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LA GAMING CONTROL BOARD ADMINISTRATIVE HEARING OFFICE

STATE OF LOUISIANA

LOUISIANA GAMING CONTROL BOARD ADMINISTRATIVE HEARING OFFICE

Trillions Ventures, LLC d/b/a lvory Nola Lounge

CASE NO.: 2600117848

JOINT MOTION FOR APPROVAL OF COMPROMISE AND SETTLEMENT AGREEMENT

TO THE HONORABLE ADMINISTRATIVE HEARING OFFICER:

NOW COME the State of Louisiana, Office of State Police Gaming Enforcement Division (hereinafter, the "Division") and Trillions Ventures, LLC d/b/a Ivory Nola Lounge (hereinafter, "Licensee"), 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:

The Division and Licensee 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 as Exhibit "A" and incorporated by reference for all purposes.

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

Respectfully Submitted,

JEFF LANDRY, ATTORNEY GENERAL

Counic M. Jones, Managing Member

Trillions Ventures, LLC, D/B/A Ivory Nota Lounge By: Talibah Mcintyre, Bar Roll #36127

Assistant Attorney General 1885 North Third Street, 5th Floor Baton Rouge, Louisiana 70802 Telephone: (225) 326-6500

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Counsel for the Office of State Police

STATE OF LOUISIANA

LOUISIANA GAMING CONTROL BOARD

ADMINISTRATIVE HEARING OFFICE

RE: TRILLIONS VENTURES, LLC D/B/A IVORY NOLA LOUNGE CASE NO.: 2600117848

COMPROMISE AND SETTLEMENT AGREEMENT

The State of Louisiana, Office of State Police Gaming Enforcement Division (hereinafter, the "Division") and Trillions Ventures, LLC d/b/a Ivory Nola Lounge (hereinafter, "Licensee"), do hereby represent and agree as follows:

WHEREAS, the Louisiana Garring Control Board has sent a Notice of Recommendation of Administrative Action to Licensee, which Notice contains allegations of certain violations of Louisiana Garring Control Law; and

WHEREAS, the issues raised by said Notice were set for hearing before the Louisiana Gaming Control Board Administrative Hearing Office on August 30, 2023;

WHEREAS, the Division and Licensee are desirous of fully and finally compromising and settling all issues and disputes arising out of and in connection with said Notice;

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

STIPULATIONS

- 1. Licensee is a Type 1 licensed establishment located at 1332 Pailet Avenue, Harvey, Louisiana 70058.
- Licensee's Louisiana Alcohol and Tobacco Control permit expired on February 28,
 2023.

- 3. The Lacensee's ATC permit was renewed and made effective as of April 3, 2023.
- 4. Between March 1, 2023 and April 2, 2023 the Licensee operated video draw poker machines and carned a profit from said devices in the amount of \$4,963.90.
- 5 Licensee failed to maintain a valid ATC permit while perating as a licensed Type 1 video draw poker establishment, in violation of LAC 42:XI.2417(A)(1), LAC 42:XI.2417(B)(2)(d) and La. R.S. 27:402(14).
- Licensee failed to timely notify the Division that its ATC permit expired on February 28, 2023, in violation of LAC 42.X1.2417(B)(4).

TERMS AND CONDITIONS

- 1. In the of administrative action, Licensee will pay a penalty of TWO THOUSAND and 09/100 (\$2,000) DOLLARS for its violation of La. R.S 27,402(14), LAC 42:XI.2417(A)(1), LAC 42:XI.2417(B)(2)(d) and LAC 42:XI.2417(B)(4).
- The Division hereby agrees that payment of a total penalty of TWO
 THOUSAND and 00/180 (\$2,000.00) DOLLARS shall be in full and final settlement of all
 matters set forth in the Notice of Recommendation of Administrative Action.
- 3. The Division reserves the right to take into consideration this admitted violation in connection with any future investigation, violation or assessment of penalty and in connection with any future assessments of Licensee's suitability.
- 4. The terms of this Compromise and Settlement Agreement shall be interpreted under the laws of the State of Louisiana.
- 5. This Compromise and Settlement Agreement constitutes the entire agreement between the Division and Licensee, pertaining to the subject matter contained herein and supersedes all prior and contemporaneous agreements, representations and understandings of the parties.

- 6. 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.
- If approved, Licensee agrees to make full payment of the civil penalty within fifteen (15) days of approval of this settlement by the Louisiana Gaming Control Board. Licensee agrees that failure to meet this requirement shall result in immediate suspension of the gaming license without the necessity of any further administrative action until such time as the penalty is paid in full.

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

Connie M. Jones, Managing Member, on behalf of Trillions Ventures, LLC d/b/a Ivory Nota Lounge

Talibah McIntyre, 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

TRILLIONS VENTURES, LLC RE: D/B/A IVORY NOLA LOUNGE CASE NO.: 2600117848

ORDER

BE IT REMEMBERED that on the 4th day of October consideration the Joint Motion for Approval of Compromise and Settlement Agreement, and the parties having appeared by and through their respective attorneys of record or representing themselves, and the Hearing Officer having considered the pleadings on file, the proposed Compromise and 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 Trillions Ventures, d/b/a Ivory Nola Lounge must pay TWO THOUSAND and 00/100 (\$2,000.00) DOLLARS to the Division within fifteen (15) days of approval by the Louisiana Gaming Control Board. Failure to do so shall result in the immediate suspension of the gaming license without the necessity of any further administrative action until such time as the penalty is paid in full.

SIGNED AND ENTERED this 4th day of 0 1000, 2023, in Baton

Rouge, Louisiana.

LOUISIANA GAMING CONTROL BOARD HEARING OFFICE I HEREBY CERTIFY THAT A CERTIFIED COPY HAS BEEN MAILED OR SERVED ON

DOCKET CLERK, ADMIN. HEARING OFFICE

CC. Trillians Ventures, uc dibla twory Noun wunge

Taliban Methtrye Sgt. Ruben Brown

HEARING OFFICER

ATRUE COPY ATTEST LOUISIANA GAMING CONTROL BOARD

DOCKET CLERK ADMINISTRATIVE HEARING OFFICE