

STATE OF NEVADA
BEFORE THE NEVADA GAMING COMMISSION

NEVADA GAMING CONTROL BOARD.

Complainant,

vs.

LEID'S INCORPORATED, dba P & L LAUNDERLAND; LEID'S

INCORPORATED, dba WASHTUBS COIN-LAUNDRY; KEVIN MICHAEL LEID; and JANET ARLEEN WELLS.

RESPONDENTS.

STIPULATION FOR SETTLEMENT AND ORDER

The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD (BOARD), filed and served a Complaint for disciplinary action in NGC Case No. 23-02, against LEID'S INCORPORATED, dba P & L LAUNDERLAND, LEID'S INCORPORATED, dba WASHTUBS COIN-LAUNDRY, KEVIN MICHAEL LEID, and JANET ARLEEN WELLS, collectively RESPONDENTS herein, alleging certain violations of the Nevada Gaming Control Act and Regulations of the Nevada Gaming Commission (Commission or NGC).

IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENTS that the Complaint, NGC Case No. 23-02, filed against RESPONDENTS in the above-entitled case shall be settled on the following terms and conditions:

 RESPONDENTS admit each and every allegation set forth in the Complaint, NGC Case No. 23-02.

- 2. RESPONDENTS fully understand and voluntarily waive the right to a public hearing on the charges and allegations set forth in the Complaint, the right to present and cross-examine witnesses, the right to a written decision on the merits of the Complaint, and the right to obtain judicial review of the Commission's decision.
- 3. RESPONDENTS agree to pay a fine in the amount of TWO THOUSAND and 00/100 DOLLARS (\$2,000.00), electronically transferred to the *State of Nevada-Nevada Gaming Commission* within two working days of the date this stipulated settlement agreement is accepted by the Commission. Said payment shall be made by a method of electronic payment approved by the Tax and License Division of the BOARD pursuant to NRS 353.1467. Interest on the aforementioned fine shall accrue pursuant to NRS 17.130 on any unpaid balance computed from the date payment is due until payment of the fine and any accrued interest is made in full.
- 4. In consideration for the execution of this Stipulation for Settlement and Order (Stipulation for Settlement), RESPONDENTS, for themselves, their heirs, executors, administrators, successors, and assigns, hereby release and forever discharge the State of Nevada, the Commission, the BOARD, the Nevada Attorney General, and each of their members, agents, and employees, in their individual and representative capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims, and demands whatsoever, known or unknown, in law and equity, that RESPONDENTS ever had, now have, may have, or claim to have against any and all of the persons or entities named in this paragraph arising out of, or by reason of, the investigation of the allegations set forth in the Complaint filed in this disciplinary action, NGC Case No. 23-02, or any other matter relating thereto.
- 5. In further consideration for the execution of this Stipulation for Settlement, RESPONDENTS hereby indemnify and hold harmless the State of Nevada, the Commission, the BOARD, the Nevada Attorney General, and each of their members, agents, and employees, in their individual and representative capacities, against any and all claims, suits, and actions brought against the persons named in this paragraph by

reason of the investigation of the allegations in the Complaint filed in this disciplinary action, NGC Case No. 23-02, and all other matters relating thereto, and against any and all expenses, damages, charges, and costs, including court costs and attorney fees, which may have been or may be sustained by the persons and entities named in this paragraph as a result of said claims, suits, and actions.

- 6. RESPONDENTS enter into this Stipulation for Settlement freely and voluntarily and acknowledge that this Stipulation for Settlement is not the product of force, threats, or any other form of coercion or duress, but is the product of discussions between RESPONDENTS and the attorney for the BOARD.
- 7. RESPONDENTS and the BOARD acknowledge that this Stipulation for Settlement is made to avoid litigation and economize resources.
- 8. RESPONDENTS and the BOARD recognize and agree that the Commission has the sole and absolute discretion to determine whether to accept this Stipulation for Settlement.
- 9. RESPONDENTS and the BOARD hereby waive any right they may have to challenge the impartiality of the Commission to hear the above-entitled case on the matters embraced in the Complaint, NGC Case No. 23-02, if the Commission determines not to accept this Stipulation for Settlement.
- 10. RESPONDENTS and the BOARD agree and understand that if the Commission does not accept this Stipulation for Settlement, it shall be withdrawn as null and void and RESPONDENTS' admissions, if any, that certain violations of the Nevada Gaming Control Act and the Regulations of the Commission occurred shall be withdrawn. This paragraph is severable from the other provisions of this Stipulation for Settlement and shall survive in the event the other provisions are withdrawn as null and void.
- 11. RESPONDENTS and the BOARD agree and understand that this Stipulation for Settlement is intended to operate as full and final settlement of the Complaint filed against the RESPONDENTS in the above-entitled disciplinary action, NGC Case No. 23-02.

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- 12. RESPONDENTS and the BOARD agree and understand that any oral representations are superseded by this Stipulation for Settlement and that only those terms memorialized in writing herein shall be effective.
- 13. RESPONDENTS agree and understand that, although this Stipulation for Settlement, if approved by the Nevada Gaming Commission, will settle the Complaint filed in the above captioned disciplinary action, NGC Case No. 23-02, the allegations contained in the Complaint and the terms of this Stipulation for Settlement may be considered by the BOARD or the Commission, with regards to any and all applications filed by any of the RESPONDENTS with the BOARD in the future, or that are currently pending before the BOARD or the Commission, and with regard to any future disciplinary action that may be brought against any of the RESPONDENTS.
- 14. RESPONDENTS and the BOARD shall each bear their own costs incurred in this disciplinary action, NGC Case No. 23-02, including, but not limited to, attorney costs, if any.
- 15. RESPONDENTS, by executing this Stipulation for Settlement, affirmatively waive all notice required by law for this matter including, but not limited to, notice concerning consideration of the character or misconduct of a person (Nevada Revised Statute (NRS) 241.033), notice concerning consideration of administrative action against a person (NRS 241.034), and notice concerning hearings before the Commission (NRS 463.312). Regardless of the waiver of the applicable legal notice requirements, the BOARD and Commission will attempt to provide reasonable notice of the time and place of any hearing relating to this disciplinary action, NGC Case No. 23-02.

	16. This Stipulation for Settlement shall become effective immediately upon
2	approval by the Commission.
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4	LEID's INCORPORATED, dba P & L LAUNDERLAND NEVADA GAMING CONTROL BOARD
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6	LEID'S INCORPORATED, dba WASHTUBS COIN-LAUNDRY KIRK D. HENDRICK, Chair
7	
8	By: KEVIN MICHAEL LEID President DR. BRITTNIE WATKINS, Member
9	r resident
10	KEVIN MICHAEL LEID HON. GEORGE ASSAD (RET.), Member
11	KEVIN MICHAEL LEID
12	Sant arleen Wells
13	GANET ARLEEN WELLS
14	BROWNSTEIN HYAIT FARBER SCHRECK
15	By:
16	SCOTT SCHERER, ESQ. Attorneys for Respondent
17	Submitted by:
18	AARON D. FORD Attorney General
19	By: Ital LA
20	EDWARD L. MAGAW
21	Senior Deputy Attorney General Office of the Nevada Attorney General
22	Attorneys for the Nevada Gaming Control Board
23	ORDER
24	IT IS SO ORDERED in NGC Case No. 23-02.
25	Dated this 11 day of October 2023.
26	NEVADA GAMING COMMISSION
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28	HON. JENNIFER P. TOGLIATTI, Chair
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