

**ORDER 2018-48  
IN RE SETTLEMENT AGREEMENT**

**INDIANA GAMING COMPANY, LLC d/b/a HOLLYWOOD CASINO  
18-HW-01**

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

**APPROVED**

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APPROVES OR DISAPPROVES

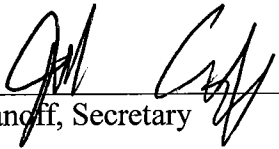
the proposed terms of the Settlement Agreement.

**IT IS SO ORDERED THIS THE 8<sup>th</sup> DAY OF MARCH, 2018.**

**THE INDIANA GAMING COMMISSION:**

  
\_\_\_\_\_  
Cris Johnston, Chair

ATTEST:

  
\_\_\_\_\_  
Joseph Svetanoff, Secretary

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

<b>IN RE THE MATTER OF:</b>	)	
	)	<b>SETTLEMENT</b>
<b>INDIANA GAMING COMPANY, LLC</b>	)	<b>18-HW-01</b>
<b>d/b/a HOLLYWOOD CASINO</b>	)	
<b>LAWRENCEBURG</b>	)	

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Sara Gonso Tait and Indiana Gaming Company, LLC d/b/a Hollywood Casino Lawrenceburg (“Hollywood”) (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 that the following facts are true:

**FINDINGS OF FACT**

**COUNT I**

1. 68 IAC 11-1-3(c)(4) states 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.
2. Hollywood’s Internal Control Procedures, Part III, Section J, describe the removal of Bill Validator Drop Boxes from Electronic Gaming Devices (EGD’s).
3. On October 16, 2017, a Security Dispatch reported that three (3) patrons entered the live bill validator (BV) drop area. Surveillance coverage showed two male patrons and one female patron approach the yellow drop barricade. One Security Officer attempted to alert the patrons the area was closed, however, another Security Officer opened the barricade and allowed the three (3) patrons to enter the live BV drop area while the cart was still unlocked.
4. On December 1, 2017, a Gaming Agent was observing the bill validator (BV) drop live on the casino floor when the Gaming Agent observed the drop begin with two patrons inside the dedicated drop zone. A Security Officer authorized the drop to begin before conducting a sweep of the drop zone area to ensure that there were no patrons present in the drop zone.

**COUNT II**

5. 68 IAC 10-2-3(a) states playing cards used in blackjack games shall comply with 68 IAC 14-3.

- (b) The riverboat licensee may use one (1) to eight (8) decks of cards in the game of blackjack.
- (c) Except as provided in section 16 of this rule, the value of the cards contained in a deck of cards is as follows:
  - (1) A card from two (2) to ten (10) has its face value.
  - (2) A jack, queen, or king has a value of ten (10).
- 6. 68 IAC 14-3-2(a) states all playing cards utilized by a riverboat licensee or a riverboat license applicant must comply with this rule.
  - (b) All playing cards must meet the following specifications:
    - (1) Unless otherwise provided in this article, all decks of cards must be one (1) complete standard deck of fifty-two (52) cards in four (4) suits. The four (4) suits shall be hearts, diamonds, clubs, and spades. Each suit shall consist of numerical cards from:
      - (A) two (2) to ten (10);
      - (B) a jack;
      - (C) a queen;
      - (D) a king; and
      - (E) an ace.
- 7. On September 14, 2017, a Table Games Shift Manager reported that a two (2) of Diamonds was found on the floor under a Blazing 7's Blackjack table during the close of the game. Surveillance coverage showed a Dealer attempt to put six (6) cards in the discard rack, but the Dealer bumped his hand on the rack and five (5) of the six (6) cards fell on the floor. The Table Games Supervisor picked up the cards and placed them into the discard rack. The Dealer counted down the cards by placing them into six (6) stacks but on the fifth (5<sup>th</sup>) stack he counted fifty-three (53) cards and on the sixth (6<sup>th</sup>), he counted fifty (50) cards. The Dealer did not realize he miscounted the cards and was still missing one (1) card. After counting down the cards, the Dealer shuffled the cards and began dealing the game again. The missing card was found underneath the table while closing the game. The card was missing for nine (9) hours.
- 8. On November 6, 2017, a Assistant Table Games Shift Manager reported that a Dealer dropped two (2) cards in the shoe under six (6) decks and the two (2) cards were not in play. The Dealer tried to put the two cards back into the shoe after shuffling the decks but the cards were not correctly placed into the shoe, resulting in the cards being taken out of play. Surveillance coverage confirmed the two (2) cards were missing from play for fifteen (15) minutes.
- 9. 68 IAC 15-12-3(a) states 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.

10. On November 18, 2017, a Surveillance Shift Manager reported that a table fill was accepted at the wrong table. A table fill was requested at a Roulette table for \$4,960 from the main cage; however, the Security Officer took the table fill to a different Roulette table, which had requested a fill of \$6,800. The Dealer and Supervisor accepted the fill even though the amount of the requested fill was not correct.

### COUNT III

11. 68 IAC 11-7-1(b) states for the purposes of this rule, "sensitive keys" means keys that either management or the commission considers sensitive to the casino licensee's operation and therefore require strict control over custody and issuance. The term includes, but is not limited to, keys that will allow access to the following:

- (1) Currency.
  - (2) Chips.
  - (3) Electronic gaming devices.
  - (4) An item that would affect the integrity or outcome of a game.
12. On December 9, 2017, a Security Dispatch reported that a Slot Supervisor failed to return sensitive keys prior to leaving the property. The keys were located in the Supervisor's desk drawer. They were left in the drawer for approximately seven (7) hours.
13. On December 13, 2017, Security reported that sensitive keys were missing. The missing keys were located in the Slot Tech office in a personal locker belonging to a Slot Tech. The keys were unsecured for approximately ten (10) hours.
14. 68 IAC 2-6-6(c) states if a casino licensee converts an electronic gaming device, the casino licensee must take the following steps:
- (1) Request permission for the conversion from the commission and supply the commission with the following information:
    - (D) If the electronic gaming device is:
      - (i) a standalone progressive; or
      - (ii) linked to a progressive controller;the old rate of progression and the new rate of progression must be submitted.
    - (E) The current and future denomination of the electronic gaming device if the denomination is to be converted.
15. On July 31, 2017, Gaming Agents had completed an audit of mystery progressive bonuses. Gaming Agents audited six (6) electronic gaming devices (EGD) with a quick strike mystery progressive bonus, which are standalone progressives. Gaming Agents tested the EGD's with a Slot Performance Manager and it was determined that the EGD's were not incrementing correctly. The EGD's had been set up incorrectly. These EGD's were incrementing incorrectly for approximately 69 days.
16. 68 IAC 15-13-3 states if a manually paid jackpot exceeds one thousand two hundred dollars (\$1,200), the casino licensee shall complete and file the forms required by the Internal Revenue Service.
17. On December 15, 2017, Security notified Gaming Agents that a Slot Shift Manager was requesting the presence of Gaming Agents at an electronic gaming device (EGD). A Slot Shift Manager and Slot Tech advised the Gaming Agent that the EGD was set over state standard limits of \$1,199. The limit was set to \$3,000. The casino became aware of this violation after a patron won a jackpot in the amount of \$1,600 and the EGD printed a TITO ticket. The patron had cashed in the ticket prior to the Slot Shift Manager becoming aware of the issue. The patron did ask a Slot Attendant if the casino had changed the jackpot tax limit and informed the Slot Attendant that the EGD had printed out a \$1,600 TITO. Since the TITO was cashed in prior to the discovery of the options being set wrong, no attempt was made to have the patron fill out a W-2G.

#### COUNT IV

18. 68 IAC 1-5-1 states a casino or supplier licensee shall provide a written notice to the executive director as soon as the casino or supplier licensee becomes aware of the following:
  - (1) A violation or apparent violation of a rule of the commission by any of the following:
    - (A) The casino or supplier licensee.
    - (B) A substantial owner, key person, or employee of the casino or supplier licensee.
  - (8) A compliance review conducted by the Internal Revenue Service under the Bank Secrecy Act of 1970. The casino or supplier licensee must provide a copy of the compliance review report or the equivalent within ten (10) days of the receipt of the report by the licensee.
  - (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.
  
19. 68 IAC 11-1-3(c)(4) states 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.
  
20. Hollywood's Internal Control Procedure, Section I-H-10-12, describes the Anti-Money Laundering Program and Suspicious Activity Reports (SAR).
  
21. On June 12, 2017, a Gaming Agent was advised through his chain of command that the Hollywood Casino Compliance Manager had reported that a patron may have used a false Social Security Number (SSN) on the following IRS forms multiple times: W-9 and W-2G. Upon review of all W-9's and W-2G's provided by Hollywood Casino, it was determined that the patron in question may have used a false SSN on five (5) W-9 forms and eight (8) W-2G forms from February 11, 2016 to May 21, 2017 for a total of \$19,323.93. The patron won five (5) promotions from February 11, 2016 – March 18, 2017 and won eight (8) jackpots over \$1,200 from April 2, 2016 – May 21, 2017.
  
22. On June 12, 2017, the Gaming Agent received a call and confirmation from an IRS Criminal Investigation Special Agent that this SSN in question belonged to a female from Pennsylvania and not the male patron who had been using it. The Special Agent also advised that Hollywood had submitted a Suspicious Activity Report (SAR) on May 17, 2016 using his correct SSN. The Gaming Agent was unable to find documentation of the SAR on any IGC logs or past emails and requested that Hollywood Casino Compliance Manager produce this information.
  
23. On June 13, 2017, the SAR from May 17, 2016 was produced by the Compliance Manager. According to the SAR, the patron had completed two (2) W-9's using an incorrect SSN as a Lexis Nexus Search returned the rightful owner of that SSN. The narrative on the SAR stated that it had been forwarded to the Commission's Audit

Director and on-site Gaming Enforcement Supervisor, however, the on-site Gaming Enforcement Supervisor did not receive the SAR nor did any of the Gaming Agents.

24. On June 15, 2017, a Gaming Agent requested all SARS and Suspicious Activity Intelligence Reports (SAIRS) for May, June and July 2016 from the Compliance Manager. On June 16, 2017, the Compliance Manager stated she was unable to provide records of notification to the Commission for two (2) SARS from May 2016. The Compliance Manager could only produce an email sent to the Audit Director on May 5, 2016. The Gaming Agent then requested documentation for all SAR and SAIR's from January 1, 2015 through December 31, 2016.
25. On June 26, 2017, the Gaming Agent received the requested records and referenced the on-site Gaming Enforcement records. After the complete audit, it was determined by the Gaming Agent that an additional eight (8) SAR's were not provided to the Commission.
26. On August 30, 2017, the Commission's Director of Compliance requested some additional information. The Gaming Agent completed a supplemental report that indicated that the patron in question did not owe any child support. The Gaming Agent also had the opportunity to interview the patron in question as the General Manager alerted the Gaming Agent to the patron's presence in the casino. The Gaming Agent was able to confirm his SSN verbally and by viewing his SSN card. The patron reviewed the W-9's and W-2G and confirmed he had completed the SSN on the forms. He stated that the number was using was his Employee Identification Number (EIN) and mistakenly placed this number in the SSN box.
27. On May 17, 2016, Hollywood Casino became aware that this patron may have been using a false SSN, as they sent a SAR to the IRS with his correct SSN identified. After this date, the patron won three (3) promotions and six (6) jackpots utilizing the incorrect SSN. There are also ten (10) occasions where SARS or SAIRS were not properly submitted to the on-site Gaming Enforcement Agents as required by their internal controls.

#### COUNT V

28. 68 IAC 1-5-1 states a casino or supplier licensee shall provide a written notice to the executive director as soon as the casino or supplier licensee becomes aware of the following:
  - (1) A violation or apparent violation of a rule of the commission by any of the following:
    - (A) The casino or supplier licensee.
    - (B) A substantial owner, key person, or employee of the casino or supplier licensee.
  - (8) A compliance review conducted by the Internal Revenue Service under the Bank Secrecy Act of 1970. The casino or supplier licensee must provide a copy of the compliance review report or the equivalent within ten (10) days of the receipt of the report by the licensee.

- (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.
29. On August 25, 2017, a Gaming Agent was advised that a male patron attempted to use a false SSN when claiming jackpot winnings on August 4, 2017. The email attachments indicated that the same patron may have also used a false SSN on the IRS W-9 form on August 3, 2017 and April 17, 2017 after winning a jackpot.
30. On August 24, 2017, the male patron was playing an EGD with a female patron. When the Slot Floor Person arrived at the machine, the female patron claimed she was the winner of the jackpot. The Slot Floor Person requested surveillance to review the jackpot and it was determined that the male patron was actually the winner of the jackpot. The Slot Floor Person and Slot Supervisor approached the male patron and informed him that he would need to produce identification and a complete a W-9 form to be paid the jackpot. The male patron signed the appropriate tax documentation and the Slot Floor Person paid out the jackpot in cash. The male and female immediately left the casino. After the patrons left, the Slot Floor Person realized that the male patron may have provided a false SSN. The Slot Floor Person notified her Supervisor and a note was made in the patron's player tracking account.
31. The Gaming Agent requested a copy of the male patron's W-2G and W-9 winning statements from two (2) jackpots he had won totaling \$3,185.10. The Gaming Agent discovered that the male patron used different SSN's on both forms. In April, he used his correct SSN but in August he used a false SSN. Gaming Agents were notified of a potential identification issue, however, at no time did the casino alert the Gaming Agents that the identification issues arose because a female patron was attempting to do a jackpot switch with a male patron. Gaming Agents were also not notified of the possible use of an incorrect SSN.

## COUNT VI

32. 68 IAC 15-2-4(a) states the casino licensee shall establish policies and procedures for the processing of cash transactions in excess of ten thousand dollars (\$10,000). Prior to the processing of a cash transaction in excess of ten thousand dollars (\$10,000), the casino licensee shall obtain, at a minimum, the information that is required by 31 U.S.C. 5313 and 31 CFR 103.
- (b) If an individual or agent is conducting a transaction on behalf of another individual, the same information as described in subsection (a) must be obtained for the individual serving as the agent. This is in addition to the information required for the individual for whom the transaction is being conducted.
- (c) Identification information must be verified by examining the identification presented by the patron. Acceptable identification for a United States resident includes the following:
- (1) Driver's license.



- (2) United States passport.
  - (3) Other government issued photo identification cards.
  - (d) For aliens or nonresidents of the United States, acceptable identification includes the following:
    - (1) Passport.
    - (2) Alien identification card.
    - (3) Other official documents evidencing nationality or residence.
  - (e) If the patron is unable to provide any of the above information or the identification provided is not acceptable, the casino licensee shall refuse the transaction until the casino licensee has obtained the necessary information.
  - (f) If the denied transaction involves chip redemptions or payment of winnings, and the patron is unable to provide adequate identification in order to verify the patron's identity and address, the patron has the option of placing the winnings on deposit or converting the winnings to chips and retaining possession of the chips. The casino licensee does, however, have the right to demand redemption of the chips. If the casino licensee chooses to exercise this right, the customer's winnings will be placed on deposit. If the customer chooses to place the winnings on deposit, this is the only instance in which a cashier will be allowed to accept a customer deposit without verifying the patron's identification. Identification information shall still be obtained verbally from the patron. A surveillance photograph must be obtained and attached to the casino's copy of the customer deposit voucher. Deposits held under this subsection will not be refunded until the patron provides proper identification and will only be refunded to the individual identified by the surveillance photograph. The table games manager or the equivalent must approve both the deposit and refund by initialing the customer deposit voucher before the transaction is complete. Identification provided for verification shall be recorded on the customer deposit withdrawal voucher and the currency transaction report.
  - (g) If a patron refuses to provide proper identification, the casino licensee shall stop the patron from making further cash transactions and prevent the patron from further gaming activity until the patron has provided the casino licensee with satisfactory identification.
33. 68 IAC 11-1-3(c)(4) states 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.
34. Hollywood's Internal Control Procedure, I-H-3, describes the Anti-Money Laundering Program and procedures for Obtaining and Verifying Identification for a CTR.
35. On July 29, 2017, a Gaming Agent received an email from the Cage Supervisor notifying the IGC of a Suspicious Activity Intelligence Report {SAIR}. The SAIR stated a female patron attempted to cash \$13,000 in chips at the marker window in the high limit cage. The Cage Banker asked the female patron for her SSN, but the female patron refused to provide it. Immediately after she refused to provide her SSN, the patron cashed in \$5,000 in chips.

## COUNT VII

36. 68 IAC 12-1-7(a) states all recordings must be kept in accordance with this section.
- (b) Recordings depicting routine activity must:
    - (1) contain the date and time reading; and
    - (2) be retained a minimum of seven (7) days.
  - (c) Recordings depicting detention or questioning of a detained individual or employee, procedural errors, regulatory violations, or criminal activity must be copied and provided to enforcement agents upon request. The casino licensee shall retain recordings under this section for a period of time not less than sixty (60) days and store the recordings in the following manner:
    - (1) Analog video and audio tapes, and copies of digital video recordings stored on tape, digital video disk, or other storage medium for later reproduction must:
      - (A) contain the date and time reading;
      - (B) be marked with the:
        - (i) date and time the recording was made;
        - (ii) identities of the employee or employees responsible for the monitoring; and
        - (iii) identity of the employee who removed the tape from the recorder and the time and date removed; and
      - (C) be secured in a cabinet that is in close proximity to the surveillance room that is security-locked and accessible by surveillance employees only.
    - (2) Digital video recordings not stored on tape, digital video disk, or other storage medium may be preserved by storing within the digital video system.
    - (d) Coverage that has been retained under this rule for a period of time exceeding seven (7) days may not be destroyed without the approval of the executive director or the executive director's designee.
37. 68 IAC 12-1-9(a) states surveillance equipment that is out of service due to malfunction must be as follows:
- (1) Immediately:
    - (A) reported to an enforcement agent; and
    - (B) repaired or:
      - (i) the equipment replaced with:
        - (AA) alternative camera coverage; or
        - (BB) live surveillance at the discretion of the enforcement agent; or
      - (ii) activity in the area affected by the malfunction must be ceased and security personnel shall guard the area until coverage is restored.
    - (2) Repaired within twenty-four (24) hours.
  - (b) Routine maintenance of surveillance equipment must be completed in one (1) of the following ways:
    - (1) Without compromising any of the surveillance coverage provided by the surveillance system.
    - (2) According to a plan subject to the review and approval of the executive director or the executive director's designee.
  - (c) The surveillance room may be subject to periodic inspection by enforcement agents to ensure the following:

- (1) All equipment is working properly.
  - (2) No camera views are blocked or distorted by improper lighting or obstructions.
  - (3) All required surveillance capabilities are in place.
38. On October 10, 2017, a Gaming Agent was notified by a Surveillance Shift Manager that sixteen (16) cameras were down. The issue was discovered during shift camera coverage testing. There were six (6) cameras that covered gaming areas (high-limit cage) but the area was closed at the time and there was alternate camera coverage available. The Director of Surveillance advised that this was an issue with an encoder, which is the device that transfers analog video to digital video. The encoder went down at 03:14 hours on October 10, 2017 and was restored at 07:17 hours on that same date. The recording of the cameras was affected for approximately four (4) hours and three (3) minutes.
39. Hollywood's Internal Control Procedure I-D-3 describes the Surveillance requirements and outlines the daily functions of the Lead Surveillance Agent.
40. On November 24, 2017, a Lead Surveillance Agent reported that seven (7) cameras had been found inoperable. The cameras were found to be black while performing shift camera coverage testing. It was determined that an encoder had failed from 18:44 hours to 07:03 hours, approximately thirteen (13) hours. All seven (7) cameras had no coverage during this time. One (1) of the cameras covered the third (3<sup>rd</sup>) base of a Craps table. The Gaming Agent also reviewed alternate surveillance coverage of the craps table and determined that the alternate camera did not provide sufficient coverage. About a fourth (4<sup>th</sup>) of the table was missing which obscured bets, was unable to provide certainty if the dice hit the rail and could not have seen theft of chips by the rail. Additionally, there would have been no way to know how much was bet on the do not pass line.

### COUNT VIII

41. 68 IAC 2-3-9.2(b) states riverboat licensees must advise the enforcement agent, on a form prescribed or approved by the commission, when one (1) of the following events occurs with an occupational licensee: (1) The occupational licensee's employment with the riverboat licensee is terminated for any reason. The form must be submitted to the enforcement agent within fifteen (15) days of the occurrence of the change or action.
42. On December 22, 2017, Gaming Agents become aware that a Dealer had been terminated on November 13, 2017. The notification was twenty-four (24) days late.

### TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of Hollywood by and through its Agents as described herein constitute a breach of IC 4-33, 68 IAC and/or Hollywood's approved

internal control procedures. The Commission and Hollywood hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Hollywood.

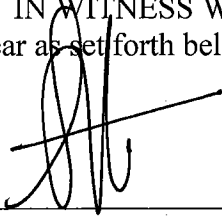
Hollywood shall pay to the Commission a total of \$39,000 (\$4,500 for Count I, \$4,500 for Count II, \$11,000 for Count III, \$5,000 for Count IV, \$1,500 for Count V, \$5,000 for Count VI, \$6,500 for Count VII and \$1,000 for Count VIII) and submit a comprehensive corrective action plan for Count's IV, V & VI 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 Settlement Agreement, Commission staff shall submit this Agreement to the Commission for review and final action. Upon approval of the Settlement Agreement by the Commission, Hollywood agrees to promptly remit payment in the amount of \$39,000 and shall waive all rights to further administrative or judicial review.

This Settlement 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 Settlement Agreement. This Settlement Agreement may not be modified, supplemented, or amended, in any manner, except by written agreement signed by all Parties.

This Settlement Agreement shall be binding upon the Commission and Hollywood.

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



Sara Gonso Tait, Executive Director  
Indiana Gaming Commission

3/8/18

Date



Bradley M. Hirsch, General Manager  
Indiana Gaming Company, L.P.

3/7/18

Date