



1 NGC 23-07

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4 STATE OF NEVADA

5 BEFORE THE NEVADA GAMING COMMISSION

6 NEVADA GAMING CONTROL BOARD,

7 Complainant,

8 vs.

9 BOB KINGSTON PRODUCTIONS, INC.,  
10 dba SADDLE N SPURS SALOON,

11 Respondent.

**STIPULATION FOR SETTLEMENT  
AND ORDER**

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13 The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD  
14 (BOARD), Complainant herein, filed and served a Complaint, NGC Case No. 23-07, against  
15 the above-captioned RESPONDENT alleging certain violations of the Nevada Gaming  
16 Control Act and Regulations of the Nevada Gaming Commission.

17 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENT  
18 that the Complaint, NGC Case No. 23-07, filed against RESPONDENT in the above-  
19 entitled case shall be settled on the following terms and conditions:

20 1. RESPONDENT admits each and every allegation set forth in the Complaint,  
21 NGC Case No. 23-07.

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

27 3. RESPONDENT voluntarily surrendered its restricted gaming license on or  
28 about February 7, 2024. The BOARD placed an administrative hold on the surrender to

1 allow the BOARD to resolve the disciplinary matters pending against the  
2 RESPONDENT. RESPONDENT agrees that its restricted gaming license shall be revoked  
3 upon approval of this Stipulation for Settlement. However, this revocation shall not extend  
4 to the sole officer, director, and shareholder of RESPONDENT, Robert Douglas  
5 Kingston. The effect of RESPONDENT's surrender of its restricted gaming license on  
6 Robert Douglas Kingston shall be the surrender of his licenses to be the sole officer,  
7 director, and shareholder of RESPONDENT. Robert Douglas Kingston shall not be  
8 considered to have had his licenses revoked by the Nevada Gaming Commission for  
9 purposes of NRS 463.174.

10 4. RESPONDENT and its sole officer, director, and shareholder, Robert Douglas  
11 Kingston, additionally agree to the following settlement conditions:

12 a. RESPONDENT and Robert Douglas Kingston shall not file an application for  
13 a license, finding of suitability, or registration for a period of five years from the date this  
14 Stipulation for Settlement is approved by the Nevada Gaming Commission.

15 b. Robert Douglas Kingston shall re-take and demonstrate successful completion  
16 of a regulatory compliance seminar for restricted licensees which is deemed acceptable to  
17 the Board Chair or the Chair's designee within 6 months of the date this Stipulation for  
18 Settlement is approved by the Nevada Gaming Commission. This condition may be  
19 administratively extended by the Board Chair or the Chair's designee; and

20 c. Robert Douglas Kingston shall retain gaming counsel or a person enrolled in  
21 accordance with Nevada Gaming Commission Regulation 10 for any future transaction  
22 involving the transfer of an interest of an entity licensed or registered under the Gaming  
23 Control Act of which he is, or proposes to become, a sole or part owner; for any future  
24 applications; and for any appearances before the BOARD or Nevada Gaming Commission  
25 subsequent to the hearing at which the Nevada Gaming Commission considers this  
26 Stipulation for Settlement.

27 5. RESPONDENT and Robert Douglas Kingston agree that they will fully  
28 cooperate with the BOARD in its investigation of Two Brothers Ventures, LLC.

1           6. In consideration for the execution of this Stipulation for Settlement,  
2 RESPONDENT, for itself, its heirs, executors, administrators, successors, and assigns,  
3 hereby releases and forever discharges the State of Nevada, the Nevada Gaming  
4 Commission, the Nevada Gaming Control Board, the Nevada Attorney General and each  
5 of their members, agents, and employees in their individual and representative capacities,  
6 from any and all manner of actions, causes of action, suits, debts, judgments, executions,  
7 claims, and demands whatsoever known or unknown, in law and equity, that  
8 RESPONDENT ever had, now has, may have, or claims to have against any and all of the  
9 persons or entities named in this paragraph arising out of, or by reason of, the investigation  
10 of the allegations in the Complaint and this disciplinary action, NGC Case No. 23-07, or  
11 any other matter relating thereto.

12           7. In consideration for the execution of this Stipulation for Settlement,  
13 RESPONDENT hereby indemnifies and holds harmless the State of Nevada, the Nevada  
14 Gaming Commission, the Nevada Gaming Control Board, the Nevada Attorney General,  
15 and each of their members, agents, and employees in their individual and representative  
16 capacities against any and all claims, suits and actions, brought against the persons named  
17 in this paragraph by reason of the investigation of the allegations in the Complaint, filed  
18 in this disciplinary action, NGC Case No. 23-07, and all other matters relating thereto, and  
19 against any and all expenses, damages, charges and costs, including court costs and  
20 attorney fees, which may be sustained by the persons and entities named in this paragraph  
21 as a result of said claims, suits and actions.

22           8. RESPONDENT enters into this Stipulation for Settlement freely and  
23 voluntarily and acknowledges that RESPONDENT had an opportunity to consult with  
24 counsel prior to entering into this Stipulation for Settlement. RESPONDENT further  
25 acknowledges that this Stipulation for Settlement is not the product of force, threats, or  
26 any other form of coercion or duress, but is the product of discussions between  
27 RESPONDENT and the attorney for the BOARD.

28           9. RESPONDENT and the BOARD acknowledge that this Stipulation for

1 Settlement is made to avoid litigation and economize resources. The parties agree and  
2 understand that this Stipulation for Settlement is intended to operate as full and final  
3 settlement of the Complaint filed against RESPONDENT in the above-entitled disciplinary  
4 case, NGC Case No. 23-07.

5 10. RESPONDENT and the BOARD recognize and agree that the Nevada  
6 Gaming Commission has the sole and absolute discretion to determine whether to accept  
7 this Stipulation for Settlement. RESPONDENT and the BOARD hereby waive any right  
8 they may have to challenge the impartiality of the Nevada Gaming Commission to hear the  
9 above-entitled case on the matters embraced in the Complaint if the Nevada Gaming  
10 Commission determines not to accept this Stipulation for Settlement. If the Nevada  
11 Gaming Commission does not accept the Stipulation for Settlement, it shall be withdrawn  
12 as null and void and Respondent's admissions, if any, that certain violations of the Nevada  
13 Gaming Control Act and the Regulations of the Nevada Gaming Commission occurred shall  
14 be withdrawn.

15 11. RESPONDENT and the BOARD agree and understand that this Stipulation  
16 for Settlement is intended to operate as the full and final settlement of the Complaint filed  
17 in NGC Case No. 23-07. The parties further agree and understand that any oral  
18 representations are superseded by this Stipulation for Settlement and that only those  
19 terms memorialized in writing herein shall be effective.

20 12. RESPONDENT agrees and understands that although this Stipulation for  
21 Settlement, if approved by the Nevada Gaming Commission, will settle the Complaint filed  
22 in NGC Case No. 23-07, that the allegations contained in the Complaint filed in NGC Case  
23 No. 23-07, and the terms of this Stipulation for Settlement, may be considered by the  
24 BOARD and/or the Nevada Gaming Commission, with regards to any and all applications  
25 by RESPONDENT that are currently pending before the BOARD or the Nevada Gaming  
26 Commission, or that are filed in the future with the BOARD.

27 13. RESPONDENT and the BOARD shall each bear their own costs incurred in  
28 this disciplinary action, NGC Case No. 23-07.

1           14.   RESPONDENT, by executing this Stipulation for Settlement, affirmatively  
2 waives all notices required by law for this matter including, but not limited to, notices  
3 concerning consideration of the character or misconduct of a person (Nevada Revised  
4 Statute (NRS) 241.033), notices concerning consideration of administrative action against  
5 a person (NRS 241.034), and notices concerning hearings before the Nevada Gaming  
6 Commission (NRS 463.312). Regardless of the waiver of legal notice requirements, the  
7 BOARD and Nevada Gaming Commission will attempt to provide reasonable notice of the  
8 time and place of the hearing. Further, in negotiating this Stipulation for Settlement,  
9 RESPONDENT acknowledges that the BOARD has provided RESPONDENT with the date  
10 and time of the Nevada Gaming Commission hearing during which the BOARD anticipates  
11 the Nevada Gaming Commission will consider approving this Stipulation for Settlement.

12           15.   By signing this Stipulation for Settlement on behalf of RESPONDENT, Robert  
13 Douglas Kingston also agrees to be bound by the conditions applicable specifically to him.

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

3 DATED this 27 day of February, 2024.

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5 BOB KINGSTON PRODUCTIONS, INC.  
6 dba SADDLE N SPURS SALOON

7   
8 ROBERT DOUGLAS KINGSTON  
9 President

NEVADA GAMING CONTROL BOARD

10   
11 KIRK D. HENDRICK, Chairman

12   
13 BRITTNIE WATKINS, PhD, Member

14   
15 HON. GEORGE ASSAD (RET.), Member

16 Submitted by:

17 AARON D. FORD  
18 Attorney General

19 By:


20   
21 JOHN S. MICHELA  
22 Senior Deputy Attorney General  
23 Gaming Division  
24 5420 Kietzke Lane, Suite 202  
25 Reno, Nevada 89511  
26 Telephone: (775) 687-2118  
27 Attorneys for the Nevada Gaming  
28 Control Board

**ORDER**

IT IS SO ORDERED in NGC Case No. 23-07.

DATED this 21st day of March, 2024.

NEVADA GAMING COMMISSION

  
HON. JENNIFER P. TOGLIATTI, Chair