



1 NGC 24-15

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STATE OF NEVADA

5

BEFORE THE NEVADA GAMING COMMISSION

6

NEVADA GAMING CONTROL BOARD,

7

Complainant,

8

vs.

**STIPULATION FOR SETTLEMENT
AND ORDER**

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NICOLE BOWYER,

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In her capacity as an Independent Agent
registered with the Nevada Gaming Control
Board,

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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 NGC Case No. 24-15, against NICOLE
BOWYER, 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. 24-15, 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. 24-15.

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2. RESPONDENT fully understands and voluntarily waives 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,
which must contain findings of fact and a determination of the issues presented, and the
right to obtain judicial review of the Nevada Gaming Commission's (Commission) decision.

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1 3. RESPONDENT agrees that her registration as an Independent Agent issued
2 by the BOARD is Revoked.

3 4. RESPONDENT further agrees that she shall not seek any Nevada gaming
4 related approvals for a period of no less than five (5) years from the date this Stipulation
5 for Settlement is accepted by the Commission.

6 5. RESPONDENT further agrees to cooperate fully with the BOARD and any
7 other federal, state, or local law enforcement or regulatory agency in any investigation that
8 seeks information relating, in any way, to the allegations contained in the Complaint, NGC
9 Case No. 24-15.

10 6. RESPONDENT, for herself, her heirs, executors, administrators, successors,
11 and assigns, hereby completely releases, dismisses, and forever discharges the State of
12 Nevada, the Nevada Gaming Commission, the Nevada Gaming Control Board, the Nevada
13 Attorney General and each of their members, agents, and employees in their individual,
14 official, and representative capacities from any and all manner of actions, causes of action,
15 suits, debts, judgments, executions, claims, obligations, losses, liens, damages, and
16 demands whatsoever known or unknown, fixed or contingent, liquidated or unliquidated,
17 suspected or claimed in law and equity, that RESPONDENT ever had, now has, may have,
18 or claims to have against any and all of the persons or entities named in this paragraph
19 arising out of, or by reason of, this disciplinary case, NGC Case No. 24-15, or any other
20 matter relating thereto.

21 7. RESPONDENT, for herself, her heirs, executors, administrators, successors,
22 and assigns, hereby defends, indemnifies, and holds harmless the State of Nevada, the
23 Nevada Gaming Commission, the Nevada Gaming Control Board, the Nevada Attorney
24 General, and each of their members, agents, and employees in their official, individual, and
25 representative capacities from and against any and all claims, suits, actions, debts,
26 damages, costs, charges, and expenses, including court costs and attorney's fees, and
27 against all liability, losses, demands, and damages of any nature whatsoever that the
28 persons and entities named in this paragraph shall or may have at any time sustain or be

1 put to by reason of this disciplinary case, NGC Case No. 24-15, or any other matter relating
2 thereto.

3 8. RESPONDENT enters into this Stipulation for Settlement freely and
4 voluntarily and with the assistance of legal counsel. RESPONDENT further acknowledges
5 that this Stipulated Settlement is not the product of force, threats, or any other form of
6 coercion or duress, but is the product of discussions between RESPONDENT, the attorneys
7 for RESPONDENT, the BOARD, and the attorneys for the BOARD.

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

14 10. RESPONDENT and the BOARD acknowledge that this Stipulation for
15 Settlement is made to avoid litigation and economize resources. The parties agree and
16 understand that this Stipulation for Settlement is intended to operate as full and final
17 settlement of the Complaint filed against RESPONDENT in the above-entitled disciplinary
18 case, NGC Case No. 24-15.

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

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

6 13. RESPONDENT agrees and understands that although this Stipulation for
7 Settlement, if approved by the Commission, will settle the Complaint filed in NGC Case
8 No. 24-15, the allegations contained in the Complaint filed in NGC Case No. 24-15 and the
9 terms of this Stipulation for Settlement may be considered by the BOARD and/or the
10 Commission, with regard to any and all applications by RESPONDENT that are currently
11 pending before the BOARD or the Commission, or that are filed in the future with the
12 BOARD.

13 14. RESPONDENT and the BOARD shall each bear their own costs incurred in
14 this disciplinary action, NGC Case No. 24-15.

15 15. RESPONDENT, by executing this Stipulation for Settlement, affirmatively
16 waives all notices required by law for this matter including, but not limited to, notices
17 concerning consideration of the character or misconduct of a person (NRS 241.033), notices
18 concerning consideration of administrative action against a person (NRS 241.034), and
19 notices concerning hearings before the Commission (NRS 463.312). Regardless of the
20 waiver of legal notice requirements, the BOARD and Commission will attempt to provide
21 reasonable notice of the time and place of the hearing. RESPONDENT shall provide any
22 electronic mail addresses to the Executive Secretary (nrupert@gcb.nv.gov) at which she
23 would like to receive such reasonable notice. Further, in negotiating this Stipulation for
24 Settlement, RESPONDENT acknowledges that the BOARD has provided RESPONDENT
25 with the date and time of the Commission hearing during which the BOARD anticipates
26 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 21 day of January, 2025.

4 NEVADA GAMING CONTROL BOARD

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6 NICOLE BOWYER
7 Respondent

8 
9 KIRK D. HENDRICK, Chair

10 HITZKE & FERRAN, LLP

11 
12 BRITTNIE WATKINS, PhD, Member

13 /s/ Erick M. Ferran, Esq. NSBN: 9554
14 ERICK FERRAN, Esq.
15 Attorneys for Respondent

16 
17 HON. GEORGE ASSAD (RET.), Member

18 Submitted by:

19 AARON D. FORD
20 Attorney General

21 By:

22 
23 MICHAEL P. SOMPS
24 Senior Deputy Attorney General
25 NONA ML LAWRENCE
26 Deputy Attorney General
27 Gaming Division
28 5420 Kietzke Lane, Suite 202
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Telephone: (775) 687-2124

ORDER

IT IS SO ORDERED in NGC Case No. 24-15.

DATED this _____ day of _____, 2025.

NEVADA GAMING COMMISSION

JENNIFER TOGLIATTI, Chairwoman

