

**ORDER 2022-158  
IN RE SETTLEMENT AGREEMENT**

**CAESARS HOLDINGS, INC.  
22-CH-02**

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

**APPROVED**

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APPROVES OR DISAPPROVES

the proposed terms of the Settlement Agreement.

**IT IS SO ORDERED THIS THE 27<sup>th</sup> DAY OF SEPTEMBER, 2022.**

**THE INDIANA GAMING COMMISSION:**



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Milton Thompson, Chair

ATTEST:



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Jason Dudich, Secretary

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

**IN RE THE MATTER OF:** )  
 ) **SETTLEMENT**  
**CAESARS HOLDINGS, INC.** ) **22-CH-02**

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission ("Commission") by and through its Executive Director Greg Small and Caesars Holdings, Inc. ("Caesars"), (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. 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 March 10, 2022, the SVP Head of Loyalty and CRM was given a level one (1) license determination in LAM, the Commission's occupational licensing database. The due date for the PD1 application was April 10, 2022, for anyone who held the position.
4. On June 7, 2022, the VP & Assistant General Counsel, Regulatory & Compliance for Caesars reached out via phone to the Commission to request an extension for the PD1 application. This particular Commission staff member was unaware that the PD1 application was already past due and approved a request to have the application submitted on July 3, 2022. The PD1 was already fifty-eight (58) days late.
5. Caesars' VP & Assistant General Counsel, Regulatory & Compliance provided that they identified the requirement for the PD1 application on May 2, 2022, despite the determination being made through LAM on March 10, 2022. Caesars also provided they expected to receive an email communication from the Commission on the requirement. The Commission's Gaming Administrator advised Caesars that it was the responsibility of LAM users to log into the system daily or at least weekly to check their pending submissions and for any other information that the Commission has sent back to them.

Caesars LAM users can always view their approved titles and pending submissions in the system from the left-hand navigation.

6. Although the thirty (30) day extension was approved, the application was still late by fifty (58) days. Without the extension, the application would have been eighty-eight (88) days late.

### **TERMS AND CONDITIONS**

Commission staff alleges that the acts or omissions of Caesars by and through its agents as described herein constitute a breach of IC 4-33, IC 4-35, IC 4-38, and/or 68 IAC. The Commission and Caesars hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Caesars.

Caesars shall pay to the Commission a total of \$3,000 in consideration for the Commission foregoing disciplinary action based on the facts specifically described in the Findings of Fact 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, Caesars agrees to promptly remit payment in the amount of \$3,000 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 Caesars.

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

  
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Greg Small, Executive Director  
Indiana Gaming Commission

  
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Jeffrey Hendricks, SVP & Asst. General  
Counsel, Regulatory & Compliance  
Caesars Entertainment, Inc.

9/26/2022  
\_\_\_\_\_  
Date

9/19/22  
\_\_\_\_\_  
Date