



Direct Mail Offer Comparison by Category
\$250 ADT Reno Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (1) Offers Received	Promotion Offers (0) Offers Received	Tournament Offers (1) Offers Received
Silver Legacy Total Offers Received 2	Free Slot Play Offer & Hotel Offer <ul style="list-style-type: none"> * \$21 free slot play (valid Aug 4) * \$21 free slot play (valid Aug 11) * \$21 free slot play (valid Aug 18) * \$21 free slot play (valid Aug 25) * \$39 Room Rates Sunday - Thursday - August 1-31 * \$21 Resort Credit for Hotel Items 	Dick Fox Golden Boys - August 1 <ul style="list-style-type: none"> * (2) free Tickets The Beach Boys - August 2 <ul style="list-style-type: none"> * (2) free Tickets Sara Bareilles - August 6 <ul style="list-style-type: none"> * (2) free Tickets Gabriel Iglesias - August 9 <ul style="list-style-type: none"> * (2) free Tickets Thompson Square - August 15 <ul style="list-style-type: none"> * (2) free Tickets Brian Regan - August 22 <ul style="list-style-type: none"> * (2) free Tickets Lucas Oil Races - August 22-23 <ul style="list-style-type: none"> * (2) free Tickets David Gray - August 29 <ul style="list-style-type: none"> * (2) free Tickets Engelbert Humperdinck - August 30 <ul style="list-style-type: none"> * (2) free Tickets Tina Turner - August 31 <ul style="list-style-type: none"> * (2) free Tickets 	\$1 Million Dollar Game Changers <ul style="list-style-type: none"> * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses \$100,000 Mustang & Monty Madness <ul style="list-style-type: none"> * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang) 	\$15,000 Bingo Blitz <ul style="list-style-type: none"> * Thursday, August 14 * (2) free entries
Hugob Total Offers Received 3	Free Slot Play Offer & Hotel Offer <ul style="list-style-type: none"> * \$15 free slot play (valid Aug 5-7) * \$15 free slot play (valid Aug 11-14) * \$15 free slot play (valid Aug 17-20) * \$15 free slot play (valid Aug 23-26) * \$10 Dining Credit (Aug 8-9) * \$10 Dining Credit (Aug 10-22) * \$10 Dining Credit (Aug 24-26) 	Hugob Rib Cook-off <ul style="list-style-type: none"> * Wed-Tuesday (Aug 27-Sept 2) * (2) Free Tickets - one day to VIP event 	\$60,000 Text 4 Treasure <ul style="list-style-type: none"> * August 16-17 * Play daily game via Text on Phone 	\$20,000 777 Slot Tournament <ul style="list-style-type: none"> * Aug 22-24 * \$20,000 Prize Pool - \$5,000 1st Prize



Direct Mail Offer Comparison by Category
\$100 ADT Reno Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (1) Offers Received	Promotion Offers (1) Offers Received	Tournament Offers (0) Offers Received
GSR Total Offers Received: 3	Free Slot Play & Hotel Offer * \$40 free slot play (valid Aug 1-2) * \$40 free slot play (valid Aug 4-6) * \$40 free slot play (valid Aug 8-9) * \$40 free slot play (valid Aug 11-13) * \$40 free slot play (valid Aug 15-16) * \$40 free slot play (valid Aug 18-20) * \$40 free slot play (valid Aug 22-23) * \$40 free slot play (valid Aug 25-27) * \$40 free slot play (valid Aug 29-30) * up to (4) Hotel stays up to (2) nights any day (8 nights total - 7 days between trips) Free Dining Credit * \$15 Dining Credit (Aug 1-31)	BBK Giveaway Weekend * August 22-24 * Up to \$10,000 Grand Prize * (2) Nights Hotel Stay Masters of Magic - thru August 10 * (2) free tickets	Sunday Gift Give Aways * Each Sunday in August (2-8p) * Wireless Handphones (Aug 3) * 60 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Photo Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points * August 8 & September 1 (10am-10pm) * Exchange comps for Free play (2-4) August Multipliers * Every Thursday in August and August 15-16 * 2x Platinum, 3x Legend, 5x Elite, 7x Grand	
Peppermill Total Offers Received: 3	Free Slot Play Offer & Hotel Offer * \$20 free slot play (valid July 29- Aug 1) * \$20 free slot play (valid Aug 2) * \$20 free slot play (valid Aug 5-6) * \$20 free slot play (valid Aug 9) * \$20 free slot play (valid Aug 12-15) * \$20 free slot play (valid Aug 19-22) * \$20 free slot play (valid Aug 23) * \$20 free slot play (valid Aug 26-29) * \$20 free slot play (valid Aug 30) * (2) free nights in Peppermill Tower (7/26-8/28) * Sunday -Thursday		Play the Pros Football Contest * 1 Free Entry for Season long football contest \$210,000 Amore Fiat and Cash Giveaway * June 15 - September 5, 2014 * Swipe and Win a Prize Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin * Sundays - Noon-midnight * Kiosk game for chance to win \$5-\$1,000 Free play * One free swipe per day * Red Card holders must earn one point to qualify	Slot August Nights Slot Tournament * Aug 3-4 * (1) Free entry * \$40,000 Prize Pool - \$10,000 first Prize
Atlantis Total Offers Received: 1	Free Slot Play Offer & Hotel Offer * \$10 Free Play (Aug 4-6) * \$15-\$200 Free Play (Aug 16) * \$10 Free Play (Aug 20-21) * \$10 Free Play (Aug 26-28) * Swipe & Win (Aug 30) * (2) free nights Deluxe Tower (Aug 1-31) * (1) Free Hot August Nights T-shirt (Aug 1-2)	Wynonna Concert * August 29th - Friday at 8pm * (2) free tickets	Batman Wonder Wheels Slot Party * August 15-16 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win (\$100,000 Quarterly Weekend) * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW)	



Direct Mail Offer Comparison by Category
\$100 ADT Reno Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (0) Offers Received	Promotion Offers (0) Offers Received	Tournament Offers (0) Offers Received
Silver Legacy Total Offers Received 1	Free Slot Play Offer & Hotel Offer <ul style="list-style-type: none"> * \$5 free slot play (valid Aug 4) * \$5 free slot play (valid Aug 11) * \$5 free slot play (valid Aug 18) * \$5 free slot play (valid Aug 26) * \$39 Room Rates Sunday - Thursday - August 1-31 * \$5 Resort Credit for Hotel Items 		\$1 Million Dollar Game Changers <ul style="list-style-type: none"> * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses \$100,000 Mustang & Money Madness <ul style="list-style-type: none"> * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang) 	
Nugget Total Offers Received 1	Free Play, Hotel, Food & Gift Offers (1) Offers Received <ul style="list-style-type: none"> * \$10 free slot play (valid Aug 5-7) * \$10 free slot play (valid Aug 11-14) * \$10 free slot play (valid Aug 17-20) * \$10 free slot play (valid Aug 23-26) * \$5 Dining Credit (Aug 6-8) * \$5 Dining Credit (Aug 19-22) * \$5 Dining Credit (Aug 24-26) 		\$60,000 Text 4 Treasure <ul style="list-style-type: none"> * August 16-17 * Play daily game via Text on Phone 	



Direct Mail Offer Comparison by Category
\$50 ADT Reno Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (7) Offers Received	Special Event Offers (1) Offers Received	Promotion Offers (3) Offers Received	Tournament Offers (0) Offers Received
GSR Total Offers Received 2	Free Slot Play & Hotel Offer * \$15 free slot play (valid Aug 1-2) * \$15 free slot play (valid Aug 4-5) * \$15 free slot play (valid Aug 8-9) * \$15 free slot play (valid Aug 11-13) * \$15 free slot play (valid Aug 15-16) * \$15 free slot play (valid Aug 18-20) * \$15 free slot play (valid Aug 22-23) * \$15 free slot play (valid Aug 25-27) * \$15 free slot play (valid Aug 29-30) * (2) Free nights - Sun-Thur any day (6) nights total -10 days between trips) Free Dining Credit * \$5 Dining Credit (Aug 1-31) (Sun-Fri)	Masters of Magic - thru August 18 * (2) free tickets	Sunday Gift Give Aways * Each Sunday in August (2-8p) * Wireless Headphones (Aug 3) * 50 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Phone Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points * August 6 & September 1 (10am-10pm) * Exchange comps for Free play (2-1) August Multipliers * Every Thursday in August and August 15-16 * 2x Platinum, 3x Legend, 5x Elite, 7x Grand	
Peppermill Total Offers Received 1	Free Slot Play Offer & Hotel Offer * \$10 free slot play (valid July 28-Aug 1) * \$10 free slot play (valid Aug 2) * \$10 free slot play (valid Aug 5-8) * \$10 free slot play (valid Aug 9) * \$10 free slot play (valid Aug 12-15) * \$10 free slot play (valid Aug 18-22) * \$10 free slot play (valid Aug 23) * \$10 free slot play (valid Aug 26-29) * \$10 free slot play (valid Aug 30) * (2) Free nights in Peppermill Tower (7/28-8/28) * Sunday - Thursday		\$210,000 Amore Flat and Cash Giveaway * June 15 - September 6, 2014 * Swipe and Win a Prize Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin * Sundays - Noon-midnight * Kiosk game for chance to win \$5-\$1,000 Free play * One free swipe per day * Red Card holders must earn one point to qualify	
Atlantis Total Offers Received 1	Free Slot Play Offer & Hotel Offer * \$5 Free Play (Aug 4-6) * \$10-\$100 Free Play (Aug 16) * \$5 Free Play (Aug 20-21) * \$5 Free Play (Aug 28-29) * Swipe & Win (Aug 30) * 2 for 1 room nights (Aug 1-31) * (1) Free Hot August Nights T-shirt (Aug 1-2)		Batman Wonder Wheels Slot Party * August 15-16 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win \$100,000 Quarterly Weekend * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW)	

EXHIBIT 30

Part 3 of 3

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 30

Part 3 of 3



Direct Mail Offer Comparison by Category
\$50 ADT Reno Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (13 Offers Received)	Special Event Offers (0 Offers Received)	Promotion Offers (0 Offers Received)	Tournament Offers (0 Offers Received)
Silver Legacy Total Offers Received 1	Free Slot Play Offer & Hotel Offer * \$5 free slot play (valid Aug 4) * \$5 free slot play (valid Aug 11) * \$5 free slot play (valid Aug 18) * \$5 free slot play (valid Aug 25) * \$39 Room Rates Sunday - Thursday - August 1-31 * \$5 Resort Credit for Hotel Items		\$1 Million Dollar Game Changers * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses \$100,000 Mustang & Money Madness * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang)	
Nugget Total Offers Received 1	Free Play, Hotel, Food & Gift Offers * \$10 free slot play (valid Aug 2-7) * \$10 free slot play (valid Aug 11-14) * \$10 free slot play (valid Aug 17-20) * \$10 free slot play (valid Aug 23-26) * \$5 Dining Credit (Aug 6-9) * \$5 Dining Credit (Aug 10-22) * \$5 Dining Credit (Aug 24-26)		\$50,000 Text 4 Treasure * August 16-17 * Play daily game via Text on Phone	

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)**

\$250 ADT Sacramento slot player

Free Play	\$125 Free Play (Aug 4-18) \$125 Free Play (Aug 21-29)		\$50-\$500 Free Play (Aug 16) \$50 Free Play (Aug 20-20)
Hotel (\$45 per night value)	(2) Free nights - any day - Aug 3-31 Multiple stays allowed (2 days between stays) up to (14) nights	(2) Free nights - Aug 15-16 (2) Free nights - Aug 19-21 (2) Free nights - Aug 22-24	(2) Free nights - Aug 8-9 (2) Free nights - Aug 15-16 (2) Free nights - Aug 21-24 (2) Free nights - Aug 29-30
Dining	\$25 Dining Credit - August 3-31		
Gifts/Other (\$40/\$20 per gift)	Wireless Headphones - August 3 50 Piece Food Storage - August 10 Soap & Hand Dispenser - August 17 Wireless Mobile Phone Zone - August 24 2 Piece BBQ Set - August 31		
Promotional Events (\$40 per event) (\$20 per week for daily promotional activities) i.e. random progressive	Grand Power Women Jackpot (daily) 55 Grand Multipliers (Wednesdays) Points for Free Play Exchange Day (August 6)	\$210,000 Free and Cash Giveaway (daily) Buena Fortune Collect and Win (daily) \$10,000 Big Spin Kiosk Game (Sundays) Points for Free Play Exchange Days (every Thursday)	Money Maker Jackpot (daily) Bullman Slot Party (Aug 15-16) Drivers to Win \$1000 Giveaway (Aug 22-23) Comp Point For Free Play Exchange (Aug 5, 11, 24)
Point Multipliers (\$30 per day)	2x, 3x, 5x, 7x Points (Every Thursday) 2x, 3x, 5x, 7x Points (Aug 15, 16 and 25)	6x Points (Aug 15-16) 5x Points (Aug 22) 4x Points (every Wednesday)	4x Points (Aug 3, 13) 2x/3x (Play/Diamond) - (Aug 8, 14, 20) 3x Points (Aug 11, 25) 4x Reels (Aug 7, 27) 2x Points (Aug 1, 18, 28, 31)
Premium Events (\$150 per event)	Sexy Banquet (August 9 - two tickets & two night stay)		
New Premium Events (\$75 per event)	\$38,000 Cash Weekend (August 22-24) Drawings & Two free nights	CanFest - August 23 (2) VIP Tickets - seating and Buffet	Viva Fiesta - Aug 9 - Dinner for 2
Concert Offers	Masters of Magic (thru August 10) (2) Free tickets		Wyman & The Big Noise (Aug 29) * Two tickets
Free Tournaments (\$20 per day offered)		\$15,000 Bingo Blast (Aug 19)	
Invitational Tournaments (\$75 event only) (\$125 event & lunch)		Slot August Nights Slot Tournament (Aug 3-4) Triple Header Slot Tournament (Aug 24-25)	\$40,000 Upside Down Tournament (Aug 17-18)

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$250 ADT Sacramento slot player**

Free Play	\$20 Free Play (Aug 1-31)	\$20 Free play (Aug 5-7) \$20 Free play (Aug 11-14) \$20 Free play (Aug 17-20) \$20 Free play (Aug 23-26)
	\$20	\$80
Hotel (\$45 per night value)	(1) free night - any day - Aug 1-31 (2) free nights - any day - through Aug 31	
	\$135	\$0
Dining		\$10 Dining Credit (Aug 6-9) \$10 Dining Credit (Aug 19-22) \$10 Dining Credit (Aug 24-26)
	\$0	\$30
Gifts/Other (\$40/\$20 per gift)		
	\$0	\$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Break the Bank Bonuses (daily) \$1 Million Game Changer (daily) \$100k Mustang & Money Drawings (weekends) Points to Free Play (Friday's)	Text 4 Treasure July 7 - August 17
	\$320	\$40
Point Multipliers (\$30 per day)		2x Points (Aug 6,7,12,13,14,15,16,18,19,20,21,24,26) 3x Points (Aug 4,10,25) 4x Points (Aug 3)
	\$0	\$510
Premium Events (\$150 per event)		\$0
Non Premium Events (\$75 per event)		\$0
Concert Offers	Dick Fox Golden Boys (Aug 1) - (2) free tickets Beach Boys (Aug 2) - (2) free tickets Sara Bareilles (Aug 8) - (2) free tickets Gabriel Iglesias (Aug 9) - (2) free tickets Thompson Square (Aug 15) - (2) free tickets Brian Regan (Aug 22) - (2) free tickets Lucas Oil Races (Aug 22-23) - (2) free tickets David Gray (Aug 29) - (2) free tickets Engelbert Humperdinck (Aug 30) - (2) free tickets Thai Chin (Aug 31) - (2) free tickets	
	\$750	\$0
Free Tournaments (\$20 per day offered)	\$15,000 Biago Blitz (Aug 14)	
	\$20	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)		\$20,000 777 Slot Tournament - Aug 22-24
	\$0	\$75
Total	\$1,215	\$645

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$100 ADT Sacramento slot player**

	CSR	Redemption	Value
Free Play	\$50 Free Play (Aug 4-14) \$50 Free Play (Aug 21-29) \$100	\$50 Free Play (August 3-31) \$50	\$15 Free Play (Aug 20-28) \$15
Hotel (\$45 per night value)	(2) Free nights - any day - Aug 3-31 Multiple stays allowed (3 days between trips) up to (14) nights \$630	(2) Free nights - Sunday-Thursday - August 3-31 (2) Free nights - Aug 19-21 \$180	(1) Free Night - Aug 4-31 Monday - Thursday \$45
Dining	\$15 Dining Credit - August 3-31 \$15	 \$0	 \$0
Gifts/Other (\$40/\$20 per gift)	Wireless Headphones - August 3 50 Piece Food Storage - August 10 Soap & Hand Dispenser - August 17 Wireless Mobile Phone Zone - August 24 5 Piece BBQ Set - August 31 \$100	 \$0	 \$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Grand Power Winners Jackpot (daily) 55 Grand Multipliers (Wednesdays) Points for Free Play Exchange Day (August 6) \$120	\$210,000 Flat and Cash Giveaway (daily) Buena Fortuna Collect and Win (daily) \$10,000 Big Spin Kiosk Game (Sundays) Points for Free Play Exchange Days (every Thursday) \$220	Money Maker Jackpot (daily) Baum's Slot Party (Aug 15-16) Drives to Win \$100k Giveaway (Aug 22-23) Comp Point For Free Play Exchange (Aug 3, 21, 24) \$240
Point Multipliers (\$30 per day)	2x, 3x, 5x, 7x Points (Every Thursday) 2x, 3x, 5x, 7x Points (Aug 15, 16 and 25) \$210	6x Points (Aug 15-16) 5x Points (Aug 22) 4x Points (every Wednesday) \$240	4x Points (Aug 3, 15) 2x/3x (Pint/Disco) - (Aug 8, 14, 20) 3x Points (Aug 11, 25) 4x Reels (Aug 7, 27) 2x Points (Aug 1, 18, 28, 31) \$390
Premium Events (\$150 per event)	 \$0	 \$0	 \$0
Non Premium Events (\$75 per event)	\$88,000 Cash Weekend (August 22-24) Drawings & Two free nights \$75	 \$0	 \$0
Concert Offers	Masters of Magic (thru August 10) (7) Free tickets \$40	 \$0	 \$0
Free Tournaments (\$20 per day offered)	 \$0	\$15,000 Bingo Blast (Aug 19) \$20	 \$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	 \$0	Slot August Nights Slot Tournament (Aug 3-4) Triple Leader Slot Tournament (Aug 24-25) \$250	 \$0
TOTAL	\$1,420	\$1,420	\$1,420

\$100 ADT Sacramento slot player

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$50 ADT Sacramento slot player**

	GSR	Promotional	Altitude
Free Play	\$100 Free Play (Aug 4-18) \$80 Free Play (Aug 21-29) \$180	\$0	\$151 Free Play (Aug 20-28) \$15
Hotel (\$45 per night value)	(2) Free nights - any day - Aug 3-31 Multiple stays allowed (3 days between trips) up to (14) nights \$630	(2) Free nights - Aug 19-21 \$90	(1) Free Night - Aug 4-31 Monday - Thursday \$45
Dining	\$20 Dining Credit - August 3-31 \$20	\$0	\$0
Gifts/Other (\$40/\$20 per gift)	Wireless Headphones - August 3 50 Piece Food Storage - August 10 Serp & Hand Dispenser - August 17 Wireless Mobile Phone Zone - August 24 3 Piece BBQ Set - August 31 \$100	\$0	\$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Grand Power Winners Jackpot (daily) 55 Grand Multipliers (Wednesdays) Points for Free Play Exchange Day (August 6) \$120	\$210,000 First and Cash Giveaway (daily) Buena Fortuna Collect and Win (daily) \$10,000 Big Spin Kiosk Game (Sundays) Points for Free Play Exchange Days (every Thursday) \$320	Money Maker Jackpot (daily) Banan Slot Party (Aug 15-16) Driven to Win \$100k Giveaway (Aug 22-23) Comp Point Per Free Play Exchange (Aug 5, 21, 24) \$240
Point Multipliers (\$30 per day)	2x, 3x, 5x, 7x Points (Every Thursday) 2x, 3x, 5x, 7x Points (Aug 15, 16 and 25) \$110	6x Points (Aug 15-16) 5x Points (Aug 22) 4x Points (every Wednesday) \$240	4x Points (Aug 3, 15) - 2x, 3x (Plat/Diamond) - (Aug 8, 14, 20) 3x Points (Aug 11, 25) 4x Reels (Aug 7, 27) 2x Points (Aug 1, 18, 28, 31) \$190
Premium Events (\$150 per event)	\$0	\$0	\$0
Non Premium Events (\$75 per event)	\$0	\$0	\$0
Concert Offers	Masters of Magic (thru August 10) (2) free tickets \$80	\$0	\$0
Free Tournaments (\$20 per day offered)	\$0	\$15,000 Biogo Blast (Aug 19) \$20	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	\$0	Slot August Night Slot Tournament (Aug 3-4) \$125	\$0
TOTAL	\$1,280		\$590

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$50 ADT Sacramento slot player**

	Silver Level	Normal
Free Play		\$5 Free play (Aug 5-7) \$5 Free play (Aug 11-14) \$5 Free play (Aug 17-20) \$5 Free play (Aug 23-26)
	\$0	\$20
Hotel (\$45 per night value)		
	\$0	\$0
Dining		\$5 Dining Credit (Aug 6-9) \$5 Dining Credit (Aug 19-22) \$5 Dining Credit (Aug 24-26)
	\$0	\$15
Gifts/Other (\$40/\$20 per gift)		
	\$0	\$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Break the Bank Bonuses (daily) \$1 Million Game Changer (daily) \$100k Mustang & Money Drawings (weekends) Points to Free Play (Friday's)	Text 4 Treasure July 7 - August 17
	\$320	\$40
Point Multipliers		2x Points (Aug 6,7,12,13,14,15,16,18,19,20,21,24,26) 3x Points (Aug 4,10,25) 4x Points (Aug 3)
	\$0	\$510
Premium Events (\$150 per event)		\$0
Non Premium Events (\$75 per event)		\$0
Concert Offers		\$0
	\$0	\$0
Free Tournaments (\$20 per day offered)		
	\$0	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)		
	\$0	\$0
Total	\$0	\$550



\$250 ADT Slot Player
Sacramento
Direct Mail Free Slot Play Offers Received

	June				July					August				
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week
GSR														
Peppercorn														
Athletic														
Silver Legacy														
Nugget														



**S100 ADT Slot Player
Sacramento
Direct Mail Free Slot Play Offers Received**

	June				July					August				
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week
OSR														
Peppercorn														
Atlanta														
Silver Legacy														
Nugget														



**550 ADT Slot Player
Sacramento
Direct Mail Free Slot Play Offers Received**

	June				July					August				
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week
CSR							ADT Player Total Rep: 15,400,000			ADT Player Total Rep: 15,400,000		ADT Player Total Rep: 21,000,000		
Peppermill														
Alhambra														
Silver Legacy														
Hugget														



Direct Mail Offer Comparison by Category
\$250 ADT Sacramento Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (3) Offers Received	Promotion Offers (1) Offers Received	Tournament Offers (0) Offers Received
GSR Total Offers Received 5	Free Slot Play & Hotel Offer * \$125 free slot play (valid August 4-18) * \$125 free slot play (valid August 21-28) * (2) free nights - any day - Aug 3-31 * Multiple stays allowed - up to (14) nights * \$25 Dining Credit * valid August 3-31	\$88k Giveaway Weekend * August 22-24 * Up to \$10,000 Grand Prize * (2) Nights Hotel Stay * Tony Bennett Concert - August 8 * (2) free tickets * (2) Nights Hotel Stay * Masters of Magic - thru August 10 * (2) free tickets	Sunday Gift Give Aways * Each Sunday in August (2-8p) * Wireless Headphones (Aug 3) * 50 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Phone Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points * August 6 & September 1 (10am-10pm) * Exchange comps for Free play (2-1) August Multipliers * Every Thursday in August and August 15-16 * 2x Platinum, 3x Legend, 5x Elite, 7x Grand	
Peppermill Total Offers Received 4		Cash Fest (August 23) * 5-11pm * (2) Free tickets + Seating and Buffet * (2) Free hotel nights	6x Points weekend * August 15-16 * (2) Free hotel nights \$210,000 Amore Fiat and Cash Giveaway * June 15 - September 6, 2014 * Swipe and Win a Prize Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin * Sundays - Noon-midnight * 100k game for chance to win \$5 \$1,000 Free play * One free swipe per day * Red Caro holders must earn one point to qualify	Slot August Nights Slot Tournament * Aug 3-4 * (1) free entry * \$40,000 Prize Pool - \$10,000 first Prize * (2) Free hotel nights Triple Header Slot Tournament! * August 24-26 * (1) Free entry * \$20,000 Prize Pool - \$7,500 first Prize * \$15,000 bonus pool for playing all (3) in series * (2) Free hotel nights
Atlanta Total Offers Received 5	Free Slot Play Offer & Hotel Offer * \$50-\$500 Free play (August 16) * (2) free hotel nights - August 15-16 * \$50 Free play (August 20-28) * (2) free hotel nights - August 20-28	Viva Fiesta Dinner * August 8th * Dinner for (2) ppl at 7pm * (2) free hotel nights Wynonna Concert * August 29th - Friday at 8pm * (2) free tickets * (2) free hotel nights -	Batman Wonder Wheels Slot Party * August 15-16 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win (\$100,000 Quarterly Weekend) * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW)	Upside Down Slot Tournament * August 17-18 * (1) Free entry * \$40,000 Prize Pool - \$10,000 first Prize * 450 Winners * (2) Free nights * Buffet for (2)



Direct Mail Offer Comparison by Category
\$250 ADT Sacramento Player
(August 2014)

Casino Name	Free Play (Hotel, Food & Gift Offers) (1) Offers Received	Special Event Offers (4) Offers Received	Promotion Offers (3) Offers Received	Tournament Offers (1) Offers Received
Silver Legacy Total Offers Received 2	Free Slot Play Offer & Hotel Offer * \$20 free slot play (valid August 1-31) * (1) Free hotel night (August 1-31) * (2) Free hotel nights (valid through August 31)	Dick Fox Golden Boys - August 1 * (2) free Tickets The Beach Boys - August 2 * (2) free Tickets Sara Bareilles - August 8 * (2) free Tickets Gabriel Iglesias - August 9 * (2) free Tickets Thompson Square - August 16 * (2) free Tickets Brian Regan - August 22 * (2) free Tickets Lucas Oil Races - August 22-23 * (2) free Tickets David Gray - August 29 * (2) free Tickets Engelbert Humperdinck - August 30 * (2) free Tickets Tina Turner - August 31 * (2) free Tickets	\$1 Million Dollar Game Changers * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses \$100,000 Mustang & Money Madness * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang)	\$15,000 Bingo Blitz * Thursday, August 14 * (2) free entries
Nugget Total Offers Received 2	Free Slot Play Offer & Hotel Offer * \$20 free slot play (valid Aug 5-7) * \$20 free slot play (valid Aug 11-14) * \$20 free slot play (valid Aug 17-20) * \$20 free slot play (valid Aug 23-26) * \$10 Dining Credit (Aug 9-9) * \$10 Dining Credit (Aug 19-22) * \$10 Dining Credit (Aug 24-26)		\$60,000 Text 4 Treasure * August 19-17 * Play daily game via Text on Phone	\$20,000 777 Slot Tournament * Aug 22-24 * (1) Free entry * \$20,000 Prize Pool - \$5,000 first Prize



Direct Mail Offer Comparison by Category
\$100 ADT Sacramento Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (1) Offers Received	Promotion Offers (1) Offers Received	Tournament Offers (0) Offers Received
GSR Total Offers Received 3	Free Slot Play & Hotel Offer <ul style="list-style-type: none"> * \$50 free slot play (valid August 4-18) * \$50 free slot play (valid August 21-28) * (2) free nights - any day - Aug 3-31 * Multiple stays allowed - up to (14) nights * \$15 Dining Credit * valid August 3-31 	\$88k Giveaway Weekend <ul style="list-style-type: none"> * August 22-24 * Up to \$10,000 Grand Prize * (2) Nights Hotel Stay Masters of Magic - thru August 10 <ul style="list-style-type: none"> * (2) free tickets 	Sunday Gift Give Aways <ul style="list-style-type: none"> * Each Sunday in August (2-8p) * Wireless Headphones (Aug 3) * 50 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Phone Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points <ul style="list-style-type: none"> * August 8 & September 1 (10am-10pm) * Exchange comps for Free play (2-4) August Multipliers <ul style="list-style-type: none"> * Every Thursday in August and August 15-16 * 2x Platinum, 3x Legend, 6x Elite, 7x Grand 	
Peppermill Total Offers Received 3	Free Slot Play Offer & Hotel Offer <ul style="list-style-type: none"> * \$50 free slot play (valid August 3-31) * (3) Free Nights - Peppermill Tower * Sunday- Thursday - August 3-31 		\$210,000 Autore Flat and Cash Giveaway <ul style="list-style-type: none"> * June 15 - September 8, 2014 * Swipe and Win a Prize Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin <ul style="list-style-type: none"> * Sundays - Noon-midnight * Kiosk game for chance to win \$5-\$1,000 Free play * One free swipe per day * Red Card holders must earn one point to qualify 	Slot August Nights Slot Tournament <ul style="list-style-type: none"> * Aug 3-4 * (1) Free entry * \$40,000 Prize Pool - \$10,000 first Prize * (2) Free hotel nights Triple Header Slot Tournament <ul style="list-style-type: none"> * August 24-25 * (1) Free entry * \$20,000 Prize Pool - \$7,500 first Prize * \$15,000 bonus pool for playing all (3) in series * (2) Free hotel nights
Atlantis Total Offers Received 1	Free Slot Play Offer & Hotel Offer <ul style="list-style-type: none"> * \$50 Free play (August 20-28) * (1) free hotel nights -August 4-31 		Batman Wonder Wheels Slot Party <ul style="list-style-type: none"> * August 15-16 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win (\$100,000 Quarterly Weekend) <ul style="list-style-type: none"> * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW) 	



Direct Mail Offer Comparison by Category
\$100 ADT Sacramento Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (0) Offers Received	Special Event Offers (0) Offers Received	Promotion Offers (0) Offers Received	Tournament Offers (0) Offers Received
Silver Legacy Total Offers Received 0			<ul style="list-style-type: none"> \$1 Million Dollar Game Changers * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses <ul style="list-style-type: none"> \$100,000 Mustang & Money Madness * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang) 	
Nugget Total Offers Received 7	<ul style="list-style-type: none"> Free Slot Play Offer & Hotel Offer * \$10 free slot play (valid Aug 5-7) * \$10 free slot play (valid Aug 11-14) * \$10 free slot play (valid Aug 17-20) * \$10 free slot play (valid Aug 23-26) <ul style="list-style-type: none"> * \$5 Dining Credit (Aug 5-8) * \$5 Dining Credit (Aug 19-22) * \$5 Dining Credit (Aug 24-26) 		<ul style="list-style-type: none"> \$50,000 Text 4 Treasure * August 16-17 * Play daily game via Text on Phone 	



Direct Mail Offer Comparison by Category
\$50 ADT Sacramento Player
(August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (13) Offers Received	Special Event Offers (2) Offers Received	Promotion Offers (1) Offers Received	Tournament Offers (0) Offers Received
CSR Total Offers Received 2	Free Slot Play & Hotel Offer * \$80 free slot play (valid August 4-18) * \$80 free slot play (valid August 21-28) * (2) free nights - any day - Aug 3-31 * Multiple stays allowed - up to (14) nights * \$20 Dining Credit * valid August 3-31	Masters of Magic - June 19 - August 10 * (2) free tickets	Sunday Gift Give Aways * Each Sunday in August (2-8p) * Wireless Headphones (Aug 3) * \$0 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Phone Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points * August 6 & September 1 (10am-10pm) * Exchange comps for Free play (2-1) August Multipliers * Every Thursday In August and August 15-16 * 2x Platinum, 3x Legend, 5x Elite, 7x Grand	
Peppermill Total Offers Received 2	Free Slot Play & Hotel Offer * (2) free nights - (Aug 19-21)		\$219,000 Amore Fiat and Cash Giveaway * June 15 - September 6, 2014 * Swipe and Win a Fiat Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin * Sundays - Noon-midnight * Kiosk game for chance to win \$5-\$1,000 Free play * One free swipe per day * Red Card holders must earn one point to qualify	Slot August Nights Slot Tournament * Aug 3-4 * (1) Free entry * \$40,000 Prize Pool - \$10,000 first Prize * (2) Free hotel nights
Atlantis Total Offers Received 1	Free Slot Play Offer & Hotel Offer * \$50 Free play (August 20-26) * (1) free hotel nights -August 4-31		Batman Wonder Wheels Slot Party * August 15-16 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win (\$100,000 Quarterly Weekend) * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW)	



Direct Mail Offer Comparison by Category
\$50 ADT Sacramento Player
 (August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (0) Offers Received	Special Event Offers (0) Offers Received	Promotion Offers (0) Offers Received	Tournament Offers (0) Offers Received
Silver Legacy Total Offers Received 0			\$1 Million Dollar Game Changers * Play daily * Legacy Video Lotto * Random Riches * Big Strike Progressive * Break the Bank Bonuses \$100,000 Mustang & Money Madness * Thru September 7 * Drawings on Friday, Saturday and Sunday * Grand Prize (2014 Mustang)	
Nugget Total Offers Received 1	Free Slot Play Offer & Hotel Offer * \$5 free slot play (valid Aug 5-7) * \$5 free slot play (valid Aug 11-14) * \$5 free slot play (valid Aug 17-20) * \$5 free slot play (valid Aug 23-25) * \$5 Dining Credit (Aug 6-9) * \$5 Dining Credit (Aug 10-22) * \$5 Dining Credit (Aug 24-26)		\$60,000 Text 4 Treasure * August 16-17 * Play daily game via Text on Phone	

EXHIBIT 31

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 31

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)
Plaintiff,)

-vs-

PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)
Defendant(s).)

VIDEOTAPED DEPOSITION OF SCOTT BEAN

(HIGHLY CONFIDENTIAL PAGES 27 - 211)

called for examination by counsel for Defendant Peppermill
Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
the offices of Robison, Belaustegui, Sharp & Low, 71
Washington Street, Reno, Nevada, at 8:36 a.m., Thursday,
April 2, 2015, before Becky Van Auker, a Certified Court
Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 A The one where you had the 6 and 7 percent
2 by each --

3 Q Oh, okay. That is going to be Exhibit 77,
4 page -- Bates 709 I think is what you're referring to.

5 A Right. So this comment here, the Nugget
6 rolled out 7 1/2 percent reinvestment.

7 Q All right. Let me focus on what you just
8 directed my attention to as Exhibit 77, first page.

9 There's a comp reinvestment percentage put
10 forth in these paragraphs for the Peppermill,
11 Atlantis, Nugget, Eldorado, and Silver Legacy.
12 Correct?

13 A Yes, sir.

14 Q And if you got -- we know these two
15 formulas are intertwined; you know, coin-in, par,
16 theo, theo, comp dollars, comp reinvestment
17 percentage.

18 Once you have the comp reinvestment
19 percentage for a machine -- excuse me, comp
20 reinvestment percentage, you can work backwards and
21 get the par on the machine?

22 A Yes, sir.

23 Q And so once GSR has these comp percentage
24 reinvestments, it can go determine the par of these
25 machines?

H I G H L Y C O N F I D E N T I A L

1 A Yes, sir.

2 Q And you have this information. Do you
3 consider this information public?

4 A No, sir. This is -- no.

5 Q This is confidential?

6 A Yes, sir.

7 Q In fact, we've had it marked "Highly
8 Confidential."

9 A Uh-huh.

10 Q Correct?

11 A Yes, sir.

12 Q But yet the GSR has the main number with
13 which it can determine par at the Peppermill and its
14 comp reinvestment percentage?

15 A Based on Compton and Dancer's --

16 Q Report?

17 A -- report.

18 Q So you can go -- you can go know and
19 realize the pars at the Atlantis or the pars at the
20 Peppermill. Correct?

21 A Yes, sir.

22 Q All right. Now, while at the Peppermill,
23 would it be fair to say that you had a little bit of a
24 rocky existence there?

25 A I mean, I guess however you want to

H I G H L Y C O N F I D E N T I A L

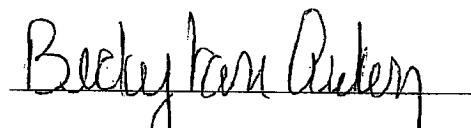
STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Thursday, April 2, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the videotaped deposition of SCOTT BEAN, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 8th day of April, 2015.


BECKY VAN AUKEN, CCR #418

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 32

EXHIBIT 32

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,)

Plaintiff,)

-vs-)

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)

Defendant(s).)

VIDEOTAPED DEPOSITION OF WILLIAM NATALE PAGANETTI

called for examination by counsel for Plaintiff pursuant to
Notice, at the offices of Robison, Belaustegui, Sharp & Low,
71 Washington Street, Reno, Nevada, at 2:30 p.m., Thursday,
April 2, 2015, before Becky Van Auken, a Certified Court
Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 Q Okay. That's it.

2
3 EXAMINATION

4
5 BY MR. ROBISON:

6 Q One question, Mr. Paganetti about your
7 ability to ascertain a par.

8 If you saw the GSR billboard advertising
9 the Buffalo at its lowest par setting, 5.28, could you
10 not then do a ratio analysis to determine what the par
11 setting was on another machine; for example, a
12 Cleopatra?

13 A I believe I could.

14 Q All you have to do is know one par.
15 Correct?

16 A I believe so.

17 Q Thank you.

18
19 EXAMINATION

20
21 BY MR. JOHNSON:

22 Q And can you be more specific how that would
23 be done, then?

24 A Yeah. Give me a little bit of time.

25 So if the billboard said lowest Buffalo pay

1 table or lowest par setting on Buffalo, you would know
2 what the par setting is; you would know what that hold
3 percentage is.

4 If I went to the Grand Sierra, played a
5 thousand dollars in coin in, the theoretical for me as
6 a player is the coin in multiplied by the par of the
7 5.28. I'd get \$52.80 in theoretical. Then I would
8 check my comps that I earned off that and I would know
9 what the comp rate is.

10 So then if I earned \$5.28 in comps, I would
11 know I had a 10 percent comp rate for that.
12 10 percent of 5280 is the \$5.28 would be the
13 10 percent comp reinvestment rate to my theoretical.

14 So if it was 10 percent, then I'd go take a
15 thousand dollars in another game, I'd put a thousand
16 dollars in coin in, I see how much did I get in comps,
17 and then I could figure out from what I got in comps
18 to what the theoretical generated from the thousand
19 coin in would have been. And then you would know that
20 that was the par of that game to get that theoretical.

21 Q And that would be on a -- like, for
22 example, your counsel said Cleopatra?

23 A I don't --

24 Q Or whatever machine you chose?

25 A I believe so, yeah.

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Thursday, April 2, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of WILLIAM NATALE PAGANETTI, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 9th day of April, 2015.



BECKY VAN AUKEN, CCR #418

EXHIBIT 33

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 33

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)

Plaintiff,)

-vs-)

PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)

Defendant(s).)

*** C O N F I D E N T I A L ***

DEPOSITION OF MICHAEL DRAEGER

(Pages 17-39)

called for examination by counsel for Defendant Peppermill
Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
the offices of Robison, Belaustegui, Sharp & Low, 71
Washington Street, Reno, Nevada, at 10:00 a.m., Monday,
October 20, 2014, before Becky Van Auken, a Certified Court
Reporter.

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

RA 02194

1 A I would say both Charles Bluth and Keith
2 Spears.

3 Q Did you see the par sheets?

4 A Only when doing my MICS compliance.

5 Q What's a MICS compliance?

6 A MICS compliance would have you verify a
7 slot machine's par sheet against its visible pay
8 tables on the machine.

9 Q So you would open up the machine yourself?

10 A No.

11 Q You would just compare the pay tables that
12 were on the screen without opening the machine?

13 A I would look at the pay table information
14 with the slot tech.

15 Q And then what would you do with the pay
16 table information?

17 A Record it on a separate sheet to be
18 compared to the par.

19 Q Okay. So the pay tables is a way to verify
20 par?

21 A Yes.

22 Q Anybody can do that with some mathematic
23 skills, correct?

24 A Yes.

25 Q So pars really aren't secret, are they?

1 STATE OF NEVADA)
2) ss.
3 COUNTY OF WASHOE)

4 I, BECKY VAN AUKEN, a Certified Court
5 Reporter in and for the County of Washoe, State of
6 Nevada, do hereby certify:

7 That on Monday, OCTOBER 20, 2014, at the
8 offices of Robison, Belaustegui, Sharp & Low, 71
9 Washington Street, Reno, Nevada, I was present and
10 took verbatim stenotype notes of the videotaped
11 deposition of MICHAEL DRAEGER, who personally appeared
12 and was duly sworn by me and was deposed in the matter
13 entitled herein; and thereafter transcribed the same
14 into typewriting as herein appears;

15 That the foregoing transcript is a full,
16 true and correct transcription of my stenotype notes
17 of said deposition.

18 Dated at Reno, Nevada, this 25th day of
19 October, 2014.

20
21 *Becky Van Auker*
22 _____
23 BECKY VAN AUKEN, CCR #418
24
25

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

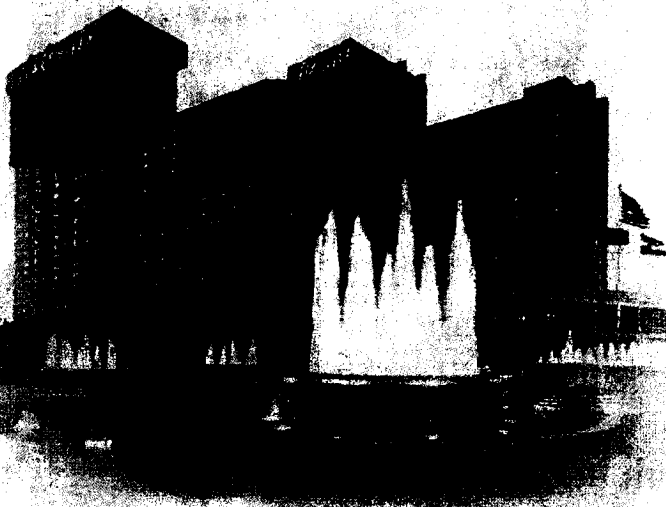
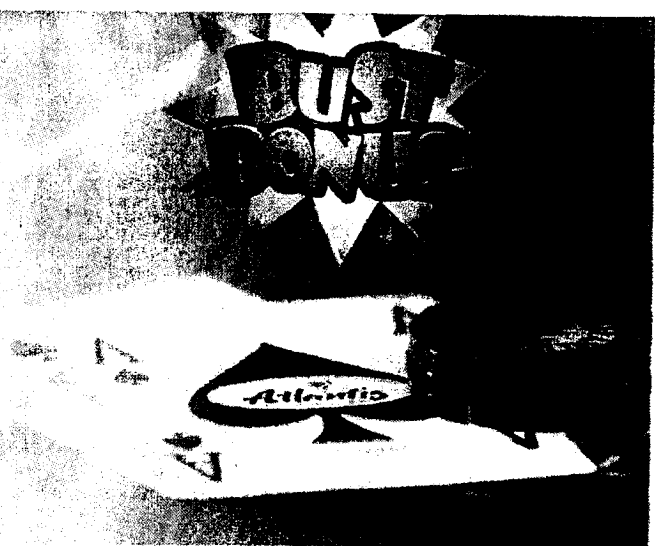
EXHIBIT 34

EXHIBIT 34



EXCLUSIVELY HERE FIRST!

Be one of the first to play Bust Bonus Blackjack, the newest and most exciting table game exclusively at Atlantis. Place your Bust Bonus bet and if the dealer busts, you win!



*Based on published Nevada Control Board figures from the previous 12 months.

TRUTH IN NUMBERS 20% Looser!†

Play the best slots in Reno. Atlantis.
We give you more value for your play.
It's a win-win proposition!

Atlantis
CASINO RESORT SPA™
every player's paradise.™

RENO GAZETTE-JOURNAL/REGISTRATION

12A • SUNDAY, AUGUST 2, 2015

14A • SUN

ATLANTIS CASINO RESORT SPA

TRUTH IN NUMBERS 20% Looser!†

Play the best slots in Reno. Atlantis.
We give you more value for your play.
It's a win-win proposition!

Bistro Napa
presents

**LAGUNITAS
BREWING COMPANY**

Brewery Dinner | Thursday, August 27th | 6 PM

*\$75 all-inclusive.
Reservations recommended.*

775.824.4411

Must be 21. Management reserves all rights.

Atlantis

CASINO RESORT SPA

every player's paradise.™

775.825.4700 | atlanticasino.com | f t s e

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 35

EXHIBIT 35



RESERVATIONS

Check In

Check Out

Adults

2



Children

0



Promo Code

CHECK AVAILABILITY

CLUB CORTEZ

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/CLUB-CORTEZ/](http://ELCORTEZHOTELCASINO.COM/GAMING/CLUB-CORTEZ/))

SLOTS

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/SLOTS/](http://ELCORTEZHOTELCASINO.COM/GAMING/SLOTS/))

TABLE GAMES

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/TABLE-GAMES/](http://ELCORTEZHOTELCASINO.COM/GAMING/TABLE-GAMES/))

SPORTS BOOK

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/SPORTS-BOOK/](http://ELCORTEZHOTELCASINO.COM/GAMING/SPORTS-BOOK/))

KENO

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/KENO/](http://ELCORTEZHOTELCASINO.COM/GAMING/KENO/))

PLAY FOR FUN

([HTTP://ELCORTEZHOTELCASINO.COM/GAMING/PLAY-FOR-FUN/](http://ELCORTEZHOTELCASINO.COM/GAMING/PLAY-FOR-FUN/))

At the El Cortez, we know there's no sound sweeter than hitting a jackpot. We have some of the loosest slots in town, and whatever your favorite kind of machine is, we have it. From exciting penny and nickel machines to \$5 machines including video poker, video keno, video reels, and multi-game machines, the El Cortez is one of the only places in Vegas where patrons can enjoy ticket or classic coin-operated machines. The El Cortez won Best Paying Slots in 2012 and Best Video Poker in 2014 in the annual Best of Las Vegas poll. **Bonus \$50 in Free Play for every jackpot of \$1,200 or more!***



**OVER 43% LOOSER
SLOTS
THAN THE LAS VEGAS STRIP**

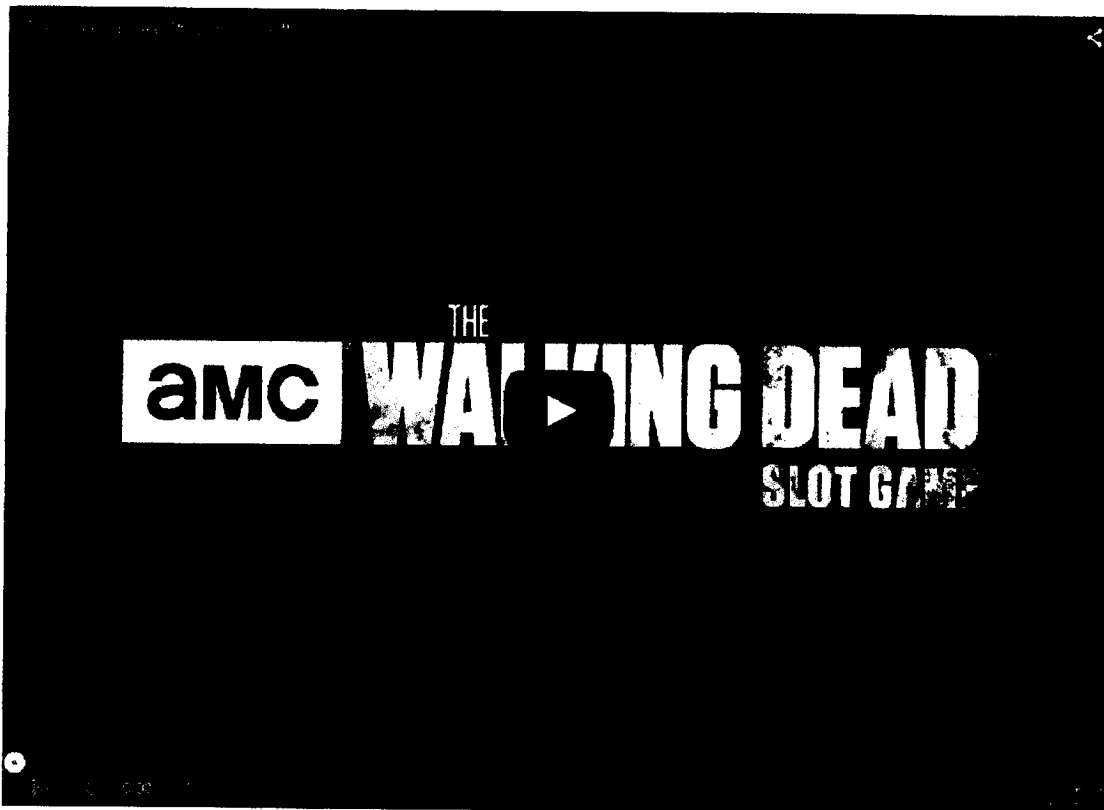
**OVER 36% LOOSER
SLOTS
THAN CLARK COUNTY AVERAGE**

PLAY ALL THE HOT NEW GAMES AT EL CORTEZ

The El Cortez features both video slots and traditional reels, as well as multiple denomination and multiple payline machines. We're always adding more games, so stop in today to play. Check out some of these new machines to hit our floor:

THE WALKING DEAD

Hit AMC show The Walking Dead has had everyone talking, and now it will have everyone winning. With exciting wheel bonuses and iconic imagery from the show, you'll always be hungry for more.



AVATAR

From the wilds of Pandora to the wilds on your reels, James Cameron's epic film comes alive in the Avatar Video Slots at the El Cortez.



FAMILY GUY

Join the whole Griffin gang in the Family Guy Video Slots at El Cortez. With classic clips from the show, crazy bonus games, and more, you'll be laughing all the way to the bank.



KING OF BLING

Party like a rock star with the King of Bling video slot from El Cortez. With seven SHOUTOUT random award events, you'll be spinning and scratching your way to the top.



*Statistics certified by CDC Gaming Reports for the 12 months ending March 31, 2015. See details at casino cage. * Must be a Club Cortez Member – [Sign Up Today \(/gaming/club-cortez/\)](http://gaming/club-cortez/)

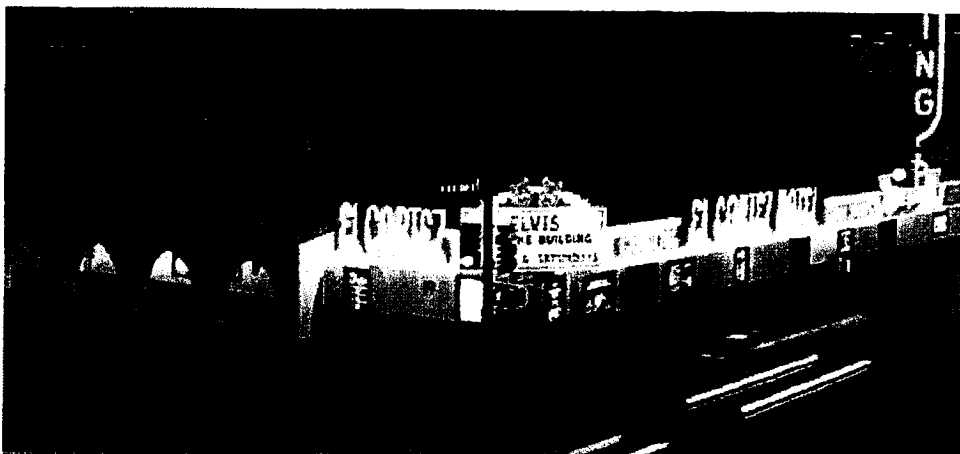


GET MAIL OFFERS ONLINE

If you've received mail within the last 90 days, you can get those offer online!

[LEARN MORE >](#)

<http://www.mycortezoffers.com>



PHONE

702 385 5200

TOLL FREE

1 800 634 6703

<http://elcortezhotelcasino.com/gaming/slots/>

8/4/2015

PM 13271

RA 02206

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 36

EXHIBIT 36

Table of Contents

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Form 10-K

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES
EXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 2011

or

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES
EXCHANGE ACT OF 1934**

For the transition period from _____ to _____

Commission file number 001-32373

LAS VEGAS SANDS CORP.

(Exact name of registrant as specified in its charter)

Nevada

(State or other jurisdiction of incorporation or organization)

27-0099920

(IRS Employer Identification No.)

**3355 Las Vegas Boulevard South
Las Vegas, Nevada**

(Address of principal executive offices)

89109

(Zip Code)

Registrant's telephone number, including area code:
(702) 414-1000

Securities registered pursuant to Section 12(b) of the Act:

Title of Each Class

Name of Each Exchange on Which Registered

Common Stock (\$0.001 par value)

New York Stock Exchange

Securities registered pursuant to Section 12(g) of the Act:
None

Indicate by check mark if the registrant is a well-known seasoned issuer, as defined in Rule 405 of the Securities Act. Yes ☒ No ☐

Indicate by check mark if the registrant is not required to file reports pursuant to Section 13 or Section 15(d) of the Act. Yes ☐ No ☒

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports); and (2) has been subject to such filing requirements for the past 90 days. Yes ☒ No ☐

Indicate by check mark whether the registrant has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T during the preceding 12 months (or for such shorter period that the registrant was required to submit and post such files). Yes ☒ No ☐

GLA does not include space that is currently under development or not on the market for lease. Base rent per square foot is the weighted average base or minimum rent charge in effect at the end of the reporting period for all tenants that would qualify to be included in occupancy. Tenant sales per square foot is the sum of reported comparable sales for the trailing 12 months divided by the comparable square footage for the same period. Only tenants that have been open for a minimum of 12 months are included in the tenant sales per square foot calculation.

Table of Contents

Year Ended December 31, 2011 Compared to the Year Ended December 31, 2010

Operating Revenues

Our net revenues consisted of the following:

	Year Ended December 31,		
	2011	2010	Percent Change
	(Dollars in thousands)		
Casino	\$ 7,437,002	\$ 5,533,088	34.4%
Rooms	1,000,035	797,499	25.4%
Food and beverage	598,823	446,558	34.1%
Mall	325,123	186,617	74.2%
Convention, retail and other	501,351	354,175	41.6%
	9,862,334	7,317,937	34.8%
Less — promotional allowances	(451,589)	(464,755)	2.8%
Total net revenues	\$ 9,410,745	\$ 6,853,182	37.3%

Consolidated net revenues were \$9.41 billion for the year ended December 31, 2011, an increase of \$2.56 billion compared to \$6.85 billion for the year ended December 31, 2010. The increase in net revenues was primarily driven by a \$1.66 billion increase from the progressive opening of the Marina Bay Sands, as well a \$719.2 million increase across all of our Macao operations and a \$111.5 million increase at our Las Vegas Operating Properties.

Casino revenues increased \$1.90 billion compared to the year ended December 31, 2010. The increase was primarily due to a \$1.30 billion increase at the Marina Bay Sands and a \$576.5 million increase at our Macao operations, primarily driven by an increase in Rolling Chip volume. The following table summarizes the results of our casino activity:

	Year Ended December 31,		
	2011	2010	Change
	(Dollars in thousands)		
Macao Operations:			
<i>The Venetian Macao</i>			
Total casino revenues	\$ 2,430,144	\$ 2,086,668	16.5%
Non-Rolling Chip drop	\$ 4,178,865	\$ 3,737,693	11.8%
Non-Rolling Chip win percentage	27.3%	26.2%	1.1pts
Rolling Chip volume	\$ 52,016,771	\$ 42,650,092	22.0%
Rolling Chip win percentage	2.95%	3.07%	(0.12)pts
Slot handle	\$ 3,564,612	\$ 2,926,606	21.8%
Slot hold percentage	6.4%	7.1%	(0.7)pts
<i>Sands Macao</i>			
Total casino revenues	\$ 1,251,084	\$ 1,168,117	7.1%
Non-Rolling Chip drop	\$ 2,811,966	\$ 2,512,122	11.9%
Non-Rolling Chip win percentage	20.5%	20.3%	0.2pts
Rolling Chip volume	\$ 31,537,280	\$ 27,415,476	15.0%
Rolling Chip win percentage	2.79%	3.06%	(0.27)pts
Slot handle	\$ 2,055,911	\$ 1,599,199	28.6%
Slot hold percentage	5.5%	5.9%	(0.4)pts

Four Seasons Macao

Total casino revenues	\$ 583,476	\$ 433,424	34.6%
Non-Rolling Chip drop	\$ 388,290	\$ 391,554	(0.8)%
Non-Rolling Chip win percentage	40.3%	29.0%	11.3pts
Rolling Chip volume	\$ 18,983,716	\$ 17,890,832	6.1%
Rolling Chip win percentage	2.88%	2.56%	0.32pts
Slot handle	\$ 833,525	\$ 510,392	63.3%
Slot hold percentage	5.7%	5.9%	(0.2)pts

Singapore Operations:**Marina Bay Sands**

Total casino revenues	\$ 2,364,922	\$ 1,062,386	122.6%
Non-Rolling Chip drop	\$ 4,445,232	\$ 2,372,451	87.4%
Non-Rolling Chip win percentage	23.0%	22.2%	0.8pts
Rolling Chip volume	\$ 49,843,694	\$ 22,277,677	123.7%
Rolling Chip win percentage	2.88%	2.74%	0.14pts
Slot handle	\$ 9,959,670	\$ 3,676,402	170.9%
Slot hold percentage	5.3%	5.8%	(0.5)pts

U.S. Operations:**Las Vegas Operating Properties**

Total casino revenues	\$ 430,758	\$ 496,637	(13.3)%
Table games drop	\$ 1,967,258	\$ 1,904,004	3.3%
Table games win percentage	17.9%	18.8%	(0.9)pts
Slot handle	\$ 1,829,923	\$ 2,549,722	(28.2)%
Slot hold percentage	8.7%	7.9%	0.8pts

Sands Bethlehem

Total casino revenues	\$ 376,618	\$ 285,856	31.8%
Table games drop	\$ 653,203	\$ 174,587	274.1%
Table games win percentage	14.8%	13.9%	0.9pts
Slot handle	\$ 3,773,734	\$ 3,644,250	3.6%
Slot hold percentage	7.2%	7.1%	0.1pts

Table of Contents

In our experience, average win percentages remain steady when measured over extended periods of time, but can vary considerably within shorter time periods as a result of the statistical variances that are associated with games of chance in which large amounts are wagered.

Room revenues increased \$202.5 million compared to the year ended December 31, 2010. The increase in room revenues was primarily due to a \$169.9 million increase at the Marina Bay Sands, as well as increases at The Venetian Macao, Four Seasons Macao and at our Las Vegas Operating Properties driven by an increase in average daily room rates. The hotel tower at Sands Bethlehem opened in May 2011. The suites at Sands Macao are primarily provided to casino patrons on a complimentary basis. The following table summarizes the results of our room activity:

	Year Ended December 31,		
	2011	2010	Change
	(Room revenues in thousands)		
Macao Operations:			
The Venetian Macao			
Total room revenues	\$ 220,116	\$ 199,277	10.5%
Occupancy rate	91.4%	90.9%	0.5pts
Average daily room rate	\$ 232	\$ 213	8.9%
Revenue per available room	\$ 212	\$ 194	9.3%
Sands Macao			
Total room revenues	\$ 23,820	\$ 24,495	(2.8)%
Occupancy rate	90.5%	93.2%	(2.7)pts

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 37

EXHIBIT 37

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

1700
COHEN-JOHNSON, LLC
H. STAN JOHNSON, ESQ.
Nevada Bar No. 00265
sjohnson@cohenjohnson.com
TERRY KINNALLY, ESQ.
Nevada Bar No. 6379
tkinnally@cohenjohnson.com
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
Telephone: (702) 823-3500
Facsimile: (702) 823-3400
Attorneys for MEI-GSR Holdings, LLC.,
d/b/a GRAND SIERRA RESORT

IN ASSOCIATION WITH

LAW OFFICES OF MARK WRAY
MARK WRAY, ESQ.
Nevada Bar No.: 4425
608 Lander Street
Reno, Nevada 89509
Telephone: (775) 348-8877
Facsimile: (775) 348-8351
Attorney for MEI-GSR Holdings, LLC. d/b/a
Grand Sierra Resort

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,

Plaintiff,

v.

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;
RYAN TORS, an individual; JOHN DOES I-X
and JANE DOES I-X; and ABC
CORPORATIONS I-X,

Defendants.

Case No.: CV13-01704

Dept. No.: B7

BUSINESS COURT DOCKET

PLAINTIFF MEI-GSR HOLDINGS LLC. A NEVADA CORPORATION d/b/a/GRAND
SIERRA RESORTS DISCLOSURE OF EXPERT WITNESSES

1 Plaintiff GRAND SIERRA RESORT ("GSR"), by and through its counsel of record,
2 Cohen-Johnson, LLC, hereby submits and identifies its expert witnesses and discloses the expert
3 report pursuant to NRCP 16.1(a)(2) in this matter as follows:

4 **I. EXPERT WITNESSES**

5 A. Jeremy A. Aguero
6 Principal Analyst
7 Applied Analysis
8 6385 S. Rainbow Blvd., Suite 105
9 Las Vegas, Nevada 89118

10 Jeremy Aguero is expected to testify regarding his opinion in this matter in regards to
11 damages in accordance with his affidavit attached hereto as Exhibit A (Bates Stamped GSR
12 17,998 – GSR 17,999) in lieu of report due to the failure of Defendant Peppermill Casino to
13 provide documents requested in this case. Upon receipt of the requested information a full expert
14 report prepared by Applied Analysis, including opinions, data and any other information
15 considered in forming said report and opinions, his professional qualifications, and any other
16 related matters will be produced.

17 Attached hereto is Mr. Aguero Curriculum Vitae and his testimonial history attached
18 hereto as Exhibit B and Bates Stamped GSR 18,000 – GSR 18,018

19 Plaintiff reserves the right to supplement this disclosure as further investigation and
20 discovery may reveal additional information.

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

AFFIRMATION

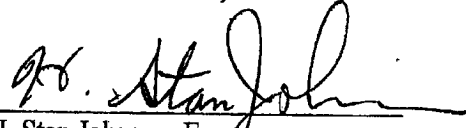
Pursuant to NRS 239B.030

The undersigned does hereby affirm that this document does not contain the social security number of any person.

Dated this 2nd day of March, 2015

COHEN-JOHNSON, LLC

By:


H. Stan Johnson, Esq.
Nevada Bar No. 00265
Terry Kinnally, Esq.
Nevada Bar No 06379
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
Attorneys for Plaintiff

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

INDEX OF EXHIBITS

Exhibits	Description	Pages
1	Affidavit of Jeremy Aguero	3
2	Curriculum Vitae of Jeremy A. Aguero	20

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of COHEN|JOHNSON, LLC., and that on this date I caused to be served a true and correct copy of the **PLAINTIFF MEI-GSR HOLDINGS LLC. A NEVADA CORPORATION d/b/a/GRAND SIERRA RESORTS DISCLOSURE OF EXPERT WITNESSES** on all the parties to this action by the method(s) indicated below:

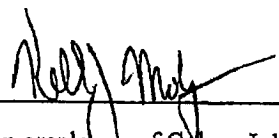
 x by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States Mail, Las Vegas, Nevada and addressed to:

ROBISON, BELAUSTEGUI, SHARP & LOW
C/o Kent R. Robison, Esq.
71 Washington Street
Reno, Nevada 89503
Attorney for the Defendant Peppermill

GUNDERSON LAW FIRM
C/o Mark H. Gunderson, Esq.
3895 Warren Way
Reno, Nevada 89509
Attorney for Defendant Ryan Tors

 by using the Court's CM/ECF Electronic Notification System addressed to:
 x by electronic email addressed to the above:
 by personal or hand/delivery addressed to:
 By facsimile (fax) addresses to:
 by Federal Express/UPS or other overnight delivery addressed to:

DATED the 2nd day of March, 2015.



An employee of Cohen-Johnson, LLC

FILED
Electronically
2015-03-02 04:51:14 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 4841113 : mpurdy

Exhibit “1”

Exhibit “1”

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

AFFIDAVIT OF JEREMY AGUERO,

I, Jeremy Aguero, being duly sworn on oath and under the penalty of perjury state that the following is true of my own personal knowledge and if called to testify in this matter would testify as follows:

1. I am a Principal Analyst with Applied Analysis. My CV is attached hereto and incorporated herein as to my credentials.
2. I have been retained to offer expert testimony in the case of GSR v. Peppermill on the subject of damages sustained by GSR as a result of the conduct of Peppermill and Ryan Tors in the unauthorized keying of GSR's slot machines and the taking of par information.
3. I will testify that GSR is seeking damages based on multiple damages theories including a royalty theory based on the value of the misappropriated trade secrets to Peppermill and the economic benefit obtained by Peppermill in not incurring the costs of obtaining such information by legal means, as well as the value of the competitive advantage obtained by Peppermill from this information.
4. To determine the amount of these damages, it is necessary for me to know and/or obtain:
 - A) The slot performance reports generated by the Peppermill as required by the State of Nevada Gaming Control Board Minimum Internal Control Standards (MICS) Sections 116 through 125 inclusive. This data should be provided in daily format for all slot machines individually and with the required summaries for ten years if possible but in no case less than the five-year retention period required by Gaming Control Board Regulation 6.060 and referenced in MICS Section 212.
 - B) A detailed summary of the Peppermill's advertising, marketing and promotional programs going back ten years where possible and including:
 1. Sample copy of all print, radio and Internet-based advertising programs;
 2. Advertising budgets, by media type, by period, including any outside agency cost;
 3. All internal or external analyses of program effectiveness, return-on-investment analyses or other similar studies related to advertising, marketing, or promotional programs;
 4. A detailed report of all slot contests/tournaments including any internal or external analyses of program effectiveness, return-on-investment analyses or other similar studies relating to slot contests/tournaments from at least January 1, 2009, or earlier where possible, through the present;

GSR17998

RA 02218

5. A detailed report of all player promotions offered including any internal or external analyses of program effectiveness, return-on-investment analyses or other similar studies relating to slot contests/tournaments;

6. A copy of the Peppermill's customer loyalty programs, including without limitation, Peppermill's Passport Rewards Club (PRC) including:

- a) How the club is structured;
- b) Any changes to the PRC or any similar or related customer loyalty program offered by the Peppermill during the period of January 1, 2009 through the present;
- c) Any internal or external analysis of loyalty program effectiveness, return on investment analyses or other similar studies relating to Peppermill's customer loyalty programs.

As of the present date Peppermill has not provided this information which is necessary for me to complete my analysis and report. Once this information has been received I shall prepare my expert report setting forth my expert opinion as to the calculation of damages in this matter.

Affirmation Pursuant to NRS 239B.030

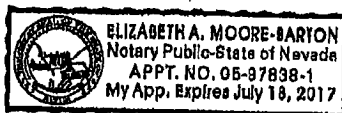
The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Further your Affiant sayeth naught.


Jeremy Aguero.

SUBSCRIBED and SWORN to before
me this 27th day of February, 2015.


NOTARY PUBLIC in and for said
County and State



GSR17999

RA 02219

FILED
Electronically
2015-03-02 04:51:14 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 4841113 : mpurdy

Exhibit “2”

Exhibit “2”

EXPERT WITNESS CREDENTIALS — JEREMY A. AGUIERO

PROFESSIONAL AND BUSINESS HISTORY

Principal Analyst

Applied Analysis, June 1997-Present
Las Vegas, Nevada

Market Analyst/Intern

Coopers & Lybrand L.L.P., January 1996-June 1997, Financial Advisory Services Group
Las Vegas, Nevada

EDUCATION

Juris Doctorate, 2004

William S. Boyd School of Law

Cum Laude, Dean's Graduation Award

- ◆ CALI Awards: (4)
- ◆ Lead a team of students who introduced and passed legislation in 2003, which clarified a conflict in a provision of the Nevada Revised Statutes as it relates to lottery payouts.
- ◆ Commerce Clause Limitations & Nevada's Tax Debate of 2003, A Review and Analysis
(Recommended for submission to the Tannenwald Competition), 2003
- ◆ Keeping Pace with Technology: The Issue of State and Local Taxation of Internet Sales, 2003
- ◆ State and Local Taxation of Securitizations, 2003

Bachelor's Degree, Hotel Administration, 1997

University of Nevada, Las Vegas

Cum Laude, Wm. M. Weinberger Graduate Award

- ◆ Undertook a special course of study under the direction of Dr. Shannon Bybee focusing on economics, finance, impact analysis and market analysis
- ◆ Elected Student Senate Representative, 1995 & 1996
- ◆ Student Association, Executive Board, 1995 & 1996
- ◆ Organized and led a team of students that drafted and adopted organizational constitution and bylaws

SELECTED PROJECT EXPERIENCE

- Retained by the City of Las Vegas to review and analyze foreclosure trends throughout southern Nevada. The comprehensive analysis considers foreclosure volumes, pre-foreclosure activities and the disposition of foreclosed properties.

- Retained by Pisanelli Bice as an expert witness for the defendant in a case involving the temporary suspension of construction and evolving economic conditions in a dispute between a development company and national home builder. AA was asked to review and comment on changing economic conditions.
- Retained by the State Bar of Nevada to develop and evaluate financial strategies related to the disposition and potential acquisition of real property. In connection with this analysis, AA was also asked to evaluate the southern Nevada economy and commercial real estate sector relative to project feasibility.
- Retained by Boles, Schiller & Flexner as an expert witness for the defendant in a case involving a loan agreement between Plainfield Specialty Holdings II and VV Ventures Operations. AA was asked to determine whether a material adverse effect had occurred in the context of whether funding of the loan should continue and to review aspects related to the viability of the project.
- Retained by the Regional Transportation Commission of Southern Nevada to review the reasonableness of the best and final offers submitted by Veolia Transportation and First Transit for fixed route services in southern Nevada. Analysis was used in the Regional Transportation Commission's determination in awarding the service contract valued at more than \$600 million. Notably, AA was originally contacted by both Veolia Transportation and First Transit to analyze the reasonableness of the offers on their behalf. Both parties agreed to allow us to review the contract for the Regional Transportation Commission as an independent and objective third party.
- Retained by Zuffa, Inc., the parent company of the Ultimate Fighting Championship (UFC), to undertake a series of pre-and post-event economic and fiscal impact studies. These studies have been completed not only for the UFC's Las Vegas-based events but also for events throughout the United States, in Canada, Mexico, Brazil, Australia, Germany, and other host jurisdictions around the world.
- Retained by Station Casinos to review and monitor economic activities in southern Nevada on a monthly basis. AA has also prepared a number of presentations and analyses for Station Casinos relative to the projection of key demand variables, geographic concentrations of foreclosure activity, various forms of measuring inflation, the impact of rising gasoline prices, and economic trends in other markets throughout the United States.
- Retained by Coyote Springs Renewable Ventures to explore labor supply-demand considerations under existing market dynamics (at the time, southern Nevada had a 15-percent unemployment rate) as well as to develop a cost-benefit analysis for development of a wind turbine manufacturing plant at the Coyote Springs site.
- AA was retained by Steer Davies Gleave to develop a range of projection scenarios for southern Nevada's tourism industry to assist the company in evaluating the market potential of a high-speed rail service between Las Vegas and southern California.

- Retained by the City of Henderson to review and analyze the economic and fiscal impacts of the legislation during the 2011 Regular Session of the Nevada State Legislature. The focus of AA's effort was specific to legislation with the potential to impact local governments.
- Retained by BrightSource Energy to review and analyze the economic and fiscal impacts associated with the development of a utility-scale solar energy generation facility located in both Nevada and California.
- Retained by Starwood Capital Group to research and analyze macro and micro economic conditions potentially impacting a select set of gaming properties in the southern Nevada market.
- Retained by Odyssey Real Estate Capital and Lone Star Investments to provide a general overview of Las Vegas market conditions, as well as how southern Nevada is positioned relative to a post-recessionary recovery and longer-term growth.
- Retained to identify and review the most favorable locations to site a number of Steak 'n Shake restaurants in the southern Nevada region.
- Retained by the Nevada Insurance Council to review and analyze the potential impacts of proposed legislation that would have disallowed consideration of credit scores in pricing insurance coverage. Our analysis reviewed the impact of similar initiatives in other areas of the United States and compiled impact data from state insurers covering more than 70 percent of the insured population.
- Retained by Boyd Gaming Corporation to review and analyze economic conditions in the southern Nevada market and to prepare a series of projections relative to population, employment, income and local gross gaming win. Projections were presented to the company's top management and its board of directors.
- Retained by Big Traffic Mass Media to review, analyze, compare and contrast the reach of mobile billboard advertising as compared to other forms of outdoor advertising.
- Retained by Pisanelli Bice as an expert witness for the defendant in a case involving changes to Mandalay Bay that a tenant claimed adversely affected their restaurant and nightclub operations. AA was asked to review economic conditions, the classification of key property elements, and to overview the history of nightclub openings and closings within the southern Nevada tourism market.
- Worked jointly with the Nevada Secretary of State's office to analyze business filing data as a leading indicator of Nevada's economic activity. Our analysis ultimately led to the development of the *Quarterly Economic & Business Activity Report* released by Secretary Miller.



- Retained by Herrah's Entertainment Inc. (now Caesar's Entertainment, Inc.) to prepare a fiscal and economic impact statement for the development of an arena along the Las Vegas Strip. The analysis included a survey of consumer sentiment relative to various alternative funding strategies as well as an estimate of incremental retail sales and use tax yields within the resort corridor.
- Retained by the Regional Transportation Commission of Southern Nevada to evaluate the potential economic and fiscal impact of indexing Clark County's fuel tax to the Consumer Price Index. The analysis included an analysis of the impacts on the RTC's operations as well as the impacts on various consumer groups.
- AA was retained by Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP as an expert witness for the plaintiffs in a case brought against Platinum Hotel. AA was asked to review various claims and representations made to investors by the developer.
- Retained by Southern California Edison and Lewis & Roca to estimate the economic and fiscal impacts associated with the development of approximately 35 miles of electricity transmission lines and related facilities in the southern portions of California and Nevada; the project is known as the Eldorado-Ivanpah Transmission Project.
- Retained by Kemp Jones as an expert witness for the defense in a case brought against Scott Financial Services regarding a non-performing investment in the now defunct Manhattan West project. AA was asked to review market conditions underlying the credit display.
- Retained by Pinnacle Homes to evaluate the potential costs and benefits of implementation of a sprinkler requirement for one and two family homes in Clark County, Nevada.
- Retained by the Las Vegas Convention and Visitors Authority to review and analyze the economic impacts associated with its various operations and southern Nevada's tourism industry generally. Reports have included the impact of LVCVA operations on the community, visitors' tax contribution, major tax payments by hotel casino operations, advertising and marketing program return on investment analyses, fiscal contribution to school and road construction programs, the relative dependence of the economy on tourism activities, trends in international visitation and other similar topics. AA also prepares a quarterly national economic briefing and tracks sector trends on behalf of the LVCVA.
- Retained by the Nevada Housing Division to evaluate the market potential for two proposed mixed-use, multi-family projects in the southern Nevada area. Other elements of the projects analyzed included limited retail, daycare facilities or other ancillary uses in support of the primary residential element.
- Retained by Herbst Gaming, Inc. (now Affinity Gaming, Inc.) to conduct primary market research on consumer activities for its Primm Valley Casinos. The analysis included a number of surveys of existing clients, lost clients and those travelling over Interstate 15.

- Retained by a company seeking to provide taxi services in Reno and Sparks Nevada to evaluate competitive concentrations relative to the requirements of Nevada Revised Statutes 706.8827; and where possible, to gauge the depth of the market and to identify potentially underserved segments. AA was also asked to review the operator's financial pro formas and other budget documents to develop conclusions relative to the market growth necessary to make the operator profitable.
- Retained by Cox Communications to review and analyze market conditions in southern Nevada and to prepare a presentation to be delivered to the company's key staff and management on key trends with the potential to impact service demand.
- Retained by Chapman Law Firm as an advisor and potential expert witness in land condemnation and eminent domain actions in Clark County, Nevada.
- Retained by Presidential Suites to evaluate alternative strategies for the company's Las Vegas real property holdings in light of current realities and expected market conditions. Essentially a highest and best use analysis, AA reviewed the potential marketability and financial productivity of multiple alternative uses for two parcels.
- Retained by the Associated General Contractors to review, analyze and monitor economic conditions impacting the construction and development industries. AA produces a quarterly economic briefing for the AGC that is routinely distributed to the AGC's members, the media and state and local elected officials.
- Retained by the City of Las Vegas Office of Business Development, Redevelopment Division to review and analyze the economic and fiscal impact associated with the development of the Las Vegas Museum of Organized Crime and Law Enforcement.
- Retained by the Regional Transportation Commission of Southern Nevada to evaluate the impacts of traffic congestion into and out of Boulder City, resulting from changes in traffic patterns after the opening of the Mike O'Callaghan - Pat Tillman Memorial Bridge. The analysis included a survey of local businesses and included a calculation of the value of drive-in visitor traffic primarily originating from feeder markets in Phoenix, Arizona.
- AA was retained by Holland & Hart, LLP as an expert witness for the plaintiff in a case involving Wells Fargo Bank's financing of a commercial retail development located at the southwest corner of Blue Diamond Road and Buffalo Drive at the Mountain's Edge master-planned community in the southwest portion of the Las Vegas valley; the project has been known as "The Edge." AA was asked to review and analyze the reasonableness of the project's development plan, given present economic realities.
- Retained by the Las Vegas Valley Water District to review and analyze changes in economic conditions and to project connection charges sourced to new development activity.



- Retained by Coyote Springs Investment to review the economic and fiscal impacts associated with the development of a 21,142 acre master planned community, located in Clark and Lincoln County, Nevada. This analysis was updated several times and used for multiple reasons, including, without limitation, a hearing on water resource allocation before the Nevada State Engineer.
- Retained by the Nevada Resort Association to summarize the economic and fiscal impacts of Nevada's tourism industry. AA routinely updates the Association's website and its materials.
- Retained by the Las Vegas Chamber of Commerce to review, analyze and report on Nevada's education system, including a comparative analysis of student performance, the identification of statistically significant factors in predicting student academic success, operating and capital funding levels, and alternative legislative strategies. The analyses were used by the Chamber, as well as the Nevada State Legislature, in developing education reform strategies during the 2011 Legislative Session.
- Retained by King Midas World Entertainment to review and analyze the potential market for a US play-for-fun and Italian-based casino gaming website based on the theme and characters of the book *The Seven Sins: The Tyrant Ascending*.
- Retained by the Clark County School District to review economic, fiscal and policy issues' potential impact on the state's schools.
- Retained by the Clark County Flood Control District to review, analyze and quantify the potential economic impacts associated with the District's long-term construction master plan.
- Retained by the Capitol Company to review and analyze the potential impact of legislation and initiatives in the state of Nevada.
- Prepared a series of presentations, reports and analyses for a Nevada-based community bank on national, regional, state and local economic conditions. Presentations were prepared and delivered monthly to bank staff with ad hoc analyses on specific economic and real estate related issues.
- Retained by the Las Vegas Chamber of Commerce to review financial disclosures required of local governments by Nevada Revised Statute 288 after creating or modifying collectively bargained labor agreements.
- Retained by General Moly, Inc. and Gallatin Public Affairs to obtain primary research data on residents' perceptions of General Moly and its proposed Mt. Hope Mine. The Mt. Hope Mine is located in Eureka County, Nevada.

- Retained jointly with Hobbs, Ong and Association by the Nevada System of Higher Education to review cost-savings initiatives sourced to internal service departments.
- Retained by the Picerne Group to review, analyze and monitor supply and demand trends for multi-family residential products in both southern Nevada and the Phoenix metropolitan area.
- Worked cooperatively with Opportunity Village, a local non-profit organization that provides care and work opportunities for those with mental disabilities, to develop an economic and fiscal impact statement for the organization's operations. The analysis, which is used routinely by the organization, demonstrates that the organization not only provides hundreds of jobs for people who would not otherwise have them, but also saves the state more than \$10 million annually in reduced public service costs.
- Retained by the Building Jobs Coalition to identify and analyze potential economic development strategies. AA ultimately produced a report entitled *Creating 100,000 Nevada Jobs* as well as a website that summarized the key findings of our review and analysis. The report was used by the Coalition in revising the Nevada's economic development policies.
- Retained as part of a consultant team asked to review and provide recommendations to restructure Washoe County internal service department functions.
- Retained by the City of Henderson to prepare an economic and fiscal impact analysis pursuant to Nevada's Community Redevelopment Law (NRS 279.573 et seq). The update was required due to changes in the local economy that necessitated a reevaluation all of its land planning efforts, including those such as the Cornerstone Redevelopment Area.
- Retained by the Silverton Hotel and Casino to review and analyze the local market relative to the potential acquisition of the neighborhood casino hotel in southern Nevada.
- Retained by the Retail Association of Nevada to review, analyze and monitor retail trends throughout the state of Nevada. This analysis has produced a number of reports on key consumer spending and retail business trends. AA also prepared a number of comparative analyses on economic trends for the Association as well as a report on the potential impacts of legislation seeking to change Nevada's affiliate nexus laws relative to required collection of sales tax by some Internet based retailers.
- Retained by Rational Services Limited, a subsidiary of PokerStars, to review and analyze the economic and fiscal impacts of legalizing Internet Poker in the State of Nevada. Our analysis was delivered to the Nevada State Legislature during its 2011 Session.
- Retained by American Medical Response and MedicWest ambulance to review and analyze the economic impacts associated with emergency medical services in the southern Nevada region.

- Retained by Gordon Silver and the Tavern Owners Association to review and analyze the economic and fiscal impacts of the Nevada Clean Indoor Air Act.
- Retained by the Nevada Development Authority to review, analyze and monitor the economic and fiscal impacts of Nevada's economic development policies and the initiatives undertaken by the Authority. The results of our analyses include a quarterly economic development tracking brief as well as in-depth presentations prepared for the Nevada State Legislature in both 2009 and 2011.
- Retained by Wynn Las Vegas to review and analyze the economic and fiscal impact of various legislative initiatives.
- Managed a team of analysts in support of Clark County's Community Growth Task Force. The Task Force met for one-year and was charged with the review of growth-related issues in Southern Nevada and to develop a series of recommendations on how growth might be most efficiently managed into the foreseeable future. AA was tasked with a review of underlying economic issues as well as a series of benefit-cost analyses for high-priority strategies. In addition, a Community Indicators Program was also created by AA in support of the Task Force efforts.
- Expert witness for the defense in a dispute involving the Conrad-Majestic hotel/condominium project in Las Vegas, Nevada. Specifically, AA was retained to review and analyze historical and current market conditions relating to the absorption and pricing of luxury condominiums in the Las Vegas market.
- Developed and analyzed alternative property tax modifications on behalf of the Nevada State Legislature and Office of the Nevada Governor. Project included the compilation of parcel-level data (i.e., just over one million parcels) for Nevada's 17 counties and the development of an econometric model that allowed for real-time "what-if" scenario analysis. AA's model was used to compare and contrast the fiscal and economic impact of several hundred alternative proposals.
- Selected to chair the Governor's Task Force on Tax Policy Technical Working Group. In doing so, served as the principal analyst for the Task Force and co-authored its 1,200-page report. The Task Force reviewed Nevada's economy and its fiscal system as well as developed a series of recommendations aimed at addressing the state's long-run revenue-expenditure imbalance. The Task Force's report has been called the most comprehensive study of Nevada's fiscal system in the State's history.
- Prepared a review of the economic, fiscal, and social impacts that the hospitality industry has on the State of Nevada. This review included consideration of direct and indirect employment, wage, and output impacts. The project also required an in-depth analysis of Nevada's municipal revenue and expense structure. State, county, and local taxes were analyzed, and the hospitality industry's contribution estimated. Social impact factors reviewed included population growth, employment and unemployment, public service costs, social



assistance programs, crime rate, and underage and problem gambling. In addition, the evolution of the gaming and hospitality industry, Nevada's regulatory structure, and current market indicators were also reviewed.

- Expert witness for the defense in a dispute involving the sale of the property upon which the Krystle Towers project was to be built. Specifically, AA was retained to review and analyze historical and current market conditions relating to the absorption and pricing of luxury condominium units in the Las Vegas market.
- Retained by the Las Vegas Chamber of Commerce to review, analyze and report on fiscal issues affecting the state of Nevada. Analyses included a detailed review of public employee wages and salaries, Nevada's Public Employee Retirement System, post-retirement health care, and various budgeting policies. The analyses were used by the Chamber as well as the Nevada State Legislature in making significant reforms to public employee benefits in 2009 and 2011.
- Retained by MedixWest Ambulance to compare and contrast public sector and private sector ambulance service costs. The analysis was ultimately used by MedixWest to put down an initiative by the North Las Vegas Fire Department that would have diverted a number of emergency medical transports from MedixWest to the fire department as a revenue generating measure.
- Retained by the Large-scale Solar Association to provide a comparative analysis of potential tax burdens for a prototypical 100-megawatt, utility scale solar facility in Nevada, Arizona and California. Analysis presented to the 2009 Session of the Nevada State Legislature and used in developing the state's abatement strategy.
- Retained as part of a team of business and community leaders opposed to the passage of the Tax and Spending Control for Nevada Initiative ("TASC"). Analysis included a review of the potential implications of the Initiative as well as a comparative analysis of alternative versions that were circulated. This analysis was introduced in the state court hearings on the matter and was utilized by the Nevada Supreme Court in finding that TASC should be removed from the November 2008 ballot.
- Retained by Bailey Kennedy and Aspen Financial as an expert witness for the defendant in a case involving the performance of various real estate investments within the southern Nevada market. AA was asked to review and comment on changing market conditions.
- Retained by Ballard Spahr, LLP as an expert witness for the defendant in a case involving a loan agreement between Lehman Brothers and Trimont Real Estate Advisor. AA was asked to review and comment on tourism sector conditions and the viability of a project that proposed to acquire and renovate the Atrium Suites Las Vegas Hotel.
- Retained by the City of Las Vegas to evaluate the economic and fiscal impacts of its redevelopment area activities. Analysis was used by the City and the Nevada State Legislature in revising Nevada's redevelopment laws as they relate to the distribution of tax revenue during the 2009 Session of the Nevada Legislature.

- Expert witness for St. Mary's Hospital in its dispute against Renown Medical relating to unfair business practices in the northern Nevada hospital market. Analysis considered historical contract requirements, definition of the relevant competitive market and mathematical analyses of market concentration.
- Retained by the Association General Contractors to review and analyze the economic and fiscal impacts of construction programs in the state of Nevada. The analysis has been used by the Association and Legislature to help preserve construction and even accelerate some capital construction programs for roads (see, Senate Bill 5, 26th Special Session of the Nevada State Legislature).
- Retained as an expert witness by Coyote Springs Investment, LLC in its petition to move water between major basins in Nevada. Analysis required a review and comparative analysis of the economic benefits of water use.
- Obtained, analyzed and reported market-based data in support of filings required in the acquisition of the Mandalay Bay Resorts by MGM MIRAGE. This included a review and analysis of supply and demand characteristics, an extensive inventory of existing and future development locally, regionally and nationally, and a comparative analysis of performance-based statistics.
- Retained by the City of North Las Vegas to evaluate gaming market concentration issues. Specifically, the analysis considered current and projected development of restricted and non-restricted gaming licenses relative to demand growth in the region.
- Acted as the lead economic and fiscal analyst in support of the Las Vegas Convention and Visitors Authority's \$737-million facility enhancement program. This included a comprehensive market analysis, internal and external return on investment calculations and the development of a performance measurement model. In January 2006, the Convention Center Board unanimously approved the enhancement program.
- Retained by Credit Suisse First Boston to prepare a review and analysis of market conditions in Clark County, Nevada. Analysis included a review of supply and demand conditions in the single family and multi-family residential markets as well as the office, industrial, retail, and vacant land markets. Also included economic modeling of anticipated future performance and identification of areas of opportunity.
- Managed preparation of a regional demographic snapshot on behalf of the Clark County Department of Child and Family Services. The analysis included a detailed review and analysis of economic factors impacting demand for government programs as well as a review and analysis of the department's service array.
- Retained by Snell & Wilmer to analyze competitive market issues relating to taxi cabs in the Las Vegas market. Specifically, an equilibrium model was constructed, projecting supply and demand based on a projection of underlying land use development. The objective of the analysis was to determine if the expansion of one

company would adversely impact either existing operators or the level of service in that company's primary trade area.

- Managed the review and analysis of several market feasibility analyses for developments ranging from high-rise condominiums to retail centers. Analysis included a review and analysis of supply and demand trends and well as competitive profiling and site-related analyses.
- Prepared a review and analysis of housing affordability issues on behalf of the Southern Nevada Homebuilders Association. Analysis included a review of housing affordability issues as well as price stability and market sustainability. Report was ultimately delivered to the Nevada State Legislature's interim committee on housing affordability.
- Retained by Clark County, Nevada to provide expert testimony relating to economic conditions and cost of living escalation factors in the County's arbitration with the Police Protective Association.
- Prepared a review and analysis of residential and commercial development indicators for a private equity/investment firm seeking to acquire a construction materials company in southern Nevada. This analysis included a review of historical trends as well as a 10-year projection of development activity. It also included a review and analysis of major project activity.
- Retained by the California Ambulance Association to review and analyze market conditions, economic and fiscal, impacting the state's emergency medical transport service providers. This analysis included a survey of selected providers and a report detailing challenges facing the industry.
- Prepared an economic, fiscal and community impact statement on behalf of the Nevada Cancer Institute. The analysis considered the economic, fiscal and social benefits to the community of providing comprehensive cancer care in Nevada. It also considered the impacts of medical service provider co-location and industry clustering.
- Prepared a portion of the economic impact statement for Southern Nevada Regional Transportation Commission, relative to the local government portion of the Las Vegas Monorail Project. This study included a detailed review of existing and future land use conditions for 1/2 and 1/4-mile rings around each proposed monorail station. Existing and future land uses were then translated into jobs, wages and business output. The before and after conditions were compared to identify the project's economic impact.
- Selected as part of a consultant team asked to analyze the potential fiscal, economic and social impacts of a growth interruption in Southern Nevada. This analysis required a documentation of the state and regional economy and projections at various levels of potential impact. It also required the coordination of regional and national panels of economic experts as well as a local working group of government administrators. The



results of our analysis were delivered to various public bodies including Clark County's Regional Planning Commission and the State Engineer.

- Prepared a comprehensive market analyses for a number of development/ redevelopment alternatives for a resident-oriented gaming operator in Nevada. Project considered the demographics of the primary trade area, likely capture rates, site characteristics, and a potential service array.
- Selected as part of a consultant team asked to estimate the economic and fiscal impacts of a high-tech manufacturing firm's expansion into one of seven U.S. states. This analysis required an assessment of a \$1 billion development schedule over a 13-year build-out period. The analysis included a review of how states would be impacted, fiscally and economically, in terms of employment, wages, and output and tax collections. State and local taxes and proposed incentive packages were also reviewed as were labor markets, infrastructure availability and delivery cost constraints.
- Managed a team of analysts asked to review the current and potential impacts of construction defect litigation. This analysis considered how construction defect laws affect home prices, housing supply, competition and several other market variables. It also considered how more limited supplies of affordable housing might adversely affect Southern Nevada's labor market, specifically as it relates to services industries.
- Retained by the Bureau of Land Management to review and analyze the impacts of the release of 380 acres of property for development in Carson City and Douglas County, Nevada. This analysis considered economic, fiscal and social impacts on an interconnected regional economic unit. It also considered a number of alternative uses at the site, from hotel-gaming to residential.
- Managed a team of analysts asked to develop an information tracking system for the Clark County Air Quality Division. This effort required the migration of over 70 legacy databases into one integrated information system. In performing this analysis, our team identified nearly \$1 million in billings that had been missed or wrongly characterized by the legacy system.
- Selected as a component of a consultant team to review and analyze the operations of a riverboat casino hotel in Rock Island, Illinois. This project included a report that was ultimately presented to the state's legislature discussing the economic impact factors created by dockside gaming versus mandatory cruising for competitive facilities within the Quad Cities.
- Provided litigation support services in a matter involving fees charged by a contractor to dispose of medical waste. This analysis required a reconstruction and review of accounting records as well as comparative analysis of services provided in Western States.
- Selected as part of a consultant team asked to estimate the fiscal and economic impacts of a 1,900-acre master planned community development in North Las Vegas, Nevada. This analysis required the development

of a 20-year development absorption build-out schedule as well as estimates of public revenues and public service costs.

- Retained by the Clark County Department of Aviation to review and analyze the value of land trades in the 5,300-acre Clark County Cooperative Management Area. This study required a comprehensive review of long-run value created by controlled development within areas impacted by McCarran International Airport's noise environs.
- Retained by the Clark County Department of Finance to project revenue streams at the county and township level over a ten-year projection period. This analysis considered revenues generated directly by the county as well as distributions from state and federal sources.
- Managed a comprehensive economic, demographic and market analysis of Central City and Black Hawk, Colorado for a national gaming operator. This analysis included a review of historical supply and demand conditions; an examination of current and projected market performance; an analysis of existing, planned, proposed, and under-construction competitive gaming facilities; a survey of infrastructure developments; and an analysis of historical, existing and potential regulatory conditions.
- Selected as part of the consulting team asked to prepare a 3,000-acre redevelopment plan for the City of North Las Vegas. This project required estimates of financial feasibility, economic vitality, development trends, and revenues likely to be generated via tax increment financing alternatives.
- Managed comprehensive economic, demographic, and site analysis for a proposed Native American gaming facility in Southern California under the covenants and restrictions of the Pala Band of Mission Indians Compact. This project included the generation of performance estimates for twelve competitive facilities, a review and analysis of existing demand and urban economic factors, an analysis of transportation and location restrictions, and an analysis of the potential contribution of an innovative video lottery terminal required under compacted operations.
- Provided litigation support in a class action lawsuit where members of a residential community claimed the value of their property was decreased when a public golf course was made private. This analysis required a longitudinal study of home sales and pricing trends over a five-year period.
- Selected as part of the team asked to develop a parcel-level revenue maximization plan for a local master plan community developer. Specifically, this analysis reviewed general pricing trends for the Valley's major master-planned communities versus those of the subject developer. The project also considered the relative value of amenities and infrastructure improvements offered by a number of developers.
- Retained by the Clark County Regional Flood Control District in 1999 and again in 2002 to develop a cost-benefit analysis for the District's flood master plan. This project required consideration of inundation reduction,

economic output and productivity, emergency management and several qualitative elements. Our 1999 analysis was called a model of government accountability by the Clark County Board of Commissioners.

- Prepared and managed a market analysis for a convention and banquet facility in the Las Vegas Valley for a local developer. The project included a review of existing, planned, proposed, and under-construction meeting facilities, as well as five-year market projections.
- Selected as part of the team asked to review the potential costs and benefits of creating a new local air quality control agency on behalf of Southern Nevada Regional Planning Coalition. This analysis included a review of existing operations, staffing, space requirements, funding alternatives, and potential single-agency costs (i.e., the creation of a fund balance).
- Developed the absorption timeline for the Clark County Southwest Study Area in support of a public facilities needs assessment in 1999 and again in 2003. This analysis included the projection of land uses, property values, population and employment densities, occupancy rates, and school enrollment.
- Worked as a member of the team selected to prepare detailed site analysis of Las Vegas' suburban casino market as part of strategic plan for a Nevada gaming corporation. The work involved the segmentation of the market into competitive submarkets in order to identify those areas with greatest growth potential.
- Prepared an absorption study for a 7,500-acre tract of land located in North Las Vegas, Nevada as part of a team reviewing the land on behalf of the United States Bureau of Land Management. The study included annual absorption estimates, by land use, through the project's development as well as a review of potential changes to the development's land use mix.
- Designed, developed and employed a set of monitoring indices specific to the Las Vegas gaming market, including the Applied Analysis Gaming Index. The publications have a national distribution base, and our gaming index is a recurring feature in the State's largest daily paper.
- Selected as a member of the consultant team hired to perform a fiscal impact analysis for the City of Las Vegas. This analysis included the creation of an absorption model to identify probable build-out patterns by land use type. These land uses were then translated into own-source revenues and public service costs (using a service standard method) for the City through build out. The revenues and costs were analyzed under alternative economic conditions (i.e., population growth rates) to determine whether existing revenue sources were sufficient to fund the public services demanded.
- Generated a fiscal impact model that was used to estimate the impact of a waste management contract extension with a governmental service provider. This model balanced the net present value of the cost to comply with the projected value of the expected contract extension, ultimately determining the "break-even" point.

- Selected as part of the consulting team that prepared a market study, site analysis, and a fiscal forecast for a mixed-use rural entertainment facility in Nevada on behalf of an international development company. The facility included a hotel, Class III casino, RV park, convenience store and gas station.
- Worked as a part of a team charged with evaluating the potential impacts of a business tax initiative proposed to be levied in the State of Nevada. A significant portion of this study included a detailed review of economic diversification throughout the Western United States and in Nevada. Diversity's effects on the State's revenue-generating powers were also considered.
- In 1999 and 2000, selected as part of the team engaged to estimate the absorption timeline for a series of "villages" within a major master-planned community. This included a detailed review of economic and demographic conditions and an econometric projection of both supply and demand. The project was performed as part of the special improvement district process.
- Designed a database application for Palm Pilot handheld computers, which allows users to identify, search, sort and update an extensive series of data on Las Vegas office, industrial and retail markets.
- From 1996 to the present, performed and/or managed an ongoing quarterly report reviewing existing and projected trends in the office, industrial and retail market for Southern Nevada's commercial real estate community. In 2005, vacant land, apartments and luxury condominium reports were added to AA's publication list. These analyses include a review of urban economic conditions, competitive facility profiles, and a three-year performance projection of both supply and demand for the company's existing and proposed projects. During 2004 and 2005, AA was the sole provider of economic information for Propertyline, Nevada's largest on-line commercial real estate listing service.
- Worked as part of the team charged with generating socioeconomic estimates and projections for the Clark County (Las Vegas) Regional Transportation Commission's Planning Variable Update, 1998 and 2000. Specifically, our role involved establishing baseline estimates and generating trend information on population, employment, housing units, and household income for 1,140 traffic analysis zones through the year 2020. Our role further involved the coordination of geographic information systems, the integration of the planning data from several independent jurisdictions and public agencies, relational database management, and econometric modeling.
- Performed numerous highest and best use studies for developments throughout the Las Vegas Valley. These studies have been for properties as diversified as hotel-gaming establishments to condominiums to retail strip centers. Generally speaking, these studies include a comprehensive review of locational factors, area economics and demographics, existing and potential competitive supply, existing and projected demand, project development costs and a maximal use analysis.

- Prepared an economic model designed to run "what if" scenarios for a solid waste disposal firm. The model was used to assist the company in its negotiations with a local government regarding the potential value of a proposed contract extension and the potential cost of complying with the United States Environmental Protection Agency administrative order dealing with waste storage at the Sunrise Mountain Landfill Facility.
- Worked in conjunction with a prominent financial advisory services firm to prepare a review of cash handling procedures for White Pine County, Nevada. The review included a diagnostic of existing policies, a revised set of cash handling procedures, and a series of internal audit checkpoints.
- Reviewed and analyzed the Clark County (Las Vegas) School District's school-siting methodology on behalf of a major Nevada development corporation.
- Managed a review of operations at the departmental level for a gaming corporation in Biloxi, Mississippi. This project focused on cost control procedures implemented with the goal of increased revenues at the EBITDA line.
- Conducted an industrial site selection analysis for a manufacturing and distribution firm. The project included the analysis of available parcels relative to zoning, visual perception, location, accessibility to rail service, local roadways and freeways, topography, easements, flood zones and other site-related issues.

SELECTED PRESENTATIONS

Presenter, "The Numbers Tell the Story," *Preview Las Vegas*, January 2015

Presenter, "The 2014 Las Vegas Perspective," *Las Vegas Perspective Annual Meeting*, March 2014

Presenter, "How Far We've Come," *Preview Las Vegas*, January 2014

Presenter, "Wired for the Future," *Las Vegas Perspective Annual Meeting*, April 2013

Presenter, "Opportunity Is Everywhere," *Preview Las Vegas*, January 2013

Presenter, "The 2012 Las Vegas Perspective," *Las Vegas Perspective Annual Meeting*, March 2012

Presenter, "Reset, Rethink, Rebuild," *Preview Las Vegas*, February 2012

Presenter, "Reinventing the Las Vegas Economy," *Las Vegas Perspective Annual Meeting*, April 2011

Presenter, "The Rise and Fall of the Next Great Economy," *Preview Las Vegas*, February 2011

Presenter, "The Impacts of the Financial Crisis on the State of Nevada," *Federal Financial Crisis Inquiry Commission*, September 2010

Presenter, "Dealing with the New Normal", *Western Legislators Conference*, September 2010

Presenter, "Signs of Life", *Preview Las Vegas*, February 2010

Presenter, "The Glass is Half Empty – The Glass is Half Full", *Las Vegas Perspective Annual Meeting*, April 2009

Presenter, "Top 10 Indicators to Watch", *Preview Las Vegas*, February 2009

Presenter, "Charting the Course", *Las Vegas Perspective Annual Meeting*, April 2008

Presenter, "Top 10 Indicators to Watch" *Preview Las Vegas*, February 2008

Presenter, "The Implications of Current Market Trends", *Las Vegas Perspective Annual Meeting*, April 2007

Presenter, "Economic Trends Impact Southern Nevada Multi-Housing Market", *SNMA Annual Trends Conference*, February 2007

Presenter, "10 Trends to Watch", *Preview Las Vegas*, January 2007

Presenter, "Luxury Condominium Market – The State of the Industry" *Las Vegas High-rise Conference*, February 2006.

Presenter, 2003 Lionel, Sawyer and Collins Legislative Roundup, "The Fiscal Outcome of the 71st Legislative Session."

SELECTED COMMUNITY INVOLVEMENT AND AWARDS

Alumni of the Year, William Boyd School of Law, 2011

Board of Directors, Nevada State Bank, 2011

Hispanic of the Year, Southern Nevada Latin Chamber of Commerce, 2010

Member, President Elect and President, Nevada Child Seekers, 2009-Present

Adjunct Professor, HMD 401, Hotel Law. William F. Harrah College of Hotel Administration, 2006 to Present

Board Member, R&R Charitable Foundation, 2009-Present

Member of the Board of Directors and Executive Secretary (2010-2011), Opportunity Village, 2009 to Present
Gubernatorial Appointee, Nevada Housing Stabilization Task Force, 2008 to Present
Chairman, Technical Working Group, Governor's Task Force on Tax Policy, December 2001 – November 2002
Member, Clark County Organization & Resource Review Committee, June 2002
Nevada Taxpayers Association, Good Government Special Recognition Award, February 2003
Member, Board of Directors, Hispanics In Politics, 1999
Member and President (2010), Board of Directors, Nevada Child Seekers, 2009 to Present
Board of Advisors, Nevada Council on Problem Gambling, 1999 to Present
Insider Club Inductee, *The Ralston Report*, May 2003
Top 40 Under 40 in Business, *InBusiness Magazine*, 2001
Who's Who In Nevada, 2002 to Present
Coach, Juniors Basketball, 2003 to Present
Coach, Paseo Verde Little League, Board of Advisors, 2004 to Present

PUBLICATIONS IN THE LAST TEN YEARS

Author, "A Positive Outlook," a recurring series of monthly articles for Nevada State Bank (November 2011 – present); articles are available at https://www.nsbank.com/about_us/forecast/index.jsp.

Co-author, Intelligence-Led Governance: Establishing Meaningful Community Indicators. Presented at an International conference on community monitoring in Leuven, Belgium, June 2006.

AA routinely produces written reports for our clients that may or may not be made available to the public by such clients; the nature of these reports are summarized in the sub-section, *Selected Project Experience*.

WITNESS TESTIMONY OR DEPOSITIONS IN THE LAST FOUR YEARS

Impacts of the Financial Crisis on the State of Nevada
(Testified before the Financial Crisis Inquiry Commission, which was created as part of the Fraud Enforcement and Recovery Act (Public Law 111-21) passed by the U.S. Congress and signed by the President in May 2009)

Southern Nevada Employment and Workforce Trends
(Testified before the U.S. Subcommittee on Education and the Workforce)

In re Club Vista Financial Services, LLC, et al. vs. Scott Financial Corporation, et al.
Case No. A579963
District Court, Clark County, Nevada
(Deposition)

Service Employees Union International (SEIU) Labor Relations Matter
(Testified at hearing before arbitrator as an expert witness on economic and employment issues in a labor dispute between the Las Vegas Convention and Visitors Authority and its labor union)

Water Resource Matter, Nevada Groundwater Basins 180, 181, 182, 194
State of Nevada Water Engineer
(Testified at Hearing before the State of Nevada Water Engineer as an expert witness for the Southern Nevada Water Authority)

In re Las Vegas Development Associates v. KB Home Nevada, Inc.
Case No. A566442
District Court, Clark County, Nevada
(Deposition)

In re Golden Road Motor Inn, dba Atlantis Casino Resort Spa v. Sumona Islam, Grand Sierra Resort, et al.
Case No. CV12-01171
District Court, Washoe County, Nevada
(Deposition and Trial)

In re Jeffrey Soffer, et al. v. Five Mile Capital Partners LLC, et al.
Case No. 2:12-cv-01407-JCM-GWF
United States District Court, District of Nevada
(Deposition)

Testified between 2009 and 2014 before the Nevada State Legislature, county commissions and local government boards on multiple occasions

EXHIBIT 38

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 38

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

1700
COHEN-JOHNSON, LLC
H. STAN JOHNSON, ESQ.
Nevada Bar No. 00265
sjohnson@cohenjohnson.com
TERRY KINNALLY, ESQ.
Nevada Bar No. 6379
tkinnally@cohenjohnson.com
CHRIS DAVIS, Esq.
Nevada Bar No. 6616
cdavis@cohenjohnson.com
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
Telephone: (702) 823-3500
Facsimile: (702) 823-3400
*Attorney for MEI-GSR Holdings, LLC. d/b/a
Grand Sierra Resort*

IN ASSOCIATION WITH

THE LAW OFFICES OF MARK WRAY
MARK WRAY, ESQ.
Nevada Bar No.: 4425
608 Lander Street
Reno, Nevada 89509
Telephone: (775) 348-8877
Facsimile: (775) 348-8351
*Attorney for MEI-GSR Holdings, LLC. d/b/a
Grand Sierra Resort*

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,

Plaintiff,

v.

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;
RYAN TORS, an individual; JOHN DOES I-X
and JANE DOES I-X; and ABC
CORPORATIONS-X,

Defendants.

Case No.: CV13-01704

Dept. No.: B7

BUSINESS COURT DOCKET

PLAINTIFF MEI-GSR HOLDINGS, LLC. A NEVADA CORPORATION, D/B/A GRAND
SIERRA RESORT'S AMENDED DISCLOSURE OF EXPERT WITNESS

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

1 Plaintiff MEI-GSR HOLDINGS, LLC., a Nevada Corporation, d/b/a Grand Sierra Resort
2 (hereinafter referred to as "GSR"), by and through its counsel of record, H. Stan Johnson, Esq. of
3 Cohen|Johnson, LLC., hereby submits and identified its expert witness and discloses the expert
4 report pursuant to NRCP 16.1(a)(2) in this matter as follows:

5
6 **I. EXPERT WITNESS**

7 **A. Jeremy A. Aguero**
Principal Analyst
Applied Analysis
8 6385 S. Rainbow Blvd., Suite 105
9 Las Vegas, Nevada 89118

10 Jeremy Aguero is expected to testify regarding the Expert Witness Report prepared by
11 Applied Analysis, including opinions, data and any other information considered in forming said
12 report (*Attached as Exhibit "1"*) and opinions, his professional qualifications, and any other
13 related matters.

14 Plaintiff reserves the right to supplement the expert witness disclosure as further
15 investigation and discovery may reveal additional information.

16 **II. NON-RETAINED EXPERTS**

17 **A. Ralph Burdick**

18 Mr. Burdick is a non-retained expert and currently holds the position as Vice-President of
19 Casino Operations for Grand Sierra Resort.

20 **B. Toby Taylor**

21 Mr. Taylor is a non-retained expert and currently holds the position as Executive Director
22 of Slots for Grand Sierra Resort.

23 **C. Scott Bean**

24 Mr. Bean is a non-retained expert and he currently provides consulting services to Grand
25 Sierra Resort.

26 ...

27 ...

1 **D. Craig Robinson**

2 Mr. Robinson is a non retained expert and he currently holds the position as Chief
3 Financial Officer for Grand Sierra Resort.

4 **F. Christopher Abraham**

5 Mr. Abraham is a non-retained expert and he currently holds the position as Vice
6 President of Marketing for Grand Sierra Resort.

7 **G. Terry Vavra**

8 Mr. Vavra is a non-retained expert and he currently holds the position as Vice-President
9 of Development for Grand Sierra Resort.

10 **III. DOCUMENTS**

11 A. June 4, 2015 Expert Report Prepared by Applied Analysis, Bates Stamped
12 GSREXP 01 – GSREXP 028.

13 Plaintiff reserves the right to supplement the document disclosures as further
14 investigation and discovery may reveal additional information.

15 **Affirmation Pursuant to NRS §239B.030**

16 The undersigned does hereby affirm that the preceding document does not contain the
17 social security number of any person.

18 Dated this 4th day of June, 2015.

19 **COHEN|JOHNSON, LLC.**

20
21 By: 

22 H. STAN JOHNSON, ESQ.
23 Nevada Bar No. 00265
24 sjohnson@cohenjohnson.com
25 TERRY KINNALLY, ESQ.
26 Nevada Bar No. 6379
27 tkinnally@cohenjohnson.com
28 CHRIS DAVIS, Esq.
 Nevada Bar No. 6616
 cdavis@cohenjohnson.com
 255 E. Warm Springs Road, Suite 100
 Las Vegas, Nevada 89119
 Attorney for MEI-GSR Holdings, LLC. d/b/a
 Grand Sierra Resort

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

INDEX OF EXHIBITS

<u>Exhibits</u>	<u>Description</u>	<u>Pages</u>
1.	Expert Report prepared by Jeremy Aguero	29

COHEN-JOHNSON, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, Nevada 89119
(702) 823-3500 FAX: (702) 823-3400

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of COHEN|JOHNSON, LLC., and that on this date I caused to be served a true and correct copy of the **PLAINTIFF MEI-GSR HOLDINGS, LLC. A NEVADA CORPORATION, D/B/A GRAND SIERRA RESORT'S AMENDED DISCLOSURE OF EXPERT WITNESS** on all the parties to this action by the method(s) indicated below:

 x by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States Mail, Las Vegas, Nevada and addressed to:

 X by using the Court's CM/ECF Electronic Notification System addressed to:

ROBINSON, BELAUSTEGUI, SHARP & LOW

C/o Kent R. Robison, Esq.

71 Washington Street

Reno, Nevada 89503

krobison@rbsllaw.com

Attorney for the Defendant Peppermill

 x by electronic email addressed to the above:
 by personal or hand/delivery addressed to:
 by facsimile(fax) addresses to:
 by Federal Express/UPS or other overnight delivery addressed to:

DATED the 4th day of June, 2015.

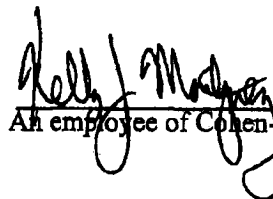

An employee of Cohen-Johnson, LLC.

Exhibit “1”

Filed Under Seal

**HIGHLY CONFIDENTIAL
INFORMATION**

**HIGHLY CONFIDENTIAL – SUBJECT TO
STIPULATED CONFIDENTIALITY
AGREEMENT AND PROTECTIVE
ORDER FILED IN JULY 17, 2014**

**To Be Opened Only Upon Further Order of This
Court or for the Sole Use of the Court and its’
Employees**

Exhibit “1”

Expert Report

MEI-GSR HOLDINGS, LLC, a Nevada Corporation, d/b/a/ GRAND
SIERRA RESORT

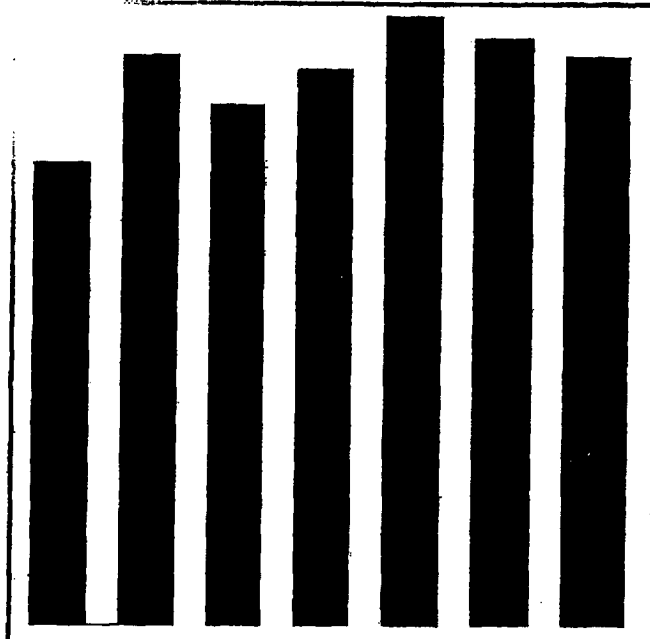
vs.

PEPPERMILL CASINOS, INC., a Nevada Corporation, d/b/a
PEPPERMILL CASINO; RYAN TORS, an individual; JOHN DOES I-X and
JANE DOES I-X; and ABC CORPORATIONS I-X

District Court
Washoe County, Nevada

Case No. CV13-01704
Dept. No. B7

**APPLIED
ANALYSIS**



GSREXP001

RA 02247

Expert Report
MEI-GSR Holdings vs. Peppermill Casinos, Inc.

Table of Contents

Introduction	1
General Background.....	1
Competitive Information.....	1
Reasonable Royalty	3
Expert Witness Credentials – Jeremy A. Aguero.....	6
Professional and Business History.....	6
Education	6
Selected Project Experience	7
Selected Presentations	22
Selected Community Involvement and Awards.....	23
Publications in the Last Ten Years.....	24
Witness Testimony or Depositions in the Last Four Years.....	24
Right to Amend or Supplement Analysis.....	25
Statement of Compensation for the Study and Testimony	26

INTRODUCTION

Applied Analysis ("AA") was retained by Cohen-Johnson, LLC ("Cohen Johnson") on behalf of MEI-GSR Holdings, LLC, doing business as Grand Sierra Resort ("GSR"), to evaluate potential damages stemming from Peppermill Casinos, Inc. ("Peppermill") employee Ryan Tors unlawfully obtaining casino operating information from GSR slot machines. This is case number CV13-01704, now before the Second Judicial District Court of the State of Nevada, Washoe County. In submitting this analysis we respectfully reserve the right to revisit, revise and supplement this analysis should additional data become available.

GENERAL BACKGROUND

Ryan Tors ("Tors"), an employee of Peppermill, unlawfully accessed the slot machines of GSR at the direction of his employer. Specifically, Tors opened a number of machines and accessed each machine's diagnostic screens and payback percentages. This was part of a systematic and coordinated data-gathering effort that a Nevada Gaming Control Board investigation determined had been going on since at least 2011 and included at least 10 other casino properties.¹ Information was then relayed back to Tors' superiors at Peppermill and was subsequently used by the Peppermill in developing its casino operations strategy. The issue of the deceitful, surreptitious and unlawful actions of Tors, and whether his actions were at the behest of the Peppermill, is not at issue here. In a Stipulation for Settlement and Order executed on February 13, 2014, between the Peppermill and the Nevada Gaming Control Board, Peppermill admits to violations of the Nevada Gaming Control Act and Regulations of the Nevada Gaming Commission. Peppermill also agreed to pay a \$1,000,000 fine to the State of Nevada, among the largest fines ever imposed on a Nevada non-restricted gaming licensee.

The fundamental question presented here is the extent to which GSR was damaged as a result of Peppermill's actions. The question of whether competitive information was obtained in an illegal or unethical manner has already been settled; the question of damages turns generally on the profits lost by the aggrieved party or profits illegally or unethically earned by the acts of a third party, sometimes referred to as unjust enrichment. We note, however, that in instances where the ability to prove such damages is not possible, courts have used a "reasonable royalty" approach under the Uniform Trade Secrets Act.²

COMPETITIVE INFORMATION

There seems to be at least some question as to whether obtaining information on the settings of slot machines should be considered ill-gained competitive intelligence. We would submit that the mere fact that the Peppermill accepted a \$1,000,000 fine and admitted "each and every allegation" set forth in the Nevada Gaming Control Board's

¹ NGC 13-23, State Gaming Control Board v. Peppermill Casinos, Inc., February 13, 2014 (at page 6).

² Uniform Trade Secrets Act (1985 with Amendments, Section 3. Damages).

complaint would provide clear and convincing evidence of wrongdoing in the acquisition of GSR's competitive information. That said, the Peppermill experts' suggestion that the information obtained by the Peppermill did not damage its competitors because it could be easily obtained, because it was of no analytical value or because the keys needed to unlock competitors' gaming machines are easily accessed is little more than an *ex post facto* attempt to recast the fact that the Peppermill systematically sought to obtain, over multiple years, information it viewed as valuable that was kept under lock and key by its competitors.

The expert reports of Dr. Lucas and Ms. Friedman were thoughtful and well-constructed in many respects; however, the position that the Peppermill's actions would merely "satisfy some measure of curiosity"³ attempts to downplay the facts of the immediate case and stands in sharp contrast as to why, for example, the industry would rely on a Harvard-trained computer scientist and Ph.D. researcher from among the largest gaming colleges in the country for information, analysis and insights. "Curiosity" is defined as "the desire to learn or know more about something or someone"⁴ or "a strong desire to know or learn something."⁵ In the private sector, the accumulation of this knowledge is generally referred to as business intelligence or competitive intelligence and there are strong arguments that it is more valuable today than ever.⁶

Both Dr. Lucas and Ms. Friedman submit that the information improperly obtained by the Peppermill did not amount to a trade secret because it was "readily ascertainable by proper means by the public or any other persons who can obtain commercial or economic value from its disclosure or use." The Peppermill, a sophisticated casino operator, did not appear to know slot machine settings could be obtained by the calculations set forth by Dr. Lucas and Ms. Friedman, calling into question how "readily ascertainable" such data were at the time by the parties involved in this case. Perhaps the Peppermill had such knowledge but preferred the expediency provided by a less ethical approach to obtaining the information. Or, perhaps it was something altogether different. Perhaps the program was never about the digital settings on a handful of casino gaming machines as much as it was a carefully conceived effort to obtain competitive intelligence on whether GSR and other local casinos were tightening or loosening their slot machines over time. As outlined by Dr. Lucas and Ms. Friedman, taken alone, the individual machine settings obtained by the illegal actions of Ryan Tors on July 12, 2013 are of little relevance. By contrast, when viewed collectively with other information available to Peppermill, including without limitation, historical data collected by its employees, the result is business intelligence that the company clearly valued and which both its competitors and its regulators viewed as ill-gotten.

Finally, the idea that this information has no value is disputed by the Peppermill's own testimony. In the settlement hearing with the Nevada Gaming Commission, the attorney for the Peppermill categorized his client's behavior as

³ Expert Report of Stacy Friedman, page 19.

⁴ See, Merriam-Webster Dictionary (available at: <http://www.merriam-webster.com/dictionary/curiosity>).

⁵ See, Oxford Dictionaries (available at: http://www.oxforddictionaries.com/us/definition/american_english/curiosity).

⁶ See, e.g., A. McAfee and E. Brynjolfsson, Big Data: The Management Revolution. Harvard Business Review (October 2012); J. Frates and S. Sharp, Using Business Intelligence to Discover New Market Opportunities. Journal of Competitive Intelligence and Management, Volume 3, Issue 3, Fall 2005; and T. Davenport (Guest Contributor), What Business Can Learn From Intelligence. The Wall Street Journal | CIO Journal. September 24, 2014.

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of Robison, Belaustegui, Sharp & Low, and
3 pursuant to NRAP 5(b)(2)(D) and N.E.F.C.R. 7, I caused the **RESPONDENT**
4 **PEPPERMILL CASINOS, INC.'S ANSWERING BRIEF - APPENDIX**
5 **VOLUME 9** to be filed electronically with the Clerk of the Nevada Supreme
6 Court. Pursuant to N.E.F.C.R. 9, notice of an electronically filed document by the
7 Court "shall be considered as valid and effective service of the document" on the
8 below listed persons who are registered users.
9

10
11 H. STAN JOHNSON, ESQ.
12 CHRIS DAVIS, ESQ.
13 Cohen Johnson Parker Edwards, LLC
14 255 E. Warm Springs Road, Suite 100
15 Las Vegas, NV 89119
16 Email: sjohnson@cohenjohnson.com
17 cdavis@cohenjohnson.com
18 *Attorneys for Appellant*

19
20 DATED: This 8th day of May, 2017.

21
22
23
24
25
26
27
28

V. JAYNE FERRETTO
Employee of Robison, Belaustegui, Sharp & Low

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3
4 MEI-GSR HOLDINGS, LLC, a Nevada
5 limited liability company, d/b/a GRAND
6 SIERRA RESORT,

7 Appellant,

8 vs.

9 PEPPERMILL CASINOS, INC., a Nevada
10 corporation, d/b/a/ PEPPERMILL
11 CASINO;

12 Respondent.
13 _____ /

Electronically Filed
May 15 2017 03:18 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 70319

District Ct. Case No. CV13-01704

14 **RESPONDENT PEPPERMILL CASINOS, INC.'S**
15 **ANSWERING BRIEF**

16 **APPENDIX VOLUME 9**

17 ROBISON, BELAUSTEGUI, SHARP & LOW

18 KENT R. ROBISON, ESQ.
19 Nevada Bar No. 1167
20 krobison@rbsllaw.com

21 SCOTT L. HERNANDEZ, ESQ.
22 Nevada Bar No. 13147
23 shernandez@rbsllaw.com

24 THERESE M. SHANKS, ESQ.
25 Nevada Bar No. 12890
26 tshanks@rbsllaw.com

27 71 Washington Street
28 Reno, Nevada 89503
Telephone: (775) 329-3151
Facsimile: (775) 329-7169

Attorneys for Respondent
Peppermill Casinos, Inc., d/b/a Peppermill Casino

RESPONDENT PEPPERMILL CASINOS, INC.'S ANSWERING BRIEF

APPENDIX – CHRONOLOGICAL TABLE OF CONTENTS

DOCUMENT	DATE FILED or ADMITTED	VOL. NO.	PAGE NO.
VOLUME 1			
Defendant Peppermill Casinos, Inc.'s Motion to Dismiss Complaint	06/04/14	1	RA 00001 – 00024
Motion for Protective Order on an Order Shortening Time and for Stay of Depositions Pending Hearing on the Matter	06/19/14	1	RA 00025 – 00073
Defendant Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Motion to Dismiss Complaint	06/30/14	1	RA 00074 – 00087
Joinder to Defendant Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Motion to Dismiss Complaint	06/30/14	1	RA 00088 – 00091
Defendant Peppermill Casinos, Inc.'s Brief in Response to Court Order; Opposition to Plaintiff's Motion to Compel Gaming Control Board to Produce Documents; Opposition to Plaintiff's Motion to	07/03/14	1	RA 00092 – 00164

Compel Peppermill's Production of Documents; Opposition to Plaintiff's Motion for Protective Order			
GSR's Reply to Peppermill's Opposition to Motion to Compel Documents Under 16.1; Motion for a Protective Order, and Request for Gaming Records	07/08/14	1	RA 00165 – 00226
Request for Submission	07/15/14	1	RA 00227 – 00229
Peppermill Casinos, Inc.'s Amended Answer to Complaint	07/25/14	1	RA 00230 – 00240
Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	08/25/14	1	RA 00241 – 00250
VOLUME 2			
Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery (Continued)	08/25/14	2	RA 00251 – 00345
Joinder to Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	08/28/14	2	RA 00346 – 00348

Errata to Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	09/03/14	2	RA 00349 – 00379
Plaintiff MEI-GSR Holdings, LLC, d/b/a Grand Sierra Resorts Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions	09/09/14	2	RA 00380 – 00500
VOLUME 3			
Plaintiff MEI-GSR Holdings, LLC, d/b/a Grand Sierra Resorts Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions (Continued)	09/09/14	3	RA 00501 – 00688
Recommendation for Order	09/19/14	3	RA 00689 – 00702
Recommendation for Order	09/26/14	3	RA 00703 – 00712
Request for Submission	09/26/14	3	RA 00713 – 00715
Defendant Peppermill Casinos, Inc.'s Opposition to Plaintiff's Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions	09/26/14	3	RA 00716 – 00745

Confirming Order	10/01/14	3	RA 00746 – 00747
Recommendation for Order	10/02/14	3	RA 00748 – 00750
VOLUME 4			
Recommendation for Order (Continued)	10/02/14	4	RA 00751 – 00762
Objection to Commissioner's Recommendation Denying Plaintiff's Motion for a Protective Order and Request for a Stay of Depositions Pending the Hearing on the Objection	10/10/14	4	RA 00763 – 00770
Peppermill Casinos, Inc.'s Opposition to Plaintiff's Objection to Commissioner's Recommendation Denying Plaintiff's Motion for a Protective Order and Request for a Stay of Depositions Pending the Hearing on the Objection	10/24/14	4	RA 00771 – 00806
Defendant Peppermill Casinos, Inc.'s Motion for Order Compelling GSR to Show Cause Why It Not Be Held in Contempt	10/27/14	4	RA 00807 – 00825

Peppermill Casinos, Inc.'s Ex Parte Emergency Motion for Rule 16 Conference	11/12/14	4	RA 00826 – 00830
Peppermill Casinos Inc.'s Supplemental Motion for Terminating Sanctions Or, In the Alternative, For an Order to Show Cause Why Plaintiff Not Be Held In Contempt and Subjected to Severe Sanctions	11/12/14	4	RA 00831 – 00969
Order	11/13/14	4	RA 00970 – 00974
Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt	11/13/14	4	RA 00975 – 01000
VOLUME 5			
Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt (Continued)	11/13/14	5	RA 01001 – 01250

VOLUME 6			
Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt (Continued)	11/13/14	6	RA 01251 – 01316
Request for Submission	11/24/14	6	RA 01317 – 01319
Order	11/26/14	6	RA 01320 – 01330
Notice of Entry of Order	12/2/14	6	RA 01331 – 01344
Defendant Peppermill Casinos, Inc.'s Memorandum of Costs and Attorneys' Fees in Response to Court's Order of November 26, 2014	12/8/14	6	RA 01345 - 01379
Peppermill Casinos, Inc.'s Motion for Order Requiring GSR to Show Cause Why It Not be Held In Contempt, Sanctioned and Ordered to Produce Documents	12/17/14	6	RA 01380 – 01417
Plaintiff's Opposition to Defendant's Motion for Contempt	01/02/15	6	RA 01418 - 01451

Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Defendant's Memorandum of Fees and Costs	01/06/15	6	RA 01452 – 01461
Request for Submission	01/06/15	6	RA 01462 – 01464
Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Defendant's Motion For Contempt	01/08/15	6	RA 01465 – 01498
Request for Submission	01/08/15	6	RA 01499 – 01500
VOLUME 7			
Request for Submission (Continued)	01/08/15	7	RA 01501 – 01504
Order	01/20/15	7	RA 01505 - 01508
Notice of Entry of Order	01/21/15	7	RA 01509 – 01515
Ex Parte Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending Hearing on the Matter	01/27/15	7	RA 01516 – 01620

Opposition to Plaintiff's Ex Parte Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending Hearing on the Matter	02/04/15	7	RA 01621 – 01696
GSR's Reply to Peppermill's Opposition to GSR's Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending a Hearing on the Matter	02/05/15	7	RA 01697 – 01750
VOLUME 8			
GSR's Reply to Peppermill's Opposition to GSR's Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending a Hearing on the Matter (Continued)	02/05/15	8	RA 01751 – 01791
Minutes	02/10/15	8	RA 01792 – 01793
Order Granting in Part and Denying in Part Motion for Protective Order	03/04/15	8	RA 01794 – 01796

Defendant Peppermill's Emergency/Ex Parte Motion For a NRCP 16 Pretrial Conference	06/12/15	8	RA 01797 – 01840
Order	06/12/15	8	RA 01841 – 01842
Opposition to Peppermill's Emergency/Ex Parte Motion For a NRCP 16 Pretrial Conference	06/23/15	8	RA 01843 – 01881
Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret"	11/13/15	8	RA 01882 – 02000
VOLUME 9			
Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret" (Continued)	11/13/15	9	RA 02001 – 02250
VOLUME 10			
Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret" (Continued)	11/13/15	10	RA 02251 – 02281

Peppermill Casinos, Inc.’s Renewed Motion for Partial Summary Judgment Regarding Damages	11/18/15	10	RA 02282 – 02500
VOLUME 11			
Peppermill Casinos, Inc.’s Renewed Motion for Partial Summary Judgment Regarding Damages (Continued)	11/18/15	11	RA 02501 – 02750
VOLUME 12			
Peppermill Casinos, Inc.’s Renewed Motion for Partial Summary Judgment Regarding Damages (Continued)	11/18/15	12	RA 02751 – 02785
Peppermill Casinos, Inc.’s Motion for Sanctions	11/20/15	12	RA 02786 – 02880
Peppermill Casinos, Inc.’s Supplement to Renewed Motion for Summary Judgment Regarding “Trade Secret”	11/25/15	12	RA 02881 – 02900
GSR’s Opposition to Peppermill Casinos, Inc.’s Motion for Sanctions With Respect to Gregory Gale. Request for Sanctions	12/14/15	12	RA 02901 – 02911

Peppermill's Reply to GSR's Opposition to Peppermill's Motion for Partial Summary Judgment Regarding Damages	12/15/15	12	RA 02912 – 02931
Reply in Opposition to Peppermill's Renewed Motion for Summary Judgment Regarding "Trade Secret" renewed	12/15/15	12	RA 02932 – 02990
Defendant Peppermill Casinos, Inc.'s Reply in Support of Motion for Sanctions	12/23/15	12	RA 02991 – 02995
Request for Submission	12/23/15	12	RA 02996 – 02998
Peppermill Casinos, Inc.'s Trial Statement	01/04/16	12	RA 02999 – 03000
VOLUME 13			
Peppermill Casinos, Inc.'s Trial Statement (Continued)	01/04/16	13	RA 03001 – 03200
Plaintiff, MEI-GSR Holdings, LLC d/b/a Grand Sierra Resort's Trial Statement	01/04/16	13	RA 03201 – 03218

Peppermill Casinos, Inc.'s Response to GSR's Motion to Clarify the Court's Order Filed December 22, 2015 Regarding Peppermill's Motions in Limine	01/04/16	13	RA 03219 – 03250
VOLUME 14			
Peppermill Casinos, Inc.'s Response to GSR's Motion to Clarify the Court's Order Filed December 22, 2015 Regarding Peppermill's Motions in Limine (Continued)	01/04/16	14	RA 03251 – 03257
Minutes	01/07/16	14	RA 03258 – 03259
Trial Exhibit 4 - GSR Billboard Photographs	01/11/16	14	RA 03260 – 03266
Trial Exhibit 5 – GSR Advertisements – “Loosest Buffalo”	01/11/16	14	RA 03267
Trial Exhibit 6 – 2341 Key on EBay	01/11/16	14	RA 03268 – 03280
Trial Exhibit 8 – 8:51 a.m. Tors Email	01/11/16	14	RA 03281 – 03282

Trial Exhibit 10 – Diagnostic Screen	01/11/16	14	RA 03283
Trial Exhibit 38 – “Reno Loosest Slots in the USA” Billboard by PM	01/11/16	14	RA 03284
Trial Exhibit 53 – 11/19/14 GSR Website Slots and Video Poker (Loosest Buffalo)	01/11/16	14	RA 03285
Trial Exhibit 54 – 11/07/14 & 11/17/14 List of games with par settings	01/11/16	14	RA 03286
Trial Exhibit 56 – Chart of GSR Earning Structure	01/11/16	14	RA 03287
Trial Exhibit 127 – GSR Buffalo Billboard	01/11/16	14	RA 03288
Trial Exhibit 154 – Casino Management Fee Information	01/11/16	14	RA 03289 – 03296
Trial Exhibit 166 – Report Entitled, “Slot Market Assessment” by Applied Analysis	01/11/16	14	RA 03297 – 03258
Trial Exhibit 188 – 02/03/15 Photocopy of Plaintiff MEI-GSR Holdings, LLC a Nevada Corporation d/b/a Grand Sierra Resorts Disclosure of Expert Witnesses	01/11/16	14	RA 03259 – 03361

Trial Exhibit 189 – 04/01/15 Grand Sierra Resort’s Rebuttal Expert Disclosure	01/11/16	14	RA 03362 – 03365
Trial Exhibit 214 – Parchanges.pdf	01/11/16	14	RA 03366 – 03382
Trial Exhibit 229 – GSR Wells Market Share Monthly Report, Percentage of Player for Peppermill v. GSR 2012 – 2013	01/11/16	14	RA 03383 – 03386
Trial Exhibit 240 – Correspondence from Gaming Control dated 7/31/2013 Re: Investigation of Ryan 01/11/16Tors activities; Peppermill Property Receipts	01/11/16	14	RA 03387 – 03391
Trial Exhibit 340.1 – Buffalo	01/11/16	14	RA 03392 – 03405
Trial Exhibit 340.2 – Cats	01/11/16	14	RA 03406 – 03407
Trial Exhibit 340.2A – Cleopatra	01/11/16	14	RA 03408
Trial Exhibit 340.3 – Ducks in a Row	01/11/16	14	RA 03409
Trial Exhibit 340.4 – Double Diamond 2000	01/11/16	14	RA 03410

Trial Exhibit 340.5 – Enchanted Unicorn	01/11/16	14	RA 03411
Trial Exhibit 340.6 – Horoscope	01/11/16	14	RA 03412
Trial Exhibit 340.7 – Lil Lady	01/11/16	14	RA 03413
Trial Exhibit 340.8 – Money Storm	01/11/16	14	RA 03414
Trial Exhibit 340.9 – Munsters	01/11/16	14	RA 03415
Trial Exhibit 340.10 – Texas Tea	01/11/16	14	RA 03416
Trial Exhibit 340.11 – Wolf Run	01/11/16	14	RA 03417
Trial Exhibit 14A – 07/12/13 Handwritten Key Sheet by Tors (Legible Copy)	01/13/16	14	RA 03418
Trial Exhibit 307 – 12/31/12 State Gaming Control Board Gaming Revenue Report	01/13/16	14	RA 03419 - 03466
Peppermill’s Objection to MEI-GSR Holdings, LLC’s (1) Proposed Jury Instructions and Verdict Forms, (2) Supplement to Proposed Jury Instructions, and (3) Supplemental Interim Jury Instructions	01/14/16	14	RA 03467 – 03500

VOLUME 15			
Peppermill's Objection to MEI-GSR Holdings, LLC's (1) Proposed Jury Instructions and Verdict Forms, (2) Supplement to Proposed Jury Instructions, and (3) Supplemental Interim Jury Instructions (Continued)	01/14/16	15	RA 03501 – 03596
Trial Exhibit 15 – 07/12/13 Tors Transcript from GSR re: Interview by GCB	01/14/16	15	RA 03597 – 033622
Trial Exhibit 16A – 01/02/13 11:24a.m. Tors email re: New Year's Eve shop	01/14/16	15	RA 03623 – 03624
Trial Exhibit 221B – Emails (with notations) from Tors to various parties with PAR information dated 12/29/2011 – 06/13/2013	01/14/16	15	RA 03625 - 03636
Trial Exhibit 74 – CDC Invoices to GSR	01/15/16	15	RA 03637 – 03645
Trial Exhibit 77 – 06/2014 CDC Report re: Free Play & Comp Rewards	01/15/16	15	RA 03646 – 03650
Trial Exhibit 78 – 07/2014 CDC Report re: Direct Mail	01/15/16	15	RA 03651 – 03700

Trial Exhibit 162 – Atlantis Advertisements	01/15/16	15	RA 03701 – 03704
Trial Exhibit 164 – Advertisement from El Cortez	01/15/16	15	RA 03705 – 03710
Trial Exhibit 82 – 11/2014 CDC Report re: Direct Mail	01/19/16	15	RA 03711 – 03750
VOLUME 16			
Trial Exhibit 82 – 11/2014 CDC Report re: Direct Mail (Continued)	01/19/16	16	RA 03751 – 03757
Trial Exhibit 20 – 09/2014 Affidavit of David Schwartz	01/20/16	16	RA 03758 - 03760
Trial Exhibit 35A – 11/03/14 GSR Answers to 2 nd Set of Interrogatories – REDACTED Interrogatory No. 14 and Response Only	01/21/16	16	RA 03761 – 03762
Objection to Peppermill’s Proposed Interim Jury Instructions	01/22/16	16	RA 03763 - 03816
Defendant’s NRCP 50 (a) Motion for Judgment as A Matter of Law	01/22/16	16	RA 03817 – 03831
Trial Exhibit 50 - GSR Slot Add Worksheet re: machine location and setting (including par) for certain machines	01/22/16	16	RA 03832 – 03850

Trial Exhibit 73 - Custodian of Records Statement	01/22/16	16	RA 03851 – 03852
Trial Exhibit 75 - 05/07/10 CDC Report re: Slot Comp	01/22/16	16	RA 03853 – 03858
Trial Exhibit 76 - 05/12/10 CDC Report re: Direct Mail	01/22/16	16	RA 03859 – 03864
Trial Exhibit 79 - 08/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03865 – 03912
Trial Exhibit 80 - 09/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03913 – 03957
Trial Exhibit 81 - 10/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03958 - 04000
VOLUME 17			
Trial Exhibit 81 - 10/2014 CDC Report re: Direct Mail	01/22/16	17	RA 04001 – 04006
Trial Exhibit 83 - 12/2014 CDC Report re: Direct Mail	01/22/16	17	RA 04007 – 04051
Trial Exhibit 84 - 01/2015 CDC Report re: Direct Mail	01/22/16	17	RA 04052 – 04096
Trial Exhibit 85 - 05/14/14 CDC Contract with GSR (signed by Mimno)	01/22/16	17	RA 04097 – 04099
Trial Exhibit 121 - GSR Slots and Video Poker Website	01/22/16	17	RA 04100

Trial Exhibit 122 - 2010-2014 Penny Video and Reels Net Win, Gross Theo Free-Play Summary	01/22/16	17	RA 04101
Trial Exhibit 123 - 2009-2/2015 NGC Monthly Gross Revenue Reports (Highly Confidential)	01/22/16	17	RA 04102 – 04249
Trial Exhibit 126 - 06/2015 Gaming Abstract Page	01/22/16	17	RA 04250
VOLUME 18			
Trial Exhibit 149 - Friedman Rebuttal Report	01/22/16	18	RA 04251 – 04292
Trial Exhibit 150 - Lucas Rebuttal Report	01/22/16	18	RA 04293 - 04329
Trial Exhibit 151 - Tom Sullivan Player Cards	01/22/16	18	RA 04330
Trial Exhibit 153 - GSR Billboards “Best”	01/22/16	18	RA 04331 – 04336
Trial Exhibit 156 - 06/05/15 Errata to Plaintiff MEI-GSR Holdings, LLC, a Nevada Corporation, d/b/a Grand Sierra Resort’s Amended Disclosure of Expert Witness	01/22/16	18	RA 04337 - 04369

Trial Exhibit 157A – 08/28/15 Plaintiff MEI-GSR Holdings, LLC, a Nevada Corporation, d/b/a Grand Sierra Resort’s Supplemental Disclosure of Expert Witness – REDACTED	01/22/16	18	RA 04370 – 04405
Trial Exhibit 159 - Nevada Trade Secret Act	01/22/16	18	RA 04406 – 04409
Trial Exhibit 160 - Aguero Charts – No Correlation	01/22/16	18	RA 04410 – 04418
Trial Exhibit 169A - Expert Rebuttal Report, Applied Analysis – REDACTED	01/22/16	18	RA 04419 - 04421
Trial Exhibit 172 - 03/01/15 Expert Witness Report of Professor Anthony Lucas	01/22/16	18	RA 04422 - 04457
Trial Exhibit 186 - 11/03/15 Defendant Peppermills Casino’s Supplement to Disclosure of Rebuttal Expert Witnesses	01/22/16	18	RA 04458 – 04487
Trial Exhibit 201 - 09/06/15 Atlantis Newspaper Ad	01/22/16	18	RA 04488
Trial Exhibit 202 - 08/30/15 Atlantis Newspaper Ad	01/22/16	18	RA 04489 – 04490

Trial Exhibit 206 - 10/15/15 Salazar Rebuttal Expert Report	01/22/16	18	RA 04491 – 04500
VOLUME 19			
Trial Exhibit 206 - 10/15/15 Salazar Rebuttal Expert Report (Continued)	01/22/16	19	RA 04501 – 04545
Trial Exhibit 215A - Peppermill Casinos, Inc. Amended Answer to Complaint dated 7/25/2014 – REDACTED	01/22/16	19	RA 04546 – 04556
Trial Exhibit 239 A – Email from Ryan Tors to NB Partners and William Paganetti Dated 06/07/12	01/22/16	19	RA 04557
Trial Exhibit 300 - 2/2015 CDC Report	01/22/16	19	RA 04558 – 04648
Trial Exhibit 301 - 3/2015 CDC Report	01/22/16	19	RA 04649 – 04695
Trial Exhibit 302 - 4/2015 CDC Report	01/22/16	19	RA 04696 – 04741
Trial Exhibit 303 - 5/2015 CDC Report	01/22/16	19	RA 04742 – 04750

VOLUME 20			
Trial Exhibit 303 - 5/2015 CDC Report (Continued)	01/22/16	20	RA 04751 – 04788
Trial Exhibit 304 - 6/2015 CDC Report	01/22/16	20	RA 04789 – 04384
Trial Exhibit 305 - 12/31/10 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04385 – 04882
Trial Exhibit 306 - 12/31/11 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04883 – 04930
Trial Exhibit 308 - 12/31/13 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04931 – 04978
Trial Exhibit 309 - 12/31/14 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04979 - 05000

VOLUME 21			
Trial Exhibit 309 - 12/31/14 State Gaming Control Board Gaming Revenue Report (Continued)	01/22/16	21	RA 05001 - 05026
Trial Exhibit 310 - 08/31/15 State Gaming Control Board Gaming Revenue Report	01/22/16	21	RA 05027 – 05074
Trial Exhibit 311 - 2010 Partial Las Vegas Sands Corp	01/22/16	21	RA 05075 – 05089
Trial Exhibit 312 - 2010 Partial Las Vegas Sands Corp 10K/A	01/22/16	21	RA 05090 – 05101
Trial Exhibit 313 - 2011 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05102 – 05115
Trial Exhibit 314 - 2012 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05116 – 05130
Trial Exhibit 315 - 2013 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05131 – 05146
Trial Exhibit 316 - 2014 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05147 – 05162
Trial Exhibit 317 - 03/31/15 Partial Las Vegas Sands Corp 10Q	01/22/16	21	RA 05163 – 05172
Trial Exhibit 318 - 06/30/15 Partial Las Vegas Sands Corp 10Q	01/22/16	21	RA 05173 – 05189
Trial Exhibit 319 - 2010 Partial Wynn Resorts, Limited 10K	01/22/16	21	RA 05190 – 05203

Trial Exhibit 320 - 2011 Partial Wynn Resorts, Limited 10K	01/22/16	21	RA 05204 – 05216
Trial Exhibit 321 - 2011 Partial Wynn Resorts Limited 10K/A	01/22/16	21	RA 05217 – 05250
VOLUME 22			
Trial Exhibit 321 - 2011 Partial Wynn Resorts Limited 10K/A (Continued)	01/22/16	22	RA 05251 – 05256
Trial Exhibit 322 - 2012 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05257 – 05266
Trial Exhibit 323 - 2013 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05267 – 05280
Trial Exhibit 324 - 2014 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05281 – 05293
Trial Exhibit 325 - 03/31/15 Partial Wynn Resorts, Limited 10Q	01/22/16	22	RA 05294 – 05302
Trial Exhibit 326 - 06/30/15 Partial Wynn Resorts, Limited 10Q	01/22/16	22	RA 05303 – 05315
Trial Exhibit 327 - 2010 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05316 – 05317
Trial Exhibit 328 - 2011 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05318 – 05319

Trial Exhibit 329 - 2012 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05320 – 05321
Trial Exhibit 330 - 2013 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05322 – 05323
Trial Exhibit 339 - Machine Performance Statistics	01/22/16	22	RA 05324
Opposition to Defendant's NRCP 50 (a) Motion for Judgment as A Matter of Law	01/24/16	22	RA 05325 – 05337
Defendant's Reply Brief in Support of NRCP 50(A) Motion for Judgment as A Matter of Law	01/25/16	22	RA 05338 - 05348
Trial Exhibit 220A – (PM part three.pdf) Emails from Ryan Tors to Other Parties Re: PAR Information Dated 03/28/2010 – 11/2010 – REDACTED	01/25/16	22	RA 05349 – 05350
Trial Exhibit 170 - Expert Rebuttal Report, Applied Analysis (with numbered paragraphs)		22	RA 05351 – 05353

Trial Exhibit 220 - (PM part three.pdf) Emails from Ryan Tors to other parties Re: PAR information dated 3/28/2010-11/2010		22	RA 05354 – 05360
Trial Exhibit 232 - Aristocrat “NOTICE OF CONFIDENTIALITY OF PAR SHEETS”		22	RA 05361
Trial Exhibit 241A - Emails dated 3/28/2010 – 11/2010 from Ryan Tors to other parties Re: PAR information (PM13272-13278) (PM13277, email between Tors and Scott Bean Re: Rail City comp reinvestment) - REDACTED		22	RA 05362 – 05368
Trial Exhibit 358 - Portions of the Deposition Transcript of Craig Robinson		22	RA 05369 – 05375
Trial Exhibit 359 - Portions of the Deposition Transcript of Terry Vavra		22	RA 05376 – 05384
Trial Exhibit 360 - Portions of the Deposition Transcript of Ralph Burdick		22	RA 05385 – 05398

Trial Exhibit 361 - Portions of the Deposition Transcript of Toby Taylor		22	RA 05399 – 05406
Trial Exhibit 362 - Portions of the Deposition Transcript of Toby Taylor		22	RA 05407 – 05413
Trial Exhibit 363 - Portions of the Deposition Transcript of Michael Draeger		22	RA 05414 – 05421
Trial Exhibit 364 - Portions of the Deposition Transcript of David Schwartz		22	RA 05422 – 05443
Portions of the Deposition of Tracy Mimno		22	RA 05444 - 05450

RESPONDENT PEPPERMILL CASINOS, INC.'S ANSWERING BRIEF

APPENDIX – ALPHABETICAL TABLE OF CONTENTS

DOCUMENT	DATE FILED or ADMITTED	VOL. NO.	PAGE NO.
Confirming Order	10/01/14	3	RA 00746 – 00747
Defendant Peppermill Casinos, Inc.'s Brief in Response to Court Order; Opposition to Plaintiff's Motion to Compel Gaming Control Board to Produce Documents; Opposition to Plaintiff's Motion to Compel Peppermill's Production of Documents; Opposition to Plaintiff's Motion for Protective Order	07/03/14	1	RA 00092 – 00164
Defendant Peppermill Casinos, Inc.'s Memorandum of Costs and Attorneys' Fees in Response to Court's Order of November 26, 2014	12/8/14	6	RA 01345 - 01379
Defendant Peppermill Casinos, Inc.'s Motion for Order Compelling GSR to Show Cause Why It Not Be Held in Contempt	10/27/14	4	RA 00807 – 00825

Defendant Peppermill Casinos, Inc.'s Motion to Dismiss Complaint	06/04/14	1	RA 00001 – 00024
Defendant Peppermill Casinos, Inc.'s Opposition to Plaintiff's Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions	09/26/14	3	RA 00716 – 00745
Defendant Peppermill Casinos, Inc.'s Reply in Support of Motion for Sanctions	12/23/15	12	RA 02991 – 02995
Defendant Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Motion to Dismiss Complaint	06/30/14	1	RA 00074 – 00087
Defendant Peppermill's Emergency/Ex Parte Motion For a NRCP 16 Pretrial Conference	06/12/15	8	RA 01797 – 01840
Defendant's NRCP 50 (a) Motion for Judgment as A Matter of Law	01/22/16	16	RA 03817 – 03831
Defendant's Reply Brief in Support of NRCP 50(A) Motion for Judgment as A Matter of Law	01/25/16	22	RA 05338 - 05348

Errata to Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	09/03/14	2	RA 00349 – 00379
Ex Parte Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending Hearing on the Matter	01/27/15	7	RA 01516 – 01620
GSR's Opposition to Peppermill Casinos, Inc.'s Motion for Sanctions With Respect to Gregory Gale. Request for Sanctions	12/14/15	12	RA 02901 – 02911
GSR's Reply to Peppermill's Opposition to GSR's Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending a Hearing on the Matter	02/05/15	7	RA 01697 – 01750
GSR's Reply to Peppermill's Opposition to GSR's Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending a Hearing on the Matter (Continued)	02/05/15	8	RA 01751 – 01791

GSR's Reply to Peppermill's Opposition to Motion to Compel Documents Under 16.1; Motion for a Protective Order, and Request for Gaming Records	07/08/14	1	RA 00165 – 00226
Joinder to Defendant Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Motion to Dismiss Complaint	06/30/14	1	RA 00088 – 00091
Joinder to Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	08/28/14	2	RA 00346 – 00348
Minutes	02/10/15	8	RA 01792 – 01793
Minutes	01/07/16	14	RA 03258 – 03259
Motion for Protective Order on an Order Shortening Time and for Stay of Depositions Pending Hearing on the Matter	06/19/14	1	RA 00025 – 00073
Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery	08/25/14	1	RA 00241 – 00250

Motion for Terminating Sanctions, Or, In the Alternative, Motion to Compel Discovery (Continued)	08/25/14	2	RA 00251 – 00345
Notice of Entry of Order	12/2/14	6	RA 01331 – 01344
Notice of Entry of Order	01/21/15	7	RA 01509 – 01515
Objection to Commissioner's Recommendation Denying Plaintiff's Motion for a Protective Order and Request for a Stay of Depositions Pending the Hearing on the Objection	10/10/14	4	RA 00763 – 00770
Objection to Peppermill's Proposed Interim Jury Instructions	01/22/16	16	RA 03763 - 03816
Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt	11/13/14	4	RA 00975 – 01000
Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt (Continued)	11/13/14	5	RA 01001 – 01250

Opposition to Defendant's Motion for Order Compelling GSR to Show Cause Why It Should Not Be Held In Contempt (Continued)	11/13/14	6	RA 01251 – 01316
Opposition to Defendant's NRCP 50 (a) Motion for Judgment as A Matter of Law	01/24/16	22	RA 05325 – 05337
Opposition to Peppermill's Emergency/Ex Parte Motion For a NRCP 16 Pretrial Conference	06/23/15	8	RA 01843 – 01881
Opposition to Plaintiff's Ex Parte Motion for Protective Order on an Order Shortening Time and For Stay of Depositions Pending Hearing on the Matter	02/04/15	7	RA 01621 – 01696
Order	11/13/14	4	RA 00970 – 00974
Order	11/26/14	6	RA 01320 – 01330
Order	01/20/15	7	RA 01505 - 01508

Order	06/12/15	8	RA 01841 – 01842
Order Granting in Part and Denying in Part Motion for Protective Order	03/04/15	8	RA 01794 – 01796
Peppermill Casinos Inc.'s Supplemental Motion for Terminating Sanctions Or, In the Alternative, For an Order to Show Cause Why Plaintiff Not Be Held In Contempt and Subjected to Severe Sanctions	11/12/14	4	RA 00831 – 00969
Peppermill Casinos, Inc.'s Amended Answer to Complaint	07/25/14	1	RA 00230 – 00240
Peppermill Casinos, Inc.'s Ex Parte Emergency Motion for Rule 16 Conference	11/12/14	4	RA 00826 – 00830
Peppermill Casinos, Inc.'s Motion for Order Requiring GSR to Show Cause Why It Not be Held In Contempt, Sanctioned and Ordered to Produce Documents	12/17/14	6	RA 01380 – 01417
Peppermill Casinos, Inc.'s Motion for Sanctions	11/20/15	12	RA 02786 – 02880

Peppermill Casinos, Inc.'s Opposition to Plaintiff's Objection to Commissioner's Recommendation Denying Plaintiff's Motion for a Protective Order and Request for a Stay of Depositions Pending the Hearing on the Objection	10/24/14	4	RA 00771 – 00806
Peppermill Casinos, Inc.'s Renewed Motion for Partial Summary Judgment Regarding Damages	11/18/15	10	RA 02282 – 02500
Peppermill Casinos, Inc.'s Renewed Motion for Partial Summary Judgment Regarding Damages (Continued)	11/18/15	11	RA 02501 – 02750
Peppermill Casinos, Inc.'s Renewed Motion for Partial Summary Judgment Regarding Damages (Continued)	11/18/15	12	RA 02751 – 02785
Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret"	11/13/15	8	RA 01882 – 02000
Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret" (Continued)	11/13/15	9	RA 02001 – 02250

Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret" (Continued)	11/13/15	10	RA 02251 – 02281
Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Defendant's Memorandum of Fees and Costs	01/06/15	6	RA 01452 – 01461
Peppermill Casinos, Inc.'s Reply to Plaintiff's Opposition to Defendant's Motion For Contempt	01/08/15	6	RA 01465 – 01498
Peppermill Casinos, Inc.'s Response to GSR's Motion to Clarify the Court's Order Filed December 22, 2015 Regarding Peppermill's Motions in Limine	01/04/16	13	RA 03219 – 03250
Peppermill Casinos, Inc.'s Response to GSR's Motion to Clarify the Court's Order Filed December 22, 2015 Regarding Peppermill's Motions in Limine (Continued)	01/04/16	14	RA 03251 – 03257

Peppermill Casinos, Inc.’s Supplement to Renewed Motion for Summary Judgment Regarding “Trade Secret”	11/25/15	12	RA 02881 – 02900
Peppermill Casinos, Inc.’s Trial Statement	01/04/16	12	RA 02999 – 03000
Peppermill Casinos, Inc.’s Trial Statement (Continued)	01/04/16	13	RA 03001 – 03200
Peppermill’s Objection to MEI-GSR Holdings, LLC’s (1) Proposed Jury Instructions and Verdict Forms, (2) Supplement to Proposed Jury Instructions, and (3) Supplemental Interim Jury Instructions	01/14/16	14	RA 03467 – 03500
Peppermill’s Objection to MEI-GSR Holdings, LLC’s (1) Proposed Jury Instructions and Verdict Forms, (2) Supplement to Proposed Jury Instructions, and (3) Supplemental Interim Jury Instructions (Continued)	01/14/16	15	RA 03501 – 03596

Peppermill's Reply to GSR's Opposition to Peppermill's Motion for Partial Summary Judgment Regarding Damages	12/15/15	12	RA 02912 – 02931
Plaintiff MEI-GSR Holdings, LLC, d/b/a Grand Sierra Resorts Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions	09/09/14	2	RA 00380 – 00500
Plaintiff MEI-GSR Holdings, LLC, d/b/a Grand Sierra Resorts Motion to Strike and Dismiss Defendant Peppermill's Motion for Case Terminating Sanctions (Continued)	09/09/14	3	RA 00501 – 00688
Plaintiff, MEI-GSR Holdings, LLC d/b/a Grand Sierra Resort's Trial Statement	01/04/16	13	RA 03201 – 03218
Plaintiff's Opposition to Defendant's Motion for Contempt	01/02/15	6	RA 01418 - 01451
Portions of the Deposition of Tracy Mimno		22	RA 05444 - 05450
Recommendation for Order	09/19/14	3	RA 00689 – 00702

Recommendation for Order	09/26/14	3	RA 00703 – 00712
Recommendation for Order	10/02/14	3	RA 00748 – 00750
Recommendation for Order (Continued)	10/02/14	4	RA 00751 – 00762
Reply in Opposition to Peppermill’s Renewed Motion for Summary Judgment Regarding “Trade Secret” renewed	12/15/15	12	RA 02932 – 02990
Request for Submission	07/15/14	1	RA 00227 – 00229
Request for Submission	09/26/14	3	RA 00713 – 00715
Request for Submission	11/24/14	6	RA 01317 – 01319
Request for Submission	01/06/15	6	RA 01462 – 01464
Request for Submission	01/08/15	6	RA 01499 – 01500
Request for Submission (Continued)	01/08/15	7	RA 01501 – 01504
Request for Submission	12/23/15	12	RA 02996 – 02998

Trial Exhibit 10 – Diagnostic Screen	01/11/16	14	RA 03283
Trial Exhibit 121 - GSR Slots and Video Poker Website	01/22/16	17	RA 04100
Trial Exhibit 122 - 2010-2014 Penny Video and Reels Net Win, Gross Theo Free-Play Summary	01/22/16	17	RA 04101
Trial Exhibit 123 - 2009-2/2015 NGC Monthly Gross Revenue Reports (Highly Confidential)	01/22/16	17	RA 04102 – 04249
Trial Exhibit 126 - 06/2015 Gaming Abstract Page	01/22/16	17	RA 04250
Trial Exhibit 127 – GSR Buffalo Billboard :	01/11/16	14	RA 03288
Trial Exhibit 149 - Friedman Rebuttal Report	01/22/16	18	RA 04251 – 04292
Trial Exhibit 14A – 07/12/13 Handwritten Key Sheet by Tors (Legible Copy)	01/13/16	14	RA 03418
Trial Exhibit 15 – 07/12/13 Tors Transcript from GSR re: Interview by GCB	01/14/16	15	RA 03597 – 033622

Trial Exhibit 150 - Lucas Rebuttal Report	01/22/16	18	RA 04293 - 04329
Trial Exhibit 151 - Tom Sullivan Player Cards	01/22/16	18	RA 04330
Trial Exhibit 153 - GSR Billboards "Best"	01/22/16	18	RA 04331 – 04336
Trial Exhibit 154 – Casino Management Fee Information	01/11/16	14	RA 03289 – 03296
Trial Exhibit 156 - 06/05/15 Errata to Plaintiff MEI-GSR Holdings, LLC, a Nevada Corporation, d/b/a Grand Sierra Resort's Amended Disclosure of Expert Witness	01/22/16	18	RA 04337 - 04369
Trial Exhibit 157A – 08/28/15 Plaintiff MEI-GSR Holdings, LLC, a Nevada Corporation, d/b/a Grand Sierra Resort's Supplemental Disclosure of Expert Witness – REDACTED	01/22/16	18	RA 04370 – 04405
Trial Exhibit 159 - Nevada Trade Secret Act	01/22/16	18	RA 04406 – 04409
Trial Exhibit 160 - Aguero Charts – No Correlation	01/22/16	18	RA 04410 – 04418
Trial Exhibit 162 – Atlantis Advertisements	01/15/16	15	RA 03701 – 03704

Trial Exhibit 164 – Advertisement from El Cortez	01/15/16	15	RA 03705 – 03710
Trial Exhibit 166 – Report Entitled, “Slot Market Assessment” by Applied Analysis	01/11/16	14	RA 03297 – 03258
Trial Exhibit 169A - Expert Rebuttal Report, Applied Analysis – REDACTED	01/22/16	18	RA 04419 - 04421
Trial Exhibit 16A – 01/02/13 11:24a.m. Tors email re: New Year’s Eve shop	01/14/16	15	RA 03623 – 03624
Trial Exhibit 170 - Expert Rebuttal Report, Applied Analysis (with numbered paragraphs)		22	RA 05351 – 05353
Trial Exhibit 172 - 03/01/15 Expert Witness Report of Professor Anthony Lucas	01/22/16	18	RA 04422 - 04457
Trial Exhibit 186 - 11/03/15 Defendant Peppermills Casino’s Supplement to Disclosure of Rebuttal Expert Witnesses	01/22/16	18	RA 04458 – 04487

Trial Exhibit 188 – 02/03/15 Photocopy of Plaintiff MEI-GSR Holdings, LLC a Nevada Corporation d/b/a Grand Sierra Resorts Disclosure of Expert Witnesses	01/11/16	14	RA 03259 – 03361
Trial Exhibit 189 – 04/01/15 Grand Sierra Resort’s Rebuttal Expert Disclosure	01/11/16	14	RA 03362 – 03365
Trial Exhibit 20 – 09/2014 Affidavit of David Schwartz	01/20/16	16	RA 03758 - 03760
Trial Exhibit 201 - 09/06/15 Atlantis Newspaper Ad	01/22/16	18	RA 04488
Trial Exhibit 202 - 08/30/15 Atlantis Newspaper Ad	01/22/16	18	RA 04489 – 04490
Trial Exhibit 206 - 10/15/15 Salazar Rebuttal Expert Report	01/22/16	18	RA 04491 – 04500
Trial Exhibit 206 - 10/15/15 Salazar Rebuttal Expert Report (Continued)	01/22/16	19	RA 04501 – 04545
Trial Exhibit 214 – Parchanges.pdf	01/11/16	14	RA 03366 – 03382
Trial Exhibit 215A - Peppermill Casinos, Inc. Amended Answer to Complaint dated 7/25/2014 – REDACTED	01/22/16	19	RA 04546 – 04556

Trial Exhibit 220 - (PM part three.pdf) Emails from Ryan Tors to other parties Re: PAR information dated 3/28/2010-11/2010		22	RA 05354 – 05360
Trial Exhibit 220A – (PM part three.pdf) Emails from Ryan Tors to Other Parties Re: PAR Information Dated 03/28/2010 – 11/2010 – REDACTED	01/25/16	22	RA 05349 – 05350
Trial Exhibit 221B – Emails (with notations) from Tors to various parties with PAR information dated 12/29/2011 – 06/13/2013	01/14/16	15	RA 03625 - 03636
Trial Exhibit 229 – GSR Wells Market Share Monthly Report, Percentage of Player for Peppermill v. GSR 2012 – 2013	01/11/16	14	RA 03383 – 03386
Trial Exhibit 232 - Aristocrat “NOTICE OF CONFIDENTIALITY OF PAR SHEETS”		22	RA 05361
Trial Exhibit 239 A – Email from Ryan Tors to NB Partners and William Paganetti Dated 06/07/12	01/22/16	19	RA 04557

Trial Exhibit 240 – Correspondence from Gaming Control dated 7/31/2013 Re: Investigation of Ryan 01/11/16Tors activities; Peppermill Property Receipts	01/11/16	14	RA 03387 – 03391
Trial Exhibit 241A - Emails dated 3/28/2010 – 11/2010 from Ryan Tors to other parties Re: PAR information (PM13272-13278) (PM13277, email between Tors and Scott Bean Re: Rail City comp reinvestment) - REDACTED		22	RA 05362 – 05368
Trial Exhibit 300 - 2/2015 CDC Report	01/22/16	19	RA 04558 – 04648
Trial Exhibit 301 - 3/2015 CDC Report	01/22/16	19	RA 04649 – 04695
Trial Exhibit 302 - 4/2015 CDC Report	01/22/16	19	RA 04696 – 04741
Trial Exhibit 303 - 5/2015 CDC Report	01/22/16	19	RA 04742 – 04750
Trial Exhibit 303 - 5/2015 CDC Report (Continued)	01/22/16	20	RA 04751 – 04788

Trial Exhibit 304 - 6/2015 CDC Report	01/22/16	20	RA 04789 – 04384
Trial Exhibit 305 - 12/31/10 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04385 – 04882
Trial Exhibit 306 - 12/31/11 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04883 – 04930
Trial Exhibit 307 – 12/31/12 State Gaming Control Board Gaming Revenue Report	01/13/16	14	RA 03419 - 03466
Trial Exhibit 308 - 12/31/13 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04931 – 04978
Trial Exhibit 309 - 12/31/14 State Gaming Control Board Gaming Revenue Report	01/22/16	20	RA 04979 - 05000
Trial Exhibit 309 - 12/31/14 State Gaming Control Board Gaming Revenue Report (Continued)	01/22/16	21	RA 05001 - 05026

Trial Exhibit 310 - 08/31/15 State Gaming Control Board Gaming Revenue Report	01/22/16	21	RA 05027 – 05074
Trial Exhibit 311 - 2010 Partial Las Vegas Sands Corp	01/22/16	21	RA 05075 – 05089
Trial Exhibit 312 - 2010 Partial Las Vegas Sands Corp 10K/A	01/22/16	21	RA 05090 – 05101
Trial Exhibit 313 - 2011 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05102 – 05115
Trial Exhibit 314 - 2012 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05116 – 05130
Trial Exhibit 315 - 2013 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05131 – 05146
Trial Exhibit 316 - 2014 Partial Las Vegas Sands Corp 10K	01/22/16	21	RA 05147 – 05162
Trial Exhibit 317 - 03/31/15 Partial Las Vegas Sands Corp 10Q	01/22/16	21	RA 05163 – 05172
Trial Exhibit 318 - 06/30/15 Partial Las Vegas Sands Corp 10Q	01/22/16	21	RA 05173 – 05189
Trial Exhibit 319 - 2010 Partial Wynn Resorts, Limited 10K	01/22/16	21	RA 05190 – 05203
Trial Exhibit 320 - 2011 Partial Wynn Resorts, Limited 10K	01/22/16	21	RA 05204 – 05216
Trial Exhibit 321 - 2011 Partial Wynn Resorts Limited 10K/A	01/22/16	21	RA 05217 – 05250

Trial Exhibit 321 - 2011 Partial Wynn Resorts Limited 10K/A (Continued)	01/22/16	22	RA 05251 – 05256
Trial Exhibit 322 - 2012 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05257 – 05266
Trial Exhibit 323 - 2013 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05267 – 05280
Trial Exhibit 324 - 2014 Partial Wynn Resorts, Limited 10K	01/22/16	22	RA 05281 – 05293
Trial Exhibit 325 - 03/31/15 Partial Wynn Resorts, Limited 10Q	01/22/16	22	RA 05294 – 05302
Trial Exhibit 326 - 06/30/15 Partial Wynn Resorts, Limited 10Q	01/22/16	22	RA 05303 – 05315
Trial Exhibit 327 - 2010 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05316 – 05317
Trial Exhibit 328 - 2011 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05318 – 05319
Trial Exhibit 329 - 2012 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05320 – 05321
Trial Exhibit 330 - 2013 Peppermill Reno 1C Video and Reel Analysis (Highly Confidential)	01/22/16	22	RA 05322 – 05323

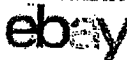
Trial Exhibit 339 - Machine Performance Statistics	01/22/16	22	RA 05324
Trial Exhibit 340.1 – Buffalo	01/11/16	14	RA 03392 – 03405
Trial Exhibit 340.10 – Texas Tea	01/11/16	14	RA 03416
Trial Exhibit 340.11 – Wolf Run	01/11/16	14	RA 03417
Trial Exhibit 340.2 – Cats	01/11/16	14	RA 03406 – 03407
Trial Exhibit 340.2A – Cleopatra	01/11/16	14	RA 03408
Trial Exhibit 340.3 – Ducks in a Row	01/11/16	14	RA 03409
Trial Exhibit 340.4 – Double Diamond 2000	01/11/16	14	RA 03410
Trial Exhibit 340.5 – Enchanted Unicorn	01/11/16	14	RA 03411
Trial Exhibit 340.6 – Horoscope	01/11/16	14	RA 03412
Trial Exhibit 340.7 – Lil Lady	01/11/16	14	RA 03413
Trial Exhibit 340.8 – Money Storm	01/11/16	14	RA 03414
Trial Exhibit 340.9 – Munsters	01/11/16	14	RA 03415

Trial Exhibit 358 - Portions of the Deposition Transcript of Craig Robinson		22	RA 05369 – 05375
Trial Exhibit 359 - Portions of the Deposition Transcript of Terry Vavra		22	RA 05376 – 05384
Trial Exhibit 35A – 11/03/14 GSR Answers to 2 nd Set of Interrogatories – REDACTED Interrogatory No. 14 and Response Only	01/21/16	16	RA 03761 – 03762
Trial Exhibit 360 - Portions of the Deposition Transcript of Ralph Burdick		22	RA 05385 – 05398
Trial Exhibit 361 - Portions of the Deposition Transcript of Toby Taylor		22	RA 05399 – 05406
Trial Exhibit 362 - Portions of the Deposition Transcript of Toby Taylor		22	RA 05407 – 05413
Trial Exhibit 363 - Portions of the Deposition Transcript of Michael Draeger		22	RA 05414 – 05421
Trial Exhibit 364 - Portions of the Deposition Transcript of David Schwartz		22	RA 05422 – 05443

Trial Exhibit 38 – “Reno Loosest Slots in the USA” Billboard by PM	01/11/16	14	RA 03284
Trial Exhibit 4 - GSR Billboard Photographs	01/11/16	14	RA 03260 – 03266
Trial Exhibit 5 – GSR Advertisements – “Loosest Buffalo”	01/11/16	14	RA 03267
Trial Exhibit 50 - GSR Slot Add Worksheet re: machine location and setting (including par) for certain machines	01/22/16	16	RA 03832 – 03850
Trial Exhibit 53 – 11/19/14 GSR Website Slots and Video Poker (Loosest Buffalo)	01/11/16	14	RA 03285
Trial Exhibit 54 – 11/07/14 & 11/17/14 List of games with par settings	01/11/16	14	RA 03286
Trial Exhibit 56 – Chart of GSR Earning Structure	01/11/16	14	RA 03287
Trial Exhibit 6 – 2341 Key on EBay	01/11/16	14	RA 03268 – 03280
Trial Exhibit 73 - Custodian of Records Statement	01/22/16	16	RA 03851 – 03852
Trial Exhibit 74 – CDC Invoices to GSR	01/15/16	15	RA 03637 – 03645

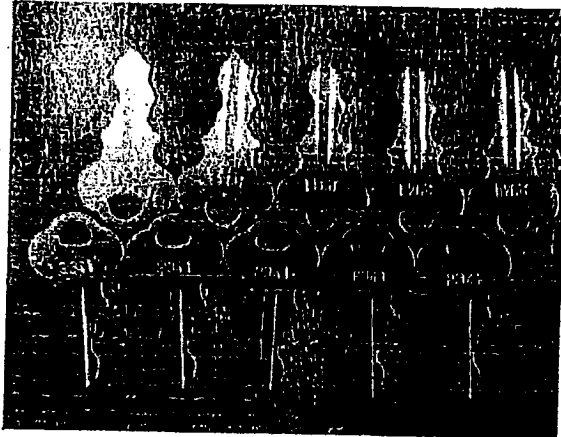
Trial Exhibit 75 - 05/07/10 CDC Report re: Slot Comp	01/22/16	16	RA 03853 – 03858
Trial Exhibit 76 - 05/12/10 CDC Report re: Direct Mail	01/22/16	16	RA 03859 – 03864
Trial Exhibit 77 – 06/2014 CDC Report re: Free Play & Comp Rewards	01/15/16	15	RA 03646 – 03650
Trial Exhibit 78 – 07/2014 CDC Report re: Direct Mail	01/15/16	15	RA 03651 – 03700
Trial Exhibit 79 - 08/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03865 – 03912
Trial Exhibit 8 – 8:51 a.m. Tors Email	01/11/16	14	RA 03281 – 03282
Trial Exhibit 80 - 09/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03913 – 03957
Trial Exhibit 81 - 10/2014 CDC Report re: Direct Mail	01/22/16	16	RA 03958 - 04000
Trial Exhibit 81 - 10/2014 CDC Report re: Direct Mail	01/22/16	17	RA 04001 – 04006
Trial Exhibit 82 – 11/2014 CDC Report re: Direct Mail	01/19/16	15	RA 03711 – 03750

Trial Exhibit 82 – 11/2014 CDC Report re: Direct Mail (Continued)	01/19/16	16	RA 03751 – 03757
Trial Exhibit 83 - 12/2014 CDC Report re: Direct Mail	01/22/16	17	RA 04007 – 04051
Trial Exhibit 84 - 01/2015 CDC Report re: Direct Mail	01/22/16	17	RA 04052 – 04096
Trial Exhibit 85 - 05/14/14 CDC Contract with GSR (signed by Mimno)	01/22/16	17	RA 04097 – 04099

[Hit Sign in or register](#)
[Daily Deals](#)
[My eBay](#)
[Sell](#)
[Community](#)
[Customer Supp](#)

[Shop by category](#)
[All Categories](#)

[Sea](#)
[Back to search results](#) | [Listed in category:](#) [Collectibles > Casino > Slots > Replacement Parts](#)

Slot Machine Jackpot Reset Replacement Key 2341- lot of 20, Free Sh



Item: **Now**
condition:

Quantity: More than 10 available / 12 sold

Price: **US \$25.00**


[Buy It Now](#)

[Add to cart](#)

4 watchers

[Add to Watch list](#)

Seller Information

usedslots(26 )

100% Positive feedback

[Save this seller](#)

[See other items](#)

Mail Later New customers get \$10 back on 1st purchase
Subject to credit approval, see terms

Shipping: **FREE Standard Shipping** | See details
Item location: **Abby, Oklahoma, United States**
Ships to: **United States and many other countries** | See details

Delivery: Estimated between **Thu, Aug. 22 and Mon, Aug. 26**

Payments: **PayPal, Bill Me Later** | See details

Returns: No returns or exchanges, but item is covered by eBay Buyer Protection.

Have one to sell? [Sell it yourself](#)

[Learn more](#)

FOR SHOPPING
ebay

Hi! Sign in or register Daily Deals

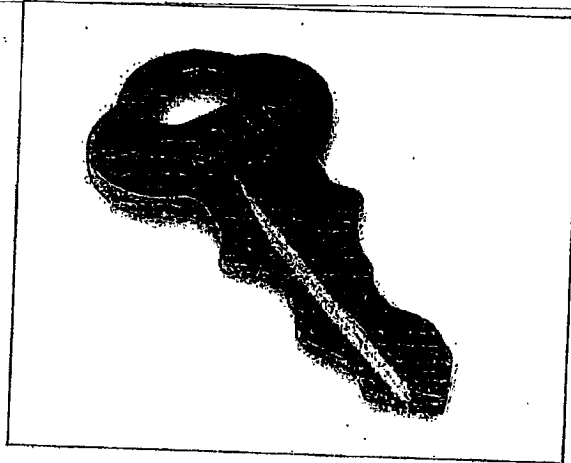
Shop by category

My eBay Sell Community Customer Support

All Categories Search

Back to search results | Listed in category: Collectibles > Casino > Slots > Replacement Parts

Bally, Atronic, Sigma and Williams Slot Machine Jackpot Reset Key



Item New condition

Quantity: More than 10 available / 21 sold

Price: US \$4.99

Buy It Now

Add to cart

4 watchers

Add to Watch list

Seller information
tuoymedia(230) 100% Positive feedback

Save this seller
See other items

Visit store: tuoymedia

New customers get \$10 back on 1st purchase
Subject to credit approval. See terms

Shipping: \$2.86 Standard Shipping | See details
Item location: Winton, Minnesota, United States
Ships to: Worldwide

Delivery: Estimated between Thu, Aug. 22 and Mon, Aug. 26
Use Expedited Shipping to get it by Aug. 23 (if available)

Payment: PayPal, Bill Me Later | See details

Returns: 60 days money back or item exchange, buyer pays return shipping | Read details

FOR SHOPPING
ebay

Mouse over image to zoom.



Learn more

Have one to sell? Sell it yourself

Hi! Sign in or register. Daily Deals

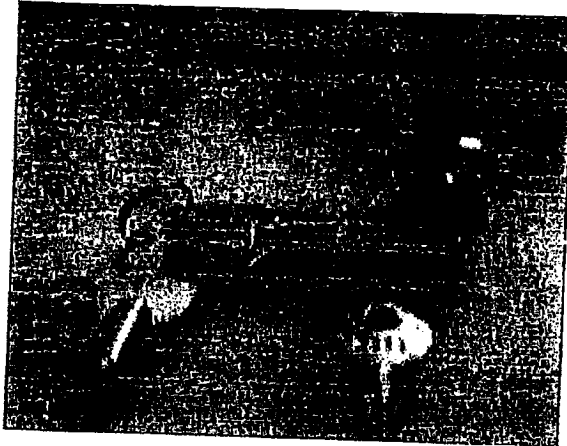
ebay Shop by category

My eBay Sell Community Customer Support

All Categories Search

Back to search results | Listed in category: Collectibles > Casino > Slots > Replacement Parts

IGT SLOT MACHINE - DOOR LOCK & RESET KEY Bally/wms/CDs



Click over image to zoom

Item New condition:

Quantity: More than 10 available / 228 sold

Price: US \$14.49

Buy it Now

Add to cart

180 watchers

Add to Watch list

Seller Information

foxsslois1(4718 ★)

99.8% Positive feedback

Save this seller

See other items

Visit store: Gallery of Slots

Mail Me Later! New customers get \$10 back on 1st purchase. Subject to credit approval. See terms

Shipping: \$3.57 Standard Shipping | See details
Item location: Framingham, Massachusetts, United States
Ships to: Worldwide

Delivery: Estimated between Thu, Aug. 22 and Mon, Aug. 26
Use Expedited Shipping to get it by Aug. 23

Payments:

Returns: 14 days money back, buyer pays return shipping | Read details

FOR SHOPPING
ebay

Have one to sell? Sell it yourself

Learn more

Description

Shipping and payments

Price

Seller assumes all responsibility for this listing.

Last updated on Apr 20, 2013 06:13:16 PDT View all revisions

eBay Item number

Item specifics

Condition: New: A brand new, unused, unopened, undamaged item (including handmade items). See the seller's listing for more details. [Read more](#)

Gallery of Slots

Visit my eBay



Add this store to favorites

Search Store

BALLY SLOTS - 25 year old | BALLY SLOTS - 30 YEAR OLD | MANUALS | BALLY FEATURE GLASS | PARTS

My eBay. Sell Community Customer Support



[Back to search results](#) | Listed in category: [Collectibles](#) > [Casino](#) > [Slots](#) > [Replacement Parts](#)

All Categories

☒ Sea

ALMOST GONE



Quantity: 9 available / 73 sold

Price: US \$10.95

Buy It Now

Add to cart

34 watchers

And to Watch list

Seller information

raz410(937 ☆)

100% Positive feedback

Save this seller

See other items

Visit store: RAZ410 SLOT

Bill Welan New customers get \$10 Back on 1st purchase
Subject to credit approval. See terms

Shipping: \$3.75 Standard Shipping | See details
Item location: Erie, Pennsylvania, United States
Ships to: United States

Delivery: Estimated between Thu. Aug. 22 and Mon.
Aug. 26

Payments: **PayPal**, Bill Me Later | See details

Returns: 14 days money back, buyer pays return shipping
| Read details

Mouse over image to zoom

learn more

Have one to sell? Sell it yourself

FOR SHOPPING
ebay

Hi Sign in or register

Daily Deals

GEICO
Start a quote

My eBay

Sell

Community

Customer Support

Browse by category

Refine your search

Category:

Collectibles

Casino

See all categories

Format:

Auction

Buy It Now

Condition:

New

Not Specified

Price:

\$1.00 - \$10.00

Free Shipping only

Item Location:

on eBay.com

US Only

North America

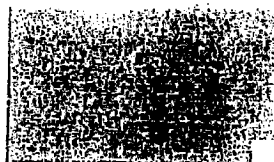
Worldwide

Refinements...

28 completed listings | active listings | sold listings

End Date: recent first

Popular on



SLOT MACHINE 2341 RESET KEY
IGT BALLY WMS WILLIAMS
JACKPOT

Jan-20 12:30

\$2.89

View similar active items Sell one like this



SLOT MACHINE 2341 RESET KEY
IGT BALLY WMS WILLIAMS
JACKPOT

Jan-27 08:56

\$2.89

View similar active items Sell one like this



IGT J/P RESET KEY #2341, NEW, NR,
SET OF 12.

Jan-26 13:48

\$14.99

View similar active items Sell one like this

L.G.T. Reset Replacement Keys (2341)
One Pair (SALE)

Jan-26 11:48

\$4.99

View similar active items Sell one like this



L.G.T. Original Reset Keys (2341) One
Pair for (Slots or Poker Machines)

Jan-21 17:49

\$5.95

View similar active items Sell one like this

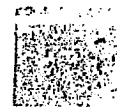


SLOT MACHINE RESET KEY 2341
IGT BALLY WILLIAMS

Jan-19 13:25

\$9.99

See suggestions



SLOT MACHINE
RESET KEY K

\$2.89

See suggestions



BALLY SLOT
MACHINE SET

\$10.00

See suggestions



Bally Slot Mach
Manual for...

\$25.00

See suggestions



BALLY SLOT
MACHINE SET

\$10.00

See suggestions

Page 1 of 1



View similar active items | Sell one like this

I.Q.T. Original Reset Keys (2341) One
Pair for (Slots or Poker Machines)

Jan-19 17:33

\$5.95
0 bids

View similar active items | Sell one like this



2 NEW RESET Chicago Keys Gaming
Access Control Switch 2 LOCKS 2
KEYS #2341 Slot

Jan-14 11:32

\$10.00
Buy it now

View similar active items | Sell one like this



IGT J/P RESET KEY #2341, NEW, NR,
SET OF 12.

Jan-12 24:44

\$14.99
0 bids

View similar active items | Sell one like this

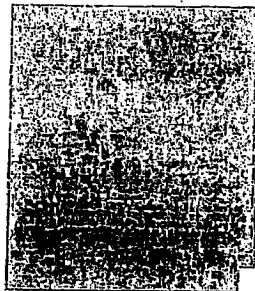


IGT BALLY WMS SLOT POKER
MACHINE 2341 JACKPOT RESET
KEY LOT OF TWO

Jan-07 13:56

\$5.00
Buy it now

View similar active items | Sell one like this



SLOT MACHINE RESET KEY 2341
IGT BALLY WILLIAMS

Jan-05 10:20

\$9.99
0 bids

View similar active items | Sell one like this



I.G.T. Original Reset Keys (2341) One
Pair for (Slots or Poker Machines)

Jan-02 10:18

\$5.95
Buy it now

View similar active items · Sell one like this



IGT WILLIAMS BALLY CDS WMS
SLOT JACKPOT 2341 RESET KEY

Jan-01 07:10

\$2.89
Buy it now

View similar active items · Sell one like this



IGT, Signia, Ballys pair of reset keys
#2341

Dec-31 29:73

\$5.50
Buy it now

View similar active items · Sell one like this

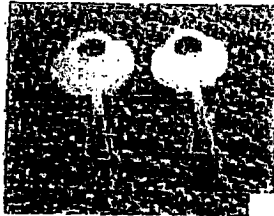
I.G.T. Original Reset Keys (2341) One

Pair for (Slots or Poker Machines)

Dec-28 06:01

\$5.95
Buy it now

View similar active items · Sell one like this

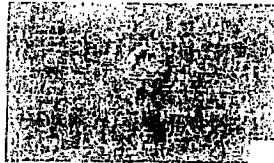


I.G.T. Reset Replacement Keys (2341)
One Pair (SALE)

Dec-26 01:43

\$5.50
Buy it now

View similar active items · Sell one like this



SLOT MACHINE 2341 RESET KEY
IGT BALLY WMS WILLIAMS
JACKPOT

Dec-24 07:24

\$2.89
Buy it now

View similar active items · Sell one like this



IGT WILLIAMS BALLY CDS WMS
SLOT JACKPOT 2341 RESET KEY

Dec-19 17:43

\$2.89
Buy it now

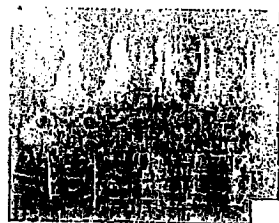
View similar active items · Sell one like this

IGT J/P RESET KEY #2341, NEW, NR.
SET OF 12.

Dec-09 15:06

\$14.99
1 bid

[View similar active items](#) [Sell one like this](#)



Slot Machine Jackpot Reset
Replacement Key 2341 - lot of 20,
Free Shipping!

Dec-04 19:57

\$25.00
Buy It Now

[View similar active items](#) [Sell one like this](#)



SLOT MACHINE RESET KEY 2341
IGT BALLY WILLIAMS

Dec-02 17:50

\$10.49
3 bids

[View similar active items](#) [Sell one like this](#)

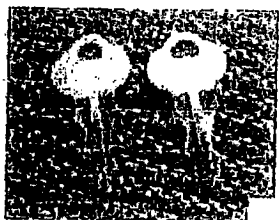


I.G.T. Original Reset Keys (2341) One
Pair for (Slots or Poker Machines)

Dec-02 16:19

\$5.95
1 bid

[View similar active items](#) [Sell one like this](#)



I.G.T. Reset Replacement Keys (2341)
One Pair (SALE)

Nov-20 05:28

\$4.99
1 bid

[View similar active items](#) [Sell one like this](#)



SLOT MACHINE 2341 RESET KEY
IGT BALLY WMS WILLIAMS
JACKPOT

Nov-24 08:39

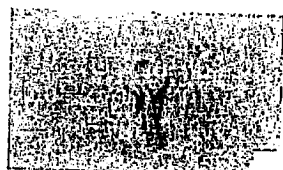
\$2.89
Buy It Now

[View similar active items](#) [Sell one like this](#)

IGT Original Reset Keys (2341) One Pair for (Slots or Poker Machines)

Nov-16 19:44
\$8.95
Buy it Now

View similar active items | Sell one like this



IGT WILLIAMS BALLY QPS WMS
SLOT JACKPOT 2341 RESET KEY

Nov-16 15:48

\$2.89
Buy it Now

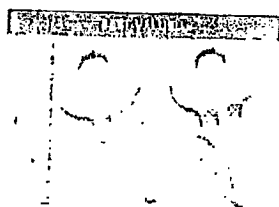
View similar active items | Sell one like this

SLOT MACHINE RESET KEY 2341
IGT BALLY WILLIAMS

Nov-11 17:05

\$9.00
1 bid

View similar active items | Sell one like this



IGT Jackpot Reset Key #2341 for IGT
Slot Machines

Nov-10 13:51

\$8.95
Buy it Now

View similar active items | Sell one like this

Sponsored Results

Las Vegas Car Keys

Car Key Specialists/Key Programming Lost Keys Replaced / Spare Keys
www.lasvegascarkeys.com/

Las Vegas Key Shop

9835 Fort Apache rd #204-89147 Call 702-804-4002 and visit us
www.lasvegaskeyshop.com/

File Keys I Lock Coren

All Mfrs- File Cabinets | Cubicles Free Shipping -No min order
www.keysolver.com/

Clear Keys

Find Clear Keys Online. Free Shipping \$50 on 100,000 items!
www.target.com/FreeShipping

Tuttnauer 2340 Autoclaves

Foremost has Tuttnauer 2340Ms in Stock and Ready to Ship
2340.foremostequipment.com/



Slot Doctor

HOME IGT 2341 Jackpot reset key

- PARTS
- MANUALS
- DOOR LOCKS
- SUBMIT A TICKET
- VIEW EXISTING TICKET
- IDENTIFY YOUR GAME
- CONTACT US
- LINKS



Jackpot reset key, number 2341..Used on IGT, Bally and Williams (WMS) gaming machines.

1 Shopping cart
0 Product(s) in cart
Total \$0.00
Checkout

Price: \$4.99

Add to cart



« Previous | Next »

Enter Email

Login

Forgot password?

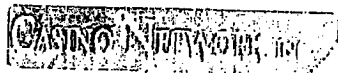
PayPal



Home - Terms and Conditions - Privacy Statement - Webmaster - Site Map - Contact Us

PayPal

© Copyright 2012 SlotDoctor.com



Currency
\$ 2.00

Shopping Cart
0 item(s) - \$0.00

Search

Welcome Visitor you can [Log Out](#) or [Create Account](#)

[Home](#) [Wish List \(0\)](#) [My Account](#) [Shopping Cart](#) [Checkout](#)

[Custom Graphics](#) [Custom Games](#) [Custom Glass](#) [Slot Machines](#) [Software](#) [Replacement Kits](#) [Replacement Parts](#)

Categories

[All Categories](#)
[Replacement Parts](#)

[Custom Graphics](#)

[Custom Games](#)

[Custom Glass](#)

[Slot Machines](#)

[Software](#)

[Replacement Kits](#)

[Replacement Parts](#)

[All Categories](#)

[Custom Graphics](#)

[Custom Games](#)

[Custom Glass](#)

[Slot Machines](#)

[Software](#)

[Replacement Kits](#)

[Replacement Parts](#)

[All Categories](#)

[Custom Graphics](#)

[Custom Games](#)

Reset Key #2341 for most slot machines (set of 2)

Reset Key #2341 for most slot machines (set of 2)



Order ID:

Order ID: 101 Reset Key

Order ID: 101

Order ID: 101

Price: \$9.95

Qty: 1

Add to Cart

OR

Buy Now

View Cart | View Details

Home

Description Reviews (0)

This is a reset key for gaming machines. It is #2341

Information

- [About Us](#)
- [Delivery Information](#)
- [Privacy Policy](#)
- [Terms & Conditions](#)
- [Legal](#)

Customer Service

- [Contact Us](#)
- [Returns](#)
- [Site Map](#)

Extras

- [Brands](#)
- [Gift Vouchers](#)
- [Affiliates](#)
- [Specials](#)

My Account

- [My Account](#)
- [Order History](#)
- [Wish List](#)
- [Newsletter](#)

OpenCell Software
Casino Network, Inc. © 2010

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 5

EXHIBIT 5

AFFIDAVIT OF KENT R. ROBISON IN SUPPORT OF
PEPPERMILL'S RENEWED MOTION FOR SUMMARY JUDGMENT REGARDING
"TRADE SECRET"

STATE OF NEVADA)
)ss.
COUNTY OF WASHOE)

KENT R. ROBISON, being first duly sworn, deposes and states under penalty of perjury that the following assertions are true and correct.

1. I am an attorney licensed in Nevada, and I am counsel representing Defendant Peppermill Casinos, Inc. in this matter. I am a shareholder with the law firm of Robison, Belaustegui, Sharp & Low.

2. I have personal knowledge of the matters set forth in this Affidavit, and if called to testify, I could. I submit this Affidavit in support of Peppermill Casinos, Inc.'s Renewed Motion for Summary Judgment Regarding "Trade Secret" ("Motion"), to which this Affidavit is attached as Exhibit 5.

3. Attached as **Exhibit 3** to this Motion is a true and correct copy of the expert report of Stacy Friedman (**Highly Confidential**).

4. Attached as **Exhibit 4** to this Motion is a true and correct copy of a printout from the website Ebay, advertising the sale of 2341 keys.

5. Attached as **Exhibit 7** to this Motion is a true and correct copy of the email sent by Ryan Tors on December 29, 2011, which email has been marked as **Highly Confidential**.

6. Attached as **Exhibit 8** to this Motion is a true and correct copy of the email sent by Ryan Tors on June 15, 2012, which email has been marked as **Highly Confidential**.

7. Attached as **Exhibit 9** to this Motion are true and correct copies of excerpts from the deposition transcript of Ryan Tors, which have been marked as **Highly Confidential**.

8. Attached as **Exhibit 10** to this Motion are true and correct copies of excerpts from the deposition transcript of Tracy Mimno, which have been marked as **Highly Confidential**.

9. Attached as **Exhibit 11** to this Motion are true and correct copies of excerpts from the deposition transcript of Terry Vavra, which have been marked as **Highly Confidential**.

10. Attached as **Exhibit 12** to this Motion are true and correct copies of excerpts from

1 the deposition transcript of David G. Schwartz, Ph.D., which have been marked as **Highly**
2 **Confidential**.

3 11. Attached as **Exhibit 13** to this Motion are true and correct copies of excerpts from
4 the October 19, 2015 deposition transcript of Jeremy Aguero.

5 12. Attached as **Exhibit 14** to this Motion is a true and correct copy of the expert
6 report of Anthony Lucas, without appendix, marked as **Highly Confidential**.

7 13. Attached as **Exhibit 15** to this Motion is a true and correct copy of the rebuttal
8 expert report of Tom Sullivan, without exhibits, marked as **Highly Confidential**.

9 14. Attached as **Exhibit 16** to this Motion are true and correct copies of excerpts from
10 the deposition transcript of William Alfred Paganetti.

11 15. Attached as **Exhibit 17** to this Motion is a true and correct copy of the October
12 13, 2015 Letter from David Ensign (**Highly Confidential**).

13 16. Attached as **Exhibit 18** to this Motion is a true and correct copy of the October 6,
14 2015 email from John J. Ascuaga.

15 17. Attached as **Exhibit 19** to this Motion is a true and correct copy of the
16 Declaration of John Farahi (**Highly Confidential**).

17 18. Attached as **Exhibit 20** to this Motion is a true and correct copy of the October
18 20, 2015 letter from Russ Sheltra.

19 19. Attached as **Exhibit 21** to this Motion is a true and correct copy of the October
20 26, 2015 letter from Gary Carano (**Highly Confidential**).

21 20. Attached as **Exhibit 22** to this Motion is a true and correct copy of the October
22 30, 2015 letter from Jeffery Siri.

23 21. Attached as **Exhibit 23** to this Motion is a true and correct copy of the October
24 30, 2015 letter from Mitch Gardner.

25 22. Attached as **Exhibit 24** to this Motion are true and correct copies of excerpts from
26 the deposition transcript of Tom Sullivan, which have been marked as **Highly Confidential**.

27 23. Attached as **Exhibit 25** to this Motion are true and correct copies of excerpts from
28 the deposition transcript of Toby Taylor, which have been marked as **Highly Confidential**.

1 24. Attached as **Exhibit 26** to this Motion is a true and correct photo of GSR's
2 Billboard regarding the GSR's Buffalo slot machines.

3 25. Attached as **Exhibit 27** to this Motion are true and correct copies of GSR's
4 billboard regarding its WMS machines.

5 26. Attached as **Exhibit 28** to this Motion are true and correct copies of GSR's
6 website publications regarding GSR's slot and video poker machines.

7 27. Attached as **Exhibit 29** to this Motion are true and correct copies of excerpts from
8 the deposition transcript of John Stone.

9 28. Attached as **Exhibit 30** to this Motion is a true and correct copy of the CDC
10 Consulting, Reno Casinos, Direct Mail Rewards Comparison & Analysis Report dated August
11 2014, which has been marked as **Highly Confidential**.

12 29. Attached as **Exhibit 31** to this Motion are true and correct copies of excerpts from
13 the deposition transcript of Scott Bean, which have been marked as **Highly Confidential**.

14 30. Attached as **Exhibit 32** to this Motion are true and correct copies of excerpts from
15 the deposition transcript of William Natale Paganetti.

16 31. Attached as **Exhibit 33** to this Motion are true and correct copies of excerpts from
17 the deposition transcript of Michael Draeger, which have been marked as **Confidential**.

18 32. Attached as **Exhibit 34** to this Motion are true and correct copies of
19 advertisements from the Atlantis Casino Resort Spa regarding loose slots.

20 33. Attached as **Exhibit 35** to this Motion are true and correct copies of
21 advertisements from the website of the Cortez Club Casino regarding loose slots.

22 34. Attached as **Exhibit 36** to this Motion is a true and correct copy of the Las Vegas
23 Sands Corp.'s Form 10-K filing for the fiscal year ending December 31, 2011.

24 35. Attached as **Exhibit 37** to this Motion is an accurate and file-stamped copy of
25 GSR's Initial Expert Witness Disclosures, filed March 2, 2015, with exhibits.

26 36. Attached as **Exhibit 38** to this Motion is an accurate, file-stamped copy of GSR's
27 Amended Disclosure of Expert Witness filed June 4, 2015, with exhibits (**Highly Confidential**).

28 37. Attached as **Exhibit 39** is an accurate and file-stamped copy (without exhibits) of

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

GSR's Rebuttal Expert Witness Disclosure.

Dated this 13th day of November, 2015.


KENT R. ROBISON

Subscribed and sworn to before me
on this 13th day of November, 2015 by
Kent R. Robison.



NOTARY PUBLIC



EXHIBIT 6

NOTE: THERE IS NO
EXHIBIT 6

EXHIBIT 6

EXHIBIT 7

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 7

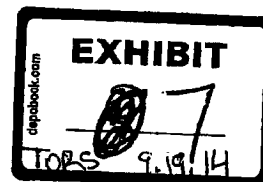
From: Ryan Tors
Sent: Thursday, December 29, 2011 8:59 AM
To: NBPartners; Rob Erwin; John C Hanson (Reno GM)
Subject: Grand Sierra



Grand Sierra
pars.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



Grand Sierra

12/29/2011

1	04-15-08	440	91.83	8.17	Buffalo
2	04-15-07	21016	91.83	8.17	Buffalo
	Aristocrat	55722	average	8.17	
1	04-15-08	440	93.99	6.01	Ducks in a Row
2	04-15-07	21016	94.03	5.97	Cleopatra
3	04-15-05	571	94.03	5.97	Money Strom
4	05-25-02	50060	93.98	6.02	Texas Tea
5	05-25-03		94.98	5.02	Munsters
6	05-25-01		94.00	6.26	Dbl Dia 2000
7	03-25-04	358	93.97	6.03	Lil Lady
	IGT		average	5.90	

overall average 6.40

*all machines that I can key quickly were flagged as having been loosened, some had the dangler pulled off

HIGHLY CONFIDENTIAL

PM 0080

RA 02020

EXHIBIT 8

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 8

From:
Sent:
To:
Subject:

Ryan Tors
Friday, June 15, 2012 8:51 AM
NBPartners; John C Hanson (Reno GM); Billy Paganetti; David McHugh
Grand Sierra pars



Grand Sierra
pars1.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



6/14/2012

Grand Sierra

1	04-07	20375	93.99	6.01	Ducks in a Row
2	04-18	1011	91.82	8.18	Buffalo
3	04-10	20050	94.06	5.94	Enchanted Unicorn
4	01-07	127	94.01	5.99	Cats
5	10-47	246	93.99	6.01	Horoscope
6	05-26	937	92.51	7.49	Wolf Run
			average	6.60	

HIGHLY CONFIDENTIAL

PM 0082

RA 02023

EXHIBIT 9

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 9

1 Case No. CV13-01704

2 Dept. No. B7

3 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
4 IN AND FOR THE COUNTY OF WASHOE

5
6 -oOo-

7 MEI-GSR Holdings, LLC, a Nevada)
8 Corporation, d/b/a Grand Sierra Resort,)
9 Plaintiff,)

10 -vs-)

11 PEPPERMILL CASINOS, INC., a Nevada)
12 Corporation, d/b/a PEPPERMILL CASINO;)
13 RYAN TORS, an individual; JOHN DOES I-X,)
14 and JANE DOES I-X and CORPORATIONS I-X,)
15 Defendant(s).)

16 *** HIGHLY CONFIDENTIAL ***

17 *** ATTORNEYS' EYES ONLY ***

18 VIDEOTAPED DEPOSITION OF RYAN TORS, VOLUME I

19 (Pages 131-286)

20 called for examination by counsel for Defendant Peppermill
21 Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
22 the offices of Gunderson Law Firm, 3895 Warren Way, Reno,
23 Nevada, at 9:38 a.m., Friday, September 19, 2014, before
24 Becky Van Auken, a Certified Court Reporter.

25 Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 machines in the Reno-Sparks community, do you?

2 A I did. Yes.

3 Q You did do that?

4 A Yes.

5 Q All right. However, isn't it true that you
6 also turned in reports to the Peppermill that were
7 contrived?

8 A Yes.

9 Q That were fake?

10 A That were fake. Yes.

11 Q And you just made up the numbers?

12 A I made up the pars. I really went to a
13 location and they really represented sections and
14 machine numbers.

15 This one I made mistakes on, I can see
16 here. It's embarrassing. But -- but, no, often I
17 just contrived them, yes.

18 Q And did you tell your employers or any
19 representatives at the Peppermill that the reports
20 that you made up, that you contrived, were actually
21 hypothetical and just guesses?

22 A I didn't tell anybody.

23 Q Did you think that they might believe that
24 this -- these reports that you made were actually
25 reports of what you actually saw on diagnostic screens

1 at various properties as a result of keying?

2 A I thought -- I -- yeah, they thought that
3 they were real, yes.

4 Q Yeah. And you told them --

5 A I believe so.

6 Q -- you told them, even though they were
7 fake, that they were real?

8 A I represented them as being -- being real.
9 I -- I wouldn't even have said they're not fake. I --
10 I represented them as being real, yes.

11 Q I mean, you wouldn't have given them to
12 Peppermill people if you told them that they were
13 fake, would you?

14 A No.

15 Q All right.

16 All right. So if we get back to Exhibit 7
17 specifically, I need the jury to be able to understand
18 this information as it flows left to right. Okay?

19 A Okay.

20 Q And I don't know if the camera can actually
21 see this if I -- if I ask you to hold it up. So would
22 you hold up the -- the sheet so the camera can pick up
23 on it so you explain these entries across left to
24 right.

25 A Okay.

1 A That's actually a machine number. A slot
2 number, excuse me. And it's just sloppy work. You
3 know, I missed some down here. It's just -- this --
4 this is very -- this is kind of embarrassing. Even
5 the date's screwed up.

6 Q All right. So the number right there next
7 to Aristocrat, 86723, that's a fictitious number,
8 isn't it?

9 A Appears to be.

10 Q Because there is no pars for this
11 fictitious machine. You just have an average. And
12 what you did is average the first two machines to get
13 to 8.17, didn't you?

14 A Yes.

15 Q There is no third Buffalo keyed, was there?

16 A No.

17 Q And there's no third Buffalo faked, is
18 there?

19 A No.

20 Q How do you explain this?

21 A It's just sloppy work. I don't -- it's
22 just -- it's just an embarrassing thing. I don't --
23 you know, I don't remember doing this. So I -- I
24 can't tell you exactly. But what -- what -- I don't
25 know.

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Friday, September 19, 2014, at the offices of Gunderson Law Firm, 3895 Warren Way, Reno, Nevada, I was present and took verbatim stenotype notes of the videotaped deposition of RYAN TORS, VOLUME I, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 27th day of September, 2014.


BECKY VAN AUKEN, CCR #418

EXHIBIT 10

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 10

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,)

Plaintiff,)

-vs-)

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO,)

Defendant(s).)

VIDEOTAPED DEPOSITION OF TRACY MIMNO

(Pages 1-27)

HIGHLY CONFIDENTIAL - VIDEOTAPED DEPOSITION OF TRACY MIMNO

(Pages 28-292)

called for examination by counsel for Defendant Peppermill
Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
the offices of Robison, Belaustegui, Sharp & Low, 71
Washington Street, Reno, Nevada, at 9:12 a.m., Wednesday,
November 4, 2015, before Becky Van Auker, a Certified Court
Reporter.

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 BY MR. ROBISON:

2 Q How did you characterize the process by
3 which John Stone asked our VIP host what the
4 theoretical win was?

5 A I recall speaking that -- I'm not sure what
6 our policy is at the Peppermill and would need more
7 information on how he went about it.

8 Q Well, we both know once you get theoretical
9 win, you can calculate par ethically. Correct?

10 A With -- I agree to the methodology we have
11 discussed.

12 Q Known coin-in, known theoretical win; easy
13 division of one into the other to determine the par of
14 the machine?

15 A Starting points and so forth, yes.

16 Q And from there you can go to comp
17 reinvestment percentage, et cetera. Correct?

18 A Yes.

19 Q All right. Finally, the last letter is --
20 on Exhibit 186 is a letter from Mitch Gardner, vice
21 president, Bordertown. Do you know this gentleman?

22 A And -- oh, I must have skipped his.

23 Q I think it's the last page.

24 A Oh, it is. Okay.

25 I do not know him.

H I G H L Y C O N F I D E N T I A L

1 Q Do you know of the Bordertown Casino?

2 A Is -- where is Bordertown?

3 Q Going out towards Hallelujah Junction.

4 A Oh, yes. Out by Bonanza perhaps.

5 Q No, no. Out by -- past -- as you're going
6 to Hallelujah Junction north on 395.

7 A Okay. Okay.

8 Okay. And did you have a question on this?

9 Q I was going to make sure you got familiar
10 with the letter before I asked the question. Are you
11 ready?

12 A Yes.

13 Q All right. Mr. Gardner has also analyzed
14 the situation where GSR got 13 pars. And let me
15 explain to you why it's 13 in this -- in this letter.

16 If you look at Exhibit 7, you'll see that
17 there are two machines.

18 A Okay.

19 Q See the Buffalo machine and the 440?

20 A Yes.

21 Q And see the first IGT machine has got the
22 same machine number?

23 A At 440?

24 Q Something's wrong with that. Correct?
25 There wouldn't be a machine number 440 that's a

H I G H L Y C O N F I D E N T I A L

1 Buffalo at your establishment and a Ducks in a Row
2 machine No. 440, would there?

3 A You would have to ask Mr. Tors.

4 Q Well, I'm asking the GM of GSR whether or
5 not you give the same machine number to different
6 themes.

7 A I was not there on 12/29/2011. I can say
8 it is not logical that you would do that.

9 Q Okay. Do you do that now? Do you give
10 different machines the same machine number?

11 A No.

12 Q In fact, the way to track machines is -- in
13 part is to give them different machine numbers so they
14 have individual identities?

15 A It would not be logical to give two
16 machines -- the same machine number to more than one
17 machine.

18 Q Have you ever seen that done at any of the
19 properties that you've worked at?

20 A I can't say that anyone would do it
21 intentionally.

22 Q At the Red Hawk did you give Buffalo the
23 same machine number --

24 A I would not --

25 Q -- as a Ducks in a Row?

H I G H L Y C O N F I D E N T I A L

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Wednesday, November 4, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the videotaped deposition of TRACY MIMNO, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 12th day of November, 2015.

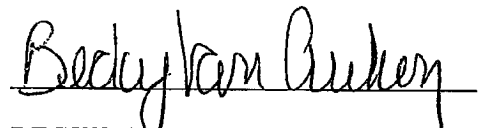

BECKY VAN AUKEN, CCR #418

EXHIBIT 11

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 11

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)
)
Plaintiff,)
)
-vs-)
)
PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)
)
Defendant(s).)

DEPOSITION OF TERRY VAVRA

(HIGHLY CONFIDENTIAL PAGES 186 - 225)

called for examination by counsel for Defendant Peppermill Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, at 9:30 a.m., Wednesday, December 3, 2014, before Becky Van Auken, a Certified Court Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 or the win per unit of your floor, yes.

2 Q So keying one machine doesn't tell you what
3 the weighted average is going to be, does it?

4 A One machine, no.

5 Q Six out of 1100?

6 A Probably not.

7 Q I want to turn your attention, sir, to
8 Interrogatory No. 4. The question is: Has the GSR
9 conducted any investigations since July of 2011
10 concerning Peppermill's comp strategies, reinvestment
11 strategies or efforts to determine Peppermill's par
12 settings, player theoretical holds or other
13 information pertinent to the Peppermill's gaming
14 strategies for slot machines?

15 The answer, after not waiving objections,
16 is that GSR has never conducted any investigation.

17 Why do you say that?

18 A Any investigation which would be deemed
19 illegal or improper.

20 Q Okay. How about what investigations has
21 the GSR done that are legal and proper?

22 A Simply -- our shoppers simply would walk
23 through the properties and observe volumes and
24 business and -- purely observational.

25 Q We know that Compton & Dancer has shopped

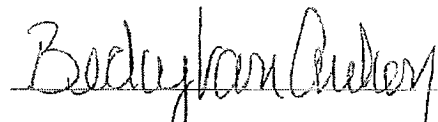
STATE OF NEVADA)
)
COUNTY OF WASHOE) ss.

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Wednesday, December 3, 2014, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of TERRY VAVRA, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 8th day of December, 2014.



BECKY VAN AUKEN, CCR #418

EXHIBIT 12

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 12

1 IN THE SECOND JUDICIAL DISTRICT FOR THE STATE OF NEVADA

2 IN AND FOR THE COUNTY OF WASHOE

3 * * * * *

4 MEI-OSR HOLDINGS, LLC, a
5 Nevada Corporation, d/b/a
6 GRAND SIERRA RESORT,

7 Plaintiff,

8 vs.

CASE NO.: CV13-01704
DEPT. NO.: B7

9 PEPPERMILL CASINOS, INC.,
10 a Nevada Corporation, d/b/a
11 PEPPERMILL CASINO; RYAN TORS,
12 an individual; JOHN DOES I-X,
13 and JANE DOE I-X and
14 CORPORATIONS I-X,

15 Defendants.

16
17 CONFIDENTIAL DEPOSITION OF

18 DAVID G. SCHWARTZ, PH.D.

19 October 21, 2014

20 9:27 a.m.

21 2300 West Sahara Avenue
22 Suite 770
23 Las Vegas, Nevada

24 Christine M. Jacobs, CCR No. 455
25

1 difficult.

2 Q. Well, what he said at his deposition, he can't
3 tell us which ones he did and which ones he made up.
4 Now, I don't know what to do with that, do you?

5 A. Right now I don't. But again, I'd like some
6 more time to look into that.

7 Q. If he's right, he's got an average par of 6.4,
8 which renders your 6 inapplicable, if true.

9 A. If the average par is 6.4?

10 Q. Yeah. But that's not the average par, is it?

11 A. I don't know what the average par is.

12 Q. I mean that's seven machines out of 303
13 machines. That's not reliable, is it?

14 A. I would want a bigger sample.

15 Q. Yeah, you'd want probably close to 40 percent to
16 be reliable according to the statistics of this kind of
17 analysis; correct?

18 A. Possibly, yes.

19 Q. So if you used 2 percent of the number of
20 machines on the floor, you're doing so at a high degree
21 of risks. Fair enough?

22 A. Sure.

23 Q. And you wouldn't recommend that anybody relied
24 on a sample of 3 percent, would you, as an expert?

25 A. It all depends on what they're using it for.

CHRISTINE M. JACOBS, CCR 455

EXHIBIT 13

EXHIBIT 13

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,)

Plaintiff,)

-vs-)

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)

Defendant(s).)

DEPOSITION OF JEREMY AGUERO

called for examination by counsel for Defendant Peppermill
Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
the offices of Cohen Johnson, 255 E. Warm Springs Road, Suite
100, Las Vegas, Nevada, at 9:34 a.m., Monday, October 19,
2015, before Becky Van Auken, a Certified Court Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 give an independent value to now has an \$8 million
2 value?

3 A I am.

4 Q Well, why did you tell me you couldn't
5 value it before?

6 A I don't think that I did. I said that you
7 have to take it in its context.

8 Q I see. And I misspoke. I apologize.

9 A That's okay.

10 Q You're saying that the individual piece of
11 pizza, Exhibits 7 and 8, if removed from the
12 constellation of other information, its value is not
13 ascertainable?

14 A That is correct.

15 Q Okay. There you go.

16 So because the other pars from the other
17 casinos are an indispensable part of this
18 constellation of information, without the other pars
19 does the data in Exhibit 7 and 8 have value?

20 A Yes, sir.

21 Q How much?

22 A I don't know. I don't think that's readily
23 ascertainable, but less.

24 Q And given the value of 8 million as these
25 pars fit into the pie, the constellation of

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Monday, October 19, 2015, at the offices of Cohen Johnson, 255 E. Warm Springs Road, Suite 100, Las Vegas, Nevada, I was present and took verbatim stenotype notes of the deposition of JEREMY AGUERO, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 25th day of October, 2015.

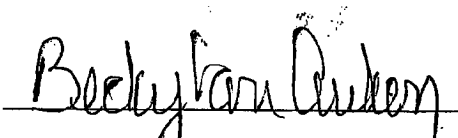

BECKY VAN AUKEN, CCR #418

EXHIBIT 14

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 14

MEI-GSR HOLDINGS, LLC.

(Plaintiff)

- versus -

PEPPERMILL CASINOS, INC., RYAN TORS, JOHN DOES I-X,

JANE DOES I-X, and CORPORATIONS I-X

(Defendants)

REBUTTAL TO MR. AGUERO'S EXPERT REPORT

PROFESSOR ANTHONY LUCAS

Table of Contents

1. QUALIFICATIONS	1
2. STATEMENT OF ASSIGNMENT	2
3. SUMMARY OF CONCLUSIONS	3
4. SUPPORT FOR CONCLUSIONS	4
4.1. Referenced Hypothetical.....	4
4.2. All Denominations vs. \$0.01 Games	7
4.3. A Handful of Pars vs. NGCB Data	7
4.4. Capacity for Increasing Pars	8
5. REFERENCE MATERIALS.....	8
Appendix A (CV).....	9

1. QUALIFICATIONS

I worked in the hotel-casino industry for 11 years in the areas of operations analysis and financial planning and analysis, with a concentration in the area of casino analytics. My responsibilities included analysis of casino operations and performance, preparation of the annual operating budget, and long- and short-range business plans. I worked in three different gaming markets over the course of my career for companies such as MGM Grand Hotel & Casino, Harvey's Hotel Casino Resort, and Palace Station Hotel Casino.

In 1999, I began consulting to gaming properties in the areas of casino operations analysis and casino marketing. Over the years this business has grown considerably, as I have provided consulting services for gaming clients in both domestic and international jurisdictions, including Fortune 500 companies and governmental agencies such as the Internal Revenue Service.

The focus of my doctoral dissertation was on the role of the physical environment in the slot player satisfaction process. My model also looked at the relationship between slot player satisfaction and key customer loyalty variables such as intent to return, willingness to recommend, and desire to remain in the casino environment. This work has been replicated and extended by several scholars following its publication in 2003.

As a tenured full professor at UNLV, I have taught courses in the following areas: casino management, casino marketing, statistics (with an emphasis on gaming applications), and a research seminar in casino topics. All of these courses are offered in the William F. Harrah College of Hotel Administration. Additionally, through UNLV's International Gaming Institute, I have delivered hundreds of casino management and

marketing presentations/seminars to industry professionals from jurisdictions across the globe.

My publications include top-selling textbooks on casino management, some of which have been adopted by more than 30 colleges/universities. I have also authored more than 30 peer-reviewed academic journal articles on gaming-related matters. I have received research awards for several of these scholarly papers, including Article of the Year from Cornell Quarterly and CHRIE's prestigious Wiley Award for best original research paper in the field of hospitality. My work is frequently cited by scholars within the field.

I have served as both an expert witness and consultant to legal counsel on several gaming-related matters which are all listed on the last page of my Curriculum Vitae (See Appendix A). Additional details related to my academic achievements and industry experience can be found in my Curriculum Vitae.

2. STATEMENT OF ASSIGNMENT

I have been asked by counsel for the Defendants (hereinafter Peppermill) to provide a rebuttal to the expert reports submitted by Mr. Jeremy Aguero of Applied Analysis on behalf of the Plaintiff (hereinafter GSR).

In accordance with NRCP 16.1(a)(2)(B), the current compensation to be paid for my analysis and testimony is \$300 per hour. My compensation is in no way affected by the opinions that I express in this report or by the outcome of this case.

I reserve the right to revise and supplement this report based on additional materials that I might review, including materials that have not yet been made available to me.

3. SUMMARY OF CONCLUSIONS

3.1. I do not believe that the hypothetical from the Nevada Gaming Commission referenced in Mr. Aguero's report serves as a valid basis for a damages model (See Section 4.1).

3.2. The basis of the damages model advanced by Mr. Aguero is flawed because it includes all slot denominations (See Section 4.2).

3.3. The NGCB data used by Mr. Aguero and available to the public serves as a far superior means to position a casino within a market, in terms of its par settings. The availability of the NGCB data highlights the lack of usefulness for a handful of penny pars in any attempt to achieve the same end (See Section 4.3).

3.4. Mr. Aguero's analysis highlights that the Peppermill already knew the extent to which it *could* increase its pars, based on the NGCB data from the Peppermill's reporting group. Therefore, a handful of penny pars was not needed or useful in this regard and would not serve as a valid basis for damages (See Section 4.4).

3.5. The "knowledge" to which Mr. Aguero assigns an \$8 million value is readily ascertainable by proper, ethical and simple means (See Sections 4.3 & 4.4).

3.6. Mr. Aguero's reports fail to identify or establish an independent economic value for the par settings allegedly obtained by Mr. Tors, as his analysis is based on superior public data that were readily available to the Peppermill (See Section 4.4).

3.7. Mr. Aguero's \$8 million valuation of the par settings allegedly obtained by Mr. Tors hinges on the assumption that increases in pars will lead to increases slot win. This conclusion contradicts a primary finding from his Applied Analysis report issued in February 2015, posing a direct challenge to the foundation and reliability of Mr. Aguero's \$8 million valuation.^[1]

4. SUPPORT FOR CONCLUSIONS

4.1. Referenced Hypothetical

In my opinion the hypothetical referenced by Mr. Aguero is not a valid starting point for a damages model, as the comment itself was offered to describe a general business strategy and it contains some inconsistencies and unsupported assumptions. The quote from the NGC Public Comment (hereinafter, the hypothetical) is included here to facilitate my rebuttal.

As we told the Board and we told the investigators, and Mr. Paganetti said, if he sees one at seven percent, then he says, well, I can take mine from four and-a-half to five and-a-half percent, I'm still a percent and-a-half lower. So I'm still going to get the business. But that extra percent adds a hundred thousand dollars a week in extra revenue.²

First, the hypothetical is referring to an existing overall floor par of a competitor, which the Peppermill could not accurately infer from a handful of penny game pars, even it had similar samples collected over multiple years.

¹ See *Slot Market Assessment: Analysis of Industry Data* (Feb. 25, 2015) from Applied Analysis at p. 9, "While statistical correlations on a state-by-state basis vary due to any number of factors, the broader, aggregate trends would suggest a rising hold percentage has not [emphasis added] translated into incremental gaming revenue for operators during the post-recession era. In fact, they very well may be contributing to its decline." Nevada's indexed data were consistent with the broader aggregate trends referenced in the preceding sentence (See *Ibid* at p. 42).

² Transcript of the Nevada Gaming Commission February 2014 Agenda, Feb. 20, 2014, at p. 26.

Second, the hypothetical assumes that most players can and would detect differences in pars on reel slot machines, which I do not believe is true.³ This second, unsupported assumption is behind the cause-and-effect conclusion related to a property's general ability to woo "price-sensitive" players away from its competitors by manipulating pars.

Third, the difference between the pars of the casinos used in the hypothetical goes from 1.5% (on Line 3) to 1.0% (on Line 4). Next, the 1.0% difference in pars is related to a \$100,000 per week revenue windfall. No basis is offered for what I can only assume is an anecdotal conclusion regarding the relationship between par settings and win levels. That is, exactly how does a 1% (or 1.5%) lower overall floor par lead to a gain in revenue of \$100,000 per week? Further, how could anyone actually know such thing? I cannot imagine the design of an experiment that would allow for this conclusion. For example, even if management manipulated its own pars, against a doubtfully constant market par, the quasi-experimental design would be riddled with bias under real-world operating conditions. For example, the design would have to either account for or dangerously assume all free-play, advertising, and promotional activities were constant across all competitors. I do not see how these variables could be known or appropriately accounted for in any such analysis. Additionally, the measurement technique employed would also have to account for internal changes in the same variables across time (e.g., the frequency and value of free-play awards from the Peppermill). The claim of a \$100,000 per week gain in slot win resulting from the 1.0 – 1.5% gap in floor par was either anecdotal or simply offered as the hypothesized outcome of a general operating philosophy.

³ See Lucas, A. (2015). Expert Report, GSR v. Peppermill, at Section 4.4, Paragraph 2.

The hypothetical presumes that players do not consider the overall quality and condition of the casino itself and the variety and desirability of the property's nongaming amenities when they choose where to play. It also ignores potential differences in casino marketing offers and promotions and slot club benefit structures. The hypothetical inaccurately suggests that par is the chief determinant, if not the sole determinant of a player's patronage decision.

Just because the par changes from 4% to 5% doesn't mean that gamblers suddenly have more money to lose. For example, if a player had a \$100 trip bankroll, a casino operator could not suddenly expect to win \$125 dollars from this player simply because the par was increased by 25%. Players cannot print money - their bankrolls are established by factors such as their personal income and expenses. If you were already attracting a player at 4% and then raised the par to 5% and retained that player's patronage, his business would still only be worth \$100, because that sum is 100% of the player's gaming bankroll/budget.

For the reasons stated in this subsection (4.1) of this rebuttal, it is my belief that the purpose of the hypothetical was merely to describe a very general business strategy and its *intended* or *hypothesized* outcome, without regard for other critical influences on slot machine business volumes and market share. The hypothetical did not represent any type of precise analysis, accurate estimate, or enumeration of any actual gains in business volumes resulting from changes in par. Without taking into account the factors described in subsection 4.1 of this report, the hypothetical is dangerously presumptive.

4.2. All Denominations vs. \$0.01 Games

I do not see the basis for a damages model (Aguero's) that considers hypothetical effects associated with all slots (i.e., all denominations and game types), when the case addresses information obtained on \$0.01 video reels. Independent of the other issues directly related to this case, such an approach would be unreliable and grossly overstate damages, if any there were.

4.3. A Handful of Pars vs. NGCB Data

The hypothetical describes a positioning strategy by way of par settings in relation to those of competing casinos. However, the NGCB supplies the data needed to compare the house advantage for the slot floor (via actual hold percentage) of one property against local competitors with similar gaming revenues.⁴ Plus, there are only a maximum of five competitors in the Peppermill's NGCB reporting category, making any comparisons to that market particularly meaningful.⁵

Mr. Aguero relied on this NGCB data to construct his damages model. For the purposes of positioning a property via house advantages, this public data is far superior to a handful of penny pars from competing properties. In fact, the NGCB data would allow the Peppermill to position its slot floor par against the market for each denomination (e.g., \$0.01 games, \$0.05 games, \$0.25 games, etc.).

⁴ See NGCB Gaming Revenue Report, Washoe County Reno Area, \$36M+ Revenue Range, for the calendar years ending 2010 – 2014.

⁵ Ibid.

4.4. Capacity for Increasing Pars

Mr. Aguero's analysis highlights that the Peppermill already knew the extent to which it *could* increase its pars, based on the NGCB data from the Peppermill's reporting group. "The knowledge" provided by a handful of pars would not be needed to reach Mr. Aguero's conclusion. Within the context of the referenced hypothetical, with respect to identifying capacity for increasing pars, I fail to see the value in a handful of penny pars. It is important to remember that the Peppermill competes against every casino in the market, making the market-level comparison using NGCB reports superior and preferable. For the purposes of positioning any property by way of par, the use of the NGCB data in Mr. Aguero's report clarifies the lack of usefulness of the pars allegedly obtained by the Peppermill from the GSR.

5. REFERENCE MATERIALS

Slot Market Assessment: Analysis of Industry Data (Feb. 25, 2015). Las Vegas, Nevada: Applied Analysis.

Lucas, A. (2015). Expert Report, GSR v. Peppermill, at Section 4.4, Paragraph 2.

NGCB Gaming Revenue Report, Washoe County Reno Area. \$36M+ Revenue Range, for the calendar years ending 2010 – 2014.

Transcript of the Nevada Gaming Commission February 2014 Agenda, Feb. 20, 2014, at p. 26.

Dated: October 12, 2015



Anthony F. Lucas

EXHIBIT 15

DESIGNATED **HIGHLY CONFIDENTIAL INFORMATION**

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 15

REBUTTAL EXPERT WITNESS REPORT OF TOM SULLIVAN

I have been engaged as an expert witness to analyze, evaluate and rebut the expert opinions, reports and testimony of the Plaintiff's expert witness, Jeremy Aguero.

I. NRCP 16.1(a)(2)(B):

Attached as **Exhibit 1** is a copy of NRCP 16.1(a)(2)(B). Set forth in section II is the complete statement of the opinions I intend to express, together with the basis and reasons therefore.

A. In formulating and expressing my opinions, I have reviewed the following:

1. The deposition of Jeremy Aguero taken on September 15, 2015;
2. Mr. Aguero's June 4, 2015 Errata to Expert Witness Report;
3. Mr. Aguero's August 27, 2015 Amended Expert Report attached to Plaintiff's Supplemental Disclosure of Expert Witness;
4. The Applied Analysis article entitled "*Slot Market Assessment – Analysis of Industry Data*" provided to the Association of Gaming Equipment Manufacturers on February 25, 2015;
5. Exhibits 7, 8 and 11 to the depositions taken in Case No. CV13-01704;
6. The transcript of my deposition taken on August 4, 2015;
7. The Declaration of John Farahi;
8. A copy of the Plaintiff's Complaint filed in Case No. CV13-01704 against the Peppermill;
9. The Expert Witness Report of Stacy Friedman dated March 2, 2015;
10. The Expert Witness Report of Dr. Anthony Lucas dated March 1, 2015;
11. Nevada Gaming Commission Hearing transcript of the February 20, 2014 hearing;

12. The deposition transcript of John Stone, CDC Consulting taken on April 1, 2015;
13. A copy of Nevada Trade Secret statute, NRS 600A.010 – 600A.100; and
14. 10Ks and 10Qs of the Las Vegas Sands and the Wynn, publicly held companies.

B. Exhibits To Be Used As Support For Opinions.

None at this time.

C. Statement of Qualifications.

See attached **Exhibit 2**.

D. Publications Authored Within the Preceding Ten Years.

None.

E. Compensation.

See attached **Exhibit 3**.

F. Other Cases In Which Expert Testimony Was Given.

None.

II. OPINIONS AND THE BASIS AND REASONS THEREFORE:

In addition to the following, I submit the opinions and the reasons for those opinions that are set forth in my deposition attached hereto as **Exhibit 4**. Specifically, and in addition to my deposition testimony, it is my opinion that:

A. Theoretical Hold Percentage Settings (pars) are not secret in the Northern Nevada Casino Market. This opinion is based upon my experience and knowledge in the casino industry and knowing how to ascertain the par settings on video reel machines by and through legitimate and proper means. The fact that pars are easy to ascertain through proper means renders them, in and of themselves, independently valueless.

B. Based on my extensive experience in the casino industry, including my service as Slot Director at the Grand Sierra Resort, it is my opinion that “knowledge” of the par settings on video reel machines of a competitor casino have no independent economic value, and have no actual or potential economic value. The par settings on a competitor’s video reel machines are not only readily ascertainable by proper means, they have no independent value because a par setting has to be considered in light of a multitude of other factors and variables including, but not limited to, the slot floor mix, game volatility, the free play earned, the comp reinvestment percentages and strategies associated therewith and all of the various marketing influences that to which the par settings have been subjected. Without knowing all of these applicable variables and influences, knowing a competitor’s pars are meaningless.

Pars have no market value to casino competitors because par settings and theoretical hold percentages are often the subject of discussions by, between and among former employees of competing casinos, discussions by and between casinos and slot machine manufacture representatives. “Net” floor pars (after accounting for floor par) are also easily determined through review and analysis of Nevada Gaming Control Board gaming revenue reports. Pars are ascertainable for many Nevada publicly held casinos by evaluating 10Ks and 10Qs filed by those public companies. Pars are also easily determined by advertising practices of competing casinos, such as those reflected in **Exhibit 5, 6 and 7** attached hereto.

C. The opinions of Mr. Aguero are flawed, inaccurate, inappropriate and unreliable. Specifically, the quoted statement of Frank Schreck set forth on pages 3 and 4 of Mr. Aguero’s Amended Expert Report is essentially unintelligible and makes no sense. The statement appears to refer to one slot machine set at a gross theoretical hold of 7%, but then refers to a gross floor par of 4 1/2 % being increased to a floor par of 5 1/2%. If an increase in par were made as

suggested, it would not necessarily or automatically result in increased revenue. This simple fact is proven by the *AGEM Slot Market Assessment* article in which Mr. Aguero's company concludes that since 2007, the national and Nevada casino markets have increased their par settings, which in part may have resulted in a dramatic decline in slot handle and slot win. I agree essentially with the finding of Applied Analysis that suggests "Aggregate trends would suggest a rising hold percentage has not translated into incremental gaming revenue for operators during the post-recession era. In fact, they very well may be contributing to its decline." Based on my experience, I agree that increasing pars could cause slot revenue to decline.

D. The "knowledge" Mr. Aguero refers to on page 5 of his Amended Expert Report is knowledge that is easily ascertained by and through proper means. A gambling casino does not need to improperly utilize a reset key (2341 key) to obtain "knowledge" that its net hold percentages (net win percentage) could be increased by 1% without affecting market share. That knowledge is very simply and easily obtained through a casino's analysis of its own revenue reports through which it determines its net win and then compares that net win to the gaming revenue reports published by the Nevada Gaming Control Board, which reflect net hold of the market. Therefore, the "knowledge" has no value.

E. In my opinion, if there were hypothetical discussions through which the Peppermill would be attempting to obtain the "knowledge" referred to in Mr. Aguero's report (p. 5, bottom paragraph), the Peppermill would be foolish to pay any money whatsoever for the "knowledge" it could easily obtain by simply analyzing its own revenue, net win and comparing those metrics with the reports published by and readily accessible from the Gaming Control Board. Mr. Aguero's report reveals an inexcusable lack of knowledge, experience and familiarity with how casinos (including GSR) actually operate.

F. Mr. Agüero's report contradicts his deposition testimony. In his deposition, he renders an opinion that the Peppermill would not purchase "knowledge", but rather would purchase an opportunity to have free "unfettered" access to all slot machines on the floor of the GSR for a period of approximately 18 months. That perpetual and unrestricted "access" is not even mentioned in his report, nor are GSR's pars, Exhibits 7 and 8 or any GSR revenue information. GSR's pars appear to be irrelevant to Mr. Agüero. Nonetheless, that hypothetical, perpetual access would have no value for many reasons, some of which are:

1. Video poker pars are readily ascertainable through an analysis of the pay table;
2. Video roulette pars are readily ascertainable;
3. The pars for wide area progressive slot machines are readily ascertainable because of manufacturer's control of the par setting;
4. As reflected by **Exhibit 8**, some casinos run advertisements by and through which their floor par can be determined;
5. Some casinos publish advertisements through which pars can be readily ascertained by competitors because competitors have access to manufacture par sheets;
6. By various shopping techniques and activities such as extended play on specific machines, pars can be readily ascertained with a high degree of accuracy, provided the competitor has the applicable par sheet;
7. Public filings such as 10Qs and 10Ks often publish their floor par in their public filings;
8. Pars are also readily ascertainable through a process of analyzing the comps afforded a player when compared to the comps afforded the same player on a machine of a known par through a method sometimes referred to as ratio analysis;

9. As former Slot Director of the GSR and as a result of my proper legal and ethical shopping activities, it is my opinion that I could ascertain the pars of other competitor casinos with a high and reliable degree of accuracy.

It is my opinion that experienced and knowledgeable casino operators are familiar with the foregoing and it is my opinion that the Peppermill executives possess the same knowledge that I have stated above. I, therefore, believe that in a hypothetical negotiation between Peppermill and GSR, the Peppermill would refuse to pay any money whatsoever for perpetual and continued "unfettered" access to the pars of the GSR for an 18 month period. Indeed, without knowing more about the GSR's strategies and casino metrics, knowing and using such pars would be risky and could likely be financially counterproductive. For the Peppermill to rely on and/or use in any way the pars of another casino without all of the other pertinent and more relevant "GSR information" would be a ludicrous endeavor for a reasonable and competent casino operator.

For Mr. Agüero to assume that all factors remain unchanged is an incredibly false assumption. In the casino industry, nothing is more evident than the reality that everything constantly changes with slot strategies, marketing strategies and slot performance.

DATED: This 9th day of October, 2015.



TOM SULLIVAN

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 16

EXHIBIT 16

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)
)
Plaintiff,)
)
-vs-)
)
PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)
)
Defendant(s).)
)

VIDEOTAPED DEPOSITION OF WILLIAM ALFRED PAGANETTI

called for examination by counsel for Plaintiff pursuant to Notice, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, at 2:30 p.m., Friday, April e, 2015, before Becky Van Auken, a Certified Court Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 is too short. I don't need arguments and this and
2 that. I like people.

3 If somebody was keying my machine and I was
4 there, I'd tell them the answer. I even had told Ryan
5 Tors at one time, "Tell the customers if they feel the
6 machine is tight."

7 To me, it was a non-event. A non-event.
8 If you want to know my pars, you can have Western
9 Village pars, you can have Wendover pars, and you can
10 have this, or anybody else that would ask for them.

11 BY MR. JOHNSON:

12 Q But as your counsel pointed out, once you
13 provided those pars, you could change the pars the
14 next day. Correct?

15 A I don't quite understand what you --

16 Q Well, if you divulged your pars to --

17 A I don't care. They're such a small part of
18 the ingredient. I don't care if I know everybody's
19 pars. It has no value to us. An individual par by
20 itself -- I hope I'm not getting --

21 MR. ROBISON: Go ahead. I'm not going to
22 yell at you. Go ahead.

23 THE WITNESS: An individual par to Bill
24 Paganetti has zero value with all the other comfort --
25 I mean, I could go on and on, and I don't want to bore

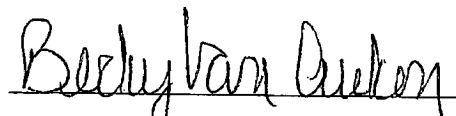
STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Friday, April 3, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of WILLIAM ALFRED PAGANETTI, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 9th day of April, 2015.



BECKY VAN AUKEN, CCR #418

EXHIBIT 17

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 17

October 13, 2015

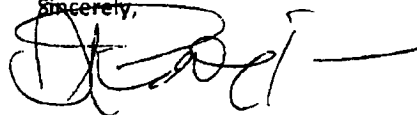
Kent Robison
Robison, Belaustegui, Sharp & Low
71 Washington St
Reno, Nv 89503

Dear Mr. Robison,

I have been asked to inform you of my opinions concerning these issues.

1. Do the 7 or 9 pars (theoretical hold percentages) reflected on the attached two schedules have any independent economic value? They do not. The par settings of individual machines located at a competitor's casino do not have any value, independent or otherwise.
2. Would I pay money to know the par settings on a handful (say 15) of penny video reel slot machines of a competitor? I would not. The information has no value.
3. If I were to be involved in negotiations with a competitor where I was asked to pay for the "knowledge" that I could raise my floor par by 1% point and still be lower than my competitor, I would refuse to pay any money for that "knowledge". That "knowledge" is readily ascertainable without having to pay for it.
4. Paying money for the par settings on video reel penny slot machines of my competitors would be foolish and in my opinion that would never happen in the real world. Too many factors and influences are involved in gaming practices, slot strategies and casino operations for par settings to have any independent economic value.
5. If I negotiated for 18 months of complete and unfettered access to another casino's par settings, I would offer no money for that access. Without knowing much more about the other casino's operation, paying for access to pars alone would be foolish.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Ensign', with a long horizontal line extending to the right.

David Ensign

From: Ryan Tors
ant: Thursday, December 29, 2011 8:59 AM
to: NBPartners; Rob Erwin; John C Hanson (Reno GM)
Subject: Grand Sierra



Grand Sierra
pars.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



Grand Sierra

12/29/2011

1	04-15-08	440	91.83	8.17	Buffalo
2	04-15-07	21016	91.83	8.17	Buffalo
	Aristocrat	55722	average	8.17	
1	04-15-08	440	93.98	8.01	Ducks In a Row
2	04-15-07	21016	94.03	5.97	Cleopatra
3	04-15-05	671	94.03	5.97	Money Strom
4	05-25-02	50060	93.98	6.02	Texas Tea
5	05-25-03		94.98	5.02	Munsters
6	05-25-01		94.00	6.28	Dbi Dia 2000
7	03-25-04	358	93.97	6.03	Li Lady
	IGT		average	5.90	
			overall average	6.40	

*all machines that I can key quickly were flagged as having been loosened, some had the dangler pulled off

HIGHLY CONFIDENTIAL

PM 0080

RA 02073

From: Ryan Tors
Sent: Friday, June 15, 2012 8:51 AM
To: NBPartners; John C Hanson (Reno GM); Billy Paganetti; David McHugh
Subject: Grand Sierra pars



Grand Sierra
pars1.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



6/14/2012

Grand Sierra

1	04-07	20376	93.99	6.01	Ducks In a Row
2	04-18	1011	91.82	8.18	Buffalo
3	04-10	20050	94.06	5.94	Enchanted Unicorn
4	01-07	127	94.01	5.99	Cats
5	10-47	246	93.99	6.01	Horoscope
6	05-26	937	92.51	7.49	Wolf Run
			average	6.60	

HIGHLY CONFIDENTIAL

PM 0082

RA 02075

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 18

EXHIBIT 18

October 6, 2015

Via Email: michelle@lvcreno.com

Michelle Salazar, CPA/ABV, CVA, CFE

Litigation and Valuation Consultants

1575 Delucchi Lane, Suite 217

Reno, NV 89502

Via Email: stacy@olympiangaming.com

Stacy Friedman

Olympian Gaming

13915 S.W. Otter Lane

Beaverton, OR 97008

Via Email: tony.lucas22@gmail.com

Anthony Lucas, Ph.D.

2562 Deer Season Street

Henderson, NV 89052

Via Email: tsullivannv@yahoo.com

Tom Sullivan

5525 Tannerwood Drive

Reno, NV 89511

Re: Grand Sierra Resort v. Peppermill Casinos Inc. re: Par Settings

Through Peppermill's counsel, Kent Robison, I have been asked for my opinion on the discussion regarding par settings (theoretical hold percentages) of video reel slot machines in Northern Nevada and if I consider them to be secret and or confidential. They are not. It is known throughout the industry that par settings are ascertainable through a variety of proper means. In fact most casinos in Northern Nevada are fully aware of and have knowledge about the par settings of their competitors.

My career in gaming started in the early 50's with a gentleman from Boise, Idaho named Dick Graves who owned a number of restaurants throughout Idaho. I had met Dick while working my way through college. Dick was much more than a restaurateur. He was a great idea man. So when Idaho outlawed slot machines in restaurants, Mr. Graves packed up and headed to the Reno/Sparks area in 1953 and I joined him fresh out of school.

In 1955, Graves opened Dick Graves' Nugget in Sparks, Nevada. By 1960, I agreed to purchase the 60 seat coffee shop with a row of slot machines with a handshake deal. Over 5 decades John Ascuaga's Nugget grew from that coffee shop on B Street in Sparks, Nevada to a full season destination resort that included 1600 rooms, 9 award winning restaurants, over 110,000 square feet of convention space, big name entertainment, and a full service casino floor with numerous table games and over 1,500 slot machines at one time.

As a Northern Nevada casino operator for over 55 years, I became very familiar with the gaming and marketing strategies needed to run a successful operation. I am well aware of the shopping activities that occur amongst the Northern Nevada casinos. Shopping is an accepted industry practice by which competitors attempt to learn more about each other through inspections, visits, and other analytical tools. The Nevada Gaming Control Board Reports also reflect the net par settings for Northern Nevada casinos, including the six largest performing casinos. While

individual properties are not identified in the gaming reports, the net par for the various markets are published.

To be competitive it is far more valuable to ascertain a specific market's par from public records than it is to know individual par settings on individual machines of individual competitors.

For many reasons, pars change frequently. Pars mean nothing without additional information such as free play, theoretical win, frequency, variability, comp reinvestment percentage and much more. Pars alone, without information about the machine, the floor par, the other slot settings and free play have no value in and of themselves. Each operator knows their coin in slot revenue and the net par for that specific market. Therefore, any casino operator could determine whether to raise or lower pars based upon their own net win percentage compared to the net pars of the market in Northern Nevada published by gaming. Par levels are not a secret. In fact we have ascertained pars of competitors through the various methods previously listed.

Because so much information is available concerning the par settings of the Northern Nevada casinos, it is my firm belief that pars have no independent economic value. I have also considered the issue of whether any reasonable and thoughtful casino operator and owner would pay any money for a license agreement to have access to the par setting of other casinos. The notion is absurd. No reasonably prudent casino operator would pay money to have access to another casino's pars.

I hope the foregoing helps you with your assignments to formulate expert opinions in the above-referenced matter. Thank you for your courtesy and cooperation.

Sincerely,

A handwritten signature in cursive script that reads "John J. Ascuaga". The signature is written in dark ink and is positioned above the printed name.

John J. Ascuaga

EXHIBIT 19

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 19

DECLARATION OF JOHN FARAH

John Farahi, being first duly sworn, deposes and states under penalty of perjury as follows:

1. I am Co-Chairman of the Board of Directors of Monarch Casino and Resort, Inc. I am also Chief Executive Officer of Monarch Casino and Resort, Inc. and have served in that capacity since 1993.
2. I have also served as Chief Executive Officer of Golden Road Motor Inn, Inc. since 1993. I have been responsible for the major and important operational decisions concerning the operations of the Atlantis Casino Resort.
3. I have been asked to express my opinion concerning the issue of whether par settings on slot machines have independent economic value. I have extensive familiarity with the Northern Nevada casino market. I am familiar with and have substantial experience in decisions, strategies and operations of slot machine strategies and marketing programs.
4. I have over 30 years' experience regarding slot machine operations, strategies and marketing programs.
5. I have been provided a copy of and I am familiar with the Plaintiff MEI-GSR Holdings, LLC, d/b/a/ Grand Sierra Resort's Supplemental Disclosure of Expert Witness to which Jeremy Aguero's August 28, 2015 Amended Expert Report is attached.
6. In my opinion, Mr. Aguero's Amended Expert Report is flawed, incorrect and unreliable.
7. Every casino could engage in the same process as did Mr. Aguero in his August 27, 2015 Amended Report. Each casino property in Northern Nevada can readily ascertain its own "slot machine operating metrics" and can easily ascertain its own total coin in for any given year, its own total slot revenue for any given year and its


own "net hold" percentage (net win) for any given year. A casino operator could then easily and properly compare its own slot machine operating metrics to the information revealed by Nevada Gaming Control Board revenue reports to ascertain whether the casino's net floor par is below or above the market as reflected in the gaming revenue reports and could adjust its par settings accordingly.

8. One of the mistakes Mr. Aguero has made is to suggest that higher pars mean increased revenue. The higher the par setting, the less time on device by the customer. Reduced time on device reduces the entertainment value to the customer. Raising pars alone does not increase coin in.

9. I have been made aware of the fact that Ryan Tors was a former employee of the Peppermill and that he utilized a "reset key" (2341 key) to obtain hold percentages from various slot machines from various gaming casinos, including the Atlantis, in the Reno/Sparks area.

10. Attached hereto is what I have been informed are Exhibits 7 and 8 to the depositions taken in the above-captioned matter. Assuming that the par and payback percentage information reflected in these exhibits is accurate, it is my opinion that the information set forth and contained in Exhibits 7 and 8 attached hereto is too limited to have value to a reasonably prudent casino operator or owner. As the Chief Executive Officer of the company that owns and operates the Atlantis Casino Resort Spa, I would not pay any money whatsoever for a license to know or use the par and payback percentages set forth in the attached exhibits.

DATED this 13 day of Oct., 2015.


JOHN FARAH

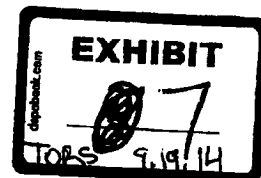
From: Ryan Tors
nt: Thursday, December 29, 2011 8:59 AM
to: NBPartners; Rob Erwin; John C Hanson (Reno GM)
Subject: Grand Sierra



Grand Sierra
pars.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



Grand Sierra

12/29/2011

1	04-15-08	440	91.83	8.17	Buffalo
2	04-15-07	21016	91.83	8.17	Buffalo
	Aristocrat	55722	average	8.17	
1	04-15-08	440	93.99	6.01	Ducks In a Row
2	04-15-07	21016	94.03	5.97	Cleopatra
3	04-15-05	571	94.03	5.97	Money Storm
4	05-25-02	50060	93.98	6.02	Texas Tea
5	05-25-03		94.98	6.02	Munsters
6	05-25-01		94.00	6.26	Dbl Dia 2000
7	03-25-04	358	93.97	6.03	Lil Lady
	IGT		average	5.90	

overall average 6.40

*all machines that I can key quickly were flagged as having been loosened, some had the dangler pulled off

HIGHLY CONFIDENTIAL

PM 0080

RA 02084

From:
Sent:
To:
Subject:

Ryan Tors
Friday, June 15, 2012 8:51 AM
NBPpartners; John C Hanson (Reno GM); Billy Paganetti; David McHugh
Grand Sierra pars



Grand Sierra
pars1.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



6/14/2012

Grand Sierra

1	04-07	20375	93.99	6.01	Ducks In a Row
2	04-18	1011	91.82	8.18	Buffalo
3	04-10	20050	94.06	5.94	Enchanted Unicorn
4	01-07	127	94.01	5.99	Cats
5	10-47	246	93.99	6.01	Horoscope
6	05-26	937	92.51	7.49	Wolf Run
			average	6.60	

HIGHLY CONFIDENTIAL

PM 0082

RA 02086

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 20

EXHIBIT 20



October 20, 2015

Via Email: stacy@olympiagaming.com
Stacy Friedman
Olympian Gaming
13915 S.W. Otter Ln
Beaverton OR 97008

Via Email: tony.lucas22@gmail.com
Anthony Lucas, Ph.D.
2562 Deer Season St
Henderson NV 89502

Via Email: michelle@lvreno.com
Michelle Salazar, CPA/ABc, CVA, CFE
Litigation and Valuation Consultants
1575 Delucchi Ln, Ste 217
Reno NV 89502

RE: Grand Sierra Resort v. Peppermill Casinos Inc. re: Par Settings

Dear Mr. Friedman, Mr. Lucas and Ms. Salazar:

I have been asked to give you my thoughts about whether a small number of par settings (6-15) obtained from a competitor's casino by utilization of a master key (2341) would have any value. I strongly believe that getting 6-15 pars (or playback percentages) from one of our competitors would have no value at all. We would not pay for them. We would be foolish to use them in any way. I would not bargain for them without substantially more par information and without all other information about the competitor's free play, frequency, variability, overall marketing strategy, overall slot strategies, a knowing of a few pars from a competitor's floor is knowledge that is worthless. Movement (up or down) or the decision to not change our floor par is dependent on our operations; not a few par settings from one of our competitor's.

Should you want to discuss these strongly held opinions, please feel free to call.

Sincerely,

Russ Sheltra
Owner Bonanza Casino

Ryan Sheltra
General Manager

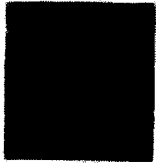
EXHIBIT 21

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 21



ELDORADO RESORTS

T: 775.328.0100 | F: 775.337.9218
100 W. Liberty St. 11th Floor Suite 1150, Reno, NV 89501
eldoradoresorts.com

October 26, 2015

Via Email: michelle@lvcreno.com
Michelle Salazar, CPA/ABV, CVA, CFE
Litigation and Valuation Consultants
1575 Delucchi Lane, Suite 217
Reno, NV 89502

Via Email: stacy@olympiangaming.com
Stacy Friedman
Olympian Gaming
13915 S.W. Otter Lane
Beaverton, OR 97008

Via Email: tony.lucas22@gmail.com
Anthony Lucas, Ph.D.
2562 Deer Season Street
Henderson, NV 89052

Via Email: tsullivanv@yahoo.com
Tom Sullivan
5525 Tannerwood Drive
Reno, NV 89511

Re: GSR v. Peppermill

Gentlemen and Ms. Salazar:

I have been informed that you are serving as expert witnesses for the Peppermill in the above-referenced matter. Please be advised that I am Chairman of the Board of Directors and Chief Executive Officer of Eldorado Resorts, Inc. ("ERI"), a publicly traded corporation formed through the merger of Eldorado Resorts and MTR Gaming Group, Inc. ERI operates the Eldorado Hotel Casino in Reno and casinos located in Shreveport Louisiana, Columbus Ohio, Erie Pennsylvania, and Cumberland, West Virginia. ERI has also owned a 50% interest in the Silver Legacy Resort Casino in Reno since its opening in 1995. ERI will be closing on the acquisition of the remaining 50% interest in the Silver Legacy Resort and the acquisition of the Circus Circus Reno Hotel Casino before the end of this year. I have worked in the casino industry continuously since 1973 in a variety of positions, starting with jobs on casino floor. Prior to the merger of Eldorado Resorts, LLC with MTR Gaming Group in 2014, I served in multiple positions as an executive in the Eldorado Hotel Casino and its affiliated entities, and served as the General Manager and Chief Executive Officer of the Silver Legacy Resort commencing upon its opening in 1995. I own significant interests in ERI, as well as in Bodine's Casino in Carson City, the Carson Valley Inn in Minden, and Sharkey's Casino in Gardnerville. I have extensive knowledge and experience in gaming

Michelle Salazar, CPA/ABV, CVA, CFE
Stacy Friedman
Anthony Lucas, Ph.D.
Tom Sullivan
October 26, 2015
Page 2

operations, slot strategies, and marketing strategies for gaming establishments generally and, particularly, for those operated within the Northern Nevada area.

I am aware of the fact that a representative of the Peppermill was caught utilizing a master key to access video reel slot machines in various casinos in the Reno-Sparks area. When the media disclosed the Peppermill's involvement in this activity, I was

concerned about the unethical conduct displayed by the Peppermill in using this form of "shopping". I am also aware of the Gaming Control Board's investigation and I feel it is appropriate that the Peppermill was properly sanctioned in having to pay a \$1,000,000 fine. Having paid the \$1,000,000 fine, the Peppermill has, in my opinion, been adequately and appropriately sanctioned for their conduct.

I have reviewed the two emails and attachments that are attached to this letter. I am aware that these two attachments are, in part, the basis for GSR's lawsuit against the Peppermill. I am also aware of the fact that obtaining 6 to 15 par settings from a competitor is of no value. The 6 to 15 pars reflected on the attached documents have absolutely no independent economic value. If I were involved on behalf of the Eldorado, Silver Legacy or Circus Circus in negotiations to purchase the par information reflected on the attached documents, I would pay nothing for the par information. The par information reflected on the attached documents is severely limited to par settings on a small number of machines. Because there are so few par settings reflected on these documents and because these documents do not reflect other crucial slot strategies that are more influential in gaming operations, I would pay no money in actual negotiations concerning the potential purchase of this information.

Should you have any questions, I am available at your convenience.

Yours very truly,


GARY CARANO

Attachments

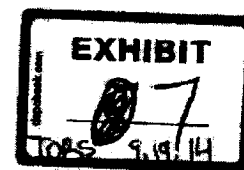
From: Ryan Tors
Sent: Thursday, December 29, 2011 8:59 AM
To: NBPartners; Rob Erwin; John C Hanson (Reno GM)
Subject: Grand Sierra



Grand Sierra
pars.xls

Thanks-
Ryan Tors
Peppermill Casinos
775 689 7499

HIGHLY CONFIDENTIAL



Grand Sierra

12/29/2011

1	04-15-08	440	91.83	8.17	Buffalo
2	04-15-07	21016	91.83	8.17	Buffalo
	Aristocrat	55722	average	8.17	
1	04-15-08	440	93.99	6.01	Ducks in a Row
2	04-15-07	21016	94.03	5.97	Cleopatra
3	04-15-05	571	94.03	5.97	Money Storm
4	05-25-02	50060	93.98	6.02	Texas Tea
5	05-25-03		94.98	6.02	Munsters
6	05-25-01		94.00	6.26	Del Dia 2000
7	03-25-04	358	93.97	6.03	Lil Lady
	IGT		average	5.80	
			overall average	6.40	

*all machines that I can key quickly were flagged as having been loosened, some had the dangler pulled off

HIGHLY CONFIDENTIAL

PM 0080

RA 02093

From: Ryan Tors
Sent: Friday, June 15, 2012 8:51 AM
To: NBPartners; John C Hanson (Reno GM); Billy Paganetti; David McHugh
Subject: Grand Sierra pars



Grand Sierra
pars1.xls

Thanks-
Ryan Tors
Peppermill Casinos
776 689 7499

HIGHLY CONFIDENTIAL



6/14/2012

Grand Sierra

1	04-07	20376	93.99	6.01	Ducks in a Row
2	04-18	1011	91.82	8.18	Buffalo
3	04-10	20060	94.06	5.94	Enchanted Unicorn
4	01-07	127	94.01	5.99	Cats
5	10-47	248	93.99	6.01	Horoscope
6	05-26	937	92.51	7.49	Wolf Run
			average	6.60	

HIGHLY CONFIDENTIAL

PM 0082

RA 02095

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 22

EXHIBIT 22

Club Cal Neva
HOTEL CASINO

October 30, 2015

Mr. Kent R. Robinson, Esq.
Robinson, Belaustegui, Sharp & Low
71 Washington Streets
Reno, NV 89503

Re: Grand Sierra Lawsuit Against Peppermill

Dear Mr. Robinson:

I met with your client Bill Paganetti on October 30, 2015, to discuss the issues involved in the lawsuit filed against the Peppermill by the Grand Sierra Resort. Mr. Paganetti asked me to give you my opinion concerning the value of knowing the slot machine par settings of slots machines from other casinos.

Prior to expressing my opinion of knowing the slot machine par settings of other casinos, I would like to give you some background of my experience in the gaming industry. I have been in the gaming business since November 1, 1981, when I started at the Club Cal Neva's finance department. In 2001, I became the Chief Executive Officer of the Club Cal Neva. In 2012 I became the sole shareholder of Club Cal Neva. Additionally, in 2014, I opened Siri's Casino in downtown Reno. As part of my experience I have been and continue to be closely involved in the setting of slot machine par percentages at the Club Cal Neva and Siri's Casino.

Mr. Paganetti informed me that the Peppermill is being sued because one of its employees obtained 6 to 15 par settings from the Grand Sierra Resort over a period of six months. He further asked me to indicate the value of knowing a competitor's hold percentage on slot machines.

Prior to giving my opinion of the value of the knowledge, some information to consider:

1. All casinos have video poker slot machines, and the pay table on video poker machines are displayed on the screen of these machines. Based on the pay table of a video poker machine anyone can find out the par percentage of a video poker machine in any casino. Additionally there are web sites, e.g. www.wizardofodds.com, that have the hold information readily available for anyone to view.
2. Casinos such as the Peppermill and Grand Sierra Resort have large gaming floors with large number and varied mix of slot machines, slot machine denominations, and slot machine locations. Many casinos vary slot machine hold percentages based on various factors such as (i) the location of a slot machine on the gaming floor (ii) if the location is more likely to attract a local or tourist, (iii) if the machine is close to an exit, in the middle of the casino, in a hard to find location, (iv) the hold percentage of an adjacent machine, e.g. placing a higher hold machine next to a lower hold machine, (v) etc.

3. Slot machine hold percentages can also vary based on the internal casino offers such as the amount of free play that a customer can earn, the amount awarded to customers for complimentary privileges, the amount awarded to customers for other promotions such as drawings, car giveaways, and special events (dinners shows, entertainment, etc.).
4. Casino can change par settings at any time. Machines are developed to allow the casino to adjust the par settings by simply changing the programming of the machine. A casino does not have to purchase a new machine or even a new operating program to adjust a par setting.
5. I have known Bill Paganetti for over 20 years, and he has always been very involved in slot operations of the Peppermill properties. Bill has always expressed his philosophy concerning slot machines and hold percentages, and his philosophy has never changed. Mr. Paganetti would not, in my opinion, change a slot machine par based on information of slot par settings from another casino.

With this information in taken into account, to suggest that Bill Paganetti gained valuable information from knowing the slot machine par settings from 6 to 15 machines at the Grand Sierra Resort is absolutely ridiculous. There are such a large number of variables that have to be taken into account when setting slot machine hold percentages that knowledge of another casino par settings would be of little or no benefit. This is further confirmed by the fact that only 6 to 15 machine par settings were obtained over a six month period. This sample is much too small and, since it was done over a significant period of time, could not have yielded inside information that would have created a competitive advantage to the Peppermill. I do not know of any casino operator that would rely on just knowing a par setting of another casino to adjust their par settings.

The simple conclusion is that if I were asked to pay someone to provide me with par settings for 6 to 15 slot machines at the Grand Sierra Resort or for any other casino in my competitive market I would refuse to pay anything; this knowledge is without value and would provide me with no benefit.

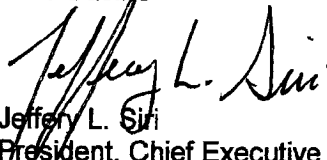
A final note, knowledge of the par settings for 6 to 15 slot machines at the Grand Sierra Resort would most certainly not have caused any other damages to the Grand Sierra Resort. A location such as the Grand Sierra Resort or Peppermill have many other factors that should be considered, such a quality and number hotel rooms, dining, entertainment, promotional activities, convention sales, amenities, atmosphere, etc. Knowledge of par settings on small sample of slot machines would not have given the Peppermill a competitive advantage that would have shifted customers from the Grand Sierra Resort to the Peppermill.

(Continued on next page)

Mr. Kent R. Robinson, Esq.
Robinson, Belaustegui, Sharp & Low
Re: Grand Sierra Resort Lawsuit Against Peppermill
October 30, 2015
Page 3 of 3

If you have any questions concerning the information contained in this letter, or if you would like to further discuss this matter, please do not hesitate to contact me.

Sincerely,
Club Cal Neva and
Siri's Casino


Jeffrey L. Siri
President, Chief Executive Officer,
and Sole Shareholder

/JLS

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 23

EXHIBIT 23

October 30, 2015

Bill Paganetti
Peppermill Hotel Resort
2707 South Virginia Street
Reno, Nevada 89502

Re: Par Settings

Dear Bill:

You asked me to give you my comments, opinions and understanding about the value of the limited number of par settings obtained by the Peppermill from the GSR. My understanding is that there is some dispute about whether your former employee, Ryan Tors, actually "keyed" video reel slot machines at the GSR. This letter is based upon the assumption that Mr. Tors obtained seven par settings from GSR slot machines from December 29, 2011. You have also asked me to consider the assumption that Mr. Tors obtained six par settings from the GSR in June of 2012. You informed me that the machines from which these par settings were obtained were IGT and Aristocrat video reel machines located on the floor of GSR.

There is absolutely no value to a competitor of GSR to have these par settings. The par settings have no individual value. The seven par settings presumably obtained in December 2011 have no value to another casino operation. The total of 13 pars theoretically obtained by Mr. Tors over a six month period have no value whatsoever. If GSR attempted to sell me the par information that Mr. Tors presumably obtained, I would refuse to buy them because they simply have no value whatsoever. The statements I make in this letter to you are based upon my extensive experience as a casino operator and my extensive experience with slot strategies, marketing strategies and casino operation strategies. Par settings are changed frequently. Par settings are dependent on many other operational factors which, if not fully known and understood, make 13 par settings of a casino that has over 1,000 slot machines on its floor irrelevant, immaterial and valueless.

I enjoyed our discussion. Good luck.

Sincerely,



Mitch Gardner
Vice President
Bordertown Casino RV Resort

EXHIBIT 24

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 24

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada
Corporation, d/b/a GRAND SIERRA RESORT,)

Plaintiff,)

-vs-)

PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)

Defendant(s).)

DEPOSITION OF TOM SULLIVAN

(PAGES 1 - 21)

CONFIDENTIAL - DEPOSITION OF TOM SULLIVAN

(PAGES 22 - 101)

called for examination by counsel for Defendant Peppermill
Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at
the offices of Robison, Belaustegui, Sharp & Low,
71 Washington Street, Reno, Nevada, at 1:30 p.m., Tuesday,
August 4, 2015, before Becky Van Auken, a Certified Court
Reporter.

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 In Mississippi, when I arrived we were
2 about 6. When I left we were about 7 1/2. So when I
3 came back to Reno, it was noticeably looser. But at
4 the Reno Hilton one of the major reasons it was such a
5 low hold is 70 percent of the volume was video poker.

6 Q Oh, okay.

7 A So when you have -- a huge preponderance of
8 your coin-in is video poker, video poker is a
9 substantially lower hold percentage.

10 Q Sure. It's always around 2, 2.1, isn't it?

11 A Again, you can have a game as low as .09
12 with Deuces Wild, and probably 3.4 would be your high
13 end.

14 Q Ascertainable, though? Those pars are
15 ascertainable by the playing public on video poker?

16 A I can sit here and ask Siri to access them
17 and I will know, by looking at the pay table, exactly
18 what that hold is. It's extremely transparent.

19 Q Right. It's not confidential if you know
20 what you're doing.

21 A Not at all. And there are massive
22 literature out there on strategy specific to video
23 poker to optimize your strategy to understand -- to
24 your questions earlier -- how do I use free play, how
25 do I use comp points, how do I get entertainment

H I G H L Y C O N F I D E N T I A L

1 BY MR. ROBISON:

2 Q Keno?

3 A Keno?

4 Q It has to be the same as the keno game?

5 A Again, it's a math equation, so yes.

6 Q Sure. So we know the par on keno, we know
7 the par on roulette, we know the par on video poker
8 and --

9 A Video reel's a wild card.

10 Q Video is a wild card. Sometimes we don't
11 know the hold on a video reel.

12 A If you look at a video reel game, just
13 looking at it, you can -- especially the multiline
14 games, it really isn't obvious by just looking at it
15 what the hold is. If you have access to par, you know
16 what the range are -- the ranges are.

17 Q Par sheets?

18 A Correct.

19 Q Right.

20 A But other than that, it's -- those games
21 are designed more for an entertainment value. It's
22 fun. It's exciting. You want to get to the bonus
23 round. But it's not a skill-based game, where I
24 believe video poker is.

25 Q Sure. Sure.

H I G H L Y C O N F I D E N T I A L

1 finite number. The theo is what the game is set at
2 that you may or may not get. So there's -- if you
3 have a reinvestment of 20 percent, it doesn't impact
4 the theoretical hold at all. It only impacts the
5 actual hold, or in this case, what we're talking
6 about, the gross. So I'm not sure where you're
7 headed.

8 Q Well, for example, if I know exactly what
9 the coin-in was and I knew what the theo was, I know
10 what the par is. I mean, I can calculate the par.

11 A If I know what the actual is and the
12 coin-in is, I can calculate what the actual hold is
13 for that day, and then I can compare it to what I've
14 set my theoretical at to know what my delta or
15 variance is, yes.

16 Q But I mean the competitor. Once a
17 competitor knows the theo, tracks the coin-in, they
18 can calculate the par on that machine for that day?

19 A If I were to go to a competitor, which I
20 have, and play a game and put a hundred dollars of
21 coin-in through that game to get a concept of where
22 they're at, I can play the game like anyone else, I
23 can determine how much I won or lost, and I can come
24 up with a ballpark figure --

25 Q Generally.

H I G H L Y C O N F I D E N T I A L

1 A It's not going -- with a hundred dollars in
2 coin-in, it may not give me what I need because I
3 don't have that cycle.

4 Q Yeah. I mean, let's face it. The more you
5 play, the more accurate you're going to be. The more
6 coin-in, the more accurate you are.

7 A That's correct.

8 Q The estimate is going to be --

9 A Right. The higher the coin-in you have --

10 Q Once you get the estimate, you go to the
11 par sheets and you go, hey, look, I'm spot on here at
12 7.

13 A Uh-huh. I mean, from an operator
14 standpoint, my goal is make sure my game is set up
15 appropriately, set up per the par sheet, that my par
16 sheets are accurate and obtainable -- because if
17 Gaming comes in, I have to show them -- and to make it
18 basically a fair game.

19 Q And, again, the par sheets are the
20 manufacturer's owner manual, so to speak?

21 A The manufacturer provides you a par sheet
22 that shows you what your options are based on what
23 Gaming has approved for that particular game and chip.
24 Every game -- every game is different, and every game
25 has their own par sheet.

H I G H L Y C O N F I D E N T I A L

1 abstract?

2 A Again, when you use the term "abstract," I
3 wasn't a hundred percent familiar. I would always
4 look at it as the Gaming Revenue Report.

5 Q Okay. Is this what you're referring to?
6 For example, the heading is "Washoe County Reno Area
7 All Nonrestricted Locations."

8 A Which is everybody that has a license, yes.

9 Q Right. And then reading the columns right
10 to left, it's the rolling twelve-month period,
11 three-month period, and the month.

12 A Correct.

13 Q And, for example, if you go down to the
14 second category, which is "Slot Machines," you see the
15 column that refers to win percent?

16 A Yes, sir.

17 Q That's more or less the net hold?

18 A I don't know how they report it. It could
19 be the gross prior to the deductions we talked about
20 earlier. It says "Win Percent."

21 Q Right. This is the -- the percentage of
22 money that is derived from the play?

23 A Right. I don't think it would be the --
24 the net. I think it would be the gross.

25 Q You don't know one way or the other?

H I G H L Y C O N F I D E N T I A L

1 A Yes.

2 Q -- correct?

3 A Yes.

4 Q Did that influence strategies?

5 A We wanted to be competitive, but it
6 depended upon, you know -- again, a great example
7 here. Let's say this was back in 2004. Not
8 significantly different. The property I was at was --
9 pulled this curve way down.

10 Did it influence our strategy? Well --

11 Q What do you mean it pulled it way down?

12 A Well, at 3.2 -- 2.8 to 3.2 hold at Reno
13 Hilton definitely impacted this 5.23, if that was --
14 if this was that -- a comparative analysis.

15 Q You were probably pulling Harrah's down.

16 A Pulling the whole market down.

17 Q Unless some of the properties were as low
18 as the Hilton.

19 A At the time, I don't know if they were.

20 Q How do you know that they weren't? You
21 have a pretty good idea from shopping?

22 A From shopping and from looking at this
23 gaming report specific and looking at who was in what
24 category.

25 Q Mr. Sullivan, it's not that hard, using

H I G H L Y C O N F I D E N T I A L

1 this data, to figure out where you are in the market
2 with your par, is it?

3 A It is not hard at all.

4 Q It's pretty easy?

5 A Yes, sir. Again, it's a math equation.

6 Q It's a simple math equation?

7 A Uh-huh.

8 Q So you pretty much know where you are with
9 regard to par competitiveness to the Atlantis?

10 A Yes.

11 Q To the Peppermill?

12 A Yes.

13 Q To the Nugget?

14 A Yes.

15 Q To Harrah's?

16 I guess the bigger players now are
17 Eldorado --

18 A Within a very close range. I won't be able
19 to tell you it is a 4.5 at the Nugget and a 3.9 at the
20 Peppermill, but I can tell you that I'm going to get
21 it pretty close.

22 Q With par sheets and that kind of data,
23 gaming abstracts and Wells, you know where you are --

24 A Yes, sir --

25 Q -- as a strategist and as an experienced

H I G H L Y C O N F I D E N T I A L

1 Q You recall those?

2 A Of course I do. I did them at GSR.

3 Q Right.

4 And where did those video advertisements
5 go? What media?

6 A They were television ads that we did. I
7 don't know if they were out-of-market or in. I
8 believe they were actually in the Sacramento area and
9 they were here.

10 Q Okay.

11 A And that -- I don't even remember the year
12 that we did those. Probably --

13 Q It was under Rosen, though?

14 A Absolutely.

15 Q And it was part of this 40 percent
16 reduction?

17 A Right. It was a marketing strategy.

18 Q Was it your impression that the GSR had a
19 reputation of having high pars, tight machines, until
20 you did that 40 percent ad?

21 A I've worked in the industry on the slot
22 side for approximately 20 years.

23 Q Right.

24 A And regardless of what my holds have been
25 in the variety of properties that I work at, I get the

H I G H L Y C O N F I D E N T I A L

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Tuesday, August 4, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of TOM SULLIVAN, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 10th day of August, 2015.

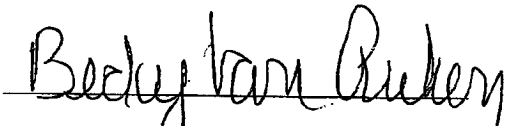

BECKY VAN AUKEN, CCR #418

EXHIBIT 25

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 25

Case No. CV13-01704

Dept. No. 57

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)
)
Plaintiff,)
)
-vs-)
)
PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)
)
Defendant(s).)

DEPOSITION OF TOBY TAYLOR

(HIGHLY CONFIDENTIAL PAGES 18 - 73)

called for examination by counsel for Defendant Peppermill Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, at 2:15 p.m., Monday, November 3, 2014, before Becky Van Auken, a Certified Court Reporter.

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 A Yes. Or ask for explanation.

2 Q Okay. And then would there be a
3 corresponding change with regard to the comp
4 reinvestment percentages if you changed the par?

5 A Again, I mean, I can't remember how the
6 reinvestment at Harrah's completely worked. It's been
7 a while.

8 Q The comp reinvestment percentages, does
9 that kind of go to the marketing side or is that still
10 in the slot department?

11 A It's mainly marketing.

12 Q Okay. So you're working on themes,
13 location, et cetera, par settings, and they're working
14 on the comp reinvestment percentages and the
15 strategies for marketing?

16 A Correct.

17 Q All right. When you were at the Atlantis
18 did you have anything to do with the slot department?

19 A No.

20 Q Did you have access to their slot tracking
21 system?

22 A No.

23 Q Did you shop for Harrah's at all?

24 A Yes.

25 Q And what properties did you shop?

1 BY MR. ROBISON:

2 Q I forgot a follow-up question or two on
3 topic No. 17, Mr. Taylor.

4 Going back to you being produced as the
5 person most knowledgeable about the diagnostics
6 received, accessed, or retrieved by Tors, do you know
7 what he received?

8 A Other than what was on the paper, no.

9 Q Okay. Other than Exhibit 14 --

10 A 14.

11 Q -- which is that piece of paper, you have
12 no information about what diagnostic or accounting
13 information was received by Mr. Tors?

14 A Correct.

15 Q And then what you do know from Exhibit 14
16 is what we've covered here today which is legible to
17 you?

18 A Yes.

19 Q Other than that, you have no information to
20 bring to the table?

21 A No.

22 Q With regard to these par settings and the
23 overall gaming at the GSR, pars are known or can be
24 ascertained quite easily with the keno games, right?

25 A Yeah. You can see the pay table, the pay

H I G H L Y C O N F I D E N T I A L

1 schedule, on keno.

2 Q And therefore determine the hold
3 percentage?

4 A Correct.

5 Q Same with blackjack?

6 A Black- -- well, the rules determine. So,
7 yeah, I guess you can get there.

8 Q Same with video poker?

9 A Yes.

10 Q Same with the video roulette?

11 A I'm not as familiar with that, so --

12 Q And same with Wheel of Fortune?

13 A No, you can't determine Wheel of Fortune
14 just by playing the game or by --

15 Q Well, no, there's only one setting for
16 Wheel of Fortune --

17 A Correct.

18 Q -- and the par sheet tells you what that
19 is, so all your competitors know what your Wheel of
20 Fortunes are at. Correct?

21 A Right.

22 Q And those -- keno, blackjack, video -- are
23 a substantial part of the casino play?

24 A Yes. It's not the majority in our house,
25 but it does -- there are a lot of folks that play

H I G H L Y C O N F I D E N T I A L

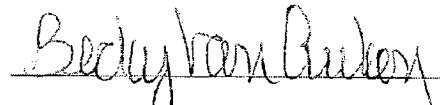
STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Monday, November 3, 2014, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of TOBY TAYLOR, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 10th date day of November, 2014.

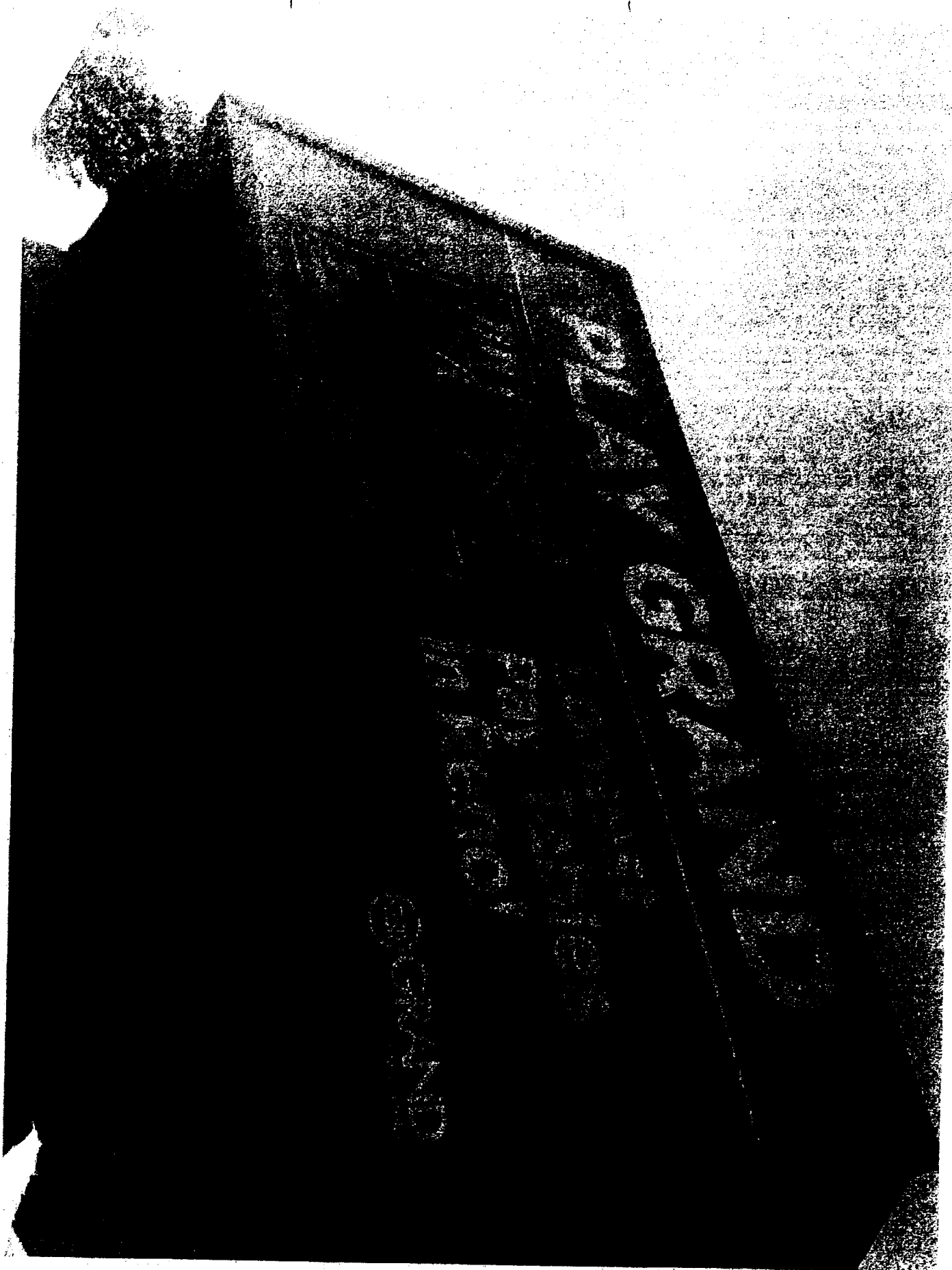


BECKY VAN AUKEN, CCR #418

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 26

EXHIBIT 26



FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 27

EXHIBIT 27





Sierra Resort and Casino

SIERRA RESORTS

007182

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 28

EXHIBIT 28



RESERVATIONS INFORMATION
800.441.1111

1,000,000,000

1,000,000,000

1,000,000,000

1,000,000,000

39 2 17 33

\$1,000,000
GIVEAWAY

SECONDS COUNTDOWN IS ON!

HOW YOU CAN WIN

HOTEL • DINING • BAR/LOUNGE • AMBITIOUS ENTERTAINMENT • CASINO • MEETINGS/CONVENTIONS • ACTIVITIES • HOTELS

SLOTS AND VIDEO POKER

SOMETHING FOR EVERYONE

We offer a wide variety of denominations from a penny to \$100 many are multi-denomination games. We invite you to play in our expansive non-smoking gaming area located from the Hotel Front Desk with over 125 games featuring an outstanding variety of reels, video reels and video poker. Check below for your old favorites and the newest games available in Reno. **GSR Rewards** members earn free play, so make sure you are using your card when you play and if you don't have a **GSR Rewards** card sign up today at the players club!

GRAND SIERRA HAS THE LOOSEST BUFFALO PAYTABLE SETTINGS

Finding loose slots is a dream for all slot players. Well, look no further. We've set all our Buffalo Slot games to the loosest payable settings allowed by the Nevada Gaming Control. This means longer play and more fun for you.



PLAY VIDEO POKER ONLINE, NOW!

Experience video poker online with many variations of games to choose from. Learn how to bet, view pay tables, and learn more about the poker games. So, what are you waiting for? Let's place those bets!

PLAY NOW!



GSR Rewards Benefits

CASINO

GSR Rewards CARD

Login

Sign Up

Retrieve Password

GSR Rewards kiosk

VIP Lounge

CASINO FLOOR

WET Party Pit

Table Games

Poker

Keno

Slots and Video Poker

Race and Sports Book

Calendar of Events

SERVICES

Credit Application

Casino Hotels

WET PARTY PIT

WE WANT YOUR FEEDBACK

SEARCH:

SEARCH

[www.grandsierraresort.com/casino/floor/slots-and-video-poker](#)
[Slots and Video Poker - Grand ...](#)
[1 800-501-2651](#)
[EMAIL UPDATES](#)
[GSR REWARDS](#)

[RESERVATIONS](#)
[BEST RATE GUARANTEE](#)

[HOTEL](#)
[DINING](#)
[BARS/LOUNGES](#)
[AMENITIES](#)
[ENTERTAINMENT](#)
[CASINO](#)
[MEETINGS](#)
[ACTIVITIES](#)
[HOT DEALS](#)

GSR GRAND

SIERRA RESORT AND CASINO


SLOTS AND VIDEO POKER

SOMETHING FOR EVERYONE

We offer a wide variety of denominations from a penny to \$100 many are multi-denomination games. We invite you to play in our expanded non-smoking gaming area (across from the Hotel Front Desk) with over 125 games featuring an outstanding variety of reels, video reels and video poker. Check below for your old favorites and the newest games available in Reno. **GSR Rewards** members earn free play, so make sure you are using your card when you play and if you don't have a **GSR Rewards** card sign up today at the players club!

GRAND SIERRA HAS THE LOOSEST BUFFALO PAYTABLE SETTINGS

Finding loose slots is a dream for all slot players. Well, look no further: We've set all our Buffalo Slot games to the loosest paytable settings available. This means longer play and more fun for you.



53

FILED
Electronically
2015-11-13 04:03:25 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 5235334 : csulezic

EXHIBIT 29

EXHIBIT 29

Case No. CV13-01704

Dept. No. B7

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

-oOo-

MEI-GSR HOLDINGS, LLC, a Nevada)
Corporation, d/b/a GRAND SIERRA RESORT,)
)
Plaintiff,)
)
-vs-)
)
PEPPERMILL CASINOS, INC., a Nevada)
Corporation, d/b/a PEPPERMILL CASINO;)
RYAN TORS, an individual; JOHN DOES I-X,)
and JANE DOES I-X and CORPORATIONS I-X,)
)
Defendant(s).)

DEPOSITION OF JOHN STONE

called for examination by counsel for Defendant Peppermill Casinos, Inc., d/b/a Peppermill Casino pursuant to Notice, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, at 9:30 a.m., Wednesday, April 1, 2015, before Becky Van Auken, a Certified Court Reporter.

APPEARANCES: (See separate page)

Reported by: BECKY VAN AUKEN, CCR No. 418, RMR, CRR

1 Q I know that because of them, and you know
2 that because of what you did.

3 A Correct.

4 Q Now, in order to get spot on to that
5 6 percent reinvestment percentage, you walk through
6 that -- pretty much that same scenario that we
7 discussed. You go to a certain amount of coin in, say
8 \$1,000, at a known par or unknown par, and you get the
9 theo, say 60 bucks, and then you know the par for that
10 machine is 6 percent?

11 A Correct.

12 Q And you get the theo from the Peppermill
13 through your social engineering, look or ask, get the
14 theo, then determine the par. Now you've got the theo
15 win because you've asked for it or seen it from the
16 Peppermill. Correct?

17 A Right.

18 Q And when I say see it, you looked at the
19 screen at the VIP office. Correct?

20 A Correct.

21 Q Now you've got the theo. You take it down
22 to the second formula and you've got the theo win, you
23 determine your comp dollars, 6, you divide 60 into
24 6 --

25 A Actually that's not going to come out to

1 Bates 709. And this -- correct me if I'm wrong --
2 this is pretty good stuff for a competitor to know.
3 Would you agree?

4 A Yes. Absolutely.

5 Q Now, this is as good as it gets in the
6 industry. Would you agree?

7 A Yes.

8 Q If you know these comp reinvestment
9 percentages of these various competitors, you know a
10 lot about their strategies?

11 A You do.

12 Q And you also know their pars because you
13 can work backwards?

14 A That is how I achieved it, so you can do
15 the same thing, yes.

16 Q Just go backwards and determine the pars?

17 A Somewhat, I guess. I'm not too sure I
18 quite --

19 Q Well, you don't do that, though?

20 A Right. But taken from this, can I
21 determine what the par is on a certain machine? No.

22 Q You can determine what the floor par is?

23 A The floor par, yes.

24 Q Of course, that's more important than the
25 par of a given machine, by far, isn't it?

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, BECKY VAN AUKEN, a Certified Court Reporter in and for the County of Washoe, State of Nevada, do hereby certify:

That on Wednesday, April 1, 2015, at the offices of Robison, Belaustegui, Sharp & Low, 71 Washington Street, Reno, Nevada, I was present and took verbatim stenotype notes of the deposition of JOHN STONE, who personally appeared and was duly sworn by me and was deposed in the matter entitled herein; and thereafter transcribed the same into typewriting as herein appears;

That the foregoing transcript is a full, true and correct transcription of my stenotype notes of said deposition.

Dated at Reno, Nevada, this 6th day of April, 2015.


BECKY VAN AUKEN, CCR #418

EXHIBIT 30

Part 1 of 3

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 30

Part 1 of 3



Reno Casinos
Direct Mail Rewards Comparison & Analysis Report
August 2014

Overview:

The following report summarizes the information contained in the direct mail offers received for the month of August 2014. CDC Consulting maintains player's accounts at Peppermill, Atlantis, Silver Legacy and Nugget casinos and are included in this comparative direct mail analysis for Grand Sierra Resort and Casino.

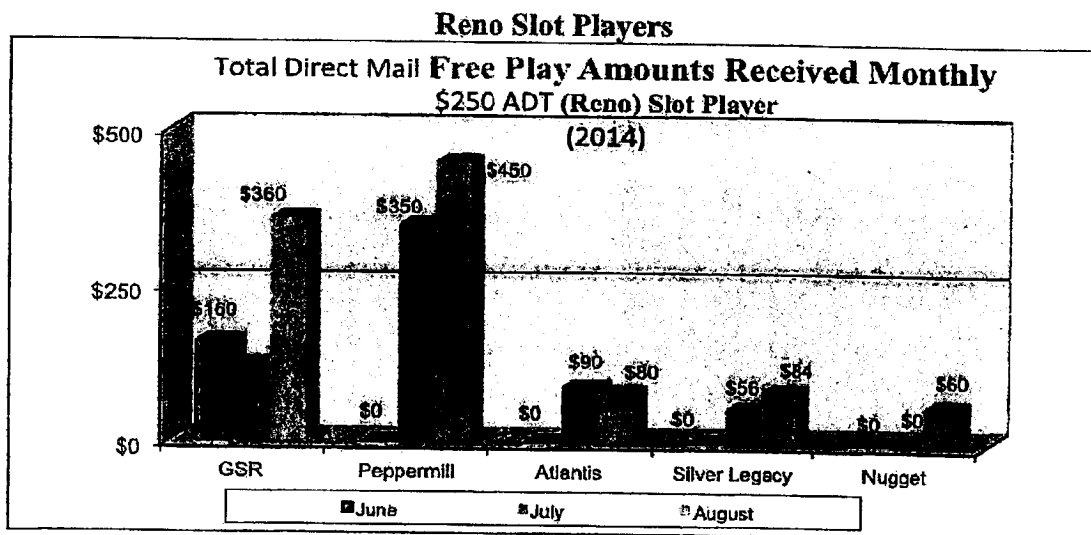
For baseline comparison purposes, six identical player accounts were established at Grand Sierra Resort and Casino. Comparable slot play takes place on each of these accounts each month as well.

In order to review the direct mail offers received, (3) player accounts have been established at each casino using a *Reno* address and (3) player accounts using a *Sacramento* address. One player account at each address is played to **\$250 ADT**, **\$100 ADT** and **\$50 ADT**.

In order to achieve an "apples to apples" comparison, similar \$1 reel slots are played at each casino during the course of each month's gaming visit to these casinos.

Direct Mail Free Play Rewards Comparisons:

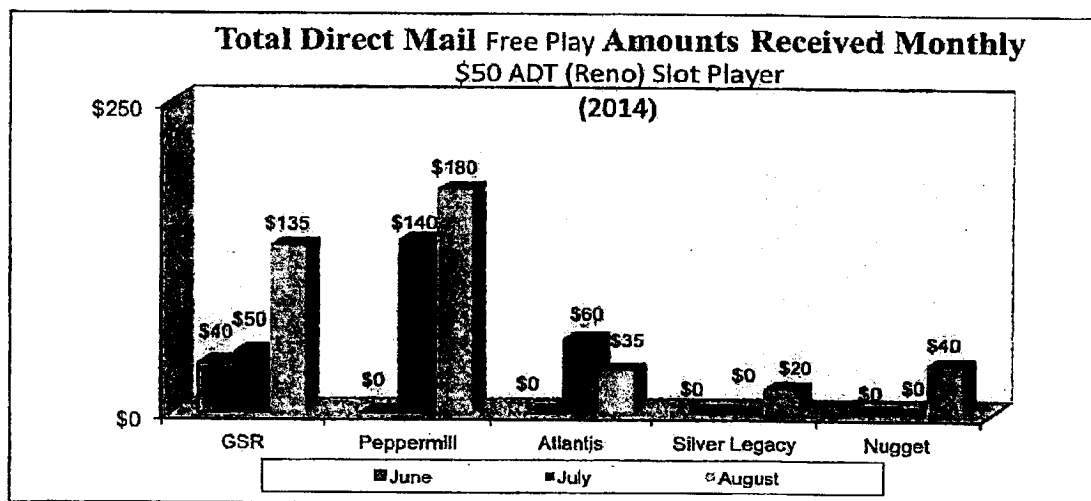
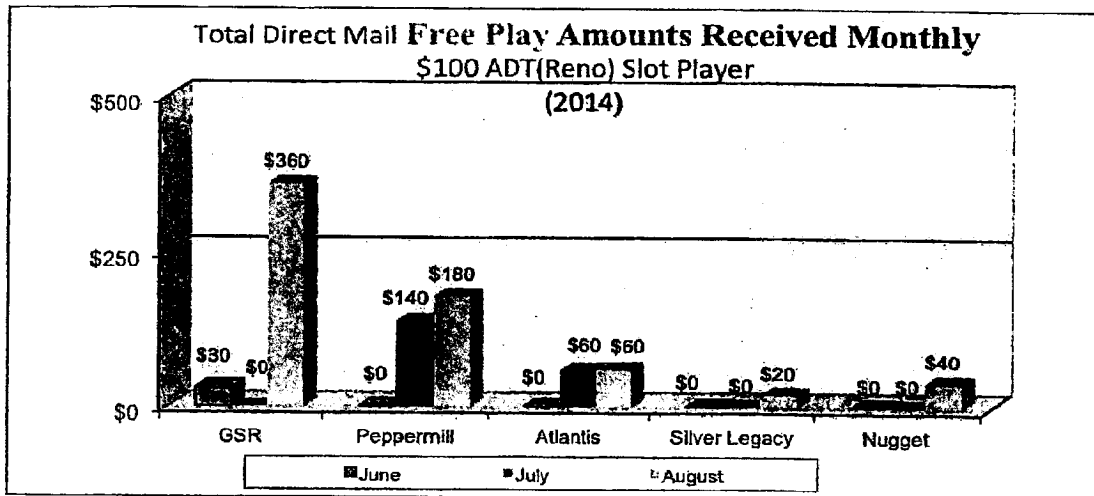
The total amount of direct mail free play rewards received by the local Reno area slot players in August are compared in the charts below.



HIGHLY CONFIDENTIAL

PM 0804

RA 02133

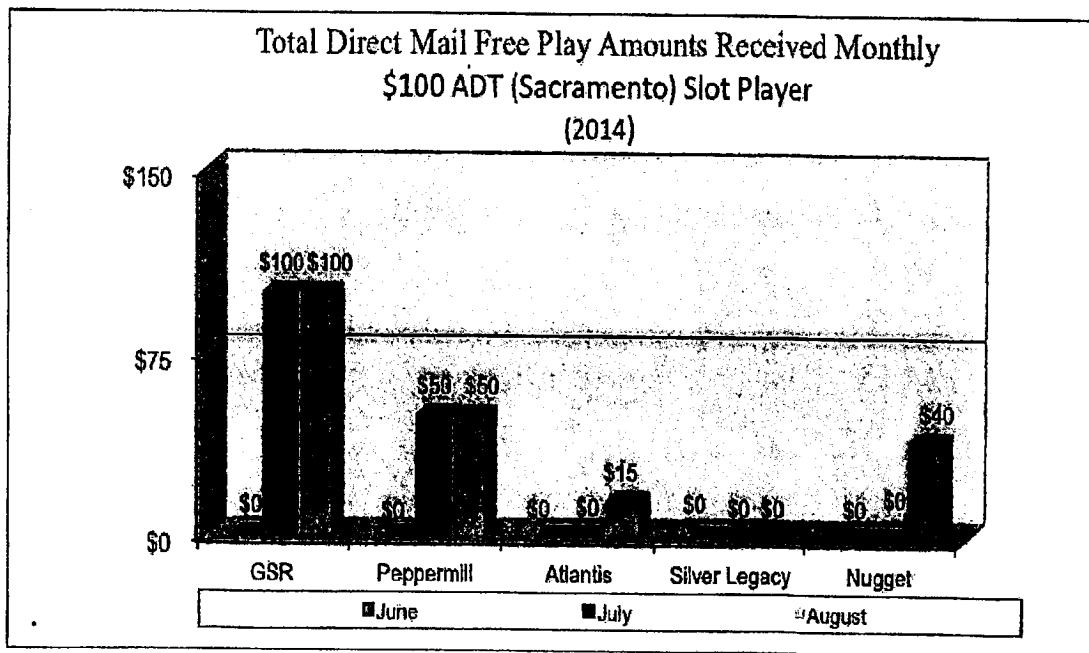
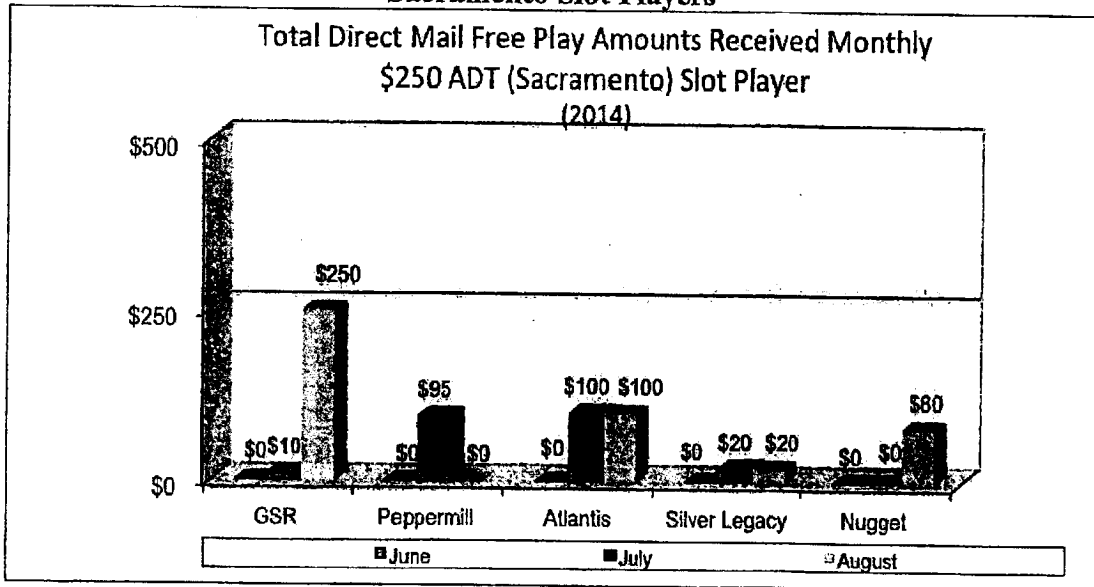


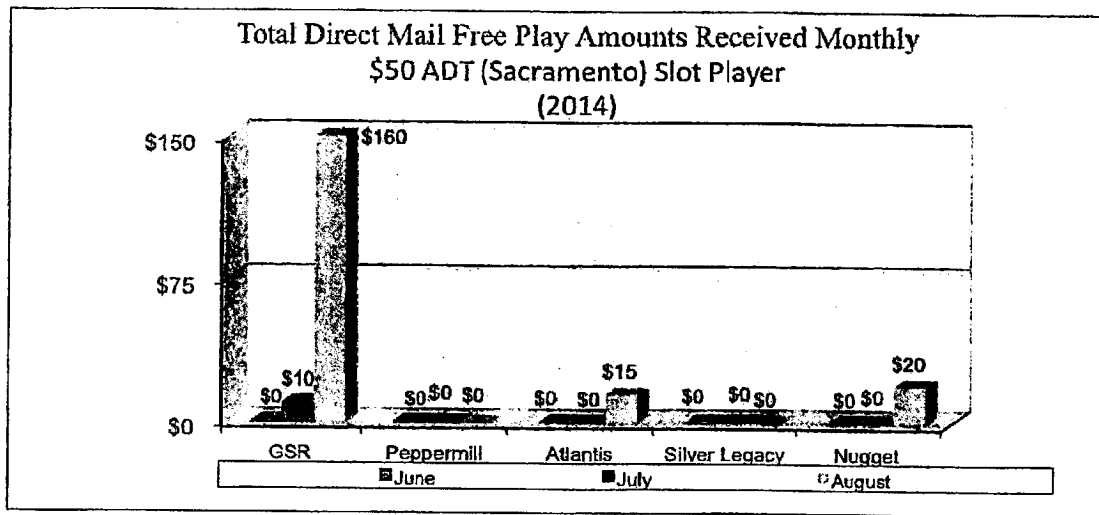
- GSR added weekends (Fri-Sat) as free play grant days for the month of August. This has more than doubled their free play offerings for the month of August to the Reno locals.
- Total free play grant days for the Reno local customers are ranked below:
 1. GSR/Peppermill: 9
 2. Atlantis: 5
 3. Silver Legacy/Nugget: 4
- GSR until recently had been the only Northern Nevada casino to send out a "free play voucher" based on their prior days play. This promotion seems to have ended and replaced with the additional free play grant days during the month.
- GSR has also joined the Peppermill & Atlantis by offering several "Play your Points" days during the month of August. Customers can exchange their points for Free Play through this program. Due to the fact that the Silver Legacy and the Nugget offers players the choice of using their points for either free play or comps, similar "points for play" day promotions are not offered here.

Direct Mail Free Play Rewards Comparisons:

The total amount of direct mail free play rewards received by the non-local Sacramento area slot players in August are compared in the charts below.

Sacramento Slot Players





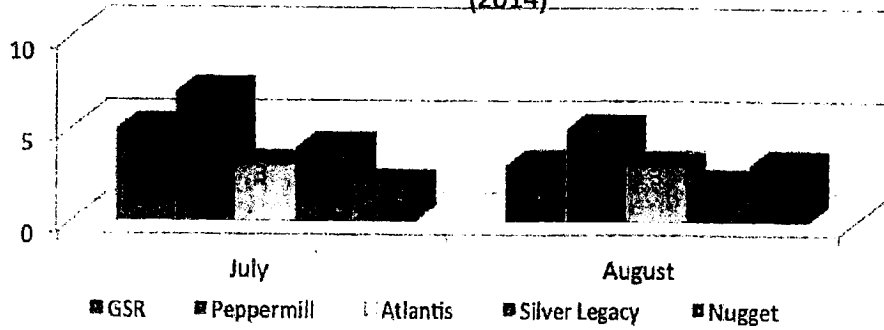
- GSR \$50 ADT non-local account received an \$80 free play offer valid twice monthly. This large re-investment is possibly due to a large tracked actual loss in May 2014.
- Peppermill's \$250 ADT non-local customer did not receive a Free Play offer for the month of August. This customer did receive an offer for September and October therefore possibly a mail pull timing issue or database error.
- The non-local Atlantis player accounts received their free play and room offers in the quarterly format used by the Atlantis. These quarterly free play & room offers are valid into October 2014. *(see attached copy of \$250 ADT Sacramento area Atlantis player quarterly free play offer)*
- Silver Legacy sent one free play offer to \$250 ADT customer. The other two accounts (\$100 & \$50 ADT) at the Silver Legacy did not receive any offers for the month of August. Both the \$100 & \$50 ADT player accounts are newly established indicating that the Silver Legacy is the market laggard in regards to responding to new player activity.
- The Nugget customers received their free play and dining offers for the month of August. The non-local customer did not receive any type of room offer with this piece. *(see attached copy of \$250 ADT Sacramento area player Nugget August Mailer)*

Direct Mail Offer/Promotional Volume Comparisons:

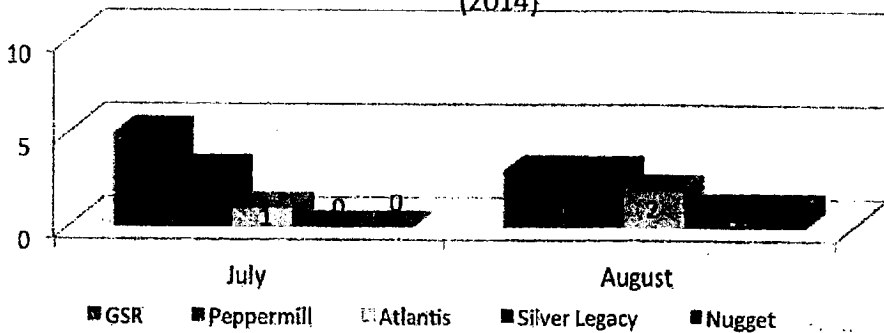
The volume of direct mail, email offers and promotions received by each of the player segments in the Reno and Sacramento areas in August are compared in the charts on the following pages.

Reno Slot Players

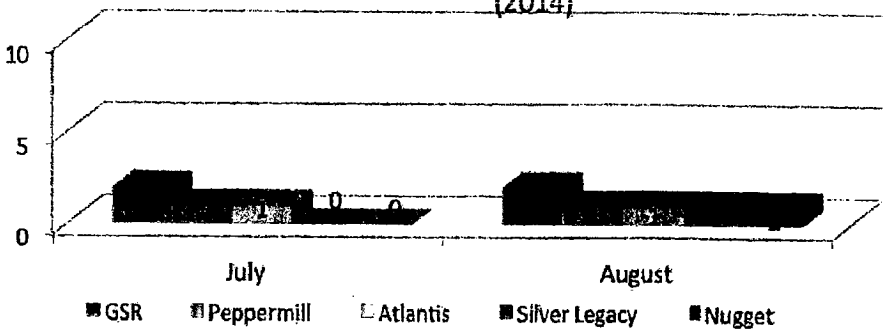
Number of Offers Received per Month
\$250 ADT (Reno) Slot Player
(2014)



Number of Offers Received per Month
\$100 ADT (Reno) Slot Player
(2014)

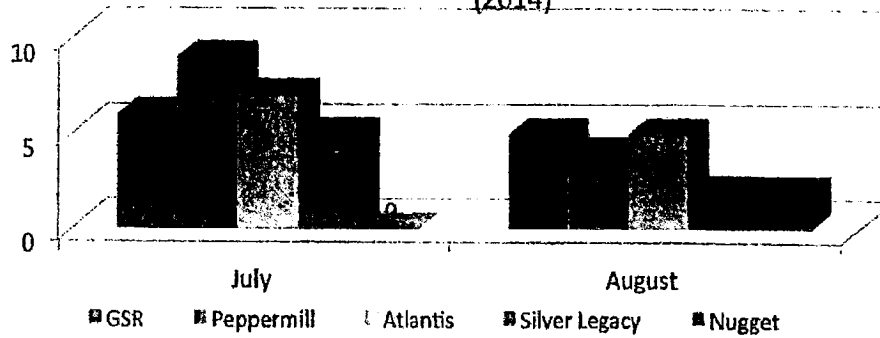


Number of Offers Received per Month
\$50 ADT (Reno) Slot Player
(2014)

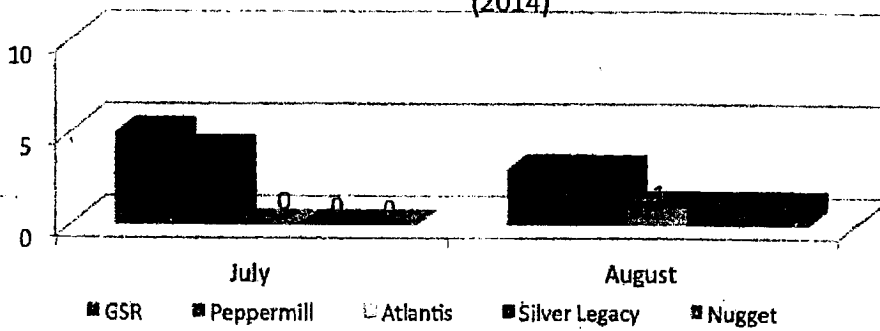


Sacramento Slot Players

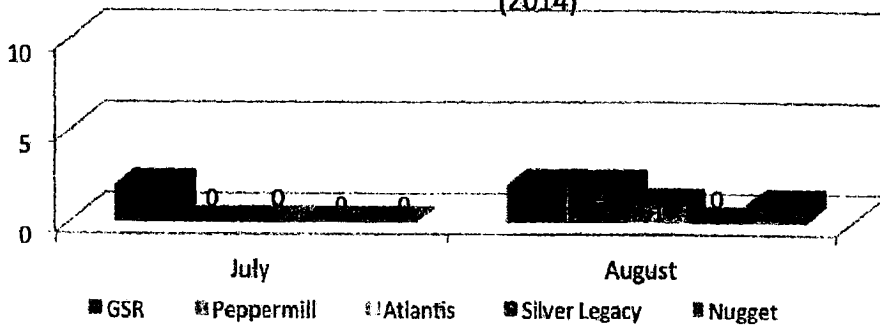
Number of Offers Received per Month
\$250 ADT (Sacramento) Slot Player
(2014)



Number of Offers Received per Month
\$100 ADT (Sacramento) Slot Player
(2014)



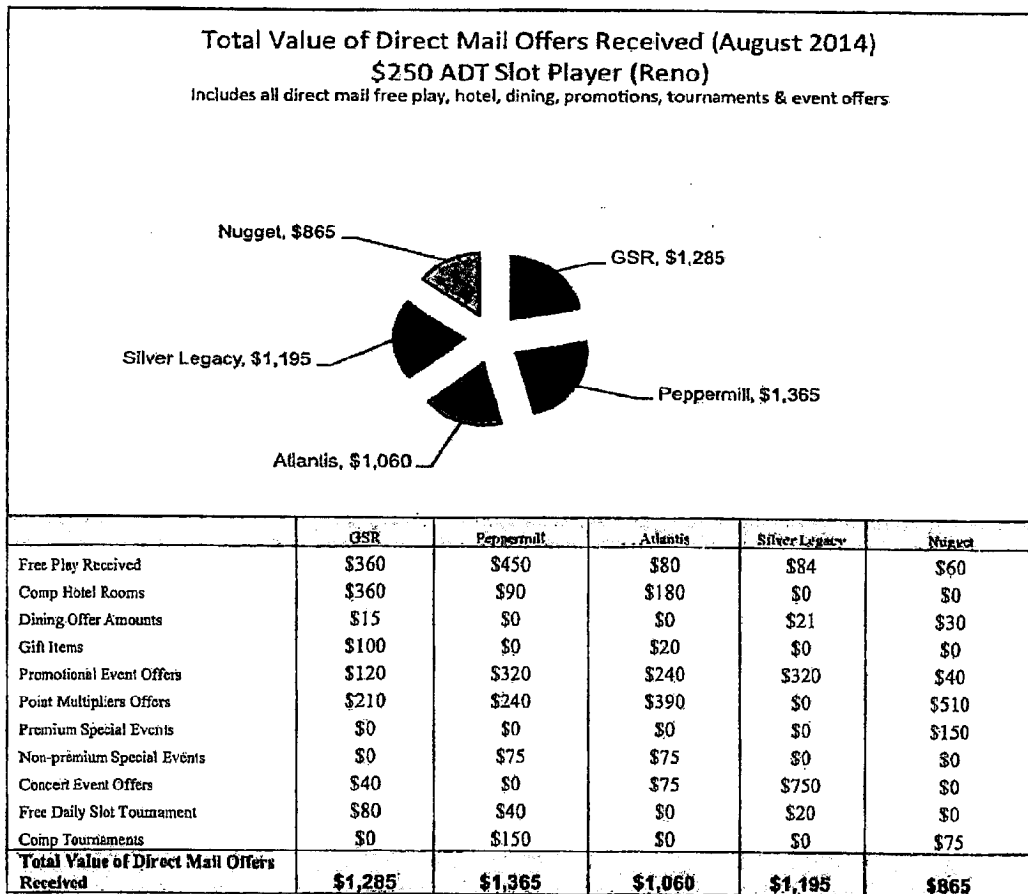
Number of Offers Received per Month
\$50 ADT (Sacramento) Slot Player
(2014)



Overall Value of Direct Mail Offers & Promotions Received

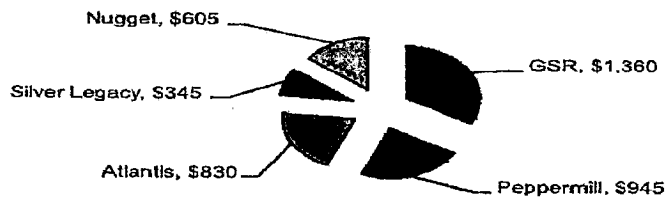
The total estimated/perceived value of each casino's direct mail rewards offers received for August is compared in the chart & graph combinations on the following pages. This total value amount is our interpretation of the *perceived* value of all free play rewards, hotel, dining, event, promotions and tournament offers received this month.

- Peppermill and Atlantis continued to have a strong presence of point multipliers throughout the month of August.
- The Nugget increased their number of point multiplier days for the month of August (19) versus July (13).
- Silver Legacy continues to be the market leader in the entertainment segment. The majority of their offer value is based on entertainment invitations.
- GSR introduced a monthly gift program that is similar to the Northern California casino market. Premium level customers get a free gift on select days while other customers have the opportunity to earn a select number of points in order to receive the free gift of the week.
- GSR also introduced "Play your Point" days on select days at a 2-1 comp to free play exchange rate. Peppermill and Atlantis also have select days for comp to free play exchanges at this same ratio of 2-1.
- GSR has the most liberal offering of "free" room nights during the month of August. Customers have the ability to "re-book" their monthly offers with a nominal time period in between stays.



Total Value of Direct Mail Offers Received (August 2014)
\$100 ADT Slot Player (Reno)

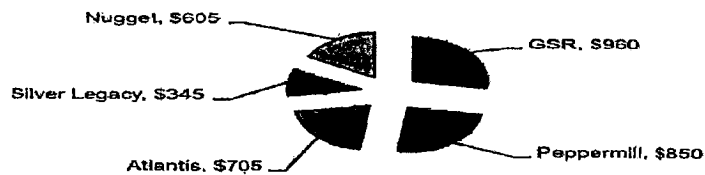
Includes all direct mail free play, hotel, dining, promotions, tournaments & event offers



	GSR	Peppermill	Atlantis	Silver Legacy	Nugget
Free Play Received	\$360	\$180	\$60	\$20	\$40
Comp Hotel Rooms	\$360	\$90	\$45	\$0	\$0
Dining Offer Amounts	\$15	\$0	\$0	\$5	\$15
Gift Items	\$100	\$0	\$20	\$0	\$0
Promotional Event Offers	\$120	\$320	\$240	\$320	\$40
Point Multipliers Offers	\$210	\$240	\$390	\$0	\$510
Premium Special Events	\$0	\$0	\$0	\$0	\$0
Non-premium Special Events	\$75	\$0	\$0	\$0	\$0
Concert Event Offers	\$40	\$0	\$75	\$0	\$0
Free Daily Slot Tournament	\$80	\$40	\$0	\$0	\$0
Comp Tournaments	\$0	\$75	\$0	\$0	\$0
Total Value of Direct Mail Offers Received	\$1,360	\$945	\$830	\$345	\$605

Total Value of Direct Mail Offers Received (August 2014)
\$50 ADT Slot Player (Reno)

Includes all direct mail free play, hotel, dining, promotions, tournaments & event offers



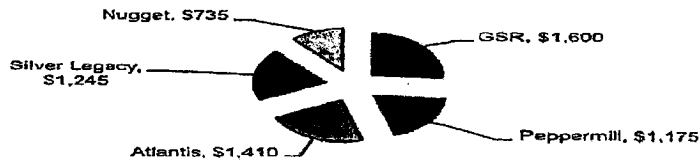
	GSR	Peppermill	Atlantis	Silver Legacy	Nugget
Free Play Received	\$135	\$180	\$35	\$20	\$40
Comp Hotel Rooms	\$270	\$90	\$20	\$0	\$0
Dining Offer Amounts	\$5	\$0	\$0	\$5	\$15
Gift Items	\$100	\$0	\$20	\$0	\$0
Promotional Event Offers	\$120	\$320	\$240	\$320	\$40
Point Multipliers Offers	\$210	\$240	\$390	\$0	\$510
Premium Special Events	\$0	\$0	\$0	\$0	\$0
Non-premium Special Events	\$0	\$0	\$0	\$0	\$0
Concert Event Offers	\$40	\$0	\$0	\$0	\$0
Free Daily Slot Tournament	\$80	\$20	\$0	\$0	\$0
Comp Tournaments	\$0	\$0	\$0	\$0	\$0
Total Value of Direct Mail Offers Received	\$960	\$850	\$705	\$345	\$605

Sacramento Slot Players

Total Value of Direct Mail Offers Received (August 2014)

\$250 ADT Slot Player (Sacramento)

Includes all direct mail free play, hotel, dining, promotions, tournaments & event offers

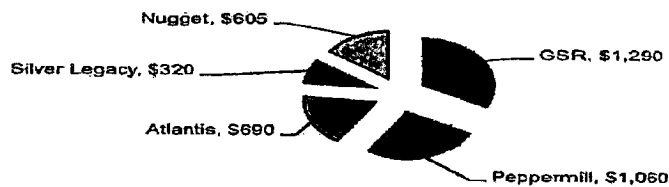


	GSR	Peppermill	Atlantis	Silver Legacy	Nugget
Free Play Received	\$250	\$0	\$100	\$20	\$80
Comp Hotel Rooms	\$630	\$270	\$405	\$135	\$0
Dining Offer Amounts	\$25	\$0	\$0	\$0	\$30
Gift Items	\$100	\$0	\$0	\$0	\$0
Promotional Event Offers	\$120	\$320	\$240	\$320	\$40
Point Multipliers Offers	\$210	\$240	\$390	\$0	\$510
Premium Special Events	\$150	\$0	\$0	\$0	\$0
Non-premium Special Events	\$75	\$75	\$75	\$0	\$0
Concert Event Offers	\$40	\$0	\$75	\$750	\$0
Free Daily Slot Tournament	\$0	\$20	\$0	\$20	\$0
Comp Tournaments	\$0	\$250	\$125	\$0	\$75
Total Value of Direct Mail Offers Received	\$1,600	\$1,175	\$1,410	\$1,245	\$735

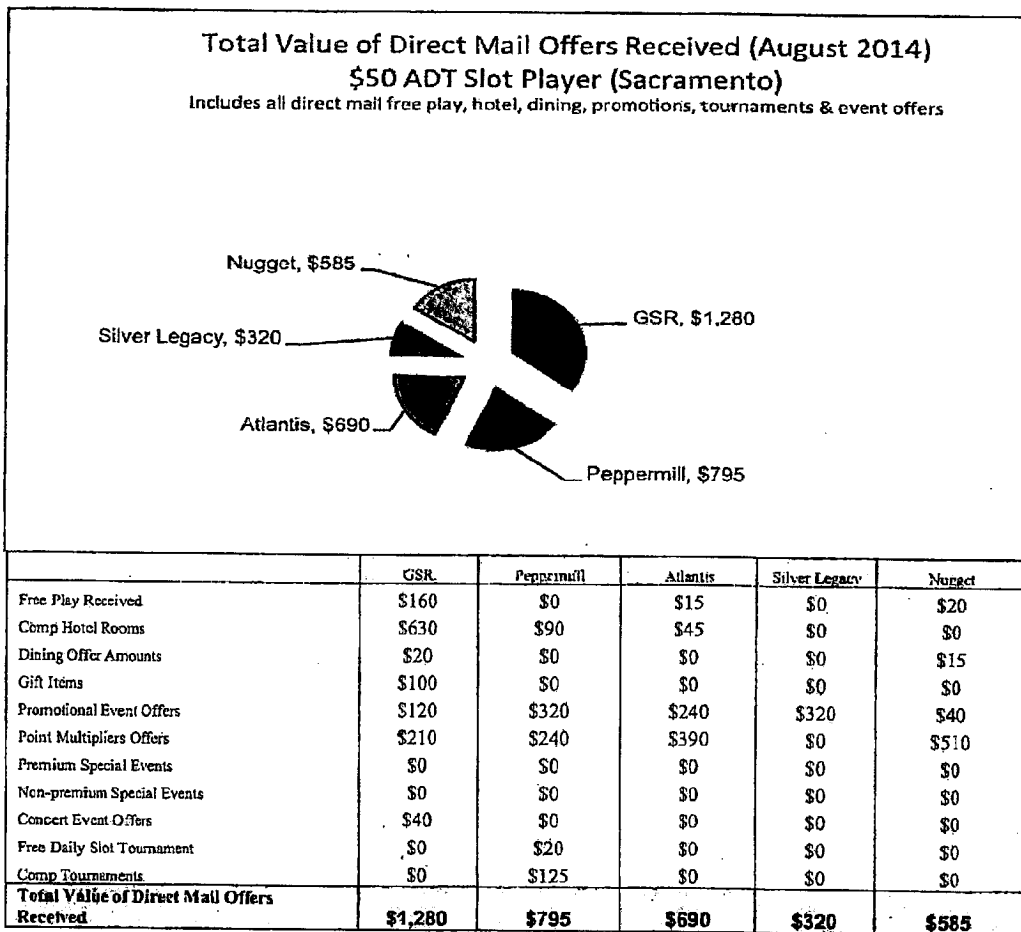
Total Value of Direct Mail Offers Received (August 2014)

\$100 ADT Slot Player (Sacramento)

Includes all direct mail free play, hotel, dining, promotions, tournaments & event offers



	GSR	Peppermill	Atlantis	Silver Legacy	Nugget
Free Play Received	\$100	\$50	\$15	\$0	\$40
Comp Hotel Rooms	\$630	\$180	\$45	\$0	\$0
Dining Offer Amounts	\$15	\$0	\$0	\$0	\$15
Gift Items	\$100	\$0	\$0	\$0	\$0
Promotional Event Offers	\$120	\$320	\$240	\$320	\$40
Point Multipliers Offers	\$210	\$240	\$390	\$0	\$510
Premium Special Events	\$0	\$0	\$0	\$0	\$0
Non-premium Special Events	\$75	\$0	\$0	\$0	\$0
Concert Event Offers	\$40	\$0	\$0	\$0	\$0
Free Daily Slot Tournament	\$0	\$20	\$0	\$0	\$0
Comp Tournaments	\$0	\$250	\$0	\$0	\$0
Total Value of Direct Mail Offers Received	\$1,290	\$1,060	\$690	\$320	\$605



- The lack of “free” hotel room offers by the Nugget seems to be an odd strategy. None of the non-local or local customers direct mail offers for the month of August contained a room offer component of any kind. (*see attached copy of \$250 ADT Sacramento area player Nugget August Mailer*)
- Overall first impressions of the Nugget's direct mail program are very poor. Offer value is far below the market standard for all player levels and the mail pieces themselves are poorly constructed and hard to read.

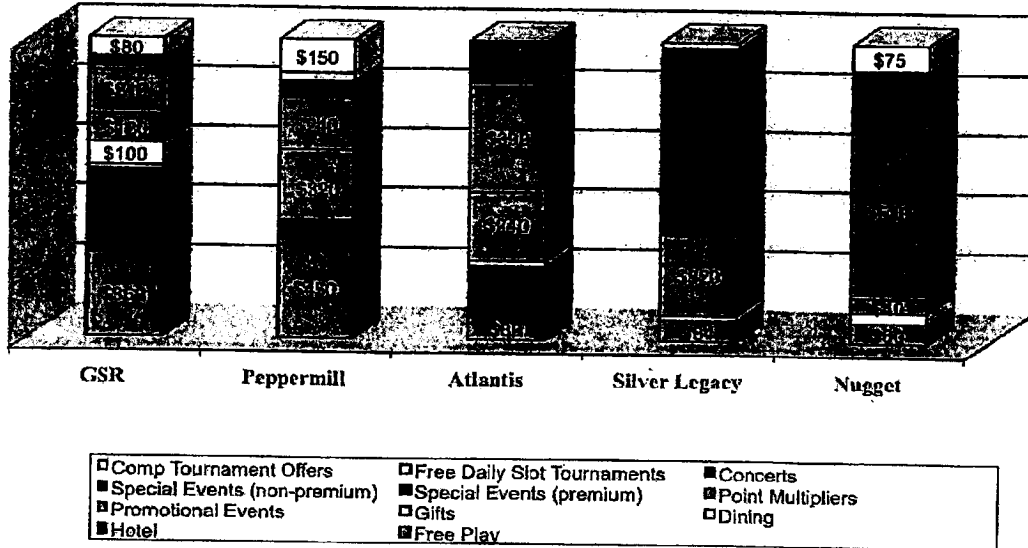
Comparison of Individual Reward Components Offered:

The graphs on the following pages compare the reward components that were included in the August direct mail & promotional offers received by the Reno and Sacramento area slot players. The relative importance of each reward component to each casino as well as the diversity of reward components or lack of diversity can be seen in this format.

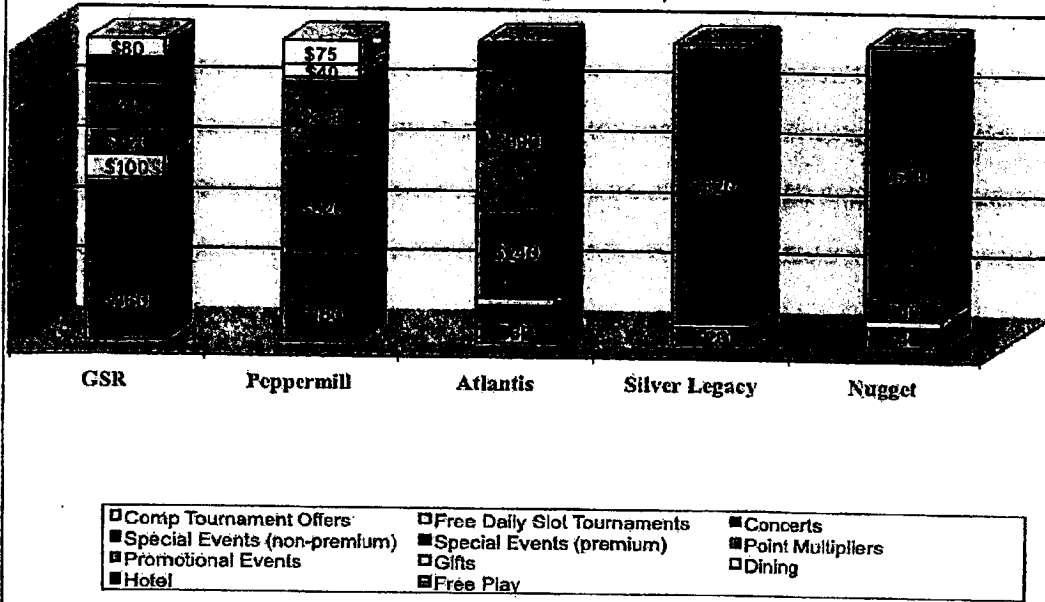
The Grand Sierra's direct mail offers to all player segments is now being seen as being much more diverse and having a much higher level of variety when compared to earlier in the year.

Reno Slot Players

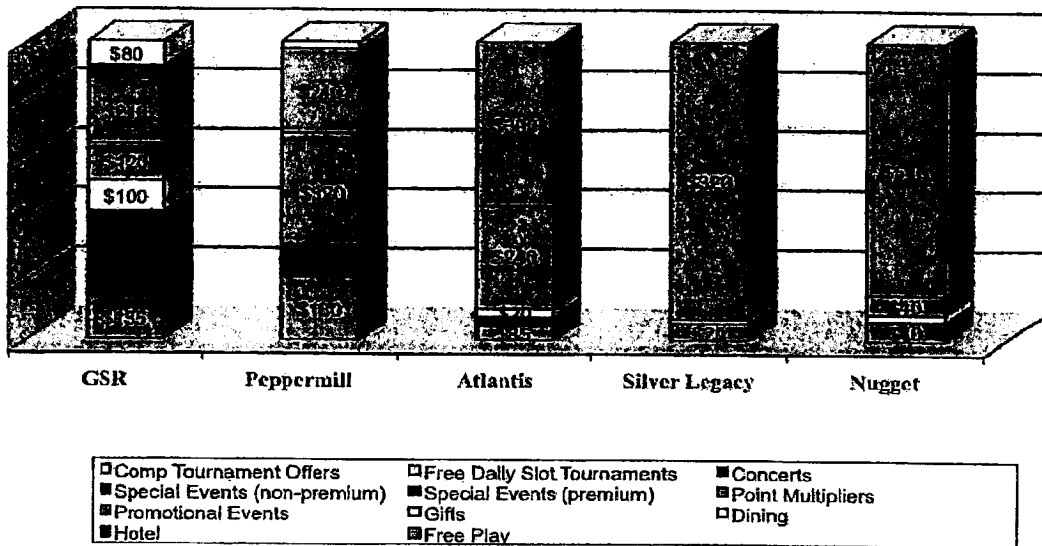
Value of Individual Direct Mail & Promotion Offer Component by Property
\$250 ADT Slot Player (Reno)
(August 2014)



Value of Individual Direct Mail & Promotion Offer Component by Property
\$100 ADT Slot Player (Reno)
(August 2014)

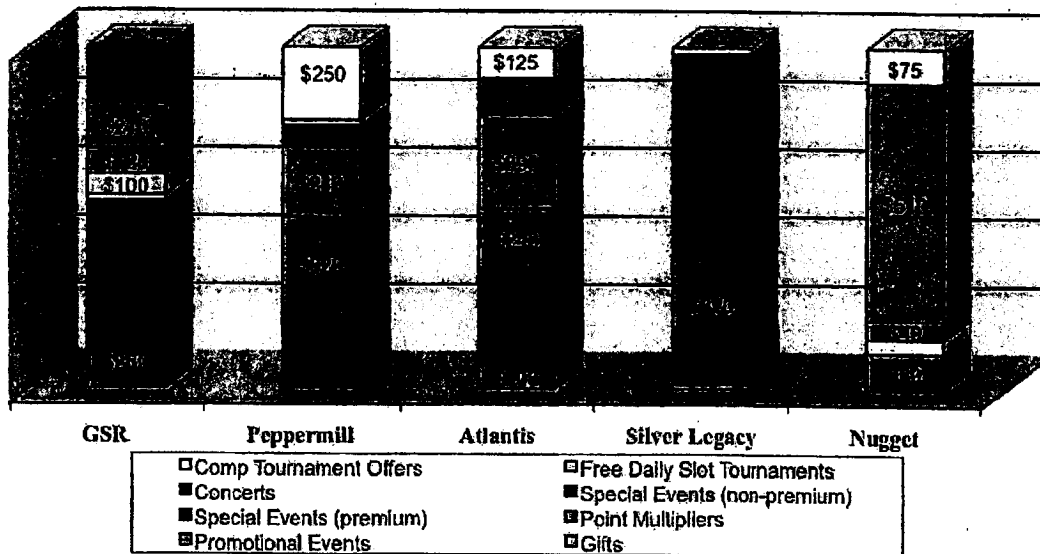


Value of Individual Direct Mail & Promotion Offer Component by Property
\$50 ADT Slot Player (Reno)
(August 2014)

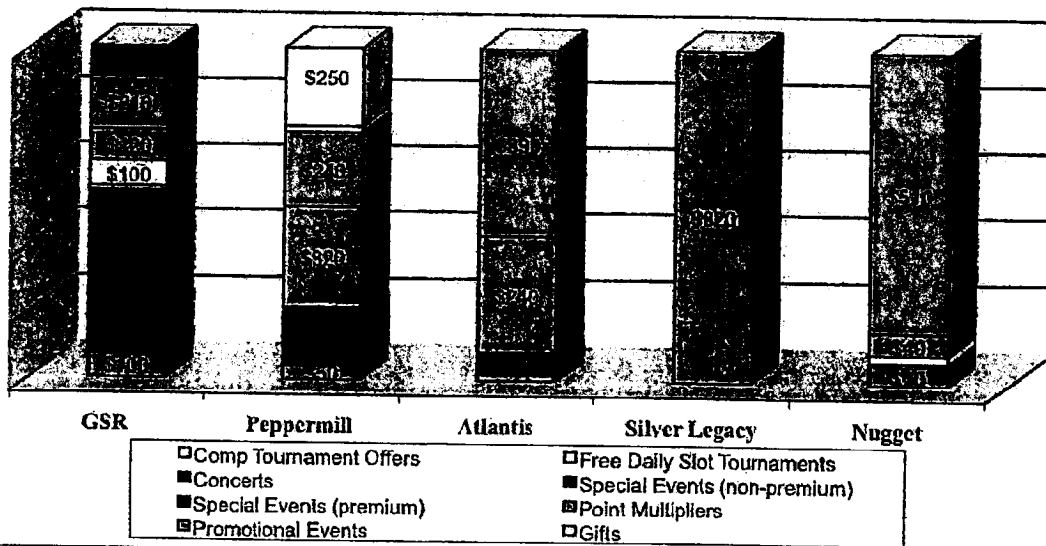


Sacramento Slot Players

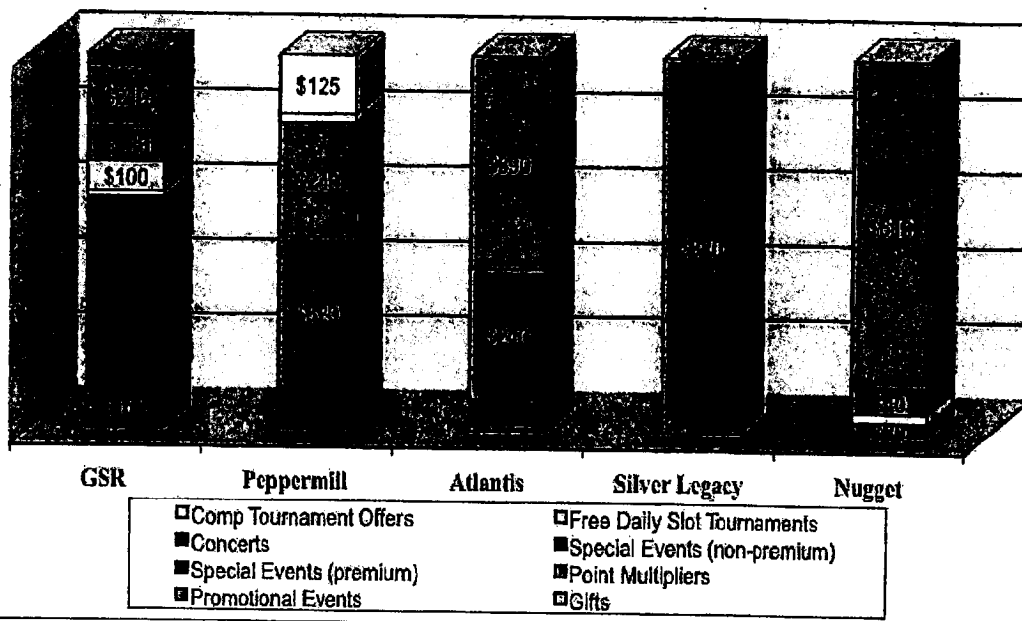
Value of Individual Direct Mail & Promotion Offer Component by Property
\$250 ADT Slot Player (Sacramento)
(August 2014)



Value of Individual Direct Mail & Promotion Offer Component by Property
\$100 ADT Slot Player (Sacramento)
(August 2014)



Value of Individual Direct Mail & Promotion Offer Component by Property
\$50 ADT Slot Player (Sacramento)
(August 2014)



Silver Legacy:

Entertainment:

Silver Legacy sent over \$750 in entertainment value to the \$250 ADT Local and Non-Local account holders for the month of August. Entertainment seems to be a core marketing strategy that Silver Legacy tries to maximize, (See attached \$250 ADT Mailer highlighting Entertainment)

\$1 Million Game Changer Promotions:

Over the past year the Silver Legacy has been very successful in the development of their "Million Dollar Game Changer" daily promotional package into a strong competitive advantage. These four promotions are well advertised, well executed through both the kiosk and slot machine interface, and are easy for the guest to understand.

The Silver Legacy has converted the majority of their yearly promotional budget into this combination of ongoing promotions, and from the outside looking in it appears this was a very good decision on their part.

Attached to this report is a brochure that explains in detail each of these promotions that currently make up the Million Dollar Game Changer concept. The "Break the Bank" promotion that targets only the penny slots is by far biggest part of this suite of promotions.

Peppermill:

\$25k Payday:

Peppermill has introduced a new Sunday drawing component starting September 21, 2014. Drawings held on Sunday's (noon, 2p and 5p). Drawing dates: September 21, October 26 and November 30, 2014. "Earn Drawing tickets all month long for a chance to win a share of \$25,000 Cash and Free Play. \$5,000 Grand Prize" (Promoting at Players Club – no advertising yet.)

Any questions you may have regarding the information contained in this report, please feel free to contact me at any time.

John Stone
CDC Consulting

Telephone:

702.378.0634

Email:

john.stone@compdance.com

Atlantis Q3 Non-Local Mailer (\$250 ADT Non Local):

\$150 IN FREE SLOT PLAY GUARANTEED!

To redeem Free Play, swipe your Club Paradise card
at any Paradise Rewards kiosk.

\$50 FREE PLAY August 20 - 28, 2014

\$50 FREE PLAY September 24 - 29, 2014

\$50 FREE PLAY October 7 - 15, 2014

\$150 TOTAL

Free Slot Play is available starting at 12:01 on the first day of each time period and is valid once during each time period. Free Slot Play is available at all Paradise Rewards kiosks. Free Slot Play is not valid at any other time period. Free Slot Play is not valid at any other time period. Free Slot Play is not valid at any other time period. Free Slot Play is not valid at any other time period.

Two **FREE** Nights Deluxe Tower Accommodations!

ABSOLUTELY FREE. No charge to your Player Account.

Make reservation today by calling 888.337.7662 and refer to the term code. Present this voucher when you
Club Paradise card and valid 2 of each.

Excludes suites and all other specialty accommodations. Not valid for use on any other
other. No payment required at time of booking. 20% refund on no-shows. No cash back. No other restrictions apply.

Valid August 4 - October 31, 2014



VOID IF DETACHED

Two **FREE** Nights Deluxe Tower Accommodations!

ABSOLUTELY FREE. No charge to your Player Account.


Make reservation today by calling 888.337.7662 and refer to the term code. Present this voucher with your
Club Paradise card and valid 2 of each.

Excludes suites and all other specialty accommodations. Not valid for use on any other
other. No payment required at time of booking. 20% refund on no-shows. No cash back. No other restrictions apply.


Valid August 4 - October 31, 2014




VOID IF DETACHED




DICK FOX'S GOLDEN BOYS
 Opening Night for Baby's Ball
FRIDAY, AUGUST 1
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see the Golden Boys




THE BEACH BOYS
 OFFER: CASHED
SATURDAY, AUGUST 2
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see the Beach Boys




SARA BAREILLES
 OFFER: CASHED
FRIDAY, AUGUST 1
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see Sara Bareilles




GABRIEL IGLESIAS
 OFFER: CASHED
SATURDAY, AUGUST 2
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see Gabriel Iglesias




\$15,000 BINGO BLITZ
 OFFER: CASHED
FRIDAY, AUGUST 1
 GRAND EXPOSITION HALL - 7PM
 * 2 FREE tickets to see \$15,000 Bingo Blitz




DAVID GRAY
 OFFER: CASHED
FRIDAY, AUGUST 2
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see David Gray



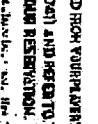
ENGELBERT HUMPERDINCK
 OFFER: CASHED
SATURDAY, AUGUST 3
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see Engelbert Humperdinck



TINA TURNER
 OFFER: CASHED
FRIDAY, AUGUST 1
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see Tina Turner



SARA BAREILLES
 OFFER: CASHED
SATURDAY, AUGUST 2
 GRAND EXPOSITION HALL - 8PM
 * 2 FREE tickets to see Sara Bareilles



\$15,000 BINGO BLITZ
 OFFER: CASHED
FRIDAY, AUGUST 1
 GRAND EXPOSITION HALL - 7PM
 * 2 FREE tickets to see \$15,000 Bingo Blitz

EXHIBIT 30

Part 2 of 3

DESIGNATED
HIGHLY CONFIDENTIAL INFORMATION

**CONFIDENTIAL-SUBJECT TO STIPULATED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE
ORDER FILED JULY 17, 2014**

**To be Opened Only Upon Further Order of This Court
Or for the Sole Use of the Court and its Employees**

EXHIBIT 30

Part 2 of 3

Silver Legacy \$1 Million Game Changer Promotions:

\$1 Million game CHANGER

Play every day and you can choose to win a
share of \$1 MILLION in cash and prizes.
THE MORE YOU PLAY THE MORE YOU WIN!

There are lots of ways to win:

BARON'S BONNIES

FLORIDA TV - Slot and Table Game players select, using their
Star Rewards card

PROPORTIONAL TIMES

Monday - Thursday - 1 pm - 4 pm - 6 min per hour
PROCEDURE - Slot & Table Game players randomly select
the bonus time to award actively playing games. 6 per hour
during game time is awarded following the overhead game
announcement. To get to the Star Rewards Center where the lucky winners
will play the Fortune Game to win on rotating press
No need to stop in at the Star Rewards Center on promotional

LEGACY VIDEO LOTTO

Guaranteed to 16 by 16/250. Everyone who select total progressive value
LEGACY LOTTO - Slot and Table Game players select using their
Star Rewards card

PROCEDURE - DAILY TIMES - every hour on the hour
Monday - Friday - 8 pm - 8 pm Saturday & Sunday - 11 am - 4 pm

PROPORTIONAL

Choose 6 out of 24 numbers on the Game Changer board

PAID

3 out of 6 - \$10 Slot FreePlay
4 out of 6 - \$10 Slot FreePlay
5 out of 6 - \$25 Slot FreePlay
6 out of 6 - \$100 Slot FreePlay

25% of total progressive is shared by all qualified players in Florida, including
Total Progressive Jackpot starts at \$25,000.
Progressive increases \$1,000 per hour every Friday.

SO BIG IN THE BIGGEST LITTLE CITY

SILVER LEGACY RESORT • CASINO • RESID

Complete rules
at the
Star Rewards
Center

FOR MORE INFORMATION, CONTACT CASINO MARKETING AT
1-800-688-7723 or (772) 328-4777

\$1 Million game CHANGER

Play every day and you can choose to win a
share of \$1 MILLION in cash and prizes.
THE MORE YOU PLAY THE MORE YOU WIN!

There are lots of ways to win:

Big Strike MACHINE

FLORIDA TV - Slot & Table Game players playing select slot machines

PROPORTIONAL TIMES

Any slot players are actively playing select slot machines
using their Star Rewards card

PROCEDURE - Big Strike Progressive is the playing on your own personal pro-
gressive slot only you can win it for every dollar played on designated ma-
chines with your Star Rewards card properly inserted, your progressive grows

When you play a \$100 or higher jackpot, all cash prize amounts
will be awarded your Big Strike Progressive to slot. Proceed to the
Star Rewards Center on promotional

LEGACY VIDEO LOTTO

FLORIDA TV - Slot & Table Game players playing select
Break the Bank using slot machines

PROCEDURE - TIMES - Any time players are actively playing select
Break the Bank using machines with your active Star Rewards card

PROCEDURE - Players will sit up when the progressive jackpot is announced, but
on different rooms on select Break the Bank slot machines for slot FreePlay
the more you play with a Star Rewards card the more of these play will win

SILVER play bonus after approximately 15 minutes of play
awarding up to \$100 in slot FreePlay

SILVER play bonus after approximately 30 minutes of play
awarding up to \$200 in slot FreePlay

GOLD play will generally award up to \$500 in slot FreePlay
after approximately 45 minutes of play

Check your bonus of slot FreePlay at the Star Rewards Center
Promotional rules are at the Star Rewards Center

SO BIG IN THE BIGGEST LITTLE CITY

SILVER LEGACY RESORT • CASINO • RESID

Complete rules
at the
Star Rewards
Center

FOR MORE INFORMATION, CONTACT CASINO MARKETING AT
1-800-688-7723 or (772) 328-4777

SATURDAY

HUGGET! Rib Cook-Off!

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$250 ADT Reno slot player**

	GSU	Depotmill	Adm
Free Play	\$40 Free Play (Aug 1-2) \$40 Free Play (Aug 4-6) \$40 Free Play (Aug 8-9) \$40 Free Play (Aug 11-13) \$40 Free Play (Aug 15-16) \$40 Free Play (Aug 18-20) \$40 Free Play (Aug 22-23) \$40 Free Play (Aug 25-27) \$40 Free Play (Aug 29-30) \$360	\$50 Free Play (Aug 1) \$50 Free Play (Aug 2) \$50 Free Play (Aug 5-8) \$50 Free Play (Aug 9) \$50 Free Play (Aug 12-15) \$50 Free Play (Aug 19-22) \$50 Free Play (Aug 23) \$50 Free Play (Aug 26-29) \$50 Free Play (Aug 30) \$450	\$10 Free Play (Aug 4-6) \$25-\$500 Free Play (Aug 16) \$10 Free Play (Aug 20-21) \$10 Free Play (Aug 26-28) Swipe & Win (Aug 30) \$80
Hotel (\$45 per night value)	(2) Free nights - any day - Aug 3-31 Multiple stays allowed (7 days between trips) up to (8) nights \$360	(2) Free nights - any day - 7/28-8/28 Tuscan Tower Suite \$90	(2) Free nights - any day - Aug 1-31 Deluxe Tower (2) Free nights - Aug 22-23 \$180
Dining	\$15 Dining Credit - Sunday-Friday - August 3-31 \$15	 \$0	 \$0
Gifts/Other (\$40/\$20 per gift)	Wireless Headphones - August 3 \$0 Piece Food Storage - August 10 Soap & Hand Dispenser - August 17 Wireless Mobile Phone Zone - August 24 3 Piece BBQ Set - August 31 \$100	 \$0	(1) Free Hot August Nights T-Shirt (Aug 1-2) \$20
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Grand Power Winners Jackpot (daily) 55 Grand Multipliers (Wednesdays) Points for Free Play Exchange Day (August 6) \$120	\$210,000 Flat and Cash Giveaway (daily) Buena Forma Collect and Win (daily) \$10,000 Big Spin Kiosk Game (Sundays) Points for Free Play Exchange Days (every Thursday) \$320	Money Maker Jackpot (daily) Batman Slot Party (Aug 15-16) Driven to Win \$100k Giveaway (Aug 22-23) Coiny Point For Free Play Exchange (Aug 5, 21, 24) \$240
Point Multipliers (\$30 per day)	2x, 3x, 5x, 7x Points (Every Thursday) 2x, 3x, 5x, 7x Points (Aug 15, 16 and 25) \$210	6x Points (Aug 15-16) 5x Points (Aug 22) 4x Points (every Wednesday) \$240	4x Points (Aug 3, 15) 2x/3x (Flat/Diamond) - (Aug 8, 14, 20) 3x Points (Aug 11, 25) 4x Points (Aug 7, 27) 2x Points (Aug 1, 18, 28, 31) \$390
Premium Events (\$150 per event)	 \$0	 \$0	 \$0
Non Premium Events (\$75 per event)	 \$0	CanFest - August 23 (2) VIP Tickets - seating and Buffet \$75	Viva Fiesta - Aug 9 - Dinner for 2 \$75
Concert Offers	Masters of Magic (thru August 10) (2) free tickets \$40	 \$0	Wycoons & Tan Big Nohas (Aug 29) * Two tickets \$75
Free Tournaments (\$20 per day offered)	\$5,000 Lucky Bonus Slot Tourney (Each Tuesday) \$80	\$15,000 Bingo Blast (Aug 19) Play the Pros (1 free entry) \$40	 \$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	 \$0	Slot August Nights Slot Tournament (Aug 3-4) Triple Bender Slot Tournament (Aug 24-25) \$150	 \$0
Total	\$1,785	\$1,165	\$1,060

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$250 ADT Reno slot player**

	Silver	Nugget
Free Play	\$21 Free Play (Aug 4) \$21 Free Play (Aug 11) \$21 Free Play (Aug 18) \$21 Free Play (Aug 25)	\$15 Free play (Aug 5-7) \$15 Free play (Aug 11-14) \$15 Free play (Aug 17-20) \$15 Free play (Aug 23-26)
	\$84	\$60
Hotel (\$45 per night value)	\$0	\$0
Dining	\$21 Resort Credit (Aug 1-31)	\$10 Dining Credit (Aug 6-9) \$10 Dining Credit (Aug 19-22) \$10 Dining Credit (Aug 24-26)
	\$21	\$30
Gifts/Other (\$40/\$20 per gift)	\$0	\$0
Promotion Events (\$40 per event) (\$30 per week for daily promotional activities i.e. random progressives)	Break the Bank Bonuses (daily) \$1 Million Game Changer (daily) \$100k Mustang & Money Drawings (weekends) Points to Free Play (Friday's)	Text 4 Treasure July 7 - August 17
	\$320	\$40
Point Multipliers	\$0	2x Points (Aug 6,7,12,13,14,15,16,18,19,20,21,24,26) 3x Points (Aug 4,10,23) 4x Points (Aug 3)
	\$0	\$110
Premium Events (\$150 per event)	\$0	Rib Cook Off (Aug 27-Sept 2) VIP entry for 2 & two free nights
	\$0	\$150
Non Premium Events (\$75 per event)	\$0	\$0
Concert Offers	Dick Fox Golden Boys (Aug 1) - (2) free tickets Beach Boys (Aug 2) - (2) free tickets Sara Bareilles (Aug 8) - (2) free tickets Gabriel Iglesias (Aug 9) - (2) free tickets Thompson Square (Aug 15) - (2) free tickets Brina Regan (Aug 22) - (2) free tickets Lucas Oil Race (Aug 22-23) - (2) free tickets David Gray (Aug 29) - (2) free tickets Engelbert Humperdinck (Aug 30) - (2) free tickets Thai Chai (Aug 31) - (2) free tickets	
	\$750	\$0
Free Tournaments (\$20 per day offered)	\$15,000 Bingo Blitz (Aug 14)	
	\$20	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	\$0	\$20,000 777 Slot Tournament - Aug 22-24
	\$0	\$75
Total	\$1,125	\$385

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$100 ADT Reno slot player**

Category	CSM	Paycom	ADT
Free Play	\$40 Free Play (Aug 1-7) \$40 Free Play (Aug 4-6) \$40 Free Play (Aug 4-9) \$40 Free Play (Aug 11-13) \$40 Free Play (Aug 15-16) \$40 Free Play (Aug 18-20) \$40 Free Play (Aug 22-23) \$40 Free Play (Aug 25-27) \$40 Free Play (Aug 29-30) \$360	\$20 Free Play (July 29 - Aug 1) \$20 Free Play (Aug 2) \$20 Free Play (Aug 5-8) \$20 Free Play (Aug 9) \$20 Free Play (Aug 12-15) \$20 Free Play (Aug 19-22) \$20 Free Play (Aug 23) \$20 Free Play (Aug 26-29) \$20 Free Play (Aug 30) \$180	\$10 Free Play (Aug 4-6) \$15-\$200 Free Play (Aug 16) \$10 Free Play (Aug 28-31) \$10 Free Play (Aug 26-28) Swipe & Win (Aug 30) \$60
Hotel (\$45 per night value)	(2) Free nights - any day - Aug 3-31 Multiple stays allowed (7 days between trips) up to (8) nights \$360	(2) Free nights - Sunday-Thursday- 7/28-8/28 Peppercorn Tower Room \$90	(2) Free nights - any day - Aug 1-31 Deluxe Tower \$45
Dining	\$15 Dining Credit - Sunday-Friday - August 3-31 \$15	 \$0	 \$0
Gifts/Other (\$40/\$20 per gift)	Wireless Headphones - August 3 50 Piece Food Storage - August 10 Soap & Hand Dispenser - August 17 Wireless Mobile Phone Zone - August 24 3 Piece BBQ Set - August 31 \$100	 \$0	(1) Free Hot August Nights T-Shirt (Aug 1-2) \$20
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities - i.e. random progressives)	Grand Power Winners Jackpot (daily) 55 Grand/Multipliers (Wednesdays) Points for Free Play Exchange Day (August 6) \$120	\$210,000 Flat and Cash Giveaway (daily) Bucon Forman Collect and Win (daily) \$10,000 Dig Soil Kiosk Game (Sundays) Points for Free Play Exchange Days (every Thursday) \$320	\$40,000 Cash Weekend (July 18-19) Money Maker Jackpot (daily) Datman Slot Party (Aug 15-16) Driven to Win \$100k Giveaway (Aug 22-23) Comp Point For Free Play Exchange (Aug 5,21,24) \$240
Point Multipliers (\$30 per day)	2x,3x,5x,7x Points (Every Thursday) 2x,3x,5x,7x Points (Aug 15,16 and 25) \$210	6x Points (Aug 15-16) 5x Points (Aug 22) 4x Points (every Wednesday) \$240	4x Points (Aug 3,15) 2x/3x(Play/Diamond) - (Aug 8,14,20) 3x Points (Aug 11,25) 4x Reels (Aug 7,27) 2x Points (Aug 1,18,28,31) \$390
Premium Events (\$150 per event)	 \$0	 \$0	 \$0
Non Premium Events (\$75 per event)	\$68,000 Cash Weekend (August 22-24) Drawings & Two free nights \$75	 \$0	 \$0
Concert Offers	Masters of Magic (thru August 10) (2) free tickets \$40	 \$0	Wynonna & The Big Noise (Aug 29) * Two tickets \$75
Free Tournaments (\$20 per day offered)	\$5,000 Lucky Bonus Slot Tourney (Each Tuesday) \$80	\$15,000 Diego Blast (Aug 19) Play the Pros (1 free entry) \$40	 \$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	 \$0	Slot August Nights Slot Tournament (Aug 3-4) \$75	 \$0
TOTAL	\$1390	\$735	\$535

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$100 ADT Reno slot player**

	Silver Player	Platinum Player
Free Play	\$5 Free Play (Aug 4) \$5 Free Play (Aug 11) \$5 Free Play (Aug 18) \$5 Free Play (Aug 25)	\$10 Free play (Aug 5-7) \$10 Free play (Aug 11-14) \$10 Free play (Aug 17-20) \$10 Free play (Aug 23-26)
	\$20	\$40
Hotel (\$45 per night value)	\$0	\$0
Dining	\$5 Resort Credit (Aug 1-31)	\$5 Dining Credit (Aug 6-9) \$5 Dining Credit (Aug 19-22) \$5 Dining Credit (Aug 24-26)
	\$5	\$15
Gifts/Other (\$40/\$20 per gift)	\$0	\$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e. random progressives)	Break the Bank Bonuses (daily) \$1 Million Game Changer (daily) \$100k Mustang & Money Drawings (weekends) Points to Free Play (Friday's)	Text 4 Treasure July 7 - August 17
	\$320	\$40
Point Multipliers	\$0	2x Points (Aug 6,7,12,13,14,15,16,18,19,20,21,24,26) 3x Points (Aug 4,10,25) 4x Points (Aug 3)
	\$0	\$510
Premium Events (\$150 per event)	\$0	\$0
Non Premium Events (\$75 per event)	\$0	\$0
Concert Offers	\$0	\$0
Free Tournaments (\$20 per day offered)	\$0	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	\$0	\$0
	\$0	\$0
Total	\$320	\$550

\$50 ADT Reno slot player

RA 02156

**Comparison of Value Received by Individual Direct Mail & Promotional Offer Components
(August 2014)
\$50 ADT Reno slot player**

	Silver Nugget	Nugget
Free Play	\$5 Free Play (Aug 4) \$5 Free Play (Aug 11) \$5 Free Play (Aug 18) \$5 Free Play (Aug 25) \$20	\$10 Free play (Aug 5-7) \$10 Free play (Aug 11-14) \$10 Free play (Aug 17-20) \$10 Free play (Aug 23-26) \$40
Hotel (\$45 per night value)	\$0	\$0
Dining	\$5 Resort Credit (Aug 1-31) \$5	\$5 Dining Credit (Aug 6-9) \$5 Dining Credit (Aug 19-22) \$5 Dining Credit (Aug 24-26) \$15
Gifts/Other (\$40/\$20 per gift)	\$0	\$0
Promotion Events (\$40 per event) (\$20 per week for daily promotional activities i.e.random progressives)	Break the Bank Bonuses (daily) \$1 Million Game Changer (daily) \$100k Mustang & Money Drawings (weekends) Points to Free Play (Friday's) \$320	Text 4 Treasure July 7 - August 17 \$40
Point Multipliers	\$0	2x Points (Aug 6,7,12,13,14,15,16,18,19,20,21,24,26) 3x Points (Aug 4,10,25) 4x Points (Aug 3) \$570
Premium Events (\$150 per event)	\$0	\$0
Non Premium Events (\$75 per event)	\$0	\$0
Concert Offers	\$0	\$0
Free Tournaments (\$20 per day offered)	\$0	\$0
Invitational Tournaments (\$75 event only) (\$125 event & hotel)	\$0	\$0
	\$0	\$0



\$259 ADT Slot Player
Reno
Direct Mail Free Slot Play Offers Received

	June				July					August				
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week
CSR	Top Free Play (Daily) Summary by 15-21 June 2011				525 \$500 Play 15-21 July	525 \$500 Play 22-28 July	525 \$500 Play 29-31 July	525 \$500 Play 1-7 Aug	525 \$500 Play 8-14 Aug		525 \$500 Play 15-21 Aug	525 \$500 Play 22-28 Aug	525 \$500 Play 29-31 Aug	525 \$500 Play 1-7 Sept
Peppercorn														
Atlantic														
Silver Legacy														
Nugget														



**\$100 ADT Slot Player
Reno
Direct Mail Free Slot Play Offers Received**

	June				July					August				
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week	1st Week	2nd Week	3rd Week	4th Week	5th Week
CSR			30 Free Play (Mail, Storage) Valid June 27 - 28, 11								30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11
Poppetvill					30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11						
Aloha					30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11	30 Free Play (Mail, Storage) Valid June 27 - 28, 11						
Silver Legacy														
Nugget														



**550 ADT Slot Player
Reno
Direct Mail Free Slot Play Offers Received**

	June				July				August			
	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week	1st Week	2nd Week	3rd Week	4th Week
CSR	528 1st Week (Daily Rewards) Add 1st Week 1st-1st 27	528 2nd Week (Daily Rewards) Add 2nd Week 1st-1st 27	528 3rd Week (Daily Rewards) Add 3rd Week 1st-1st 27	528 4th Week (Daily Rewards) Add 4th Week 1st-1st 27	528 1st Week (Daily Rewards) Add 1st Week 1st-1st 27	528 2nd Week (Daily Rewards) Add 2nd Week 1st-1st 27	528 3rd Week (Daily Rewards) Add 3rd Week 1st-1st 27	528 4th Week (Daily Rewards) Add 4th Week 1st-1st 27	528 1st Week (Daily Rewards) Add 1st Week 1st-1st 27	528 2nd Week (Daily Rewards) Add 2nd Week 1st-1st 27	528 3rd Week (Daily Rewards) Add 3rd Week 1st-1st 27	528 4th Week (Daily Rewards) Add 4th Week 1st-1st 27
Pepperdill												
Atlantis												
Silver Legacy												
Nugget												



Direct Mail Offer Comparison by Category
\$250 ADT Reno Player
 (August 2014)

Casino Name	Free Play, Hotel, Food & Gift Offers (1) Offers Received	Special Event Offers (1) Offers Received	Promotion Offers (1) Offers Received	Tournament Offers (0) Offers Received
GSR Total Offers Received: 3	Free Slot Play & Hotel Offer * \$40 free slot play (valid Aug 1-2) * \$40 free slot play (valid Aug 4-5) * \$40 free slot play (valid Aug 6-9) * \$40 free slot play (valid Aug 11-13) * \$40 free slot play (valid Aug 15-18) * \$40 free slot play (valid Aug 18-20) * \$40 free slot play (valid Aug 22-23) * \$40 free slot play (valid Aug 25-27) * \$40 free slot play (valid Aug 28-30) * up to (4) Hotel stays up to (2) nights any day (8 nights total - 7 days between trips) Free Dining Credit * \$15 Dining Credit (Aug 1-31)	Masters of Magic thru August 10 * (2) free tickets	Sunday Gift Give Aways * Each Sunday in August (2-8p) * Wireless Headphones (Aug 3) * 50 Piece Food Storage (Aug 10) * Soap & Hand Dispenser (Aug 17) * Wireless Mobile Phone Zone (Aug 24) * 3 Piece BBQ Set (Aug 31) Play your Points * August 8 & September 1 (10am-10pm) * Exchange comps for Free play (2x1) August Multipliers * Every Thursday in August and August 15-18 * 2x Platinum, 3x Legend, 5x Elite, 7x Grand	
Peppermill Total Offers Received: 5	Free Slot Play Offer & Hotel Offer * \$50 free slot play (valid July 29-Aug 1) * \$50 free slot play (valid Aug 2-3) * \$50 free slot play (valid Aug 5-6) * \$50 free slot play (valid Aug 9-10) * \$50 free slot play (valid Aug 12-15) * \$50 free slot play (valid Aug 16-22) * \$50 free slot play (valid Aug 23-29) * \$50 free slot play (valid Aug 30) * (2) free nights in Tuscan Tower (7/28-8/28)	Can Fest (August 23) * 5-11pm * (2) Free tickets + Seating and Buffet	\$20,000 Amore Fiat and Cash Giveaway * June 15 - September 6, 2014 * Swipe and Win a Prize Daily * Collect Letters and Spell the word of the month * One Free Letter per day - Earn 20 Points for another Sunday Big Spin * Sundays - Noon-midnight * Kiosk game for chance to win: \$5-\$1,000 Free play * One free swipe per day * Red Card holders must earn one point to qualify Play the Pros Football Contest * 1 Free Entry for Season long football contest	Slot August Nights Slot Tournament * Aug 3-4 * (1) Free entry * \$40,000 Prize Pool - \$10,000 first Prize Triple Header Slot Tournament * August 24-25 * (1) Free entry * \$20,000 Prize Pool - \$7,500 first Prize * \$15,000 bonus pool for playing all (3) in series
Atlantis Total Offers Received: 3	Free Slot Play Offer & Hotel Offer * \$10 Free Play (Aug 4-6) * \$25-\$500 Free Play (Aug 16) * \$10 Free Play (Aug 20-21) * \$10 Free Play (Aug 28-29) * Swipe & Win (Aug 30) * (2) free nights Deluxe Tower (Aug 1-31) * (2) free nights Deluxe Tower (Aug 22-23) * (1) Free Hot August Nights T-shirt (Aug 1-2)	Viva Fiesta Dinner * August 8th * Dinner for (2) ppl at 7pm Wynonna Concert * August 29th - Friday at 8pm * (2) free tickets	Balmain Wonder Wheels Slot Party * August 15-18 * Free entries between 4p-midnight (Aug 15) * Drawings every 30 minutes (7-10p on Aug 16) Driven to Win (\$100,000 Quarterly Weekend) * August 22-23 * Drawings at 8p and 10p each day * Grand Prize (BMW)	