

**ORDER 2021-154  
IN RE SETTLEMENT AGREEMENT**

**THE UNITED STATES PLAYING CARD COMPANY  
21-USPC-02**

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

**APPROVED**

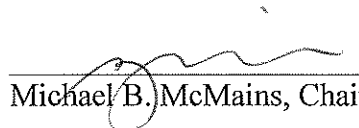
---

APPROVES OR DISAPPROVES


the proposed terms of the Settlement Agreement.

**IT IS SO ORDERED THIS THE 29<sup>th</sup> DAY OF SEPTEMBER, 2021.**

**THE INDIANA GAMING COMMISSION:**

  
\_\_\_\_\_  
Michael B. McMains, Chair

ATTEST:

  
\_\_\_\_\_  
Jason Dudich, Secretary

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

<b>IN RE THE MATTER OF:</b>	)	
	)	<b>SETTLEMENT</b>
<b>THE UNITED STATES PLAYING</b>	)	<b>21-USPC-02</b>
<b>CARD COMPANY</b>	)	

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Greg Small and The United States Playing Card Company (“USPC”) (collectively, the “Parties”) desire to settle this matter prior to the initiation of a disciplinary proceeding pursuant to 68 IAC 13-1-18(a). The Parties stipulate and agree to the following:

**FINDINGS OF FACT**

**COUNT I**

1. 68 IAC 2-2-1(d) provides the applicant's key persons, substantial owners, and any other persons deemed necessary to allow the commission to ensure the applicant meets the statutory criteria for licensure set forth in IC 4-33, IC 4-35, and this title must complete and submit a Personal Disclosure Form 1 (PD1) application for occupational license under 68 IAC 2-3-1.
2. 68 IAC 2-2-4(b)(3) provides an application shall be deemed filed when the completed application forms, including all required documents, all personal disclosure forms, materials, photographs, and application fee have been submitted. The commission will not begin its background investigation until the application is filed.
3. On September 13, 2020, the Casino Compliance/Sr. Account Manager for USPC notified the Commission of three (3) new Directors for Brepols Group NV, 50% shareholder of Cartamundi NV, who is the parent company of The United States Playing Card Company and asked if the Directors needed to apply for licensure in Indiana.
4. On September 15, 2020, the Commission’s Director of Background Investigations advised USPC that a PD1 would need to be filed within thirty (30) days for all three (3) Directors, making the applications’ due dates between October 8, 2020 through October 15, 2020.

5. On October 6, 2020, USPC requested a thirty (30) day extension, and the Commission approved this request placing the applications' due dates between November 8, 2020 through November 15, 2020.
6. On November 6, 2020, USPC requested an extension of two (2) additional weeks and the Commission approved this request placing the applications' due dates between November 22, 2020 through November 28, 2020.
7. On November 19, 2020, USPC notified the Commission that two (2) of the three (3) PD1's had been submitted to the Commission.
8. On November 20, 2020, the Commission reached out to USPC regarding deficiencies in one (1) of the two (2) submitted PD1's. USPC responded and advised that the information would be submitted as soon as possible.
9. On December 14, 2020, the Commission followed up on the third Director's PD1 as well as the missing information on the insufficient PD1.
10. On December 16, 2020, USPC provided that they were finalizing translations for the missing information for one of the PD1's. USPC advised they would send an email once the PD1 was complete.
11. On April 23, 2021, the Commission followed up on the missing information. USPC responded, stating it had received all of the missing documents and would resend the link for download. The Commission responded and advised that it had not received the link.
12. On April 26, 2021, the Commission reached out to USPC, stating it had not received the link. USPC subsequently provided the link.
13. On May 2, 2021, the Commission noticed that information was still missing from the PD1.
14. On June 11, 2021, the Commission followed up on the May 2, 2021 email.
15. On June 14, 2021, USPC responded with a new link and information, making the PD1 approximately 200 days late.
- 16.

## COUNT II

17. 68 IAC 14-3-10 provides (a) at least ten (10) days before transporting dice or playing cards, the person causing the movement of the dice or playing cards shall notify the executive director, in writing, and provide the following information:
  - (1) The:
    - (A) full name;

- (B) business address; and
- (C) business telephone number;
- of the supplier licensee that is selling the dice or playing cards. (2) The:
  - (A) method of transportation; and
  - (B) name, business address, and business telephone number of the carrier or carriers. (3) The:
    - (A) full name;
    - (B) business address; and
    - (C) business telephone number;
- of the person to whom the dice or playing cards are being transported.
  - (4) The individual responsible for the shipment of the dice or playing cards for each person listed in subdivisions (1) through (3).
  - (5) The quantity of dice or playing cards being transported.
  - (6) A brief description of the dice or playing cards being transported.
  - (7) The expected date and time of delivery to the riverboat of the dice or playing cards.
- (b) The person receiving the dice or playing cards must prove receipt of the dice or playing cards if requested by the executive director.

18. On August 26, 2021, USPC sent an incorrect playing card shipment to Indiana Grand. The shipment that arrived contained the following: four (4) cases of burgundy single decks, one (1) case of burgundy eight (8) pack decks and twenty-five (25) cases of green eight (8) pack decks. The shipment notification that was approved by the Commission included the following: four (4) cases of burgundy single decks, one (1) case of green single decks and twenty-five (25) cases of burgundy eight (8) pack decks.

### TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of USPC by and through its agents as described herein constitute a breach of IC 4-33, IC 4-35, and/or 68 IAC. The Commission and USPC hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against USPC.

USPC shall pay to the Commission a total of \$4,500 (\$3,000 for Count I and \$1,500 for Count II) in consideration for the Commission foregoing disciplinary action based on the facts specifically described in 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, USPC agrees to promptly remit payment in the amount of \$4,500 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 USPC.

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

Greg Small  
Greg Small, Executive Director  
Indiana Gaming Commission

9/28/21

Date

Stephanie Krummert  
Stephanie Krummert  
Casino Compliance Manager  
The United States Playing Card  
Company

September 23, 2021  
Date