

SUPREME COURT OF NEVADA

Friedlander v. Tamarack Junction Race & Sports Book

142 Nev. Adv. Op. No. 23 (2026) · No. 89527 · Decided March 12, 2026

SUMMARY

The Nevada Supreme Court affirmed a district court order upholding a Nevada Gaming Control Board decision concerning the payout of two Kentucky Derby wagers. The court held that William Hill's posted house rules limiting exacta and trifecta odds provided sufficient notice and controlled the wagers' payout terms. The Board's decision was supported by evidence and was not arbitrary, capricious, or contrary to law.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Nevada                                                                                                                                                                                                                                                                                                                                                                                                                               |
| WRITING FOR THE COURT | Stiglich, J.; Pickering, C.J.; Bell, J.; Cadish, J.; Lee, J.                                                                                                                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | Supreme Court of Nevada                                                                                                                                                                                                                                                                                                                                                                                                                               |
| DECIDED               | March 12, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| DOCKET                | 89527                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | Appeal from a district court order denying a petition for judicial review of a Nevada Gaming Control Board decision concerning the payout of gaming wagers.                                                                                                                                                                                                                                                                                           |
| STANDARD OF REVIEW    | The appellate court reviews the Board's decision in the same manner as the district court and defers to the Board unless the decision lacks any evidentiary support or is arbitrary, capricious, or otherwise contrary to law. Under NRS 463.3666(3), reversal or remand is authorized when substantial rights are prejudiced by, among other things, a decision unsupported by any evidence or arbitrary, capricious, or not in accordance with law. |
| PRECEDENTIAL VALUE    | Published Nevada Supreme Court opinion; precedential                                                                                                                                                                                                                                                                                                                                                                                                  |
| PARTIES               | Steve Friedlander v. Tamarack Junction Race & Sports Book, operated by William Hill Race & Sports Book William Hill                                                                                                                                                                                                                                                                                                                                   |

TOPICS

gambling

judicial review of agency action

administrative law

contract interpretation

appellate procedure

## PRACTICE AREAS

gaming and gambling law

administrative law

contracts

appellate procedure

## QUESTIONS PRESENTED

1. Whether the Nevada Gaming Control Board's determination that William Hill adequately disclosed and could apply its limited exacta and trifecta odds was supported by evidence.
2. Whether the Board's decision was arbitrary, capricious, or contrary to law because it applied posted house rules and contract principles rather than awarding full track odds.
3. Whether Friedlander could challenge the gaming payout through a breach-of-contract theory rather than through the exclusive administrative process governing gaming disputes.

## HOLDINGS

1. The Board's finding that William Hill conspicuously displayed the limited-odds terms was supported by evidence, including the posted notices, the house-rules printout, and the betting sheets.
2. When an establishment's house rules are conspicuously displayed so that patrons have notice of them, those rules govern the payout terms of gaming wagers, regardless of whether the patron actually read or knew the terms.
3. The Board's decision to enforce the posted limited-odds terms was not arbitrary, capricious, or contrary to law.
4. A patron may not challenge a gaming payout through a breach-of-contract claim; the dispute must be submitted to the Nevada Gaming Control Board under the exclusive statutory administrative process.

## KEY QUOTATIONS

*“In resolving disputes, the terms of a gaming wager are construed according to an establishment's house rules, so long as patrons have sufficient notice of those rules.” (1)*

*“As a result of that conspicuous display, the Board determined that that term governed Friedlander's wager, regardless of whether Friedlander actually knew about it.” (9)*

*“The Board's decision was supported by the evidence and was not arbitrary, capricious, or otherwise contrary to law.” (9)*

## FACTUAL BACKGROUND

Steve Friedlander, an experienced sports bettor, placed winning boxed exacta and trifecta wagers on the 2019 Kentucky Derby at Tamarack Junction Race & Sports Book, a nonpari-mutuel William Hill facility. William Hill's house rules capped exacta odds at 150-to-1 and trifecta odds at 500-to-1, while the full track odds were substantially higher. The facility displayed signs referring patrons to the house rules and payout-odds limits,

posted a printout identifying the specific caps near the betting counter, and listed the limits on Kentucky Derby betting sheets. Friedlander claimed he did not see the notices and sought payment at full track odds.

### PROCEDURAL HISTORY

Friedlander complained to the Nevada Gaming Control Board after William Hill paid his winning exacta and trifecta wagers at capped odds rather than full track odds. A Board agent denied the request, and the Board affirmed on reconsideration, finding that the sports book's signage and posted rules adequately disclosed the limited odds. The Second Judicial District Court in Washoe County denied Friedlander's petition for judicial review and affirmed the Board's decision. The Nevada Supreme Court affirmed.

### DISPOSITION

affirmed

### CASES CITED

- Sengel v. IGT, 116 Nev. 565, 2 P.3d 258 (2000)
- Redmer v. Barbary Coast Hotel & Casino, 110 Nev. 374, 872 P.2d 341 (1994)
- City of Las Vegas v. Laughlin, 111 Nev. 557, 893 P.2d 383 (1995)
- State v. Eighth Jud. Dist. Ct. (Armstrong), 127 Nev. 927, 267 P.3d 777 (2011)
- Nev. Gaming Comm'n v. Consol. Casinos Corp., 94 Nev. 139, 575 P.2d 1337 (1978)
- Watson v. Watson, 95 Nev. 495, 596 P.2d 507 (1979)
- Edwards v. Emperor's Garden Rest., 122 Nev. 317, 130 P.3d 1280 (2006)