRS 463.5733 and/or Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h),
9 5.011(1)(k), and/or 8.020.

10 31. Respondents' failure to comply with NRS 463.170 and/or NRS 463.5733 and/or
11 Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 8.020 is
12 grounds for disciplinary action against Respondents. See NRS 463.1405(4), NRS 463.170(8)
13 and Commission Regs. 5.010(2), and 5.030.

14 **COUNT THREE**
15 **VIOLATION OF NRS 463.170 and/or COMMISSION REGULATIONS**
16 **5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 4.040**

17 32. The BOARD realleges and incorporates the above paragraphs by reference as
18 though set forth in full herein.

19 33. Between May 5, 2020, when ARTESIAN PARTNERS' application for a
20 restricted gaming license was submitted to the BOARD, and April 22, 2021, when
21 ARTESIAN PARTNERS' application for a restricted gaming license was approved by the
22 Commission, Respondents failed to disclose to either the BOARD or the Commission the
23 July 10, 2020 Agreement between Ms. NOBLE and Mr. REARDON or the June 3, 2021
24 payment of \$75,000.00 from Ms. NOBLE to Mr. REARDON.

25 34. All information required to be included in an application must be true and
26 complete as of the dates of the BOARD's and Commission's action and an applicant has an
27 ongoing obligation to promptly supply by amendment, prior to any such action by the
28 BOARD and Commission, any information based on facts occurring after the original

1 application so as to make such information not misleading as of the dates of such action by
2 the Board and the Commission. See Commission Regulation 4.040(3).

3 35. Respondents' conduct, as described herein, is in violation of NRS 463.170
4 and/or Commission Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 4.040.

5 36. Respondents' failure to comply with NRS 463.170 and/or Commission
6 Regulations 5.011(1), 5.011(1)(a), 5.011(1)(h), 5.011(1)(k), and/or 4.040 is grounds for
7 disciplinary action against Respondents. See NRS 463.1405(4), NRS 463.170(8) and
8 Commission Regs. 5.010(2), and 5.030.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, based upon the allegations contained herein, which constitute
11 reasonable cause for disciplinary action against RESPONDENTS, pursuant to
12 NRS 463.310 and/or NGC Regulations 5.010, 5.011, and/or 5.030, the BOARD prays for
13 relief as follows:

14 1. That the Commission serve a copy of this Complaint on RESPONDENTS
15 pursuant to NRS 463.312(2);

16 2. That the Commission fine RESPONDENTS a monetary sum pursuant to the
17 parameters defined at NRS 463.310(4) for each separate violation of the provisions of the
18 Nevada Gaming Control Act or the Regulations of the Commission;

19 3. That the Commission take action against RESPONDENTS' licenses pursuant
20 to the parameters defined in NRS 463.310(4); and

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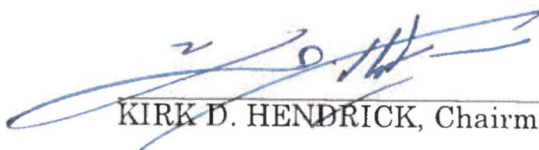
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1 4. For such other and further relief as the Commission may deem just and
2 proper.

3 DATED this 18 day of July, 2023.

4 NEVADA GAMING CONTROL BOARD

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6 
7 KIRK D. HENDRICK, Chairman

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10 BRITTNE WATKINS, Ph.D., Member

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12 
13 HON. GEORGE ASSAD (RET.), Member

13 Submitted by:

14 AARON D. FORD
15 Attorney General

16 By:

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20 Gaming Division
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