

**ORDER 2020-130
IN RE SETTLEMENT AGREEMENT**

**BLUE CHIP CASINO, LLC
20-BC-02**

After having reviewed the attached Settlement Agreement, the Indiana Gaming Commission hereby:

APPROVED

APPROVES OR DISAPPROVES

the proposed terms of the Settlement Agreement.

IT IS SO ORDERED THIS THE 23rd DAY OF NOVEMBER, 2020.

THE INDIANA GAMING COMMISSION:



Michael B. McMains, Chair

ATTEST:



Jason Dudich, Secretary

**STATE OF INDIANA
INDIANA GAMING COMMISSION**

IN RE THE MATTER OF:)	
)	SETTLEMENT
BLUE CHIP CASINO, LLC)	20-BC-02
)	

SETTLEMENT AGREEMENT

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Sara Gonso Tait and Blue Chip Casino, LLC (“Blue Chip”) (collectively, the “Parties”) desire to enter into this settlement agreement (“Agreement”) prior to the initiation of a disciplinary proceeding pursuant to 68 IAC 13-1-18(a). The Parties stipulate and agree that the following facts are true:

FINDINGS OF FACT

COUNT I

1. IC 4-38-11-1 provides that the bureau shall provide information to a certificate holder concerning persons who are delinquent in child support.
 - (b) Prior to a certificate holder disbursing a payout of six hundred dollars (\$600) or more, in winnings, from sports wagering to a person who is delinquent in child support and who is claiming the winning sports wager in person at the certificate holder's facility, the certificate holder:
 - (1) may deduct and retain an administrative fee in the amount of the lesser of:
 - (A) three percent (3%) of the amount of delinquent child support withheld under subdivision (2)(A); or
 - (B) one hundred dollars (\$100); and
 - (2) shall:
 - (A) withhold the amount of delinquent child support owed from winnings;
 - (B) transmit to the bureau:
 - (i) the amount withheld for delinquent child support; and
 - (ii) identifying information, including the full name, address, and Social Security number of the obligor and the child support case identifier, the date and amount of the payment, and the name and location of the licensed owner, operating agent, or trustee; and
 - (C) issue the obligor a receipt in a form prescribed by the bureau with the total amount withheld for delinquent child support and the administrative fee.
 - (c) The bureau shall notify the obligor at the address provided by the certificate holder that the bureau intends to offset the obligor's delinquent child support with the winnings.
 - (d) The bureau shall hold the amount withheld from the winnings of an obligor for ten (10) business days before applying the amount as payment to the obligor's delinquent child support.
 - (e) The delinquent child support required to be withheld under this section and an administrative fee described under subsection (b)(1) have priority over any secured or

unsecured claim on winnings except claims for federal or state taxes that are required to be withheld under federal or state law.

2. Chapter 5, Section 2(2)(W) of the Emergency Rules for Sports Wagering provide that prior to beginning sports wagering operations, a sports wagering operator must submit for approval under 68 IAC 11 internal controls for withholding winnings from delinquent child support obligors in accordance with IC 4-38-11, including a plan for complying with IC 4-38-11 if the sports wagering operator allows the redemption of tickets via mail.
3. 68 IAC 11-9-2(a) provides the casino licensee or trustee shall submit to the executive director internal control procedures concerning the withholding of cash winnings from delinquent obligors in accordance with 68 IAC 11-1.
4. 68 IAC 11-1-3(c)(4) provides that no casino licensee or casino license applicant may use an internal control procedure unless the internal control procedure has been approved, in writing, by the executive director.
5. Blue Chip's approved internal control procedures, R-8 and K-23, describe the procedures for child support arrears delinquency reporting.
6. Gaming Agent's audited the Child Support Arrears Delinquency Registry (the "CSADR") for February 2020. The results of this audit found one (1) individual was not searched through the CSADR system at the time a taxable jackpot was won.
7. Gaming Agent's audited the CSADR for March 2020. The results of this audit found one (1) individual was not searched through the CSADR system at the time a taxable jackpot was won and one (1) individual was not searched through the CSADR at the time sports wagering winnings in excess of \$600 was won.
8. Gaming Agent's audited the CSADR for June 2020. The results of this audit found four (4) individuals were not searched through the CSADR system at the time a taxable jackpot was won.
9. Gaming Agent's audited the CSADR for July 2020. The results of this audit found three (3) individuals were not searched through the CSADR system at the time a taxable jackpot was won and one (1) individual was not searched through the CSADR at the time sports wagering winnings in excess of \$600 was won.
10. Gaming Agent's audited the CSADR for August 2020. The results of this audit found one (1) individual was not searched through the CSADR at the time sports wagering winnings in excess of \$600 was won.

COUNT II

9. 68 IAC 1-5-1, provides, in relevant part, that a casino or supplier licensee shall provide written notice to the executive director as soon as the casino or supplier licensee becomes aware of (10) apparent criminal activity taking place at the casino. A casino licensee shall submit the notice required under this subdivision to a gaming agent in addition to submitting it to the executive director.
10. On August 8, 2020, a Security Officer notified Gaming Agents that an underage person had attempted to enter the casino floor with another patron's identification. Security did not notify Gaming Agents or Surveillance at the time of the incident.

COUNT III

11. 68 IAC 15-2-5 provides that the casino licensee shall establish policies and procedures for the notification of surveillance prior to completing a currency transaction report. The procedures shall include, at a minimum, the following:
 - (1) The window cashier, pit boss, table games shift manager, or table games manager must notify surveillance.
 - (2) Surveillance shall take a photograph of the patron from the surveillance camera.
 - (3) Prior to the completion of the transaction, surveillance shall notify the window cashier, pit boss, table games shift manager, or table games manager that it has an acceptable photograph.
12. On February 2, 2020, Surveillance notified Gaming Agents that the sportsbook completed a transaction in the amount of \$11,600 without notifying Surveillance prior to completing the currency transaction report. Sportsbook cashiers do not notify Surveillance; rather, the sportsbook cashiers are to notify their supervisor and then the supervisor is to make the notice to Surveillance.
13. On February 3, 2020, Surveillance notified Gaming Agents that Table Games and Cage personnel failed to notify Surveillance prior to completing a currency transaction report. The patron left the craps table and cashed out at the cage for \$10,900.

COUNT IV

14. 68 IAC 13-1-1(b)(2) and (3) provides the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
15. 68 IAC 2-3-1(i)(3) provides that the Chief of Security shall hold a Level 1 occupational license.
16. The Commission is charged with making licensing determinations for the employees of the Indiana casinos based off the regulation outlined in the Indiana Administrative Code. The need for licensure is determined by Commission staff through job description and

organizational chart submissions made by the casino. Submissions must be sent to the Commission's Gaming Administrator for review and approval prior to implementation.

17. On May 8, 2020, Blue Chip terminated and eliminated five (5) licensed positions: 1) Director of Marketing (L2); 2) Employee Relations Manager (L3); 3) Facilities Manager (L3); 4) Financial Controller (L2); and 5) Food and Beverage Director (L3).
18. On May 11, 2020, Blue Chip notified the Commission by letter of the elimination of the Director of Marketing and the Financial Controller positions.
19. On May 20, 2020, the separation of service forms were submitted to the Commission for all five (5) individuals.
20. On June 19, 2020, the Commission's Gaming Administrator reached out to the General Manager at Blue Chip to determine the status of these positions since the job descriptions and organization charts had not been submitted to the Commission for review and approval prior to the elimination of the position.
21. On June 23, 2020, the Commission's Deputy Director reached out to the General Manager at Blue Chip seeking a response to the Commission's inquiry.
22. On June 23, 2020, the General Manager responded and provided that Blue Chip had furloughed the HR Manager and retained Director of HR. The former HR Manager was responsible for submitting the organizational charts and job descriptions and the Director of HR did not realize that these documents needed to be submitted.

COUNT V

23. 68 IAC 13-1-1(b)(2) and (3) provides the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
24. On May 26, 2020, the Commission's Gaming Administrator sent out an email to all casinos directing them to complete a list of employees that were either: 1) returning to work when the casinos re-opened; or 2) staying on furloughed status. The email contained a spreadsheet and listed instructions with time limits attached to each step for what the casinos had to do to be in compliance. Ten (10) days prior to re-opening, casinos were required to submit the spreadsheet to the Commission via email indicating which employees had been terminated/furloughed and which are returning to work. Any licensees marked as terminated/furloughed would have their licenses terminated as of the casino reopening date.
25. On May 29, 2020, the Gaming Administrator revised the email directive. The directive gave the casinos additional time to submit the spreadsheet, requiring the spreadsheet to be submitted five (5) days prior to re-opening which resulted in a due date of June 10, 2020.

26. On June 10, 2020, the Human Resource (HR) Director submitted a list to the Commission that did not comply with the Gaming Administrator's directive. The HR Director was instructed to re-submit the correct list.
27. On June 19, 2020, the HR Director re-submitted the list nine (9) days after the required due date.
28. On June 26, 2020, the HR Manager contacted Gaming Agents regarding discrepancies with the list submitted on June 19th. Five (5) employees were reported as terminated on the list provided, but were actually recalled and actively working. Three (3) employees were listed as active but should have been reported as still on furlough and been terminated in the occupational licensing database.

COUNT VI

29. IC 4-33-9-12(a) provides a person who is less than twenty-one (21) years of age may not be present in the area of a riverboat where gambling is being conducted.
30. 68 IAC 1-11-1(c) provides a person under twenty-one (21) years of age shall not be present in a casino.
31. On July 31, 2020, a Slot Shift Manager requested a Gaming Agent's presence at the Cage due to an unusual jackpot payout situation. A patron had won a jackpot but provided an incorrect social security number (SSN). The patron had to call his mother to obtain his correct SSN. While the Cage personnel began processing the payment for the jackpot, the patron fled leaving his identification behind. Later that evening, another patron attempted to claim the abandoned jackpot but was denied payment. Further investigation determined that both patrons were underage.

It was determined that both underage patrons presented a fake identification to obtain access to the casino. The Security Officer manning the entrance scanned the fake identifications through the Veridocs scanner. On both occasions, the scanner failed the identifications noting that they were not valid. The Security Officer allowed the patrons to enter the casino and did not report the failed scan to a Security Supervisor.

COUNT VII

32. 68 IAC 1-12.5-2(a)(1) provides a casino licensee shall submit a promotional event under this subsection to the commission at least fifteen (15) days prior to the promotional event.
33. Gaming Agents were advised that a promotional event had occurred without Commission approval. The VP-GM at Blue Chip Casino advised that a point multiplier promotion for Aliante Casino in Las Vegas was inadvertently scripted to include Belterra and Blue Chip Casinos in Indiana. The error was missed during quality control.

34. On September 5, 2020, a Slot Shift Supervisor notified Gaming Agents that she was concerned with an unusually high player credit balance while viewing a player account. The Slot Shift Manager advised she had contacted the patron's Casino Host who also advised that she had noticed another player had similar credit incentive but was not familiar with a promotion that would award such a bonus. While the Casino Host and Slot Shift Manager were not aware of such promotion, the marketing department was aware of the bounce back offer. The Slot Department confirmed there were no issues with the electronic gaming devices (EGD) these patron's played on and communicated with marketing about the credit amount. Marketing advised that the credit amount was a legitimate offer and was a corporate initiated new member offer. Blue Chip believed this event fell under their approved blanket submission, however, absent a notification under the blanket submission, the Commission had no record of this promotion or the parameters of the promotion nor was it reviewed or approved by the Commission. Blue Chip is working towards a better understanding of what qualifies as requiring a second submission for Commission review and approval.
36. Chapter 7, Section 16 of the Emergency Rules for Sports Wagering provide:
- (a) Patrons must be able to access information pertaining to any available promotions or bonuses. This information must be clear and unambiguous, especially where promotions or bonuses are limited to certain events or markets, or when other specific conditions apply.
 - (b) A record of all promotional or bonus wagering offers shall be maintained in an electronic file that is readily available to the division. All bonus and promotional wagering offers shall be stated in clear and unambiguous terms and shall be readily accessible by the patron after the offer is accepted and prior to completion. Offer terms and the record of all offers shall include at a minimum:
 - (1) the date and time presented;
 - (2) the date and time the offer is active and expires;
 - (3) patron eligibility, including any limitations on patron participation;
 - (4) any restriction on withdrawals of funds;
 - (5) wagering requirements and limitations;
 - (6) the order in which funds are used for wagers;
 - (7) eligible events or wagers; and
 - (8) rules regarding cancellation.
 - (c) All promotions and bonuses must:
 - (1) include terms and conditions that are full, accurate, clear, concise, and transparent, and not contain misleading information;
 - (2) ensure advertising materials include material terms and conditions for that promotion or bonus and have those material terms in close proximity to the headline claim of the promotion or bonus and in reasonably prominent size;
 - (3) disclose applicable terms if the patron has to risk or lose his or her own money as part of the promotion or bonus or has conditions attached to his or her own money as a result of the promotion or bonus;
 - (4) not be described as risk free if the patron needs to incur any loss or risk the patron's own money to use or withdraw winnings from the risk free bet; and

(5) not restrict the patron from withdrawing the patron's own funds or withdrawing winnings from bets placed using the patron's own funds.

37. On March 11, 2020, the Director of Legal and Regulatory Affairs at FanDuel notified the Commission's Sports Wagering Investigator that FanDuel had conducted an unapproved promotion on the sports wagering kiosks (SWK) at Blue Chip Casino. FanDuel had activated its parlay insurance promotion at the SWK's. This promotion had been approved for mobile sports wagering only and ran from February 12, 2020 to February 26, 2020. The promotion was activated by FanDuel; however Blue Chip, as the certificate holder, has a responsibility to know what promotions are being run on its property and to ensure they have been approved.

COUNT VIII

38. 68 IAC 15-13-2(d)(6-7) provides that during a manually paid jackpot payout process, a security officer or slot department employee shall escort the slot attendant from the cage to the appropriate electronic gaming device. The security officer or slot department employee who begins completing the manually paid jackpot must complete the process of witnessing, escorting, and signing the appropriate documentation to verify the manually paid jackpot was completed. If there is a discrepancy with the manually paid jackpot, the same security officer or slot department employee who began the manually paid jackpot must accompany the manually paid jackpot back to the cage to resolve the discrepancy. After arriving at the appropriate electronic gaming device, the security officer or slot department employee shall (A) Verify the jackpot, (B) Witness the jackpot payout to the patron and (C) Complete the appropriate sections of the manually paid jackpot slip.

39. On July 31, 2020, Surveillance notified Gaming Agents that the Security Officer who responded to the jackpot payout did not sign the jackpot slip.

40. On August 25, 2020, Surveillance notified Gaming Agents that the Security Officer who responded to the jackpot payout did not sign the jackpot slip.

41. On September 2, 2020, Surveillance notified Gaming Agents that the Security Officer who responded to two (2) jackpot payouts did not sign the jackpot slip.

42. 68 IAC 2-7-7(b)(1) provides upon receipt of notice that the executive director has revoked an approval under this rule, the casino licensee or casino license applicant shall do the following: Cease using the associated equipment for which approval has been revoked by the date established by the executive director.

43. On January 10, 2020, a Slot Tech notified Gaming Agents that an electronic gaming device (EGD) was out of service due the Kobe signatures not coming up correctly during an audit of the EGD. The Kobe signature is made up of identification numbers used to verify only approved software is installed in the EGD. The Gaming Agent pulled the signature from the EGD and attempted to verify the signature in the EGD system. At that time, it was discovered the software was revoked, and the revoked software was found in

six (6) games. Gaming Agents were able to confirm that Blue Chip had been notified of the revoked software on April 22, 2019. It is the Commission's policy that revoked software be replaced within thirty (30) days of notice unless an extension is granted. An extension was not requested by Blue Chip.

COUNT IX

44. 68 IAC 11-4-4 provides at any time when a live gaming device is closed, chips remaining at the live gaming device shall be counted by the appropriate level of occupational licensee assigned to the live gaming device and verified by the pit boss or the equivalent.
 - (b) A live gaming device inventory slip shall be prepared.
 - (c) The occupational licensee and the pit boss or the equivalent who observed the count of the contents of the tray shall sign the inventory slip at the time of closing the live gaming device attesting to the accuracy of the information recorded.
 - (d) The occupational licensee shall immediately deposit the closer in the drop box.
 - (e) The pit boss or the equivalent shall place the opener on the live gaming device tray in a manner that the amounts on the opener may be read through the cover, and lock the transparent live gaming device tray lid in place.
45. On February 25, 2020, Surveillance notified Gaming Agents of an error on the table closer. The closer form indicated \$20,500 in green \$25 chips. The actual physical count was \$20,050 in green \$25 chips.
46. 68 IAC 12-1-5.5(11) provides that surveillance employees shall visually record on-site maintenance and repair of gaming or money handling equipment.
47. 68 IAC 11-1-3(c)(4) provides that no casino licensee or casino license applicant may use an internal control procedure unless the internal control procedure has been approved, in writing, by the executive director.
48. 68 IAC 13-1-1(b)(2) and (3) provides the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
49. Blue Chip's approved internal control procedures, M-4.4, describes the process for notifying surveillance when on-site maintenance is occurring.
50. On March 2, 2020, Surveillance notified Gaming Agents that two (2) Scientific Games employees were working on a shuffler in a table games pit on the casino floor. Table Games failed to notify Surveillance.
51. On August 3, 2020, Surveillance notified Gaming Agents that a Scientific Games employee was working on a shuffler in the poker room. Table Games failed to notify Surveillance.

52. 68 IAC 15-12-3 provides live gaming device fills shall proceed in the following manner:
- (1) The appropriate occupational licensee shall initiate a live gaming device fill by completing an input form. The input form is either carried to the casino cage or the information is electronically transmitted to the casino cage.
 - (2) The appropriate occupational licensee uses the input form to prepare and print a live gaming device fill slip.
 - (3) Surveillance shall be notified that a live gaming device fill is being processed.
 - (4) Based on the information contained on the fill slip, the casino cashier shall prepare the proper denomination and amount of chips and sign the fill slip. The casino cashier shall sign the fill slip, summon a security officer, and present the chips and the fill slip to the security officer.
 - (5) The security officer shall verify that the denomination and amount of chips match the amount on the fill slip. The security officer shall sign the fill slip after verifying the chips match the fill slips. The security officer who begins the live gaming device fill must complete the process of witnessing, escorting, and signing the appropriate documentation to verify that the live gaming device fill was completed. If there is a discrepancy with the live gaming device fill, the same security officer who began the live gaming device fill must accompany the fill back to the cage to resolve the discrepancy.
 - (6) The casino cashier shall retain one (1) copy of the fill slip in the casino cage.
 - (7) The security officer shall transport the chips to the appropriate pit area.
 - (8) The appropriate level of occupational licensee shall count the chips that are received as a live gaming device fill to ensure the denomination and amounts received match the amount and denomination reflected on the fill slip.
 - (9) If the amounts in subdivision (4) agree, the occupational licensee who counted the fill shall sign the fill slip. The pit supervisor or the equivalent shall also sign the fill slip. A copy of the fill slip or the original shall be inserted into the drop box of the live gaming device that received the fill. A copy of the fill slip or the original fill slip shall be returned to the casino cage.
 - (10) If the amounts in subdivision (4) do not agree, the fill slip shall not be signed and the discrepancy shall be resolved in accordance with the policy and procedure submitted in accordance with section 2(b)(8) of this rule. Surveillance shall be notified and the security officer shall return the chips and the fill slip to the casino cage.
- (b) The casino cashier or appropriate department shall use copies of the completed live gaming device fill slip to balance the cage. All completed live gaming device fill slips shall be used to complete the soft count.
- (c) If a live gaming device fill slip was erroneous, it shall be voided and a new live gaming device fill slip generated. The person voiding the fill slip shall indicate the reason the slip was voided and sign the slip. A voided live gaming device fill shall be retained and deposited into a locked accounting box.
- On June 15, 2020, Surveillance notified Gaming Agents that a Cage Cashier sent out a table fill to a table without notifying surveillance.

53. On August 25, 2020, Surveillance notified Gaming Agents that an incorrect table fill occurred. The table fill was for \$12,000 and was delivered, accepted and dropped at the wrong table.

53. On September 5, 2020, Surveillance notified Gaming Agents that a Cage Manager sent out a table fill to a table without notifying Surveillance.

COUNT X

54. 68 IAC 15-6-4(b) provides vendors and visitors must report to security to complete the vendor and visitor log and to obtain a badge. When the vendor or visitor leaves the casino, the vendor or visitor must complete the appropriate portion of the log.

55. 68 IAC 15-6-4(e) provides the vendor and visitor log shall contain the following information:

(1) The name of the vendor or visitor.

(2) The company or organization the vendor or visitor represents.

(3) The date and time the vendor or visitor entered the casino.

(4) The purpose that necessitates the vendor or visitor entering the casino.

(5) The date and time that the vendor or visitor exits the casino. The casino licensee is responsible for instituting a policy that ensures that vendor and visitor badges are returned to the security department and accounted for when the vendor or visitor exits the casino.

(6) If the person is a visitor, the individual who authorized the visitor's presence in the casino.

(7) Any other information deemed necessary by the executive director or the commission to ensure compliance with IC 4-33, IC 4-35, and this title.

56. On January 24, 2019, the Commission issued a memorandum to all casino licensees on occupational licenses and the usage of the vendor log. The memorandum states vendor and visitor badges are not to be utilized by those who hold or should hold an occupational license. If individuals referenced above attempt to access the gaming floor using a vendor or visitor badge, casino staff should assist in the matter by refusing entry and directing the individuals to local Gaming Agents for assistance.

57. On March 3, 2020, a Gaming Agent audited the vendor log for the month of February 2020.

58. On February 13, 2020, a vendor was signed in on the vendor log; however, his last name on the log was illegible.

59. On July 1, 2020, Surveillance notified Gaming Agents of a vendor log violation. Three (3) vendors entered the radio room; however, only (1) vendor obtained a vendor badge and was logged in.

60. On August 11, 2020, a Gaming Agent audited the vendor log for the month of July 2020.

61. On July 27, 2020, four (4) vendors were signed in on the vendor log but the entry was incomplete.

TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of Blue Chip by and through its agents as described herein constitute a breach of IC 4-33, IC 4-38, 68 IAC, the Emergency Rules for Sports Wagering, and/or Blue Chip's approved internal control procedures. The Commission and Blue Chip hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Blue Chip.

Blue Chip shall pay to the Commission a total of \$45,000 (\$12,000 for Count I, \$1,000 for Count II, \$2,000 for Count III, \$5,000 for Count IV, \$2,000 for Count V, \$4,500 for Count VI, \$2,500 for Count VII, \$7,000 for Count VIII, \$6,500 for Count XI and \$2,500 for X) in consideration for the Commission foregoing disciplinary action based on the facts specifically described in each Count of this Agreement. This Agreement extends only to those violations and findings of fact specifically alleged in the findings above. If the Commission subsequently discovers facts that give rise to additional or separate violations, the Commission may pursue disciplinary action for such violations even if the subsequent violations are similar or related to an incident described in the findings above.

Upon execution and approval of this Agreement, Commission staff shall submit this Agreement to the Commission for review and final action. Upon approval of the Agreement by the Commission, Blue Chip agrees to promptly remit payment in the amount of \$45,000 and shall waive all rights to further administrative or judicial review.


This Agreement constitutes the entire agreement between the Parties. No prior or subsequent understandings, agreements, or representations, oral or written, not specified or referenced within this document will be valid provisions of this Agreement. This Agreement may not be modified, supplemented, or amended, in any manner, except by written agreement signed by all Parties.

This Agreement may be executed in multiple counterparts, each of which shall be deemed an original agreement and both of which shall constitute one and the same agreement. The counterparts of this Agreement may be executed and delivered by electronic mail, facsimile, or other electronic signature by either of the parties and the receiving party may rely on the receipt of such document so executed and delivered electronically as if the original had been received.

This Agreement shall be binding upon the Commission and Blue Chip.

IN WITNESS WHEREOF, the Parties have signed this Agreement on the date and year as set forth below.

Sara Gonso Tait, Executive Director
Indiana Gaming Commission



Brenda Temple, V.P. and Gen. Mgr.
Blue Chip Casino, LLC

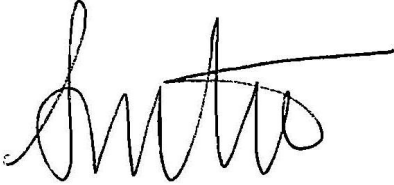
Date

11.13.20

Date

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IN WITNESS WHEREOF, the Parties have signed this Agreement on the date and year as set forth below.



Sara Gonso Tait, Executive Director
Indiana Gaming Commission

11/20/20

Date

Brenda Temple, V.P. and Gen. Mgr.
Blue Chip Casino, LLC

Date