



MOHEGAN
CASINO LAS VEGAS

November 6, 2023

By e-mail only to: regcomments@gcb.nv.gov

Nevada Gaming Control Board
Attention: Executive Secretary
555 East Washington Avenue
Las Vegas, Nevada 89101

Re: Request for consideration of a change to Regulation 5.225 20. (h)
For presentation to the Nevada Gaming Control Board
At its workshop dated November 28, 2023

Dear Chairman, Members, Executive Secretary and Board Staff:

Respectfully, this is a public statement made by MGNV, LLC, dba Mohegan Casino Las Vegas, and its general manager, Joe Hasson, regarding Regulations 5.225 20. (g) and 20. (h)

Regulation 5.225 addresses Wagering accounts. More specifically, Regulation 5.225 20. describes Reserve requirements and related reporting to the Board that are reflective of good public policies to protect the value of, and the public trust pertaining to, accounts established and maintained by patrons at casinos in Nevada.

Regulation 5.225 20. (g) specifically states:

(g) Each licensee must engage an independent certified public accountant to examine the pertinent records relating to the reserve each month and determine the reserve amounts required by this subsection for each day of the previous month and the reserve amounts actually maintained by the licensee on the corresponding days. The licensee shall make available to the accountant whatever records are necessary to make this determination. The accountant shall report the findings with respect to each day of the month under review in writing to the board and the licensee no later than the tenth day of the next month. The report shall include the licensee's statement addressing each day of noncompliance and the corrective measures taken.

Regulation 5.225 20. (h) specifically states:

(h) The report described in paragraph (g) of this subsection may be prepared by an employee of the licensee that is independent of the gaming operations if written approval has been received from the chairman. The report must contain the signature of an employee attesting to the accuracy of the submitted information.



Page 2

Request to establish a defined time-line to consider the applicability of Regulation 5.225 20. (h)

This public statement seeks to establish a time-line defining when a licensee may affirmatively seek the Board's relief contemplated by Regulation 5.225 20. (h). Absent a time-line definition, a licensee is subject to the regulation's silence regarding when the Board would or could consider granting written approval of applicability of Regulation 5.225 20. (h). Perhaps equally so, the Board's professional staff is also subject to the regulation's silence regarding time-line permissibility of considering a licensee's request.

This public statement asks the Nevada Gaming Control Board to consider:

- If a licensee is subject to Regulation 5.225 20. (g) and (h), and
- If a licensee, in conformance with those regulations, receives and maintains in good order and in good conformity an independent certified public accountant's duly prepared reports for a period of twelve (12) consecutive months, and
- If such reports are timely remitted in good order to the Nevada Gaming Control Board for those twelve (12) consecutive months, then
- A licensee may seek the chairman's written approval to continue to perform such record maintenance and remittance to the Nevada Gaming Control Board in accordance with Regulation 5.225 20. (h).

To add time specificity to Regulation 5.225 20. (h) the following language could be considered for amendment to the existing regulation:

(h) The report described in paragraph (g) of this subsection may be prepared by an employee of the licensee that is independent of the gaming operations if, after twelve (12) consecutive months of a licensee's conformity with Regulation 5.225 20. (g) and provided that such records are maintained and timely remitted to the Board in good order by a licensee, a licensee requests and receives written approval ~~has been received~~ from the chairman. The report must contain the signature of an employee attesting to the accuracy of the submitted information.

Alternatively, absent a complex initiative to consider changes to existing Regulation 5.225 20. (h), the Board might more simply change its internal application of its operating protocols to consider as permissible requests by licensees to be favorably granted consideration of the available application of Regulation 5.225 20. (h) after twelve (12) consecutive months of suitable, conforming, and timely reporting of pertinent information to the Board as defined by Regulation 5.225 20 (g).

Yours truly,

Joe Hasson
General Manager

MGNV, LLC dba Mohegan Casino Las Vegas