



State of Louisiana  
Gaming Control Board

BOBBY JINDAL  
GOVERNOR

DANE K. MORGAN  
CHAIRMAN

IN RE: A PLUS CHEMICAL SALES, INC.  
NO. P081002823

ORDER


This matter was considered by the Louisiana Gaming Control Board at its meeting of March 17, 2011. The Hearing Officer's order dated March 9, 2011, based on the "Joint Motion for Approval of Compromise and Settlement Agreement" in the matter of the "Notice of Recommendation of Suspension and Penalty," No. P081002823, by and between A Plus Chemical Sales, Inc., and the State of Louisiana, Department of Public Safety and Corrections, Office of State Police, which is attached hereto and incorporated herein, is **APPROVED**.

THUS DONE AND SIGNED on this the 17<sup>th</sup> day of March, 2011.

LOUISIANA GAMING CONTROL BOARD

BY:   
DANE K. MORGAN, CHAIRMAN

DKM/gac

LOUISIANA GAMING CONTROL BOARD  
I HEREBY CERTIFY THAT A CERTIFIED  
COPY HAS BEEN MAILED OR SERVED ON  
ALL PARTIES THIS 18<sup>th</sup> DAY  
OF March, 2011  
APPEAL DOCKET CLERK  


LGCB-0500-11

STATE OF LOUISIANA  
LOUISIANA GAMING CONTROL BOARD  
ADMINISTRATIVE HEARING OFFICE

**RECEIVED**

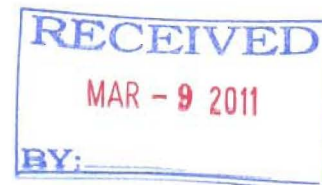
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LGCB  
ADMINISTRATIVE HEARING OFFICE

IN RE: A PLUS CHEMICAL SALES, INC.

PERMIT NO. P081002823

JOINT MOTION FOR APPROVAL OF  
COMPROMISE AND SETTLEMENT AGREEMENT



TO THE HONORABLE ADMINISTRATIVE HEARING OFFICER:

NOW COMES the State of Louisiana, Department of Public Safety and Corrections, Office of State Police (hereinafter the "Division") and A Plus Chemical Sales, Inc., Permit No. P081002823 (hereinafter "Permittee"), who file this Joint Motion for Approval of Compromise and Settlement Agreement, and in support thereof would respectively show unto the Hearing Officer as follows:

1.

The Division and Permittee are desirous of compromising and settling all disputes between them relative to the referenced administrative proceeding. In connection therewith, the parties have entered into a compromise and settlement agreement which by its terms will become effective upon approval by the Administrative Hearing Office and the Louisiana Gaming Control Board.

2.


A true and correct copy of the proposed Compromise and Settlement Agreement is attached hereto.

TRUE COPY  
*[Signature]*  
Representative  
Louisiana Gaming Control Board


**WHEREFORE, PREMISES CONSIDERED**, the Division and Permittee respectfully request that this Honorable Administrative Hearing Officer approve the parties' Compromise and Settlement Agreement.

Respectfully submitted,

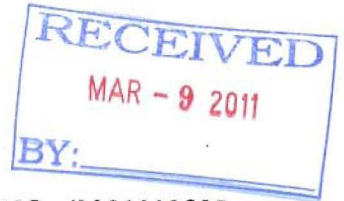
**A PLUS CHEMICAL SALES, INC.**

By:   
**TRACEY LEJEUNE**  
P.O. Box 13046  
Lake Charles, Louisiana 70612

**JAMES D. "BUDDY" CALDWELL,  
ATTORNEY GENERAL**

By:   
**ASHLEY C. WIMBERLY**  
**Bar Roll #33434**  
Assistant Attorney General  
1885 North Third Street, 5<sup>th</sup> Floor  
Baton Rouge, Louisiana 70802  
Telephone: (225) 326-6500  
Facsimile: (225) 326-6599  
*Counsel for the Office of State Police*

STATE OF LOUISIANA  
LOUISIANA GAMING CONTROL BOARD  
ADMINISTRATIVE HEARING OFFICE



IN RE: A PLUS CHEMICAL SALES, INC.

PERMIT NO. P081002823

**COMPROMISE AND SETTLEMENT AGREEMENT**

The State of Louisiana, Department of Public Safety and Corrections, Office of State Police (hereinafter the "Division") and A Plus Chemical Sales, Inc., Permit No. P081002823 (hereinafter "Permittee") do hereby represent and agree as follows:

**WHEREAS**, the Louisiana Gaming Control Board has issued a Notice of Recommendation of Suspension and Penalty, alleging certain violations of Louisiana Gaming Control Law; and

**WHEREAS**, the Division and Permittee are desirous of fully and finally compromising and settling all issues and disputes arising out of and in connection with the said Notice of Recommendation of Suspension and Penalty;

**NOW, THEREFORE**, in consideration of the foregoing, the parties hereto do hereby agree and stipulate as follows:

**STIPULATIONS**

1. The Permittee stipulates that it failed to timely submit its Annual Affidavit form and Annual Permit fee, by November 11, 2010, as required by Louisiana Gaming Control Law.
2. The Division stipulates that it did not receive the Permittee's Annual Affidavit form and Annual Permit fee until February 10, 2011.

## TERMS AND CONDITIONS

1. Within fifteen (15) days of the approval of this settlement by the Louisiana Gaming Control Board, the Permittee shall pay FIVE HUNDRED SIXTY TWO DOLLARS AND 50/100 (\$562.50) for the violation of **La. R.S. 27:29(I)**, **La. R.S. 27:29.3(F)**.

2. The Division hereby agrees to accept a FIVE HUNDRED SIXTY TWO DOLLARS AND 50/100 (\$562.50) penalty for the Permittee's violation of **La. R.S. 27:29(I)**, **La. R.S. 27:29.3(F)**.


3. The terms of this Compromise and Settlement Agreement shall be interpreted under the laws of the State of Louisiana.

4. This Compromise and Settlement Agreement constitutes the entire agreement between the Division and the Permittee pertaining to the subject matter contained herein, and supersedes all prior and contemporaneous agreements, representations and understandings of the parties.

5. This Compromise and Settlement Agreement is subject to approval by the Hearing Officer and the Louisiana Gaming Control Board. It is expressly understood that if this proposed settlement is approved by the Hearing Officer, this agreement is not thereby executory, but will be submitted to the Louisiana Gaming Control Board for its determination as to whether to approve same or to remand the matter to the Hearing Officer for a full hearing on the merits.

6. If approved by the Louisiana Gaming Control Board, Permittee must pay FIVE HUNDRED SIXTY TWO DOLLARS AND 50/100 (\$562.50) within fifteen (15) calendar days of such approval. Any failure to meet this requirement will result in immediate suspension of the Permittee's non-key gaming supplier permit, without the necessity of any further administrative action, until such time as the penalty is paid in full.

I have read this entire Compromise Settlement Agreement and agree to all stipulations and terms and conditions hereof.

  
\_\_\_\_\_  
**TRACEY LEJEUNE**  
ON BEHALF OF A PLUS CHEMICAL SALES, INC.

  
\_\_\_\_\_  
**ASHLEY C. WIMBERLY, AAG**  
ON BEHALF OF STATE OF LOUISIANA, DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS,  
OFFICE OF STATE POLICE

STATE OF LOUISIANA  
LOUISIANA GAMING CONTROL BOARD  
ADMINISTRATIVE HEARING OFFICE

IN RE: A PLUS CHEMICAL SALES, INC.

PERMIT NO. P081002823

ORDER

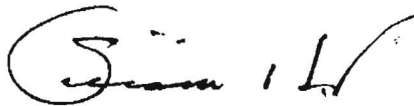
BE IT REMEMBERED that on the 9<sup>th</sup> day of March, 2011, came on for consideration the Joint Motion for Approval of Compromise and Settlement Agreement, and the parties having appeared by and through their respective attorneys of record, and the Hearing Officer having considered the pleadings on file, the proposed Settlement Agreement, and the said Motion, and it appearing to the Hearing Officer that the said Compromise and Settlement Agreement should be approved; it is, therefore,

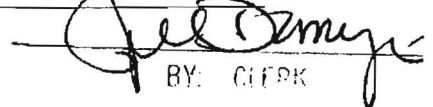
ORDERED, ADJUDGED, AND DECREED that the Compromise and Settlement Agreement attached to the parties' Joint Motion for Approval of Compromise and Settlement Agreement be, and the same is hereby, **APPROVED** that the Permittee must pay FIVE HUNDRED SIXTY TWO DOLLARS AND 50/100 (\$562.50) to the Division within fifteen (15) days of the approval by the Louisiana Gaming Control Board. Failure to do so shall result in the immediate suspension of the Permittee's non-key gaming supplier permit without the necessity of any further administrative action until such time as the penalty is paid in full.

LOUISIANA GAMING CONTROL BOARD  
I HEREBY CERTIFY THAT A COPIED  
COPY HAS BEEN MAILED OR DELIVERED ON  
ALL PARTIES LOUISIANA 9<sup>th</sup> DAY  
OF March 2011  
DOCKET CLERK, ADMINISTRATIVE HEARING OFFICE

cc. Tracy Leavine  
Ashley Wimberey  
Sgt. Umel Subly

SIGNED AND ENTERED this 9<sup>th</sup> day of March, 2011, in Baton Rouge,

  
HEARING OFFICER

A TRUE COPY ATTEST  
LOUISIANA GAMING CONTROL BOA  
HEARING OFFICE  
BATON ROUGE, LA 3-9-11  
  
BY: CLERK