

December 15, 2025

Nicole Rupert, Executive Secretary  
Nevada Gaming Control Board  
7 State of Nevada Way  
Las Vegas, NV 89119

Re: Joint Comments to Proposed Amendments to NGC Regulation 5.160 and  
Surveillance Standards ("Proposed Surveillance Amendments")

Dear Executive Secretary Rupert:

On behalf of Stillwater Gaming, LLC, we respectfully submit the comment listed below:

Standard 14 Restricted Licensees

Stillwater Gaming LLC is a slot route operator. We support a grandfather exception for slot route locations in which the slot operator is not the location business owner. The current proposed Surveillance Standard 14 requires slot route licensees to install a surveillance system in a business that it does not own. Installing a system in a location not owned creates logistical and financial challenges, especially for space lease locations. If the business owner installs the surveillance system, the slot route licensee cannot control if the system is continuously compliant with the standards, especially regarding remote access.

Our route locations are in small businesses. These businesses do not necessarily have a secure location or a separate room to house the surveillance equipment. A few of our slot route locations do not have internet, preventing the installation of a simple system.

We appreciate the Board's attention to this matter and time to consider the above. We are available to discuss any questions or concerns. Please contact me at 775-423-3101 ext. 233 or [kristietate@nuggetcasinos.com](mailto:kristietate@nuggetcasinos.com)

Best regards,

A handwritten signature in cursive script, appearing to read "Kristie Tate".

Kristie Tate  
LLC Manager