#### ORDER 2018-53 IN RE SETTLEMENT AGREEMENT

# GAMING ENTERTAINMENT (INDIANA), LLC d/b/a RISING STAR CASINO RESORT 18-RR-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  $8^{th}$  DAY OF MARCH, 2018.

THE INDIANA GAMING COMMISSION:

Cris Johnston, Chair

ATTEST:

Joseph Svetanoff, Secretary

### STATE OF INDIANA INDIANA GAMING COMMISSION

IN RE THE MATTER OF:	)	
	)	SETTLEMENT
GAMING ENTERTAINMENT (INDIANA),	)	18-RR-01
LLC d/b/a RISING STAR CASINO RESORT	)	

#### SETTLEMENT AGREEMENT

The Indiana Gaming Commission ("Commission") by and through its Executive Director Sara Gonso Tait and Gaming Entertainment (Indiana), LLC d/b/a Rising Star Casino Resort ("Rising Star") (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. IC 4-33-9-12(a) states a person who is less than twenty-one (21) years of age may not be present in the area of a riverboat where gambling is being conducted.
- 2. 68 IAC 1-11-1(c) states a person under twenty-one (21) years of age shall not be present in a casino.
- 3. On November 10, 2017, Gaming Agents were notified that a wallet had been turned into Security Dispatch and the wallet contained identification that belonged to an underage person. Gaming Agents reviewed surveillance coverage which showed the underage person approach the turnstiles and present the Security Officer with a piece of paper. It is suspected that this was an Indiana interim identification card that had also been found in the wallet and belonged to another person who was over 21. The Security Officer thoroughly reviewed the paper and had a brief conversation with the underage person. The Security Officer then made a phone call and afterwards, permitted the underage person onto the casino floor. The Director of Security advised Gaming Agents that they allow the use of interim identification as long as the patron can present their expired identification. There was no indication from surveillance that an expired identification was presented.

#### **COUNT II**

4. 68 IAC 11-4-2(c) states the live gaming device inventory slip shall be a two-part form. On the original copy of the slip, the closer, and on the duplicate of the slip, the opener,

the live gaming device inventory slip shall, at a minimum, include the following information:

- (1) The name of the riverboat licensee.
- (2) The date and time the inventory slip is generated.
- (3) The shift and pit number.
- (4) The live gaming device type and number.
- (5) The denomination and total of all chips remaining at the live gaming device.
- (6) The total dollar amount of all chips remaining at the live gaming device.
- (7) The name, occupational license number, and signature of the individual generating the inventory slip.
- 5. 68 IAC 11-4-3(a) states immediately before opening a live gaming device, a security officer shall do the following:
  - (1) Obtain the key to the locked live gaming device tray lid from the main bank in accordance with 68 IAC 11-7.
  - (2) Turn the key over to the pit boss or the equivalent who is designated to access the live gaming device tray.
  - (b) In the presence of the appropriate level of occupational licensee assigned to the live gaming device, the pit boss or the equivalent shall unlock the transparent live gaming device tray lid.
  - (c) The occupational licensee assigned to the live gaming device shall do the following:
  - (1) Count the chips by denomination in the presence of a pit boss or the equivalent.
  - (2) Verify the count to the opening dollar amount of the opener removed from the live gaming device tray.
  - (d) The occupational licensee and the pit boss or the equivalent that observed the count of the contents of the tray shall sign the opener attesting to the accuracy of the information recorded on the opener.
  - (e) Once the opener is signed, the occupational licensee shall immediately deposit the opener into the drop box attached to the live gaming device.
  - (f) The riverboat licensee shall implement procedures to be followed when the counted inventory differs from the amount recorded on the opener. These procedures shall be completed before the opening of the live gaming device. These procedures shall include, at a minimum, the following:
  - (1) The preparation of an error form by the table games manager.
  - (2) The signatures required on the error form.
  - (3) The distribution of each part of the form.
  - (4) Ensuring that at least one (1) part is deposited in the drop box.
  - (g) A riverboat licensee shall do the following:
  - (1) Notify the enforcement agent, in writing, immediately, upon the discovery of a live gaming device inventory or live gaming device tray that has been compromised.
  - (2) Provide a written explanation, including all conclusions to the enforcement agent and the executive director within twenty-four (24) hours.
- 6. Rising Star's Internal Control Procedures, Section 5-2, describe the procedures for live gaming device inventory

- 7. The Commission's 24 Hour Gaming Operation Plan for the table games drop states the following:
  - 2. Hot Drops
  - a. The Drop Team will consist of three Security Officers.
  - b. Play will be suspended at the end of the roll/hand once winnings are paid.
  - c. Table inventory is counted by Floorperson or above and verified by the Dealer or Boxperson.
  - The "closer" is placed in the drop box by Table Games Management personnel.
  - d. The boxes are exchanged by Security with the dropped box placed on the trolley.
  - e. Play is resumed and the process is continued with next "live table" until the entire drop is completed.
- 8. On July 16, 2017, a Gaming Agent was notified by a Surveillance Observer of a live gaming device (LGD) inventory violation where the Live Gaming Device Inventory Card (LGDIC) or Table-Game Inventory Slip (TIS) was incorrect. The rollover LGDIC/TIS completed by the second shift stated there were \$28,500 in purple (\$500) chips. The LGDIC was signed by the Dealer and verified by a Dual Rate (DR) Floor Supervisor and Lead Floor Supervisor. The table remained open and active and a corrected LGDIC/TIS was created stating the rollover of the purple (\$500) chips was \$18,000. It was later discovered by the Table Games Manager that the purple (\$500) chips should have been \$18,500. Upon further investigation, the third set of numbers provided to Internal Audit by the Table Games Manager were still incorrect and the Table Games Manager failed to fill out a new LGDIC/TIS form when he discovered the error which led to Internal Audit submitting the wrong numbers on the RG-1. The state of Indiana was shorted \$70.25 initially and Rising Star had to adjust the RG-1 on at least two (2) occasions. This investigation also determined Rising Star was not following proper procedure while dropping table games. The Dealer completed the LGDIC and then resumed play.
- 9. On July 20, 2017, a Gaming Agent was notified by a Lead Floor Supervisor that an LGDIC was incorrect. The LGD was closed with \$1,135 in red (\$5) chips, however, upon opening the LGD, there was \$1,130 in red (\$5) chips.
- 10. On October 16, 2017, a Gaming Agent was notified by a Surveillance Supervisor that a LGDIC closer was not completed. The Gaming Agent spoke to a Table Games Shift Manager who advised that the LGD had been credited for a layout change. When the LGD was opened later in the day, it was discovered that a LGDIC closer was never completed. Further review indicated that after the layout change, the LGD received a table fill of \$28,180. The LGD was closed after the fill. The Lead Floor Supervisor acknowledged that he did complete a LGDIC closer, however, he forgot to place the LGDIC closer in the float and the drop box.

#### **COUNT III**

11. 68 IAC 15-2-6 states the following information shall, at a minimum, be included on the currency transaction report:

- (1) Part I. Section A. The patron or organization for whom the transaction was completed, including the following information:
- (A) Patron's last name, first name, and, if provided, middle initial.
- (B) The last four (4) digits of the patron's Social Security number.
- (C) Name of organization and employer identification number if the transaction is being conducted on behalf of a business or organization.
- (D) If the patron is an alien or nonresident of the United States, the passport number or alien registration number, or both, and issuing country for both.
- (E) Complete address of the patron, including the number and street, city, state, zip code and country if not in the United States.
- (F) Patron's date of birth.
- (G) Type and number of identification used to verify patron's identity.
- (H) Patron's account number. Include the patron's account number if an account relationship has been established between the patron and the casino or the deposit receipt number.
- 12. 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.
- 13. 68 IAC 13-1-1(b)(2)(3) states the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
- 14. Rising Star's Internal Control Procedures, 3-8, describe the procedures for Cashier Cage and Currency Transaction Reports (CTR's).

#### 15. 68 IAC 12-1-5 states

- (b) The surveillance system shall provide coverage of each of the following areas as specified in this rule:
- (1) Areas of the main bank, including the following:
- (A) A general overview of the entire area of each cage and vault area with sufficient clarity to identify patrons and employees.
- (B) Dedicated coverage with sufficient clarity to identify the following:
- (i) Currency.
- (ii) Coin.
- (iii) Cash.
- (iv) Cash equivalents.
- (v) Chip values.
- (vi) Amounts on credit slips in an area where fills and credits are transacted.
- 16. On May 5, 2017, a Gaming Agent was notified by a Cage Shift Manager that a Cage Cashier had failed to retrieve the necessary personal information from an unidentified patron to complete a Currency Transaction Report (CTR).

17. On May 4, 2017, at 15:50 hours, an unidentified patron cashed in value chips totaling \$4,800 at the Cage. The Dual Rate Cage Supervisor/Main Banker completed a multiple transaction log (MTL) since the transaction amount exceeded \$3,000. At 17:08 hours, the unidentified patron completed another transaction at the Cage in the amount of \$4,025. At 18:44, the unidentified male patron made his third and final transaction in the amount of \$1,685, resulting in a total transaction amount of \$10,510 during the gaming day. Once the unidentified patron met the \$10,000 threshold, a CTR should have been completed. The Cage Cashier paid out this amount to the unidentified patron and failed to complete the required CTR. The same Cage Cashier completed the second and third transaction. By the time the Cage Shift Manager became aware of the failure of the Cage Cashier to complete a CTR, the patron had already left the casino. Additionally, the unidentified patron did not have a player's card so the casino was unable to obtain personal information from that system to complete the CTR.

#### **COUNT IV**

- 18. 68 IAC 11-9-2(a) states the casino licensee or trustee shall submit to the executive director internal control procedures concerning the withholding of cash winnings from delinquent obligors in accordance with 68 IAC 11-1.
- 19. Rising Star's Internal Control Procedures, 3-14, outline the intercept procedures for withholdings of outstanding child support from W-2G winnings of child support obligors and specifically outline the search process and the remittance process.
- 20. In July 2017, a Gaming Agent became aware of an incorrect CSADR entry which led to a review of audit exceptions for the CSADR from January 1, 2017 June 30, 2017. The result of the review indicated that seven (7) were searched by an incorrect SSN and six (6) were not searched at all.
- 21. On October 3, 2017, it was determined a Slot Attendant had entered the wrong name and SSN in the CSADR on September 22, 2017. A female patron had won a jackpot, however, the W-2G was prepared for her husband and the SSN run through CSADR matched her husband's information.
- 22. The CSADR Audit for October 2017 found five (5) SSN's searched incorrectly.
- 23. The CSADR Audit for November 2017 found one (1) SSN entered incorrectly and two (2) patrons not searched in the CSADR. One of the patron's not searched in the CSADR subsequently won three (3) additional jackpots. When the three (3) additional jackpots were won, the Slot Attendants were under the impression the patron had already been run through the CSADR.

#### **COUNT V**

- 24. 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.
- 25. 68 IAC 13-1-1(b)(2)(3) states the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
- 26. Rising Star's Internal Control Procedures, 2-6, describe the bill validator currency collection process.
- 27. On December 23, 2017, Surveillance notified Gaming Agents of drop zone intrusion. A Security Officer and Count Room Attendant failed to wait for Security to properly clear the area and secure the area with barricades prior to opening the drop cart door in a new drop area. A patron was in the area of the open drop cart that contained "hot" boxes.

#### **COUNT VI**

- 28. 68 IAC 12-1-3(c)(5)(C)(D)(i) states analog videotape recorder must be capable of taping what is viewed by any camera in the system and be of sufficient number to allow simultaneous taping of coverage required by this rule.
- 29. 68 IAC 12-1-3(c)(13)(A)(iii) states Digital video systems, which are used to comply with the requirements of this rule for surveillance required by section 4 of this rule, shall be enterprise systems capable of allowing simultaneous recording and playback.
- 30. 68 IAC 12-1-4(a) states the surveillance system must be capable of monitoring activities on the: (1) casino floor, (2) support areas, (3) areas of which the pavilion through which monies are transported and (4) all other areas necessary to further the purpose of the surveillance system, including, but not limited to, the areas specifically outlined in this rule.
- 31. 68 IAC 12-1-5(a) states surveillance employees shall:
  - (1) monitor regularly; and
  - (2) visually record, either by:
  - (A) continuous recording; or
  - (B) motion activation; whichever is appropriate; the surveillance system coverage of the areas described in this section.
  - (b) The surveillance system shall provide coverage of each of the following areas as specified in this rule:
  - (1) Areas of the main bank, including the following:
  - (A) A general overview of the entire area of each cage and vault area with sufficient clarity to identify patrons and employees.

- (B) Dedicated coverage with sufficient clarity to identify the following:
- (i) Currency.
- (ii) Coin.
- (iii) Cash.
- (iv) Cash equivalents.
- (v) Chip values.
- (vi) Amounts on credit slips in an area where fills and credits are transacted.
- (2) Hard and soft count rooms including a general overview of each room and additional dedicated coverage capable of clearly identifying the following:
- (A) Employees.
- (B) The value of cash and cash equivalents.
- (3) The route, both inside and outside the casino, through which monies are transported.
- (4) The location in which cards and dice are stored and canceled.
- (5) Ticket redemption kiosks, automated teller machines, and bill breakers with dedicated coverage sufficient to identify the following:
- (A) Individuals using or servicing the machine.
- (B) Whether or not cash was received by the individual as a result of the transaction.
- (c) The surveillance system must provide an overall view of pit areas and gaming tables capable of clearly identifying the following:
- (1) Dealers.
- (2) Patrons.
- (3) Hands of the participants.
- (4) Facial views of the participants.
- (5) Pit personnel.
- (6) Activities of the pit personnel.
- (7) The amount and incrementation of a progressive jackpot contained on a progressive jackpot display of a live gaming device.
- (d) The playing surface of the live gaming devices must be viewed by the surveillance system with sufficient clarity to do the following:
- (1) Determine the following:
- (A) Wagers.
- (B) Card values.
- (C) Game results.
- (2) Clearly observe, in detail, the following:
- (A) Chip trays.
- (B) Cash receptacles.
- (C) Tip boxes.
- (D) Dice.
- (E) Shuffle machines.
- (F) Card shoes.
- (e) Roulette tables must be viewed by the surveillance system with color cameras.
- (f) Electronic gaming device surveillance must be capable of providing the following:
- (1) A view of all patrons.
- (2) A facial view of the patrons with sufficient clarity to allow identification of a patron.
- (3) A view of the electronic gaming device with sufficient clarity to observe the result of the game.

- (4) An overall view of the areas around the electronic gaming device.
- (5) A view of bill validators with sufficient clarity to determine bill value and the amount of credit obtained.
- (6) Progressive games, including dedicated coverage of the following:
- (A) An electronic gaming device or group of electronic gaming devices with a possible jackpot payout in excess of fifty thousand dollars (\$50,000).
- (B) The progressive display showing the incrementation of the progressive jackpot for an electronic gaming device
- or a bank of electronic gaming devices.
- (g) The surveillance system must include cameras dedicated to monitoring areas where the following items are transported or stored:
- (1) Cash.
- (2) Cash equivalents.
- (3) Chips.
- (4) Cards.
- (5) Dice.
- (h) The surveillance system must include cameras dedicated to monitoring the following:
- (1) All activities in any area of the security office where a person may be detained and questioned by the security department. Areas where a person may be detained and questioned must display a notice clearly stating that the area is or may be under surveillance.
- (2) The entrances and exits of the casino and the entrances and exits of the following rooms in the casino with sufficient clarity to identify a person using the entrances and exits:
- (A) Count rooms.
- (B) Vaults.
- (C) Surveillance rooms.
- (D) Security rooms.
- (E) Cage areas.
- 32. On October 3, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a Primary Storage Node (PSN), a network video recorder, stopped functioning which caused fourteen (14) surveillance cameras to cease recording. Seven (7) cameras lost coverage for three (3) minutes and the other seven (7) cameras lost coverage for five minutes. These cameras covered the following areas: Banks of Electronic Gaming Devices (EGD), Live Gaming Devices (LGD), Count Machine, Marker Bank, IT Room on Vessel, Main Bank, Storage and VIP Lounge Bar.
- 33. On October 9, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a PSN stopped functioning and caused one (1) camera to cease recording. While there are thirteen (13) cameras connected to the PSN, only one (1) camera was being affected. It was showing a blue screen during live footage and not recording. The PSN went into a "hot swap" and coverage was lost for approximately twenty-five (25) minutes. A "hot swap" occurs when the PSN fails and is being transferred to a backup PSN.

The Gaming Agent reviewed all thirteen (13) surveillance cameras and determined that all the cameras on this PSN were not recording during this twenty-five (25) minute timeframe (1:35:59 – 2:01:09). The cameras cover the following areas: Craps tables, banks of EGD's, a progressive jackpot of \$10,323.65, Slot Department toke box, Cage windows, Cage Window table top and Cage Cashier Drawer.

- 34. On October 9, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a PSN had stopped functioning. This was the same PSN that had stopped functioning earlier in the day. The PSN had went into a "hot swap" again and some surveillance coverage was lost. Coverage was lost on all thirteen (13) cameras for approximately three (3) to (5) minutes. This PSN has had multiple failures in 2017. The Director of Surveillance advised that this specific PSN would be replaced.
- 35. On October 10, 2017, the PSN was placed into "hot swap" and the replacement process began. Surveillance coverage was lost between 8:47 and 9:05 due to this replacement. According to the Surveillance Tech that "synbridge" may have malfunctioned during the replacement and caused the coverage to be lost. Synbridge is a bridge of communication which allows the PSN to relay information to the server.
- 36. On October 10, 2017, a Gaming Agent was notified by a Surveillance Supervisor that a PSN failed and caused eight (8) cameras to lose coverage. A total of four (4) minutes of surveillance coverage was lost from 14:57 to 15:01. The PSN went into a hot swap. Eight (8) cameras lost coverage and eight (8) did not. It was reported that an encoder also went down causing the hot swap to occur. These surveillance cameras cover banks of EGD's.
- 37. On October 18, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a PSN failed and caused sixteen (16) cameras to lose coverage for one (1) minute and thirty-five (35) seconds. These cameras cover the following areas: main bank, card and dice destruction, banks of EGD's and Level 2 Cage.
- 38. On October 26, 2017, a Gaming Agent was notified by a Surveillance Supervisor that a PSN had failed and one (1) surveillance camera lost coverage. The other cameras on the PSN did not lose coverage during the hot swap. The camera that lost coverage was covering a live gaming device and there was live play at the time of the lost coverage. Coverage was lost for approximately six (6) minutes (23:34:54-23:40:17).
- 39. On October 28, 2017, a Gaming Agent was notified by a Surveillance Supervisor that two (2) PSN's had failed and went into hot swap. The first PSN has sixteen (16) cameras and covers the Fill Bank, Live Gaming Devices, Card and Destruction Room, Banks of EGD's, Level 2 Cage and Main Bank. This PSN did not appear to lose coverage during the hot swap. The second PSN has eight (8) cameras and covers Cage windows (face shot), count machine, banks of EGD's and live gaming devices. This PSN lost coverage for approximately three (3) minutes during the hot swap.

- 40. On November 11, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a Pan Tilt and Zoom (PTZ) camera went into a hot swap and transitioned to a backup PSN. The PTZ covers the cage cashier windows. The camera lost coverage for less than a minute but once restored the image was grainy but still viewable. Approximately six (6) minutes later, the same camera once again lost coverage for less than a minute. The Surveillance Tech advised that the camera's bit rate may have fell to a certain threshold that automatically transitions it into a hot swap mode.
- 41. On October 30, 2017, a Gaming Agent was notified by a Lead Surveillance Observer that a PSN had failed and went into a hot swap. The hot swap occurred due to issues with the encoder. The power supply on the encoder needed to be replaced. This PSN covers eight (8) cameras and covers the following areas: Banks of EGD's and Level 2 Entrance. Coverage was lost from 5:48-7:41, approximately two (2) hours.
- 42. On November 6, 2017, a Gaming Agent was notified by a Surveillance Supervisor that a PSN had failed and went into a hot swap due to an encoder going down. Coverage was lost on eight (8) cameras. The cameras cover the following areas: Banks of EGD's, Player's Club and Live Gaming Devices. Surveillance coverage was lost from 11:05 to 11:09, approximately four (4) minutes.
- 43. On December 7, 2017, Surveillance notified Gaming Agents that a PSN stopped functioning which caused sixteen (16) cameras to cease recording. Recordings were lost for one minute while going into a hot swap. In this case, the system started a disk check which caused the hot swap. A disk check verifies the file system integrity and fixes logical file system errors. The Surveillance Tech advised that Rising Star has never experienced this before but when it was done fixing the errors the system worked correctly. This started at 7:58 hours and ended at 08:15 hours. These cameras covered Table Games, Main Bank and banks of EGD's.
- 44. On December 8, 2017, Surveillance notified Gaming Agents that a camera was malfunctioning and entering hot swap. The camera was located in the soft count room and the soft count team was finishing up their procedures with counting the currency from the bill validator drop. This camera covered the currency counter and the camera was going in and out. The Gaming Agent observed this camera from the IGC office. The camera appeared to be functioning at the time but then would be dim and the image would be hard to identify. At 10:09 hours, the camera begins to flicker and go completely blank. At 10:15 hours, the camera returns to the image but still somewhat dim. At 10:33 hours, the camera goes blank again until 10:39 hours when the image is returned. At 10:51 hours, the camera malfunctions again but returns at 10:54 hours.
- 45. On December 28, 2017, Surveillance contacted a Gaming Agent requesting to know if Gaming Agents had been notified of a PSN failure on the previous day. There was no record of the Gaming Agents being contacted. Surveillance investigated the PSN failure but it appeared to just have stalled and began working again on its own, however, there was approximately two minutes of coverage lost on 15 cameras. These cameras covered High Limit Slots, Cage, Player's Club, bank of EGD's and Chip Storage.

#### TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of Rising Star by and through its Agents as described herein constitute a breach of IC 4-33, 68 IAC and/or Rising Star's approved internal control procedures. The Commission and Rising Star hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Rising Star.

Rising Star shall pay to the Commission a total of \$39,000 (\$1,500 for Count I, \$1,500 for Count II, \$4,000 for Count III, \$5,000 for Count IV, \$1,000 for Count V and \$26,000 for Count 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, Rising Star 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 Rising Star.

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** 

Date

Steven Jimenez, General Manager

Rising Star Casino & Resort

Date