

**ORDER 2024-19
IN RE SETTLEMENT AGREEMENT**

**IGT
24-IGT-01**

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 21st DAY OF MARCH, 2024.

THE INDIANA GAMING COMMISSION:



Milton Thompson, Chair

ATTEST:



Jason Dudich, Secretary

**STATE OF INDIANA
INDIANA GAMING COMMISSION**

IN RE THE MATTER OF:)
)
IGT) **SETTLEMENT**
) **24-IGT-01**
)

SETTLEMENT AGREEMENT

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Greg Small and IGT (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 to the following:

FINDINGS OF FACT

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 2-2-6.1(a) provide that all key persons and substantial owners of supplier licensees and supplier license applicants must obtain a Level 1 occupational license.
3. 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.
4. On January 8, 2021, the Commission issued a directive to all Licensed Suppliers on Supplier Occupational Licensing that outlined the requirements for occupational licensing for Licensed Suppliers.
5. On June 30, 2023, an individual was appointed to the DeAgostini S.P.A Board of Directors, a substantial owner of IGT, requiring a level one license. As a result of the appointment, the PD1 application for the new board member was due on July 30, 2023.
6. On July 10, 2023, IGT submitted changes to their organizational chart to the Commission. Upon receipt of the organizational chart, back and forth communication occurred between Commission staff and IGT.
7. On July 20, 2023, the Commission confirmed that the new board member would require a level one license and the PD1 application would be due on July 30, 2023.

8. On July 21, 2023, IGT confirmed the understanding that the PD1 would be due and requested an extension of the deadline. Commission staff granted an extension, resulting in a new due date of August 30, 2023.
9. On August 25, 2023, a second extension was requested by IGT.
10. On August 30, 2023, the Commission requested more information about why an additional extension was warranted. IGT responded and the Commission granted their extension request. The new due date would be September 30, 2023, and the Commission advised that no additional extensions would be granted.
11. On September 28, 2023, IGT advised the Commission that the PD1 application was still incomplete and would not be submitted by the deadline. The Commission confirmed receipt and advised IGT to submit the PD1 application once it was completed.
12. On November 27, 2023, Commission staff requested a status update from IGT on the PD1 application. IGT responded with a list of deficient items.
13. On November 28, 2023, the Commission advised IGT which items were required for submission of the PD1 and the items that could be submitted once received by the applicant.
14. On December 13, 2023, IGT submitted the completed PD1 application.
15. The PD1 application was submitted seventy-four (74) days past the second extension.

TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of IGT 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 IGT hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against IGT.

IGT shall pay to the Commission a total of \$1,500 in consideration for the Commission foregoing disciplinary action based on the facts specifically described in in the Findings 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, IGT agrees to promptly remit payment in the amount of \$1,500 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 IGT.

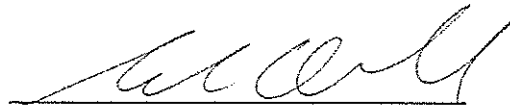
IN WITNESS WHEREOF, the Parties have signed this Agreement on the date and year as set forth below.



Greg Small, Executive Director
Indiana Gaming Commission

3/11/24

Date



Luke Orchard, SVP, Chief Compliance
& Risk Management Officer
IGT

2/28/2024

Date