



1 NGC 26-04

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4 **STATE OF NEVADA**

5 **BEFORE THE NEVADA GAMING COMMISSION**

6 **NEVADA GAMING CONTROL BOARD,**

7 **Complainant,**

8 **vs.**

STIPULATION FOR SETTLEMENT
AND ORDER

9 **IRISH HOLDINGS, LTD. dba SUNRISE**
10 **CASABLANCA; and THOMAS EDWARD**
11 **SULLIVAN**

12 **Respondents.**

13 The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD
14 (BOARD), Complainant herein, filed a Complaint in NGC Case No. 26-04, against IRISH
15 HOLDINGS, LTD. dba SUNRISE CASABLANCA and THOMAS EDWARD SULLIVAN
16 (collectively, "RESPONDENTS"), herein, alleging certain violations of the Nevada Gaming
17 Control Act and Regulations of the Nevada Gaming Commission.

18 IT IS HEREBY STIPULATED AND AGREED to by the BOARD and
19 RESPONDENTS that the Complaint, NGC Case No. 26-04, filed against RESPONDENTS
20 in the above-entitled case, shall be settled on the following terms and conditions:

21 1. RESPONDENTS admit each and every allegation set forth in the Complaint,
22 NGC Case No. 26-04.

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

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1 3. RESPONDENTS agree to pay a fine in the total amount of THREE
2 THOUSAND DOLLARS and NO CENTS (\$3,000.00), electronically transferred to the State
3 of Nevada-Nevada Gaming Commission within two working days of the date this
4 Stipulation for Settlement is accepted by the Commission. Interest on the fine shall accrue
5 in accordance with Nevada Revised Statute (NRS) 17.130 on any unpaid balance computed
6 from the date payment is due until payment is made in full.

7 4. In consideration for the execution of this settlement agreement,
8 RESPONDENTS, for themselves, their heirs, executors, administrators, successors, and
9 assigns, hereby release and forever discharge the State of Nevada, the Commission, the
10 BOARD, the Nevada Attorney General, and each of their members, agents, and employees
11 in their individual and representative capacities, from any and all manner of actions,
12 causes of action, suits, debts, judgments, executions, claims, and demands whatsoever,
13 known or unknown, in law and equity, that RESPONDENTS ever had, now have, may
14 have, or claim to have against any and all of the persons or entities named in this
15 paragraph arising out of, or by reason of, the investigation of the allegations in the
16 Complaint and this disciplinary action, NGC Case No. 26-04, or any other matter relating
17 thereto.

18 5. In consideration for the execution of this settlement agreement,
19 RESPONDENTS hereby indemnify and hold harmless the State of Nevada, the
20 Commission, the BOARD, the Nevada Attorney General, and each of their members,
21 agents, and employees in their individual and representative capacities against any and
22 all claims, suits, and actions brought against the persons named in this paragraph by
23 reason of the investigation of the allegations in the Complaint, filed in this disciplinary
24 action, NGC Case No. 26-04, and all other matters relating thereto, and against any and
25 all expenses, damages, charges, and costs, including court costs and attorney fees, which
26 may be sustained by the persons and entities named in this paragraph as a result of said
27 claims, suits, and actions.

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1 6. RESPONDENTS enter into this Stipulation for Settlement freely and
2 voluntarily and with the assistance of legal counsel. RESPONDENTS further acknowledge
3 that this stipulated settlement is not the product of force, threats, or any other form of
4 coercion or duress, but is the product of discussions between RESPONDENTS and the
5 attorney for the BOARD.

6 7. RESPONDENTS affirmatively represent that if RESPONDENTS, this
7 Stipulation for Settlement and Order, and/or any amounts distributed under this
8 Stipulation for Settlement and Order are subject to, or will become subject to, the
9 jurisdiction of any bankruptcy court, the bankruptcy court's approval is not necessary for
10 this Stipulation for Settlement and Order to become effective, or that the bankruptcy court
11 has already approved this Stipulation for Settlement and Order.

12 8. RESPONDENTS and the BOARD acknowledge that this settlement is made
13 to avoid litigation and economize resources. The parties agree and understand that this
14 Stipulation for Settlement is intended to operate as a full and final settlement of the
15 Complaint filed against RESPONDENTS in the above-entitled disciplinary case, NGC
16 Case No. 26-04.

17 9. RESPONDENTS and the BOARD recognize and agree that the Commission
18 has the sole and absolute discretion to determine whether to accept this stipulated
19 settlement agreement. RESPONDENTS and the BOARD hereby waive any right they may
20 have to challenge the impartiality of the Commission to hear the above-entitled case on the
21 matters embraced in the Complaint if the Commission determines not to accept this
22 stipulated settlement agreement. If the Commission does not accept the Stipulation for
23 Settlement, it shall be withdrawn as null and void, and RESPONDENTS' admissions, if
24 any, that certain violations of the Nevada Gaming Control Act and the Regulations of the
25 Commission occurred shall be withdrawn.

26 10. RESPONDENTS and the BOARD agree and understand that this settlement
27 agreement is intended to operate as a full and final settlement of the Complaint filed in
28 NGC Case No. 26-04. The parties further agree and understand that any oral

1 representations are superseded by this settlement agreement and that only those terms
2 memorialized in writing herein shall be effective.

3 11. RESPONDENTS agree and understand that although this settlement, if
4 approved by the Commission, will settle the Complaint filed in NGC Case No. 26-04, the
5 allegations contained in the Complaint filed in NGC Case No. 26-04 and the terms of this
6 settlement agreement may be considered by the BOARD and/or the Commission, with
7 regard to any and all applications by RESPONDENTS that are currently pending before
8 the BOARD or the Commission, or that are filed in the future with the BOARD.

9 12. RESPONDENTS and the BOARD shall each bear their own costs incurred in
10 this disciplinary action, NGC Case No. 26-04.

11 13. RESPONDENTS, by executing this Stipulation for Settlement, affirmatively
12 waive all notices required by law for this matter, including, but not limited to, notices
13 concerning consideration of the character or misconduct of a person (NRS 241.033), notices
14 concerning consideration of administrative action against a person (NRS 241.034), and
15 notices concerning hearings before the Commission (NRS 463.312). Regardless of the
16 waiver of legal notice requirements, the BOARD and Commission will attempt to provide
17 reasonable notice of the time and place of the hearing. Further, in negotiating this
18 Stipulation for Settlement, RESPONDENTS acknowledge that the BOARD has provided
19 RESPONDENTS with the date and time of the Commission hearing during which the
20 BOARD anticipates the Commission will consider approving this settlement.

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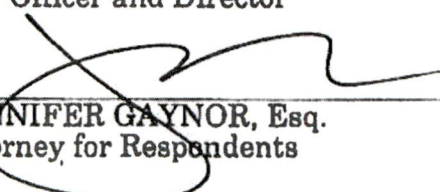
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1 14. This stipulated settlement agreement shall become effective immediately
2 upon approval by the Commission.

3 DATED this 26th day of October, 2026.

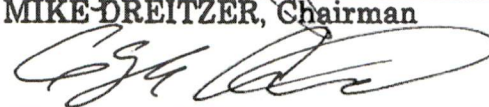
4 IRISH HOLDINGS, LTD.
5 dba SUNRISE CASABLANCA; and
6 THOMAS EDWARD SULLIVAN

7 By: 
8 THOMAS EDWARD SULLIVAN
9 Officer and Director

10 
11 JENNIFER GAYNOR, Esq.
12 Attorney for Respondents

NEVADA GAMING CONTROL BOARD

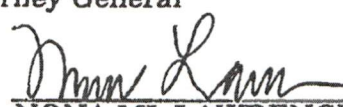

MIKE DREITZER, Chairman


HON. GEORGE ASSAD (RET.) Member


CHANDENI K. SENDALL, Member

Submitted by:

AARON D. FORD
Attorney General

15 By: 
16 NONA M. LAWRENCE
17 Deputy Attorney General
18 Gaming Division
19 (702) 486-3160

20
21 **ORDER**

22 IT IS SO ORDERED in NGC Case No. 26-04.

23 DATED this _____ day of _____, 2026.

24 NEVADA GAMING COMMISSION

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26 HON. JENNIFER P. TOGLIATTI, (RET.), Chair
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