



1 NGC 24-01

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STATE OF NEVADA

5

BEFORE THE NEVADA GAMING COMMISSION

6

NEVADA GAMING CONTROL BOARD,

7

Complainant,

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vs.

**STIPULATION FOR SETTLEMENT
AND ORDER**

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MEI-GSR HOLDINGS, LLC,
dba GRAND SIERRA RESORT
AND CASINO,

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Respondent.

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The State of Nevada, on relation of its NEVADA GAMING CONTROL BOARD
(BOARD), Complainant herein, filed a Complaint in case No. NGC Case No. 24-01 against
MEI-GSR HOLDINGS, LLC, dba GRAND SIERRA RESORT AND CASINO,
RESPONDENT herein, alleging certain violations of the Nevada Gaming Control Act and
Regulations of the Nevada Gaming Commission.

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IT IS HEREBY STIPULATED AND AGREED to by the BOARD and RESPONDENT
that the Complaint, NGC Case No. 24-01, filed against RESPONDENT in the above-
entitled case, shall be settled on the following terms and conditions:

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1. RESPONDENT admits each and every allegation set forth in the Complaint,
NGC Case No. 24-01.

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2. RESPONDENT requested, and the BOARD agreed, that RESPONDENT be
allowed to include a statement in this Stipulation for Settlement regarding its view of the
specific facts resulting in the allegations set forth in the Complaint. Although the BOARD
disputes the following and is prepared to present evidence to the contrary if this were to
proceed to a hearing, RESPONDENT makes the following statement as indicated with
italics:

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1 *RESPONDENT admits that the Board Agent was delayed but*
2 *asserts that the Board Agent was delayed for approximately six*
3 *minutes and then allowed to proceed into the theater without being*
4 *disarmed, but instead of entering the theater, he chose to leave the*
5 *premises after additional discussion with RESPONDENT'S*
 security officers.

6 3. RESPONDENT fully understands and voluntarily waives the right to a public
7 hearing on the charges and allegations set forth in the Complaint, the right to present and
8 cross-examine witnesses, the right to a written decision on the merits of the Complaint,
9 which must contain findings of fact, and a determination of the issues presented, and the
10 right to obtain judicial review of the Nevada Gaming Commission's (Commission) decision.

11 4. RESPONDENT agrees to pay a fine in the total amount of TWO HUNDRED
12 FIFTY THOUSAND DOLLARS and NO CENTS (\$250,000.00) electronically transferred
13 to the *State of Nevada-Nevada Gaming Commission* within two working days of the date
14 this Stipulation for Settlement is accepted by the Commission. Interest on the fine shall
15 accrue in accordance with Nevada Revised Statute (NRS) 17.130 on any unpaid balance
16 computed from the date payment is due until payment is made in full.

17 5. RESPONDENT further agrees that its license shall be conditioned as follows:

18 MEI-GSR HOLDINGS, LLC, dba GRAND SIERRA RESORT
19 AND CASINO shall develop, implement, and maintain a
20 training program for all of its employees and representatives
21 who may interact with Nevada Gaming Control Board (Board)
22 agents that instructs such employees and representatives on
23 how to interact with Board agents and on Board agents'
24 authority while on the premises, including without limitation
25 that Board agents acting within the course of their job duties
26 must be given immediate access to all portions of the premises
27 upon presentation of a Board issued badge and credentials. The
28 training program must require that employees and
 representatives be trained within the first three shifts worked by
 the employee or representative and on an annual basis
 thereafter.

27 6. In consideration for the execution of this Stipulation for Settlement,
28 RESPONDENT, for itself, its heirs, executors, administrators, successors, and assigns,

1 hereby releases and forever discharges the State of Nevada, the Commission, the BOARD,
2 the Nevada Attorney General and each of their members, agents, and employees in their
3 individual and representative capacities, from any and all manner of actions, causes of
4 action, suits, debts, judgments, executions, claims, and demands whatsoever known or
5 unknown, in law and equity, that RESPONDENT ever had, now has, may have, or claim
6 to have against any and all of the persons or entities named in this paragraph arising out
7 of, or by reason of, the investigation of the allegations in the Complaint and this
8 disciplinary action, NGC Case No. 24-01, or any other matter relating thereto.

9 7. In consideration for the execution of this Stipulation for Settlement,
10 RESPONDENT hereby indemnifies and holds harmless the State of Nevada, the
11 Commission, the BOARD, the Nevada Attorney General, and each of their members,
12 agents, and employees in their individual and representative capacities against any and
13 all claims, suits and actions, brought against the persons named in this paragraph by
14 reason of the investigation of the allegations in the Complaint, filed in this disciplinary
15 action, NGC Case No. 24-01, and all other matters relating thereto, and against any and
16 all expenses, damages, charges and costs, including court costs and attorney fees, which
17 may be sustained by the persons and entities named in this paragraph as a result of said
18 claims, suits and actions.

19 8. RESPONDENT enters into this Stipulation for Settlement freely and
20 voluntarily and with the assistance of legal counsel. RESPONDENT further acknowledges
21 that this Stipulated Settlement is not the product of force, threats, or any other form of
22 coercion or duress, but is the product of discussions between RESPONDENT and the
23 attorney for the BOARD.

24 9. RESPONDENT affirmatively represents that if RESPONDENT, this
25 Stipulation for Settlement, and/or any amounts distributed under this Stipulation for
26 Settlement are subject to, or become subject to, the jurisdiction of any bankruptcy court,
27 the bankruptcy court's approval is not necessary for this Stipulation for Settlement and
28 Order to become effective, or that the bankruptcy court has already approved this

1 Stipulation for Settlement.

2 10. RESPONDENT and the BOARD acknowledge that this Stipulation for
3 Settlement is made to avoid litigation and economize resources.

4 11. RESPONDENT and the BOARD recognize and agree that the Commission
5 has the sole and absolute discretion to determine whether to accept this Stipulation for
6 Settlement. RESPONDENT and the BOARD hereby waive any right they may have to
7 challenge the impartiality of the Commission to hear the above-entitled case on the matters
8 embraced in the Complaint if the Commission determines not to accept this Stipulation for
9 Settlement. If the Commission does not accept the Stipulation for Settlement, it shall be
10 withdrawn as null and void and RESPONDENT'S admissions, if any, that certain
11 violations of the Nevada Gaming Control Act and the Regulations of the Commission
12 occurred shall be withdrawn.

13 12. RESPONDENT and the BOARD agree and understand that this Stipulation
14 for Settlement is intended to operate as full and final settlement of the Complaint filed in
15 NGC Case No. 24-01. The parties further agree and understand that any oral
16 representations are superseded by this Stipulation for Settlement and that only those
17 terms memorialized in writing herein shall be effective.

18 13. RESPONDENT agrees and understands that although this Stipulation for
19 Settlement, if approved by the Commission, will settle the Complaint filed in NGC Case
20 No. 24-01, the allegations contained in the Complaint filed in NGC Case No. 24-01 and the
21 terms of this Stipulation for Settlement may be considered by the BOARD and/or the
22 Commission, with regard to any and all applications by RESPONDENT that are currently
23 pending before the BOARD or the Commission, or that are filed in the future with the
24 BOARD.

25 14. RESPONDENT and the BOARD shall each bear their own costs incurred in
26 this disciplinary action, NGC Case No. 24-01.

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1 15. RESPONDENT, by executing this Stipulation for Settlement, affirmatively
2 waives all notices required by law for this matter including, but not limited to, notices
3 concerning consideration of the character or misconduct of a person (NRS 241.033), notices
4 concerning consideration of administrative action against a person (NRS 241.034), and
5 notices concerning hearings before the Commission (NRS 463.312). Regardless of the
6 waiver of legal notice requirements, the BOARD and Commission will attempt to provide
7 reasonable notice of the time and place of the hearing. RESPONDENT shall provide any
8 electronic mail addresses to the Executive Secretary (nrupert@gcb.nv.gov) at which it
9 would like to receive such reasonable notice. Further, in negotiating this Stipulation for
10 Settlement, RESPONDENT acknowledges that the BOARD has provided RESPONDENT
11 with the date and time of the Commission hearing during which the BOARD anticipates
12 the Commission will consider approving this settlement.

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1 16. This Stipulation for Settlement shall become effective immediately upon
2 approval by the Commission.

3 DATED this 3rd day of October 2024.

4 MEI-GSR HOLDINGS, LLC, dba
5 GRAND SIERRA RESORT AND CASINO

6 By: 
7 SHANNON KEEL
8 General Manager

NEVADA GAMING CONTROL BOARD


KIRK D. HENDRICK, Chair

9 BROWNSTEIN HYATT FARBER
10 SCHRECK, LLP

11 By: _____
12 SCOTT SCHERER, Esq.
13 Attorneys for Respondent


BRITTNIE WATKINS, PhD, Member


HON. GEORGE ASSAD (RET.), Member

Submitted by:

14 AARON D. FORD
15 Attorney General

16
17 By: 
18 MICHAEL P. SOMPS
19 Senior Deputy Attorney General
20 Gaming Division
21 5420 Kietzke Lane, Suite 202
22 Reno, Nevada 89511
23 Telephone: (775) 687-2124

21 ORDER

22 IT IS SO ORDERED in NGC Case No. 24-01.

23 DATED this 4th day of November 2024.

24 NEVADA GAMING COMMISSION

25 
26 JENNIFER TOGLIATTI, Chairwoman
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1 16. This Stipulation for Settlement shall become effective immediately upon
2 approval by the Commission.

3 DATED this ____ day of _____ 2024.

4 MEI-GSR HOLDINGS, LLC, dba
5 GRAND SIERRA RESORT AND CASINO

NEVADA GAMING CONTROL BOARD

6 By: 
7 SHANNON KEEL
8 General Manager

KIRK D. HENDRICK, Chair

9 BROWNSTEIN HYATT FARBER
10 SCHRECK, LLP

BRITTNIE WATKINS, PhD, Member

11 By: 
12 SCOTT SCHERER, Esq.
13 Attorneys for Respondent

HON. GEORGE ASSAD (RET.), Member

14 Submitted by:

15 AARON D. FORD
16 Attorney General

17 By: 
18 MICHAEL P. SOMPS
19 Senior Deputy Attorney General
20 Gaming Division
21 5420 Kietzke Lane, Suite 202
22 Reno, Nevada 89511
23 Telephone: (775) 687-2124

24 ORDER

25 IT IS SO ORDERED in NGC Case No. 24-01.

26 DATED this ____ day of October 2024.

27 NEVADA GAMING COMMISSION

28 JENNIFER TOGLIATTI, Chairwoman