



1 NGC Case No. 13-046-LL
2 NGC Case No. 13-047-LL

3
4 STATE OF NEVADA
5 BEFORE THE NEVADA GAMING COMMISSION

6 In the Matter of:)
7 LAS VEGAS SANDS LLC, dba VENETIAN)
8 RESORT HOTEL CASINO/PALAZZO)
9 RESORT HOTEL CASINO,)
10 Petition for Redetermination of the Statements)
11 of Determination of Live Entertainment Tax for)
the periods of October 1, 2008 through)
May 31, 2010, and June 1, 2010 through)
October 31, 2012.)

STIPULATION FOR SETTLEMENT
AND ORDER

Attorney General's Office
Gaming Division
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101

12 The Petitioner, LAS VEGAS SANDS LLC, dba VENETIAN RESORT HOTEL
13 CASINO/PALAZZO RESORT HOTEL CASINO (hereinafter "PETITIONER"), and the
14 Respondent, NEVADA GAMING CONTROL BOARD (hereinafter "BOARD"), hereby stipulate
15 and agree that the Petition for Redetermination filed in NGC Case Nos. 13-046-LL and
16 13-047-LL shall be settled on the following terms and conditions:

17 1. On or about December 13, 2013, PETITIONER filed with the Nevada Gaming
18 Commission (hereinafter "Commission" or "NGC") a Petition for Redetermination of the
19 Statements of Determination issued by the BOARD for the audit periods of October 1, 2008
20 through May 31, 2010, and of June 1, 2010 through October 31, 2012, concerning a
21 deficiency assessment for Live Entertainment Tax (hereinafter "LET"), pursuant to Nevada
22 Revised Statutes (hereinafter "NRS") 463.3883 and NGC Regulation 6.170.

23 2. After the above referenced Statements of Determination were issued, the
24 PETITIONER provided the BOARD with additional documentation regarding the facility in
25 which the live entertainment activities at issue in the above referenced Statements of
26 Determination occurred. Upon receipt of the documentation, the BOARD, through its Audit
27 Division, determined that live entertainment activities had not occurred on certain nights for
28 which LET had been assessed in the above referenced Statements of Determination.

1 3. As a result of the above, the BOARD hereby agrees to reduce the amount of its
2 original assessment of LET by NINETY-TWO THOUSAND, TWO HUNDRED FIFTY-ONE
3 AND 29/100 DOLLARS (\$92,251.29).

4 4. In exchange, the PETITIONER hereby agrees to pay, and the BOARD agrees to
5 accept, as full and final settlement of the Petition for Determination in NGC Case Nos. 13-046-
6 LL and 13-047-LL, TWO HUNDRED SIX THOUSAND, SIX HUNDRED EIGHTY-ONE AND
7 25/100 DOLLARS (\$206,681.25) plus accrued interest. The BOARD acknowledges that such
8 payment has been made in full.

9 5. This settlement is made for the purposes of avoiding litigation and economizing
10 resources and does not constitute an admission of liability on the part of PETITIONER or the
11 BOARD, nor shall it operate or be construed as any precedent for the validity or invalidity of
12 any legal position taken in this matter by either party. This settlement is made exclusively
13 between the BOARD and PETITIONER and no licensee may rely upon it for any purpose.

14 6. PETITIONER fully understands and voluntarily waives any right it may have to a public
15 hearing on the Petition for Redetermination, in NGC Case Nos. 13-046-LL and 13-047-LL, and
16 its right to pursue judicial review in state district court or otherwise contest this matter in any
17 court of competent jurisdiction.

18 7. PETITIONER, for itself, its heirs, executors, administrators, successors, and assigns,
19 hereby releases, dismisses, and forever discharges the State of Nevada, the Nevada Gaming
20 Commission, the State Gaming Control Board, the Nevada Attorney General and each of their
21 members, agents, and employees in their individual and representative capacities from any
22 and all manner of actions, causes of action, suits, debts, judgments, executions, claims, and
23 demands whatsoever known or unknown, in law and equity, that PETITIONER ever had, now
24 has, may have, or claims to have against any and all of the persons or entities named in this
25 paragraph arising out of, or by reason of, this Petition for Redetermination, NGC Case Nos.
26 13-046-LL and 13-047-LL, or any other matter relating thereto.

27 8. PETITIONER, for itself, its heirs, executors, administrators, successors, and assigns,
28 hereby indemnifies and holds harmless the State of Nevada, the Nevada Gaming

1 Commission, the State Gaming Control Board, the Nevada Attorney General, and each of
2 their members, agents, and employees in their individual and representative capacities
3 against any and all claims, suits, actions, debts, damages, costs, charges, and expenses,
4 including court costs and attorney's fees, and against all liability, losses, and damages of any
5 nature whatsoever that the persons and entities named in this paragraph shall or may have at
6 any time sustain or be put to by reason of this Petition for Redetermination, NGC Case Nos.
7 13-046-LL and 13-047-LL, or any other matter relating thereto.

8 9. PETITIONER enters into this Stipulation freely and voluntarily. PETITIONER confirms
9 that this settlement is not a result of force, threats, or any other type of coercion or duress, but
10 is the product of negotiations between representatives of PETITIONER and the BOARD.

11 10. PETITIONER and the BOARD recognize and agree that the Nevada Gaming
12 Commission has the sole and absolute discretion to determine whether to accept this
13 Stipulation for Settlement. PETITIONER and the BOARD hereby waive any right they may
14 have to challenge the impartiality of the Nevada Gaming Commission to hear and consider the
15 facts and matters embraced in the Petition for Redetermination, NGC Case Nos. 13-046-LL
16 and 13-047-LL, in the event the Nevada Gaming Commission does not accept this Stipulation
17 for Settlement.

18 11. This Stipulation for Settlement shall not become effective until such time as the
19 Nevada Gaming Commission approves it. Such approval shall not constitute an admission of
20 liability on the part of the Nevada Gaming Commission.

21 12. PETITIONER fully understands and voluntarily waives the 21-day and the five-day
22 notice requirements found under NRS 241.033 and 241.034, including the content

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Attorney General's Office
Gaming Division
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101


1 requirements of such notices, in relation to any hearing before the Nevada Gaming
2 Commission on this Settlement Agreement that may be held.

3 Dated this 16th day of September 2015.

Dated this 16th day of September 2015.

4 LAS VEGAS SANDS LLC, dba
5 VENETIAN RESORT HOTEL CASINO/
6 PALAZZO RESORT HOTEL

NEVADA GAMING CONTROL BOARD

7 By: 
8 GEORGE MARKANTONIS
9 President and COO of
10 Venetian Casino Resort, LLC and
11 Senior V.P. of Las Vegas Sands, LLC


A.G. BURNETT, Chairman


SHAWN R. REID, Member

GREENBERG TRAURIG, LLP


TERRY JOHNSON, Member

12 By: (see attached page.)
13 TAMI D. COWDEN, ESQ.
14 3773 Howard Hughes Parkway
15 Suite 400 North
16 Las Vegas, Nevada 89169

Attorneys for Petitioner

17 Submitted by:
18 ADAM PAUL LAXAULT
19 Attorney General

20 By: 
21 EDWARD L. MAGAW
22 Deputy Attorney General
23 Gaming Division
24 (702) 486-3082

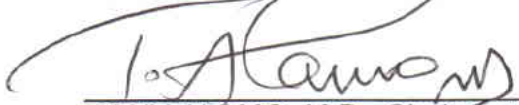
Attorneys for the Nevada Gaming Control Board

ORDER

IT IS SO ORDERED in NGC Case Nos. 13-046-LL and 13-047-LL.

DATED this 17th day of September, 2015.

NEVADA GAMING COMMISSION


TONY ALAMO, M.D., Chairman

Attorney General's Office
Gaming Division
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101

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2 Commission on this Settlement Agreement that may be held.

3 Dated this ___ day of September 2015. Dated this ___ day of September 2015.

4 LAS VEGAS SANDS LLC, dba
5 VENETIAN RESORT HOTEL CASINO/
6 PALAZZO RESORT HOTEL

NEVADA GAMING CONTROL BOARD

6
7 By: _____
8 GEORGE MARKANTONIS
9 President and COO of
10 Venetian Casino Resort, LLC and
11 Senior V.P. of Las Vegas Sands, LLC

A.G. BURNETT, Chairman

12 GREENBERG TRAURIG, LLP

SHAWN R. REID, Member

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14 By: _____
15 TAMM D. COWDEN, ESQ.
16 3773 Howard Hughes Parkway
17 Suite 400 North
18 Las Vegas, Nevada 89169

TERRY JOHNSON, Member

19 Attorneys for Petitioner

20 Submitted by:

21 ADAM PAUL LAXAULT
22 Attorney General

23 By: _____
24 EDWARD L. MAGAW
25 Deputy Attorney General
26 Gaming Division
27 (702) 486-3082

28 Attorneys for the Nevada Gaming Control Board

ORDER

IT IS SO ORDERED in NGC Case Nos. 13-046-LL and 13-047-LL.

DATED this _____ day of _____, 2015.

NEVADA GAMING COMMISSION

TONY ALAMO, M.D., Chairman