

**ORDER 2023-90  
IN RE SETTLEMENT AGREEMENT**

**UNIBET INDIANA, LLC  
23-UB-01**

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

**APPROVED**

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APPROVES OR DISAPPROVES

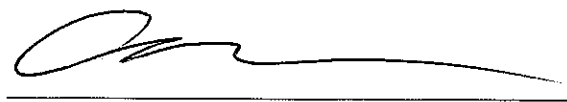
the proposed terms of the Settlement Agreement.

**IT IS SO ORDERED THIS THE 15<sup>th</sup> DAY OF JUNE, 2023.**

**THE INDIANA GAMING COMMISSION:**

  
Milton O. Thompson, Chair

ATTEST:

  
Charles Cohen, Commissioner

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

**IN RE THE MATTER OF:** )  
 ) **SETTLEMENT**  
**UNIBET INDIANA, LLC** ) **23-UB-01**  
 )

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Greg Small and Unibet Indiana, LLC (“Unibet”), (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**

1. 68 IAC 27-2-16(a) provides all key persons and substantial owners of a sports wagering operator applicant must obtain a Level 1 occupational license.
2. 68 IAC 27-2-16(d) provides except as outlined in this section, occupational licensing of an employee, independent contractor, agent, or subagent of a sports wagering operator shall be governed by IC 4-33-8 and 68 IAC 2-3.
3. 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.
4. w 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.
5. On December 21, 2020, the Commission issued a directive to all Sports Wagering Operators on Sports Wagering Occupational Licensing that outlined the requirements for occupational licensing for Sports Wagering Operators.
6. On November 14, 2022, Unibet appointed a new individual to the Director of the Board of Kindred Group Plc, the parent company of Unibet Indiana LLC. As a result of this appointment, the PD1 would be due on December 15, 2022.
7. On November 15, 2022, Unibet’s Group Deputy General Counsel advised the Commission of the appointment and acknowledged the understanding that the Director would need to file a PD1 within thirty (30) days of his appointment.

8. On January 18, 2023, the Commission requested a status update on the PD1. Unibet advised they would follow up with the Director who was managing the process and correspondence on the matter independently from Unibet's standard process.
9. On January 19, 2023, Unibet advised they would file the PD1 by January 27, 2023, if that would be acceptable for the Commission. The Commission responded that the PD1 was already past due and would be best to submit a complete application at the earliest possibility.
10. On January 26, 2023, Unibet advised the required filings would be submitted today.
11. On January 27, 2023, Unibet filed the PD1.
12. On February 3, 2023, the Commission advised Unibet that there was information missing from the PD1. Unibet confirmed receipt of the email.
13. On February 21, 2023, the director submitted part of the missing information to the Commission.
14. Between February 21, 2023, and April 17, 2023, there are various communications with the director requesting the status of the missing information.
15. On April 17, 2023, the Commission received the required information.
16. The PD1 was 116 days late.

#### TERMS AND CONDITIONS

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

Unibet 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 contained 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, Unibet agrees to promptly remit payment in the amount of \$3,000 and shall waive all rights to further administrative or judicial review.

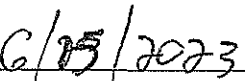
This Agreement constitutes the entire agreement between the Parties. No prior or subsequent understandings, agreements, or representations, oral or written, not specified or referenced within this document will be valid provisions of this Agreement. This Agreement may not be modified, supplemented, or 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 Unibet.

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

  
\_\_\_\_\_  
Date

DocuSigned by:  
  
\_\_\_\_\_  
Liv Biesemans, Group Deputy General  
Counsel  
Kindred Group, Unibet Indiana, LLC

06-Jun-2023 | 10:07 PM BST  
\_\_\_\_\_  
Date