

OCT 28 2026

NEVADA GAMING COMMISSION
CARSON CITY, NEVADA

NGC 26-04

STATE OF NEVADA

BEFORE THE NEVADA GAMING COMMISSION

NEVADA GAMING CONTROL BOARD,

Complainant,

vs.

COMPLAINTIRISH HOLDINGS, LTD. dba SUNRISE
CASABLANCA; and THOMAS EDWARD
SULLIVAN,

Respondents.

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 NONA ML LAWRENCE, Deputy Attorney General, hereby files this Complaint for disciplinary action ("Complaint") before the Nevada Gaming Commission ("Commission" or "NGC") against IRISH HOLDINGS, LTD. dba Sunrise Casablanca ("IHL"), Thomas Edward Sullivan ("SULLIVAN"), (collectively, "RESPONDENTS"), Respondents herein, pursuant to Nevada Revised Statute ("NRS") 463.310(2).

JURISDICTION

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 the NRS ("Nevada Gaming Control Act" or "Act") and the regulations of the Commission adopted thereunder.

2. Respondent IHL, located at 6230 East Charleston Boulevard, Las Vegas, Nevada 89142, at all times relevant to this Complaint, held, and currently holds, a restricted gaming license issued by the Commission, and, as such, has been charged with

1 the responsibility of complying with all relevant provisions of the Act and the regulations
2 of the Commission.

3 3. Respondent SULLIVAN, at all times relevant to this Complaint, was, and
4 currently is, licensed by the Commission as an officer and director of IHL, owning 100%
5 thereof, and, as such, has been charged with the responsibility of complying with all
6 relevant provisions of the Act and the regulations of the Commission.

7 **RELEVANT LAW**

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

14 5. To ensure proper oversight and control over the gaming industry, the Nevada
15 Legislature has granted the Commission "full and absolute power and authority to. . . limit,
16 condition, restrict, revoke or suspend any license, registration, finding of suitability or
17 approval, or fine any person licensed, registered, found suitable or approved, for any cause
18 deemed reasonable by the Commission." NRS 463.1405(4).

19 6. The BOARD is statutorily charged with determining whether a violation of
20 the Gaming Control Act has occurred. NRS 463.310(1). If the BOARD determines that a
21 violation has occurred, and is satisfied that discipline is warranted, it shall initiate
22 disciplinary action by filing a complaint with the Commission. NRS 463.310(2).

23 7. The BOARD is authorized to observe the conduct of all licensees in order to
24 ensure that gaming operations are not being operated in an unsuitable manner or by an
25 unqualified or unsuitable person. NRS 463.1405(1) and Nev. Gaming Comm'n Reg. 5.040.

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1 8. A person approved by the Commission has an ongoing obligation to meet the
2 standards required to obtain such approval, including, without limitation, to be a person of
3 good character, honesty, and integrity and to refrain from activities and associations that
4 may have an impact on the interests of Nevada, the regulation of gaming, or the reputation
5 of gaming in Nevada. NRS 463.170(8).

6 9. Nevada Gaming Commission Regulation 5.011(1) provides, in relevant part,
7 as follows:

8 The Board and the Commission deem any activity on the part of
9 a licensee, registrant, or person found suitable by the
10 Commission, or an agent or employee thereof, that is inimical to
11 the public health, safety, morals, good order, or general welfare
12 of the people of the State of Nevada, or that would reflect or tend
13 to reflect discredit upon the State of Nevada or the gaming
industry, 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.

14 Nev. Gaming Comm'n Reg. 5.011(1).

15 10. Nevada Gaming Commission Regulation 5.030 provides as follows:

16 Violation of any provision of the Nevada Gaming Control Act or
17 of these regulations by a licensee, the licensee's agent or
18 employee shall be deemed contrary to the public health, safety,
19 morals, good order and general welfare of the inhabitants of the
20 State of Nevada and grounds for suspension or revocation of a
21 license. Acceptance of a state gaming license or renewal thereof
22 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.

23 Nev. Gaming Comm'n Reg. 5.030.

24 11. At all times relevant to the Complaint, NGC Regulation 15.530-3 imposes the
25 following conditions upon RESPONDENTS:

26 Corporate non-compliance with NRS 463.530. Whenever, as
27 contemplated by NRS 463.530, it is the judgment of the
28 Commission that the public interest will be served by requiring
any or all of the corporation's, lenders, holders of evidences of
indebtedness, underwriters, key executives and agents,

employees or other persons dealing with the corporation and having the power to exercise a significant influence over decisions made by the corporation to be licensed, the Commission shall serve a notice of such determination upon the corporation, and if the person, persons or other entity or entities which are the subject of such determination shall not have, within 30 days following the service of such notice, applied for a license as contemplated by NRS 463.530, the corporation may be deemed to have failed to require such application as contemplated by NRS 463.530.

Nev. Gaming Comm'n Reg. 15.530-3.

12. At all times relevant to the Complaint, NGC Regulation 5.050 imposes a requirement upon licensees to submit mandatory annual affirmations related to company structure and changes:

1. Except as otherwise provided herein, every licensee shall report to the Board annually the full name and address of every person, including lending agencies, who has, or had during the previous twelve months, any right to share in the profits of the licensee's licensed games, whether as an owner, assignee, landlord or otherwise, or to whom any interest or share in the profits of any licensed game has been pledged or hypothecated as security for a debt or deposited as a security for the performance of any act or to secure the performance of a contract of sale. Such report shall be submitted annually on a date as determined by the Board Chair.

2. Any person who has received Commission approval to share in the profits of the licensee's licensed games or who is otherwise allowed to share in the licensee's profits of licensed games pursuant to NRS chapter 463 is not required to be included in the annual report.

3. Failure to comply with this section is an unsuitable method of operation.

Nev. Gaming Comm'n Reg. 5.050.

COUNT ONE
VIOLATION OF NGC REGULATION 5.050(1)
RESPONDENT SULLIVAN'S SUBMISSION OF FALSE INFORMATION TO THE
BOARD

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

14. An application for licensure as an officer and key employee was made to the BOARD in September 2025 on behalf of Respondent SULLIVAN'S son, Michael John Sullivan.

1 15. During the mandatory investigation process, agents of the BOARD reviewed
2 meeting minutes on February 5, 2019, provided by IHL and discovered that Michael John
3 Sullivan was appointed as Secretary and Treasurer on January 28, 2019. Nevada Secretary
4 of State records reflect the same.

5 16. In response to this discovery, Respondent SULLIVAN stated:

6 In regards to the 2019 change in the officers at Irish Holdings
7 Ltd, it was my decision to make the change. I was operating
8 under the assumption that the NVSOS office was supposed to
9 automatically notify the NGC about the change in officer status
 and that alone would activate the key employee application that
 Michael had submitted and that no further action was required
 on our part.

10 17. NGC-09, the annual reporting form required of licensees pursuant to NGC
11 Regulation 5.050, was submitted without Michael John Sullivan listed as Secretary and
12 Treasurer, on at least the following dates:

13 March 3, 2025
14 March 30, 2026

15 18. The NGC-09 forms were attested to and electronically submitted in the name
16 of Respondent SULLIVAN.

17 19. The false representation made to the BOARD regarding the actual officers of
18 IHL constitutes a violation of NGC Regulation 5.050(1) and calls into question
19 RESPONDENTS' oversight of the company. NRS 463.170(8).

20 20. Such violations constitute an unsuitable method of operation, and, as such,
21 provide grounds for disciplinary action. See NRS 463.170(8) and Nev. Gaming Comm'n
22 Regs. 5.010(2), 5.011(1), and 5.030.

23 **COUNT TWO**
24 **VIOLATIONS OF NRS 463.530 AND NGC REGULATION 15.530-3**
25 **RELATED TO MICHAEL JOHN SULLIVAN'S LATE FILING FOR FINDINGS OF**
 SUITABILITY AS AN OFFICER

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

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22. As stated earlier, all officers or directors of a corporation that hold or apply for a state gaming license must be licensed individually. If, in the judgment of the Commission, the public interest will be served by requiring any or all of the corporation's individual stockholder's, key executive, agents or employees to be licensed, a person who is required to be licensed shall apply for a license within 30 days after the person becomes an officer. NRS 463.530 and NGC Regulation 15.530-3.

23. Michael John Sullivan was named as an officer of IHL on or about January 28, 2019.

24. An application for a finding of licensure as an officer was not submitted to the BOARD until September 3, 2025.

25. The filing delay of five years and seven months constitutes a violation of NRS 463.530 and NGC Regulation 15.530-3.

26. Such violation constitutes an unsuitable method of operation, and, as such, provides grounds for disciplinary action. *See* NRS 463.170(8) and Nev. Gaming Comm'n Regs. 5.010(2), 5.011(1), and 5.030.

PRAYER FOR RELIEF

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

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

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

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

• • • •

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

DATED this 26th day of October, 2026.

NEVADA GAMING CONTROL BOARD

MIKE DREITZER, Chairman

HON. GEORGE ASSAD (RET.), Member

CHANDEN K. SENDALL, Member

Submitted by:

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By:


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